

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 08-80736-Misc-Marra/Matthewman

JANE DOE #1 and JANE DOE #2,

Petitioners,

■.

UNITED STATES OF AMERICA,

Respondent.

_____ /

**RESPONDENT'S ANSWERS TO PETITIONERS' FIRST REQUESTS FOR
ADMISSIONS**

1. Admit.
2. (a) Cannot admit or deny. Jeffrey Epstein's ("Epstein") attorneys learned of the notifications that were planned to be provided to persons designated as victims when contact was made with the attorney who was then representing Jane Doe #2¹ to determine how she wanted to be notified. At that time, Epstein's attorneys contacted the U.S. Attorney's Office ("USAO") and stated their objections to the procedure for notification and the legal bases therefore. Epstein's attorneys also objected to the designation of Jane Doe #2 as a victim because she had self-reported that she was not a victim. Members of the USAO considered those objections.

(b) Admit.

¹ This attorney was being compensated by Epstein to represent Jane Doe #2.

- (c) Cannot admit or deny. As a result of the objections lodged by Epstein's attorneys, in particular with regard to Jane Doe #2, Epstein's attorneys sought review of the case in Washington, D.C. which halted all proceedings with the USAO.
- (d) Deny. Notifications prior to signing the agreement were not contemplated.
3. Deny.
 4. Deny.
 5. Admit.
 6. (a) Deny. [These all need to be confirmed.]
 - (b) Deny.
 - (c) Admit.
 - (d) Admit.
 - (e) Admit to the extent this is meant to refer to Lilly Ann Sanchez.
 - (f) Admit.
 - (g) Admit.
 7. Admit; however, on or about January 10, 2008, Epstein was challenging the legitimacy of the non-prosecution agreement and the FBI and the USAO were preparing for the possibility that the non-prosecution agreement might be set aside and a federal prosecution might proceed; thus, the case was, in fact, "currently under investigation."
 8. Deny.
 9. (a) Admit.
 - (b) Admit.
 - (c) Deny.

- (d) Deny.
 - (e) Deny. [Need to explain.]
10. (a) Admit.
- (b) Admit in part and deny in part. The agents explained to Jane Doe #1 that Epstein would plead guilty to state charges for procuring minors to engage in prostitution for which he would be required to register as a sex offender; and that Jane Doe #1 would be entitled to seek damages from Epstein and that, if she desired, Jane Doe #1 would be entitled to use the services of an attorney at no expense to her in seeking those damages from Epstein. The agents did not explain that the state charges “involv[ed] another victim.”
 - (c) Deny. The agents explained that an agreement had been signed and they were explaining the terms of that agreement to Jane Doe #1. They further explained that the agreement resolved the investigation of her case.
 - (d) Deny.
 - (e) Deny.
 - (f) Deny.
 - (g) Deny.
11. [I can't certify to the date.] Admit in part and deny in part. The Respondent admits that, following that correspondence, Epstein's counsel asked to have the case reviewed by attorneys at the Justice Department in Washington, D.C., and, accordingly, the U.S. Attorney's Office did not, at that time, send the proposed victim notification letter because it was unclear whether the Non-Prosecution Agreement would, in fact, go into effect.

12. Admit.

13. (a) Deny as to Jane Doe #1; admit as to Jane Doe #2. Please see response to Request #10.

(b) Admit. [Can we add: Members of the Executive Division at the USAO determined that attorneys for the USAO and the FBI agents would not confer with Jane Doe #1 prior to the USAO's decision to enter into the non-prosecution agreement. Jane Doe #2 had already informed the attorney for the government and the FBI agents that she did not believe that Epstein should be prosecuted.]

(c) Cannot admit or deny. Information lies within the possession of Epstein's defense attorneys.

(d) Deny. The Non-Prosecution Agreement contains a confidentiality provision that keeps the document confidential. It does not govern conferring with victims prior to entering into the Agreement nor does it govern advising them regarding its terms.

14. Admit in part. The parties sought to keep the document confidential, not its existence, which was disclosed to the state court judge during the change of plea.

15. (a) Admit in part. While he was an Assistant U.S. Attorney, ██████████ learned confidential, non-public information about the Epstein matter.

(b) Admit in part. While he was an Assistant U.S. Attorney, ██████████ discussed the Epstein matter with another Assistant U.S. Attorney working on the Epstein matter.

(c) Deny.

16. [I haven't completed the review yet. So far there may be some personal emails with Jack Goldberger only. We don't have any telephone logs or other documents.]
17. [You need to check with DC about this. Does DC have my emails by any chance?]
Deny.
18. [I don't know how to answer this. "improper communication or influence" is so vague and potentially broad that a denial is problematic. I also have never seen all of the emails between Guy and Lilly Ann and Alex, ~~Jeff, Matt, Andy, and Rolando~~ (and any others in DC).]
19. [Again, I don't know how to answer this. The RFA does not use the word "former," so it would seem to only cover personal or business relationships between Epstein himself and persons who were then-employees of the USAO. I am unaware of any such relationships with Epstein directly. We will need to review emails and possibly interview Alex/~~Jeff/Matt/Andy~~.]
20. Admit. [I know that ~~Menchel~~ now has a business relationship with Epstein. I don't have any documentary evidence, but I have been told this by ~~1-88-81~~.]
21. [I don't know.]
22. [OPR needs to answer these.]
23. Admit.
24. [I don't know what "valuable consideration" means. I had heard a rumor that Epstein was a cooperator in the Bear Stearns investigation but this was never confirmed.]
25. Deny?
26. Admit.