

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-80736-CIV-MARRA

JANE DOE #1 and JANE DOE #2,

Petitioners,

vs.

UNITED STATES OF AMERICA,

Respondent.

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RESPONDENT'S INITIAL DISCLOSURES

Respondent United States of America, by and through its undersigned counsel, makes its Initial Disclosures, pursuant to Fed.R.Civ.P. 26(a)(1)(A), and state:

Fed.R.Civ.P. 26(a)(1)(A)(i):

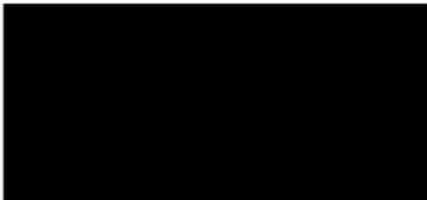
1. R. Alexander Acosta  
Dean, School of Law  
Florida International University  
Rafael Diaz-Balart Hall  
11200 S.W. 8<sup>th</sup> Street  
Miami, Florida 33199  
(305) 348-1118

Dean Acosta was the United States Attorney, Southern District of Florida, during the time when the criminal investigation of Jeffrey Epstein was opened in the U.S. Attorney's Office, and the non-prosecution agreement was negotiated.

2.   


 was the First Assistant U.S. Attorney in the U.S. Attorney's Office, during the time when the criminal investigation of Jeffrey Epstein was opened, and the non-prosecution agreement was negotiated.

3.



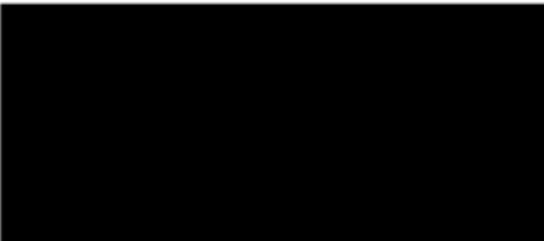
██████████ was the Chief of the Criminal Division in 2006-2007, when the criminal investigation of Jeffrey Epstein was opened,

4.



██████████ was a Supervisory Assistant U.S. Attorney in the West Palm Beach office of the U.S. Attorney's Office, during the time the criminal investigation of Jeffrey Epstein was opened, and the non-prosecution agreement was negotiated.

5.



██████████ was the federal prosecutor in the Southern District of Florida assigned primary responsibility for the federal criminal investigation of Epstein during the time when that criminal investigation was open in the U.S. Attorney's Office and while the non-prosecution agreement was negotiated.

6.



██████████ is a Supervisory Assistant U.S. Attorney in the West Palm Beach office of the U.S. Attorney's Office, and supervised portions of the criminal investigation of Jeffrey Epstein.

7.



[REDACTED] was a Supervisory Assistant U.S. Attorney in the West Palm Beach office of the U.S. Attorney's Office, and supervised portions of the criminal investigation of Jeffrey Epstein.

8.

[REDACTED]

[REDACTED] assisted AUSA Villafana during the criminal investigation of Jeffrey Epstein.

9.

[REDACTED]

In his previous capacity as Deputy Chief of the Criminal Division, U.S. Attorney's Office, [REDACTED] reviewed various portions of the criminal investigation of Jeffrey Epstein.

10.

[REDACTED]

In 2008, [REDACTED] was the Chief of the Child Exploitation & Obscenity Section at the DOJ. At the request of Mr. Epstein's attorneys, he conducted a review of the U.S. Attorney's handling of the Epstein matter.

11.

[REDACTED]

[REDACTED] participated in the review of the non-prosecution agreement, and other actions taken by the U.S. Attorney's Office, in her capacity as a deputy chief in the Child Exploitation & Obscenity Section, U.S. Department of Justice.

12.

[REDACTED]

[REDACTED] in her previous capacity as a Trial Attorney in the Child Exploitation & Obscenity Section, participated in the criminal investigation of Jeffrey Epstein.

13.

[REDACTED]

In her previous capacity as Assistant Attorney General, Criminal Division, Assistant Attorney General [REDACTED] was the recipient of correspondence from Kenneth Starr and Jay Lefkowitz, seeking review of the non-prosecution agreement.

14.

[REDACTED]

[REDACTED] was a Senior Associate Deputy Attorney General in the DOJ in 2008, and conducted a review of the U.S. Attorney's handling of the Epstein matter, at the request of Mr. Epstein's attorneys, Jay Lefkowitz and Kenneth Starr.

15.

[REDACTED]

Special Agent [REDACTED] was the co-case agent in the criminal investigation of Jeffrey Epstein.

16.

[REDACTED]

Special Agent [REDACTED] was the co-case agent in the criminal investigation of Jeffrey Epstein.

17.

[REDACTED]

Special Agent [REDACTED] was the co-case agent for the Epstein investigation, prior to his transfer to FBI Headquarters in Washington, D.C. He contacted Jane Doe No. 3 by telephone in January-February 2007, in an attempt to interview her.

18. Kenneth W. Starr  
President and Chancellor  
Baylor University

[REDACTED]

Judge Starr represented Jeffrey Epstein concerning the criminal investigation conducted by the U.S. Attorney's Office and the resolution of that investigation.

19. Jay Lefkowitz  
Kirkland and Ellis, LLP

[REDACTED]  
[REDACTED]

Mr. Lefkowitz represented Jeffrey Epstein concerning the criminal investigation conducted by the U.S. Attorney's Office and the resolution of that investigation

20. Gerald B. Lefcourt, P.C.

[REDACTED]  
[REDACTED]

Mr. Lefcourt represented Jeffrey Epstein concerning the criminal investigation conducted by the U.S. Attorney's Office and the resolution of that investigation

21. Roy Black  
Black, Srebnick, Kornspan and Stumpf

[REDACTED]

Mr. Black represented Jeffrey Epstein concerning the criminal investigation conducted by the U.S. Attorney's Office and the resolution of that investigation.

22. Lilly Ann Sanchez  
LS Law Firm

[REDACTED]

Ms. Sanchez represented Jeffrey Epstein concerning the criminal investigation conducted by the U.S. Attorney's Office and the resolution of that investigation.

23. Alan M. Dershowitz  
Professor Emeritus  
Harvard Law School



Professor Dershowitz represented Jeffrey Epstein concerning the criminal investigation conducted by the U.S. Attorney's Office and the resolution of that investigation.

24. Jack Goldberger  
Atterbury Goldberger et al.



Mr. Goldberger represented Jeffrey Epstein concerning the criminal investigation conducted by the U.S. Attorney's Office and the resolution of that investigation.

25. Martin G. Weinberg



Mr. Weinberg represented Jeffrey Epstein concerning the criminal investigation conducted by the U.S. Attorney's Office and the resolution of that investigation.

26. Guy Lewis  
Lewis & Tein



Mr. Lewis represented Jeffrey Epstein concerning the criminal investigation conducted by the U.S. Attorney's Office and the resolution of that investigation.

27. Barry E. Krischer



Mr. Krischer was the State Attorney for Palm Beach County, Florida, who charged Jeffrey Epstein with state offenses arising out of his sexual activities with underaged girls. His office was responsible for the prosecution of the state criminal charges lodged against Epstein.

28. Lanna L. Belohlavek



Ms. Belohlavek was the Assistant State Attorney in the State Attorney's Office, County of Palm Beach, who was responsible for the prosecution of Jeffrey Epstein.

29. Jane Doe No. 1

30. Jane Doe No. 2

31. Jane Does A through Z

These are the young women who were referred to Jeffrey Epstein by Jane Doe No. 1, Jane Doe No. 2, and Jane Doe No. 3.

Fed.R.Civ.P. 26(a)(1)(A)(ii):

Attorney General Guidelines for Victim and Witness Assistance, U.S. Department of Justice, Office of Justice Programs, Office for Victims of Crime (May 2005)

October 10, 2007 letter from Jay Lefkowitz, Kirkland & Ellis, LLP, to R. Alexander Acosta

November 29, 2007 letter from Jay Lefkowitz to R. Alexander Acosta

December 5, 2007 letter from Kenneth W. Starr and Jay Lefkowitz to R. Alexander Acosta

December 6, 2007 letter from  First Assistant U.S. Attorney, to Jay Lefkowitz

December 11, 2007 letter from Jay Lefkowitz to R. Alexander Acosta

December 19, 2007 letter from R. Alexander Acosta to Lilly Ann Sanchez

December 21, 2007 letter from Jay Lefkowitz to R. Alexander Acosta

December 26, 2007 letter from Jay Lefkowitz to R. Alexander Acosta

Non-Prosecution Agreement, executed on September 24, 2007

Addendum to The Non-Prosecution Agreement, executed on October 29, 2007

Transcript of Taped Statement of Jane Doe No. 1, April 24, 2007

Video Recording of Statement of Jane Doe No. 1, April 24, 2007

January – May 2008 correspondence from Jay Lefkowitz regarding DOJ review of non-prosecution agreement

May 2008 letter from [REDACTED], Chief, Child Exploitation & Obscenity Section, U.S. Department of Justice, to Jay Lefkowitz

May – June 2008 correspondence from Jay Lefkowitz and/or Kenneth Starr, to Deputy Attorney General [REDACTED]; Assistant Attorney General [REDACTED]; and Senior Associate Deputy Attorney General [REDACTED]

June 2008 letter [REDACTED], Senior Associate Deputy Attorney General, to Jay Lefkowitz and Kenneth Starr.

These documents have already been produced in discovery.

Fed.R.Civ.P. 26(a)(1)(A)(iii):

The United States Government is not seeking money damages in this case.

Fed.R.Civ.P. 26(a)(1)(A)(iv):

The United States is self-insured.

DATED: July 20, 2015

Respectfully submitted,

[REDACTED]  
UNITED STATES ATTORNEY

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ATTORNEY FOR RESPONDENT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 20, 2015, I sent via electronic mail the foregoing document to the individuals on the attached Service List.

s/ Dexter A. Lee  
DEXTER A. LEE  
Assistant U.S. Attorney

SERVICE LIST

Jane Does 1 and 2 ■ United States,  
Case No. 08-80736-CIV-MARRA/JOHNSON  
United States District Court, Southern District of Florida

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Attorneys for Jane Doe # 1 and Jane Doe # 2