

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

**Subject:** Fw: Urgent request -- Jane Doe #3's 302's

**Date:** Mon, 05 Jan 2015 00:26:15 +0000

**Importance:** Normal

**Inline-Images:** image001.png; image002.png; image003.jpg; image004.png

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[REDACTED]  
I received this urgent request from Cassell seeking copies of the FBI 302's pertaining to interviews of [REDACTED]. I will contact the FBI FOIA unit tomorrow morning to see if Cassell did file a FOIA request for the 302's. If the FBI has no basis under the FOIA to withhold the documents, then I believe they should be released to Cassell.

The reason we did not provide the 302's to Cassell, like we did for Jane Does 1 and 2, was because [REDACTED] is not a party to the CVRA lawsuit.

[REDACTED]

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**From:** Paul Cassell [mailto:[REDACTED]]  
**Sent:** Sunday, January 04, 2015 05:20 PM  
**To:** [REDACTED] (USAFLS); [REDACTED] <[REDACTED]>  
**Subject:** RE: Urgent request -- Jane Doe #3's 302's

Dear [REDACTED],

Brad and I writing with an urgent request: We would like for you to send us [REDACTED] (a/k/a Jane Doe #3's) FBI 302's as soon as possible. If necessary, we would like for you to run this request up the chain rapidly as appropriate to get permission. Our reason for writing to try and avoid another possible point of contention between the Government and a victim in the Epstein case.

A bit of background: As you recall, we represent Jane Doe #3. We requested of the FBI, and then of you, her 302's early in 2014. We were instructed to file a FOIA request. We did that in July. There was a bit of back and forth on this back in August, but we haven't heard anything since.

More recently, as you know, Jane Doe #3 filed a request to join the CVRA case. She made certain factual allegations in that pleading, including the fact that she had been trafficked by Jeffrey Epstein to Prince Andrew and former Harvard Law Professor Alan Dershowitz. These allegations have been picked up by media worldwide.

As a result of these allegations, Ms. [REDACTED] has been attacked. For example, Buckingham Palace has identified her and called her a liar. Mr. Dershowitz has said: "I'm also challenging the young woman and the lawyers to level those charges against me outside of the courtroom, so that I can sue them for defamation. ... Finally, I'm challenging the woman to file criminal charges against me because the filing of false criminal charges is a crime."

[http://www.huffingtonpost.com/2015/01/03/alan-dershowitz-sexual-assault\\_n\\_6410380.html](http://www.huffingtonpost.com/2015/01/03/alan-dershowitz-sexual-assault_n_6410380.html)

Mr. Dershowitz has also indicated that he will begin disbarment proceedings against Brad and me tomorrow, Monday.

We are considering what response Ms. [REDACTED] should make to these charges. Of course, it would be very useful to responding to Mr. Dershowitz to show that she has reported the crimes against her to the FBI, well before any of the recent events. But as of right now, she does not have her 302's.

We are considering whether Ms. [REDACTED] should make a statement next week. If she does, as things stand, she might be forced to say something along the lines of "My attorneys requested the documents showing that I reported crimes to the FBI, but the Government has refused to provide those documents to me."

Frankly, this seems like an unnecessary sideshow to the other issues that are swirling around. And we strongly believe that Ms. [REDACTED] is entitled to see her 302's, both under FOIA and under the Crime Victims' Rights Act. We would note that the Government voluntarily provided the 302's to us for Jane Doe #1 and Jane Doe #2, so we can't understand why they are still being withheld from Jane Doe #3.

In light of all this, we are writing to urgent request that you eliminate this unnecessary dispute and simply send us Jane Doe #3's FBI 302's (particularly the interview in Australia). We hope you will agree this is a reasonable request and one way to avoid getting into a fight over this - a fight that we believe the Government will ultimately lose in any event.

We would like to have this issue presented to the appropriate decision maker (Mr. [REDACTED]?) as rapidly as possible, so that we could receive the 302's by c.o.b. Monday. Thank you in advance for considering this request - a request made in good faith to smoothly resolve an issue.

Paul Cassell and Brad Edwards, co-counsel for Jane Doe #3

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

[REDACTED]  
[REDACTED]  
You can access my publications on <http://ssrn.com/author=30160>

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**From:** [REDACTED] (USAFLS) [mailto:[REDACTED]]  
**Sent:** Friday, January 02, 2015 9:49 AM  
**To:** Paul Cassell; [REDACTED]  
**Subject:** Re: Meeting in January 2015

Paul and Brad,  
We will do all we can to accommodate your schedule, to avoid you having to cancel your class. Happy New Year.  
[REDACTED]

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**From:** Paul Cassell [mailto:[REDACTED]]  
**Sent:** Friday, January 02, 2015 11:42 AM  
**To:** Brad Edwards <[REDACTED]>; [REDACTED] (USAFLS)  
**Subject:** RE: Meeting in January 2015

Hi [REDACTED]

As Brad mentioned, it's a bit tricky for me to get out there and back. The best days for me are Wednesday Jan. 20 or Jan. 27 (any time, morning preferred). The second best days for me are Jan. 21 or Jan. 28, in the morning, so that I can fly

home for class Friday morning.

Brad can chime in with any conflicts that he has. I have weird teaching schedule this semester, teaching Monday afternoon, Tuesday morning and Friday morning. I'm hoping to avoid having to cancel a class, but could do that if absolutely necessary.

Thanks! Paul

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

You can access my publications on <http://ssrn.com/author=30160>

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**From:** Brad Edwards [REDACTED]  
**Sent:** Friday, January 02, 2015 8:32 AM  
**To:** [REDACTED] (USAFLS); Paul Cassell  
**Subject:** RE: Meeting in January 2015

[REDACTED]

The longer we wait to pick a date the more difficult it gets for Paul and [REDACTED] to make travel arrangements. We would like to make sure to meet sometime in January. Please get back to me.

Sincerely,



**Farmer, Jaffe, Weissing,  
Edwards, Fistos & Lehrman, P.L.**

**Brad Edwards**  
**Board Certified Trial Attorney**

425 North Andrews Avenue, Suite 2  
Fort Lauderdale, Florida 33301

Toll Free: 800-400-1098 | Local: 954-524-2820  
Cell: 954-294-9544 | Facsimile: 954-524-2822

[REDACTED] [www.pathtojustice.com](http://www.pathtojustice.com)



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**From:** [REDACTED] (USAFLS) [[mailto:\[REDACTED\]](mailto:[REDACTED])]  
**Sent:** Tuesday, December 23, 2014 6:19 PM  
**To:** Brad Edwards; Paul Cassell ([REDACTED])  
**Subject:** RE: Meeting in January 2015

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Brad and Paul,

We will let you know which dates are good for us. We actually wanted to discuss adding the new parties to the case at the meeting. Our position is that we oppose adding new petitioners at this stage of the litigation.

Best Wishes for a wonderful holiday to you and your families.

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**From:** Brad Edwards [mailto: ]  
**Sent:** Monday, December 22, 2014 12:17 PM  
**To:** (USAFLS); Paul Cassell ( )  
**Subject:** RE: Meeting in January 2015

We have a few available dates to choose from. January 21-22 and 28-29. Hopefully one of those will work for you guys.

On the motion to add and MJ, I don't believe you indicated your position. As we said, we hoped you would agree, or at least not oppose, but either way we would like to know your position so that we can so inform the Court.

Thanks again. Please let me know which meeting date works best so that those coming from out of town can make arrangements.

Sincerely,



**Farmer, Jaffe, Weissing,  
Edwards, Fistos & Lehrman, P.L.**

**Brad Edwards  
Board Certified Trial Attorney**

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

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**From:** (USAFLS) [mailto: ]  
**Sent:** Tuesday, December 16, 2014 3:03 PM  
**To:** Brad Edwards; Paul Cassell ( )  
**Subject:** Meeting in January 2015

Brad and Paul,

We would like to schedule a meeting with the Executive Division, as you requested, for January 2015, at a time convenient for both of you. Also, do MJ and [REDACTED] wish to attend?

Please let me know of a suitable time for all parties who wish to attend. Thanks.

[REDACTED]

[REDACTED]