

**From:** "[REDACTED] (USAFLS)" </O=USA/OU=FLS/CN=RECIPIENTS/CN=DLEE>

**To:** "[REDACTED] (USAFLS)" <[REDACTED]>

**Subject:** FW: facts to response to Reinhart

**Date:** Tue, 10 May 2011 19:54:38 +0000

**Importance:** Normal

**Attachments:** response-motion-to-intervene-todexter.doc

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[REDACTED]

At 4:00 p.m. today, I am going to be speaking with Paul and Brad about their desire to get information to respond to Bruce Reinhart's motion to intervene and motion for sanctions. They just sent me this draft response that they want to file in response to Reinhart's motion. It references comments you made during the December 10, 2010 meeting with CW, and calls you made to Brad during the weekend of March 19-20, before they filed their motions.

I will see what they want, and contact you later.

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**From:** Paul Cassell [mailto:[REDACTED]]

**Sent:** Tuesday, May 10, 2011 3:34 PM

**To:** [REDACTED] (USAFLS)

**Cc:** Brad Edwards

**Subject:** RE: facts to response to Reinhart

Dear [REDACTED]

Thanks so much for the copy of my(!) letter – secretarial issue here!!

One of the things Brad and I would like to discuss with you is how we should respond to Reinhart's attack on us. Attached is draft statement of facts, that explains some of the reasons why we included the facts about him in our summary judgment motion. We want to discuss with you whether your Office would have any concern about us filing this? Or whether it should be filed under seal? Or whether we should not file it all, relying on other information? We also want to discuss with you what sorts of information DOJ is willing and able to give us to respond.

We hope you can look through this before the call. We look forward to chatting soon. Paul

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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EFTA00205027

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**From:** [REDACTED] (USAFLS) [mailto:[REDACTED]]  
**Sent:** Tuesday, May 10, 2011 10:16 AM  
**To:** Paul Cassell  
**Cc:** Brad Edwards  
**Subject:** RE: pdf copy of Dec. 10 letter to Ferrer

Paul,

Here it is.

[REDACTED]

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**From:** Paul Cassell [mailto:[REDACTED]]  
**Sent:** Tuesday, May 10, 2011 12:04 PM  
**To:** [REDACTED] (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: pdf copy of Dec. 10 letter to Ferrer

Hi [REDACTED]

I'm sorry to trouble you with this, but do you by any chance have a pdf copy of the letter Brad and I delivered to US Attorney Ferrer on December 10? I can find a Word copy here, but not the final pdf delivered? If you don't have it close at hand, please don't waste time looking for it. But if it is close at hand, I'd appreciate getting a copy sent back. Thanks for your assistance! Paul

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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**From:** [REDACTED] (USAFLS) [mailto:[REDACTED]]  
**Sent:** Tuesday, May 10, 2011 9:29 AM  
**To:** Paul Cassell  
**Cc:** Brad Edwards  
**Subject:** RE: OPR inquiry - request for information - 4 PM today?

[REDACTED].

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**From:** Paul Cassell [mailto:[REDACTED]]  
**Sent:** Tuesday, May 10, 2011 11:08 AM  
**To:** [REDACTED] (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: OPR inquiry - request for information - 4 PM today?

Great – what number should we call? Paul

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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**From:** [REDACTED] (USAFLS) [mailto:[REDACTED]]  
**Sent:** Tuesday, May 10, 2011 9:03 AM  
**To:** Paul Cassell  
**Cc:** Brad Edwards  
**Subject:** RE: OPR inquiry - request for information - 4 PM today?

Paul,

Yes it does. I will be here.

[REDACTED]

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**From:** Paul Cassell [mailto:[REDACTED]]  
**Sent:** Tuesday, May 10, 2011 11:02 AM  
**To:** [REDACTED] (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: OPR inquiry - request for information - 4 PM today?

Thanks [REDACTED] - does 4 PM your time work today? Paul

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah

[REDACTED]  
[REDACTED]  
[REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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**From:** [REDACTED] (USAFLS) [mailto:[REDACTED]]  
**Sent:** Tuesday, May 10, 2011 8:29 AM  
**To:** Paul Cassell  
**Cc:** Brad Edwards  
**Subject:** RE: OPR inquiry - request for information - [REDACTED] - when can chat?

Paul and Brad,

We can talk today or tomorrow. I am in the office both days. Thanks.

██████████

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**From:** Paul Cassell [mailto:██████████]  
**Sent:** Wednesday, May 04, 2011 3:36 PM  
**To:** Plagenhoef, Ruth (OPR); ██████████ (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: OPR inquiry - request for information - ██████████ - when can chat?

Ruth – Thanks.

██████████ – When can we chat about this? Brad and I are free next Monday, Tuesday and Wednesday. Paul

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah

██████████  
██████████  
██████████

Fax: ██████████

Email: ██████████

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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**From:** Plagenhoef, Ruth (OPR) [mailto:██████████]  
**Sent:** Wednesday, May 04, 2011 1:28 PM  
**To:** Paul Cassell; ██████████ (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: OPR inquiry - request for information

Paul, you will need to talk to ██████████ about discovery requests. You will be notified of the result of our review of your complaint.

Ruth

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**From:** Paul Cassell [mailto:██████████]  
**Sent:** Tuesday, May 03, 2011 12:23 PM  
**To:** Plagenhoef, Ruth (OPR); ██████████ (USAFLS)  
**Cc:** Brad Edwards  
**Subject:** RE: OPR inquiry - request for information

Dear ██████████ and Ruth,

As you will have seen, Bruce Reinhard has filed a motion to intervene in our Crime Victims' Rights Act case. (Since Ruth has not been served, I attach a copy of the pleading to this e-mail).

As you will see, Reinhard claims that we have no factual basis for making an assertion that (for example) Reinhard improperly represented ██████████ in violation of Justice Department regulations.

In view of this motion, we are writing to inquire into the current status of the Justice Department's inquiry into Reinhard's conduct.

We also believe that the Justice Department has access to information that will support the allegations in our summary judgment motion. We further believe that the Justice Department has access to information that will help us respond to Reinhard's claim that he was not privy to any non-public information about the Epstein case. We are therefore

respectfully requesting that the Justice Department provide this information to us by Tuesday, May 10, 2011, so that we can use this information in responding to Reinhard's motion to intervene. Alternatively, if releasing the information at this time will be harmful to the Justice Department's on-going inquiry into Reinhard's conduct, we request that the Justice Department inform Judge Marra that the Reinhard situation is currently the subject of a Justice Department inquiry and that further release of information would be harmful at this time.

We request an opportunity to discuss this matter with you at your earliest convenience. Thank you in advance for your assistance.

Sincerely,

Brad Edwards and Paul Cassell

Co-Counsel for Jane Doe #1 and Jane Doe #2

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

S.J. Quinney College of Law at the University of Utah

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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**From:** Plagenhoef, Ruth (OPR) [mailto:[REDACTED]]  
**Sent:** Friday, April 15, 2011 3:02 PM  
**To:** Paul Cassell  
**Subject:** RE: OPR complaint

Thanks, Paul. I will pass this on to the Assistant conducting the review.

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**From:** Paul Cassell [mailto:[REDACTED]]  
**Sent:** Friday, April 15, 2011 4:57 PM  
**To:** Plagenhoef, Ruth (OPR)  
**Cc:** Brad Edwards  
**Subject:** RE: OPR complaint

Hi Ruth,

Thanks for getting back to me. I was confused about one point – my letter to U.S. Attorney Ferrer requesting further investigation of the Epstein matter didn't appear to me to raise any issues that even arguably could have been raised in litigation. So I was a bit confused by the reference to that complication in your e-mail – I wasn't sure what you were suggesting might have been the subject of earlier litigation.

Perhaps you were referring to Crime Victims Rights Act issues. As you know, we have raised claims in on-going litigation that the government attorneys violated the Crime Victims Rights Act -- the government attorneys have now responded by arguing that these issues are not properly subject to litigation and the issue is under review by Judge Marra. But we were asking OPR for a general review of the issue of whether improper influences were brought to bear or improper actions taken that led to Epstein receiving a generous "non-prosecution" offer from the U.S. Attorney's Office – a separate subject.

Thanks for keeping us posted. Paul Cassell

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
Email: [REDACTED]  
<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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**From:** Plagenhoef, Ruth (OPR) [mailto:[REDACTED]]  
**Sent:** Friday, April 15, 2011 2:24 PM  
**To:** Paul Cassell  
**Cc:** Brad Edwards  
**Subject:** RE: OPR complaint

Paul, your complaint is under review. Please note that it is unusual for OPR to initiate an investigation of matters that have been or could be raised in litigation. If we determine based on the record in the pending matter that this is the case, we most likely will decline to go forward. Of course, if a court makes a finding criticizing the government or finding misconduct, the complaint can be renewed. We will let you know the results of our review.

Ruth

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**From:** Paul Cassell [mailto:[REDACTED]]  
**Sent:** Friday, April 15, 2011 3:10 PM  
**To:** Plagenhoef, Ruth (OPR)  
**Cc:** Brad Edwards  
**Subject:** RE: OPR complaint

Hi Ruth,

I'm just writing to see what the status is regarding the OPR inquiry that has been initiated into the Epstein matter. Brad Edwards and I would like to update our clients.

Also, I am wondering if we can be helpful in providing any information to you in the inquiry. We know a lot about the Epstein matters, and would be happy to pass that along to you.

Thanks in advance for any further information you can provide.

Paul Cassell , Co-Counsel for Jane Doe

Paul G. Cassell  
Ronald N. Boyce Presidential Professor of Criminal Law  
S.J. Quinney College of Law at the University of Utah

[REDACTED]  
[REDACTED]  
[REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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**From:** Plagenhoef, Ruth (OPR) [mailto:[REDACTED]]

**Sent:** Thursday, March 17, 2011 10:50 AM

**To:** Paul Cassell

**Subject:** RE: OPR complaint

Thanks, Paul.

OPR takes no position regarding any party's representations in litigation.

Ruth

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**From:** Paul Cassell [mailto:[REDACTED]]

**Sent:** Thursday, March 17, 2011 12:11 PM

**To:** Plagenhoef, Ruth (OPR)

**Cc:** Brad Edwards

**Subject:** RE: OPR complaint

Hi Ruth,

Thanks for the information.

Tomorrow (3/18) we will be filing a pleading in which we mention AUSA Bruce Reinhart's apparently improper representation of Epstein-related witnesses. I assume that doing so publicly will not compromise your inquiry.

We look forward to hearing from you as a soon as possible about the results of your inquiry. Thanks for your help. Paul Cassell

Paul G. Cassell

Ronald N. Boyce Presidential Professor of Criminal Law

S.J. Quinney College of Law at the University of Utah

[REDACTED]

[REDACTED]

[REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

<http://www.law.utah.edu/profiles/default.asp?PersonID=57&name=Cassell,Paul>

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**From:** Plagenhoef, Ruth (OPR) [mailto:[REDACTED]]

**Sent:** Thursday, March 17, 2011 9:44 AM

**To:** Paul Cassell

**Subject:** OPR complaint

Mr. Cassell, I received your voice mail and thought that I should respond by email to be sure you get a timely answer – with the time difference it can be hard to get in touch.

EFTA00205033

I understand from AUSA [REDACTED] that he confirmed to you that he sent your complaint and request for an investigation to OPR. We will therefore consider you a complainant in the matter. Your complaint is being handled within the normal process here at OPR. It has been opened as an inquiry and assigned for review. It is not an investigation.

We will contact you if we need further information and/or to inform you of the results of our review.

Ruth Plagenhoef  
Acting Associate Counsel  
Office of Professional Responsibility  
U.S. Department of Justice  
[REDACTED]