

[REDACTED] (USAFLS)

From: [REDACTED] (USAFLS)
Sent: Wednesday, March 05, 2008 5:58 PM
To: [REDACTED]
Subject: RE: Epstein update

I don't think we have an issue with staleness because the memory cards are fixed (they haven't changed since the original search warrant).

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

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

From: Kuyrkendall, E N.
Sent: Wednesday, March 05, 2008 5:55 PM
To: [REDACTED] (USAFLS)
Subject: Re: Epstein update

I like your style! Unsure what communication btw Jeff and Jay is about?? Also do we have staleness issues with SW?

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

[REDACTED]
Robert (USA)
Cc: [REDACTED]
Sent: Wed Mar 05 16:54:35 2008
Subject: Epstein update

Hi all - I wanted to update you on a couple of new developments in the Epstein case. First, Jeff Herman is supposed to give a press conference today announcing the filing of a third lawsuit against Epstein. That case also involves a victim whom we are no longer referring to in the indictment [Drew - please do not tell that to the defense.] Herman seems to have latched onto the [REDACTED] [REDACTED] group which, as discussed in my third addendum to the pros memo, we have already decided to forego for the most part.

Drew - Since I am not certain of the scope of your meeting, I do not know how critical it is for you to see the new facts developed in the supplemental pros memos (you reviewed the initial pros memo from May of last year). If you would like the supplements, please let me know. The legal theories have remained the same.

I also wanted to call to everyone's attention the three-year statute of limitations in Florida for the state solicitation offenses. The statute will run for all the victims this summer. Once it runs we cannot insist on a state court plea to a new charge. It also means that the state cannot charge the crimes related to the victims discovered after the initial investigation. We have asked the Palm Beach Police Department to forego presenting those charges for state prosecution in deference to our prosecution. If we do not intend to go forward, it is imperative that we communicate that to the Police Department as soon as possible so they can present those victims for state prosecution.

I have reserved time with the grand jury on the 18th. I had hoped to present the indictment at that time, but in light of Jeff's communication with Jay, I will push it off until the 25th. I would still like to start the presentation on the 18th so we aren't accused of rushing the grand jury. So, I hope that the final indictment packet will be approved by that date.

Thank you.

[REDACTED]

[REDACTED] (USAFLS)

From: [REDACTED]
Sent: Wednesday, March 05, 2008 5:55 PM
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Subject: Re: Epstein update

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Thank you.

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08-80736-CV-MARRA

P-014658

EFTA00189354

[REDACTED]

[REDACTED] (USAFLS)

From: [REDACTED] (USAFLS)
Sent: Wednesday, March 05, 2008 10:39 AM
To: [REDACTED]
Subject: RE: Epstein

Sounds good. I think it is worth doing the search warrant. Can Jason get the cards out of evidence when he is down there?

Do you have a copy of your affidavits that we submitted on the computer issue? I think those are a good start for the search warrant affidavit. Thanks.

A. Marie Villafaña
Assistant U.S. Attorney
500 S. Australian Ave. Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: [REDACTED]
Sent: Wednesday, March 05, 2008 10:35 AM
To: [REDACTED] (USAFLS)
Subject: RE: Epstein

Marie,

Still no word from Mr. Herman. Just to clarify about the memory cards - Joe and Jason have both reviewed the evidence some time ago. There is no significant photographs on the cards. However, a forensic analysis was not done which would show any deleted photos. Jason has to go tomorrow to Miami. I have asked him to pick up the copies of documents, obtain the copyright date for the "Massage for Dummies" book and get a description of the memory cards - should we decide to go ahead with a search warrant. We're still working on obtaining some of the girls' phone records. I have put Hauge on standby to put together the travel/phone charts once we have [REDACTED] and Jennifers' records. I'll give you a call once I have spoken with Herman.

From: [REDACTED] (USAFLS) [Ann.Marie.C.Villafana@usdoj.gov]
Sent: Tuesday, March 04, 2008 12:15 PM
To: [REDACTED]
Subject: RE: Epstein

Thank you for the update. On the statute of limitations, it doesn't matter for the pending charges because they were indicted in time, it just matters to adding new charges.

Can you call Mr. Herman and see if he will give us the following items without a subpoena?

1. Copy of [REDACTED] deposition transcript
2. Copy of any video and/or audiorecording of that deposition
3. Transcript(s) of any other depositions taken in that suit
4. Copies of any e-mails and correspondence sent to or received from Epstein or his lawyers
5. Copies of any agreements - formal or informal - entered into between Epstein/his lawyers and Saige/Saige's dad/their lawyers.

And maybe you can ask him why there will be a press conference?

Thank you.

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Fax 561 820-8777

From: [REDACTED]
Sent: Tuesday, March 04, 2008 11:24 AM
To: [REDACTED] (USAFLS)
Subject: Epstein

Hey Marie,

I just heard from Joe that Mr. Herman is holding another press conference tomorrow at Palm Beach Town [REDACTED] at 1:00pm. He called the Town of Palm Beach to see if he could hold it at EPSTEIN's residence. They told him "NO".

Also FYI, there is a three year statute of limitations on the State charges of Solicitation. Joe feels like that State or Epstein's Counsel may be waiting for those dates to pass. September/October 2005 is when most of the other victims reported so that means in Sept/Oct 2008 the statute of limitations applies.

Villafana, Ann Marie C. (USAFLS)

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[REDACTED] (USAFLS)

From: [REDACTED] (USAFLS)
Sent: Tuesday, March 04, 2008 12:16 PM
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