

September 29, 2011

Wifredo A. Ferrer  
United States Attorney  
Southern District of Florida  
99 N.E.4<sup>th</sup> Street  
Miami, FL 33132

Re: Follow-up on Jeffrey Epstein

Dear Mr. Ferrer:

As you know, Brad Edwards and I represent Jane Doe #1 and Jane Doe #2 in their efforts to protect their rights under the Crime Victims' Rights Act. You were nice enough to meet with Jane Doe #1 in December 2010 on that case, and we appreciate that. At the conclusion of that meeting, I also provided you with a letter presenting my grave concerns about possible improper influences being brought to bear on your Office during its negotiation of the Jeffrey Epstein non-prosecution agreement. (For your convenience, I attach a copy of that letter.) It was my understanding that you deemed my allegations serious enough to forward my letter to the Office of Professional Responsibility (OPR) for further investigation, and it was my impression that OPR was going to look into the allegations raised in my letter.

I must say that I was surprised to receive a letter five months later from OPR indicating that my concerns were not being investigated. On May 6, 2011, OPR stated that it was their policy "to refrain from investigating issues or allegations that were, are being, or could have been addressed in the court of litigation, unless a court has made a specific finding of misconduct by a DOJ attorney . . . or there are present other circumstances." OPR stated that my allegations fell into the category of allegations that were being litigated because Jane Doe #1 and Jane Doe #2 were raising these issues in their CVRA case. Accordingly, OPR indicated it was not going to review the allegations that I presented.

I am writing now to request the opportunity to meet with you further and to pass along additional information in support of my concerns. I wanted to follow up with you to make sure that *someone* was looking into my allegations about improper influences affecting your Office's decision to accord Jeffrey Epstein an extraordinarily lenient plea. It may well be that OPR has some policy precluding an investigation. But will your Office then investigate these issues?

I am also writing to alert you to additional information that continues to lead me to believe that something was rotten with the way this case was handled.

As you may know, [REDACTED] was a senior prosecutor and supervisor in your Office when the non-prosecution agreement with Jeffrey Epstein was approved. It is our impression that he was directly involved in supervising the Epstein investigation as the former Chief of the Criminal Division of your Office. It has been our understanding for quite some time that he frequently corresponded with Epstein's attorneys, especially Lily Ann Sanchez, during the plea discussions, and it is our understanding that he left your Office around the time the non-prosecution agreement was signed.

Our private investigator has recently learned that [REDACTED] left your office to work at a New York law firm representing white collar criminals. He also learned that [REDACTED] quite expensive apartment in New York City is located in close proximity to real estate properties (specifically condos) owned by Jeffrey Epstein. The location of [REDACTED] apartment, his role during the Epstein negotiations, and his departure immediately after the NPA was signed, leads us to believe that [REDACTED] and Epstein may have had a business or other relationship either during or after [REDACTED] time in the Office. If that is the case, then we would appreciate you providing the information that you have in that regard voluntarily, as opposed to us having to conduct formal discovery to get it.

As you also know, Judge Marra has recently ordered discovery to proceed in this case. We obviously would like for that process to go as smoothly as possible and want to avoid becoming involved in true adversary litigation with your Office. On behalf of our clients, we just want to get to the bottom of this, and we feel safe in assuming that you do too at this point.

For all these reasons, I am writing to request another chance to meet with you about our concerns and about making the discovery process go smoothly. Thank you in advance for considering this request. I would be happy to provide any other additional information that would be useful to you.

Sincerely,



Paul G. Cassell

cc: Assistant U.S. Attorney [REDACTED]

cc: Assistant U.S. Attorney [REDACTED]