

[REDACTED] (USAFLS)

From: [REDACTED] (USAFLS)
Sent: Monday, September 10, 2007 3:52 PM
To: [REDACTED] (USAFLS)
Subject: Plea

Hi [REDACTED] – Just talked with [REDACTED] I am sure that he communicated these thoughts, but I wanted to mention a couple of things that I hoped to talk to you about.

There are two things that I think might be tricks up the sleeves of the defense. First, [REDACTED] had mentioned in our Miami meeting with all the defense attorneys that Epstein would be willing to do a split sentence of community control followed by jail time because, in the state system, if you complete community control without a violation, the jail time is converted to probation or more community control. Second, it wasn't clear that Epstein would be pleading to a child sex offense that involves sex offender registration. Third, I mentioned to [REDACTED] that the revised indictment references 19 victims, so 15 months is less than 1 month per victim. I agree that this is a reasonable counteroffer in light of our starting position of 24 months, but this is a really low sentence.

So, whatever the U.S. Attorney decides to do, can we please follow with a version of my written non-prosecution agreement? That will allow us to avoid any state shenanigans and will keep the defense on a strict timeline.

Before this counter-offer, I was going to propose that we include in our response to Messrs. Starr and Lefkowitz one page of the draft overt acts section. I have attached the proposed overt acts related to two of the girls, as an example.



Overt acts
insert.wpd

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone [REDACTED]
Fax 561 820-8777

Tracking:

3237

08-80736-CV-MARRA

P-014062

EFTA00189115

[REDACTED] (USAFLS)

From: [REDACTED] (USAFLS)
Sent: Tuesday, September 11, 2007 5:01 PM
To: [REDACTED] (USAFLS)
Subject: RE: Revised Agreement re Epstein

Hi [REDACTED] -- I will try to get back as soon as possible. I just don't know how long I will be at the hospital. Is it just us three or is [REDACTED] also attending? What should I be prepared to discuss?

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone [REDACTED]
Fax 561 820-8777

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

From: [REDACTED] (USAFLS)
Sent: Tuesday, September 11, 2007 4:54 PM
To: [REDACTED] (USAFLS)
Subject: Re: Revised Agreement re Epstein

Good. Barry leaves early for jewish holidays any chance u can make 130

Sent from my BlackBerry Wireless Handheld

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

From: [REDACTED]
To: [REDACTED] (USAFLS) <ALourie@usa.doj.gov>
Sent: Tue Sep 11 16:52:10 2007
Subject: RE: Revised Agreement re Epstein

Plead to the three specified charges, a 30 month sentence, split 20 in jail and 10 in "community control," and agree that the girls are victims for purposes of damages. We also put in deadlines for a plea and sentencing date.

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone [REDACTED]
Fax 561 820-8777

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

From: [REDACTED] (USAFLS)
Sent: Tuesday, September 11, 2007 2:17 PM

3194

08-80736-CV-MARRA

P-014063

EFTA00189116

To: [REDACTED] (USAFLS)
Subject: Re: Revised Agreement re Epstein

What is our latest offer?

Sent from my BlackBerry Wireless Handheld

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

From: [REDACTED] (USAFLS) <[REDACTED]>
To: Gerald Lefcourt <GBL@lefcountlaw.com>
CC: [REDACTED] (USAFLS) <[REDACTED]>; [REDACTED] (USAFLS)
<[REDACTED]>; [REDACTED] (USAFLS) <[REDACTED]>
Sent: Tue Sep 11 14:15:25 2007
Subject: Revised Agreement re Epstein

Dear Gerry: I have attached a revised version, as per Mr. Acosta's request. The operative terms have not changed. If you have any questions, please do not hesitate to call. Also, please confirm your receipt of this e-mail.

Thank you.

<<070911 Epstein Non-Prosecution Agreement.pdf>>

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone [REDACTED]
Fax 561 820-8777

Tracking:

3195

08-80736-CV-MARRA

P-014064

EFTA00189117

[REDACTED] (USAFLS)

From: [REDACTED] (USAFLS)
Sent: Tuesday, September 11, 2007 4:54 PM
To: [REDACTED] (USAFLS)
Subject: Re: Revised Agreement re Epstein

Good. Barry leaves early for jewish holidays any chance u can make 130

Sent from my BlackBerry Wireless Handheld

-----Original Message-----
From: [REDACTED] (USAFLS) <AVillafana@usa.doj.gov>
To: [REDACTED] (USAFLS) <ALourie@usa.doj.gov>
Sent: Tue Sep 11 16:52:10 2007
Subject: RE: Revised Agreement re Epstein

Plead to the three specified charges, a 30 month sentence, split 20 in jail and 10 in "community control," and agree that the girls are victims for purposes of damages. We also put in deadlines for a plea and sentencing date.

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone [REDACTED]
Fax 561 820-8777

-----Original Message-----
From: [REDACTED] (USAFLS)
Sent: Tuesday, September 11, 2007 2:17 PM
To: [REDACTED] (USAFLS)
Subject: Re: Revised Agreement re Epstein

What is our latest offer?

Sent from my BlackBerry Wireless Handheld

-----Original Message-----
From: [REDACTED] (USAFLS) [REDACTED] >
To: Gerald Letcount <GRL@letcountlaw.com>
CC: [REDACTED] >; [REDACTED] (USAFLS)
<[REDACTED]>; [REDACTED] (USAFLS) <[REDACTED]>
Sent: Tue Sep 11 14:15:25 2007
Subject: Revised Agreement re Epstein

Dear Gerry: I have attached a revised version, as per Mr. Acosta's request. The operative terms have not changed. If you have any questions, please do not hesitate to call. Also, please confirm your receipt of this e-mail.

Thank you.

<<070911 Epstein Non-Prosecution Agreement.pdf>>


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

[REDACTED] (USAFLS)

From: [REDACTED] (USAFLS)
Sent: Thursday, September 13, 2007 8:12 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS)
Subject: Epstein Indictment Package

In case Karen has any changes to the indictment package and wants to send it on to [REDACTED], here are the indictment and pros memo. [REDACTED] has the forms.



070913 revised Pros Memo 2nd Addendum
indictment.wpd 1-07 REVISED.wp Pros Memo.wpx

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone [REDACTED]
Fax 561 820-8777

Tracking:

3162

08-80736-CV-MARRA

P-014067

EFTA00189120

[REDACTED] (USAFLS)

From: [REDACTED] (USAFLS)
Sent: Friday, September 14, 2007 1:04 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS);
[REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: RE: Epstein Documents

[REDACTED] has agreed to help finalize this. I will be out of town beginning tomorrow.

From: [REDACTED] (USAFLS)
Sent: Friday, September 14, 2007 9:52 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); Garcia, [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: Epstein Documents

Here are the proposed plea agreement and information. If any changes need to be made, please contact [REDACTED] via e-mail or at [REDACTED]. I will be out the rest of the day, but you can get me at [REDACTED] and I will be able to access e-mail over the weekend.

Thank you!

<< File: Information charging 1512 and 113.wpd >>
<< File: OLY Plea Agreement v4 1512 and 113 violations.wpd >>

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone [REDACTED]
Fax 561 820-8777