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July 22, 2011



**Re: Jeffrey Epstein**

Dear Ms. Villafaña:

Roy Black forwarded to me your letter to him dated July 21, 2011, from the District Attorney of the County of New York. We thank you for providing notice of the intended disclosure but we do object to any disclosure of the Non-Prosecution Agreement and the related list of witness/victims on the basis of the confidentiality provisions of paragraph 13. Absent an enforceable subpoena - which we would have the right to move to quash in the Court from which it was issued - there exists no right or duty to disclose the confidential Non-Prosecution Agreement or the non-public witness/victim list which was referenced in paragraph 7 of the NPA. Further, given that the witness/victim list was compiled based on the federal grand jury investigation, we object under Fed. R. Crim. P. 6(e) to its disclosure absent an appropriate court order.

Very truly yours,

  
Martin G. Weinberg

cc: Roy Black