

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 08-80736-Civ-Marra/Johnson**

**JANE DOE #1 and JANE DOE #2,**

**Plaintiffs**

**vs.**

**UNITED STATES,**

**Defendants**

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**JANE DOE #1 AND JANE DOE #2'S SUPPLEMENTAL REQUEST  
FOR PRODUCTION TO THE GOVERNMENT REGARDING "ACCUSATION" OF  
THE VICTIMS OF CRIMES AND RELATED SUBJECTS**

COME NOW Jane Doe #1 and Jane Doe #2 ("the victims), by and through undersigned counsel, and request the defendant United States (hereinafter "the Government") to produce within 21 days the original or best copy of the items listed herein below for inspection and/or copying, pursuant to the Court's Order (DE 99) directing discovery in this case, the Court's Order denying the Government's motion to dismiss and lifting stay of discovery (DE 189), the Court's Omnibus Order (DE 190), and the Court's Order Denying Motion to Join (DE 324):

**BACKGROUND**

As the Government will recall, it has previously suggested that it might argue that various persons who are "victims" in this case might also be persons "accused of the crime" under 18 U.S.C. § 3771(d)(1). The Government has also entered into a non-prosecution agreement that precludes prosecution of certain unidentified "potential co-conspirators" of Jeffrey Epstein. Accordingly, Jane Doe 1 and Jane Doe 2 propound the following supplemental discovery

requests. They hope that the Government will voluntarily provide the requested information without need for intervention by the Court.

### **SUPPLEMENTAL DISCOVERY REQUESTS**

The numbered discovery requests below should all be construed to provide the maximum possible information to Jane Doe 1 and Jane Doe 2 and in light of the definition of terms provided at the end of the requests. If not information is covered by the request, please note that fact. If the request has multiple, letter subparts, please provided all information covered by each of the subparts:

Supplemental Discovery Request 1. Please provide all documents, correspondence, and other information in which the Government has treated and/or identified one or more of Jane Does 1 - 33 as a person covered by 18 U.S.C. § 3771(d)(1)'s sentence providing that "[a] person accused of the crime may not obtain any form of relief under this chapter."

Supplemental Discovery Request 2. Please provide all documents, correspondence, and other information, including any FBI 302's, pertaining to an "accusation," 18 U.S.C. § 3771(d)(1), of Jane Does 1 - 33 of involvement with or complicity in any crime committed by Jeffrey Epstein or involving Jeffrey Epstein, including (but not limited to) any documents, correspondence, and other information that the Government will use to advance any claim that any of Jane Does 1 – 33 are covered by the provision in 18 U.S.C. § 3771(d)(1) regarding "[a] person accused of the crime may not obtain any form of relief under this chapter" and/or are otherwise not entitled to "obtain any form of relief" in this case.

Supplement Discovery Request 3. The Non-Prosecution Agreement in this case contains a provision that provides immunity in the Southern District of Florida not only to Jeffrey Epstein, but also to "any potential co-conspirators of Epstein." Please provide:

(a) the names of those persons covered by this provision;

(b) the names of those persons that legal counsel for Jeffrey Epstein represented were covered by this provision;

(c) all documents, correspondence, and other information pertaining to those persons who are covered by this provision;

(d) all documents, correspondence, and other information pertaining to legal counsel for Jeffrey Epstein's representations regarding those persons who are covered by this provision.

Supplement Discovery Request 4. On September 16, 2007, the U.S. Attorney's Office wrote to defense counsel about a provision in the proposed NPA dealing with potential co-conspirators that would not highlight for the judge persons who could potentially be charged: "I will include our standard language regarding resolving all criminal liability and I will mention 'co-conspirators,' but I would prefer not to highlight for the judge all of the other crimes and all of the other persons that we could charge." Please identify all of the "other crimes" and "other persons" referred to in this email, and provide all documents, correspondence, and other information pertaining to those crimes and persons.

### **DEFINITIONS**

For the purpose of construing the foregoing discovery requests, the following terms are defined:

The term "documents" means and includes, without limitation, all writings of any kind, including the originals and all non-identical copies or drafts, whether different from the original by reason of any notation made on such copy or draft or otherwise including, without limitation, correspondence, memoranda, notes, diaries, statistics, letters, e-mails, electronic computer files, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, interoffice communications, reports of interviews, FBI 302's, offers, notations of any sort of conversation, telephone calls, meetings or other communications, bulletins, printed matter, computer print-outs, teletypes, facsimiles, invoices, work sheets, flight logs, flight manifests, and all drafts, alterations, modifications, changes, and amendments of any of the foregoing, graphic or aural writs, records or representations of any kind including, without

limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings, motion pictures; and electronic, mechanical or electric records or representations of any kind including, without limitation, tapes, cassettes and disc recordings, and writings and printed material of every kind.

The term “correspondence” means any tangible object that conveys information or memorializes information that was conveyed in tangible or oral form including, but not limited to, writings, letters, memoranda, reports, notes, e-mails, telephone logs, telephone billing information, telephone recordings, and interoffice communications.

The term “victim” means any person that the Government identified as a possible victim of a sex offense committed by Jeffrey Epstein, including Jane Doe 1, 2, 3, and 4, all victims identified in attachment to the non-prosecution agreement entered into by Epstein, and any other person that the Government investigated as a possible victim of Epstein’s sex offenses.

The term “Government” means the federal government, including all employees of and components of the United States Department of Justice (such as, the Office of the Attorney General, the Office of the Deputy Attorney General, the Criminal Divisions, the Office of Professional Responsibility, the Child Exploitation and Obscenity Section, the U.S. Attorney’s Offices for the Southern District and Middle District of Florida, New Mexico, the Virgin Islands, and the Southern District of New York, and the Federal Bureau of Investigation) and other federal government agencies with law enforcement responsibilities related to the Epstein case (such as the Internal Revenue Service). This request for production seeks all documents, correspondence, and other information held by all of these entities, including all employees of and components of the Justice Department that worked on or were in any way involved the Epstein investigation and/or that possess information relevant to the victims’ claims. For purposes of the request for production of flight logs and related travel information, this request includes the Federal Aviation Administration and Bureau of Immigrations and Customs Enforcement.

The term “including” means containing within the request, but not limiting the request.

The term “witness statement” means any document or other recording in any form (including oral form) reflecting, recording, or otherwise memorializing a statement made or information conveyed by a potential witness, including for example FBI 302’s. The term includes information collected by any law enforcement, prosecuting or government agency, including all federal, state, and local law enforcement agencies located in Washington, D.C., or Florida.

### **PRIVILEGE LOG**

If you believe that any document, correspondence, or other information requested in this request is subject to a privilege and if you intend to assert that privilege, please provide a “privilege log” consistent with Local Rule 26.1(g), including a description a document that is consistent with Local Rule 26.1(g)(3)(B). Your privilege log should include the type of

document, general subject matter of the document, date of the document, and author and addressee of the document or correspondence.

**REDUCING ANY UNDUE BURDEN**

If you believe that complying with any of the foregoing requests would be unduly burdensome, please contact victims' counsel – Bradley J. Edwards – to discuss ways to reduce any such burden.

DATED: December 29, 2015

Respectfully Submitted,

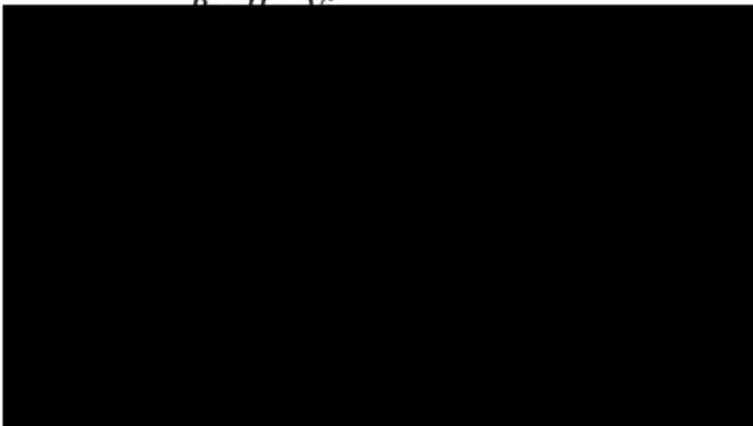
s/ Bradley J. Edwards  
Bradley J. Edwards



and

Paul G. Cassell

Paul G. Cassell



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