

**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,

Defendant

**JANE DOE 1 AND JANE DOE 2'S FOURTH REQUEST FOR ADMISSIONS
TO THE GOVERNMENT REGARDING QUESTIONS RELEVANT TO
"ACCUSATION" OF THE VICTIMS**

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 admit or deny the following facts in not later than 30 days:

BACKGROUND

As the Government will recall, it has previously stipulated that Jane Doe 1 and Jane Doe 2 were "victims" under the Crime Victims' Rights Act (CVRA) for purpose of the above-captioned case. Recently, however, it appears that the Government may attempting to argue that they were somehow "accused" of the crimes involving Epstein. The Government may also take a similar position with regard to other young women who may wish to participate in this case. Accordingly, Jane Doe 1 and Jane Doe 2 seek the following discovery.

DISCOVERY REQUESTED

The numbered requests for admissions below should all be construed in light of the definitions of terms provided at the end of the requests. Where the request for admission has separate, lettered sub-parts, please admit or deny each separate sub-part:

1. Between 1999 and September 2007, the following persons were not “[a] person accused of” a crime, 18 U.S.C. § 3771(d)(1), committed by or involving Jeffrey Epstein in the Southern District of Florida:
 - A. Jane Doe 1.
 - B. Jane Doe 2.
 - C. Jane Doe 3.
 - D. Jane Doe 4.
 - E. Jane Doe 5.
 - F. Jane Doe 6.
 - G. Jane Doe 7.
 - H. Jane Doe 8.
 - I. Jane Doe 9.
 - J. Jane Doe 10.
 - K. Jane Doe 11.
 - L. Jane Doe 12.
 - M. Jane Doe 13.
 - N. Jane Doe 14.
 - O. Jane Doe 15.
 - P. Jane Doe 16.
 - Q. Jane Doe 17.
 - R. Jane Doe 18.
 - S. Jane Doe 19.
 - T. Jane Doe 20.
 - U. Jane Doe 21.
 - █. Jane Doe 22.
 - W. Jane Doe 23.
 - X. Jane Doe 24.
 - Y. Jane Doe 25.
 - Z. Jane Doe 26.
 - AA. Jane Doe 27.
 - BB. Jane Doe 28.
 - CC. Jane Doe 29.
 - DD. Jane Doe 30.
 - EE. Jane Doe 31.
 - FF. Jane Doe 32.
 - GG. Jane Doe 33.

2. Between 2005 and 2008, the Government never notified the following persons that they were being “accused of” a crime, 18 U.S.C. § 3771(d)(1), involving Jeffrey Epstein or committed by Jeffrey Epstein:
 - A. Jane Doe 1.
 - B. Jane Doe 2.
 - C. Jane Doe 3.
 - D. Jane Doe 4.
 - E. Jane Doe 5.
 - F. Jane Doe 6.
 - G. Jane Doe 7.
 - H. Jane Doe 8.
 - I. Jane Doe 9.
 - J. Jane Doe 10.
 - K. Jane Doe 11.
 - L. Jane Doe 12.
 - M. Jane Doe 13.
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 - X. Jane Doe 24.
 - Y. Jane Doe 25.
 - Z. Jane Doe 26.
 - AA. Jane Doe 27.
 - BB. Jane Doe 28.
 - CC. Jane Doe 29.
 - DD. Jane Doe 30.
 - EE. Jane Doe 31.
 - FF. Jane Doe 32.
 - GG. Jane Doe 33.

3. On the date on which each of the following persons was first sexually abused by Jeffrey Epstein in the Southern District of Florida, they were not “[a] person accused of the crime,” 18 U.S.C. § 3771(d)(1), of their sexual abuse:
 - A. Jane Doe 1.
 - B. Jane Doe 2.
 - C. Jane Doe 3.
 - D. Jane Doe 4.
 - E. Jane Doe 5.
 - F. Jane Doe 6.

G. Jane Doe 7.
H. Jane Doe 8.
I. Jane Doe 9.
J. Jane Doe 10.
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FF. Jane Doe 32.
GG. Jane Doe 33.

4. On about November 27, 2007, AUSA Jeff Sloman sent a communication to counsel for Jeffrey Epstein that stated, in part, “Therefore, unless you provide me with a good faith objection to Judge Davis’s selection [as special master for selecting legal counsel for victim pursuing claims against Epstein] by COB tomorrow, November 28, 2007, I will authorize the notification of the victims.” Each of the “victims” referred to in this email were not considered at that time to have been “[a] person accused of the crime” within the meaning of 18 U.S.C. § 3771(d)(1):
- A. Jane Doe 1.
B. Jane Doe 2.
C. Jane Doe 3.
D. Jane Doe 4.
E. Jane Doe 5.
F. Jane Doe 6.
G. Jane Doe 7.
H. Jane Doe 8.
I. Jane Doe 9.
J. Jane Doe 10.
K. Jane Doe 11.

- L. Jane Doe 12.
- M. Jane Doe 13.
- N. Jane Doe 14.
- O. Jane Doe 15.
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- CC. Jane Doe 29.
- DD. Jane Doe 30.
- EE. Jane Doe 31.
- FF. Jane Doe 32.
- GG. Jane Doe 33.

5. The Government has never accused the following persons of a crime:

- A. Jane Doe 1.
- B. Jane Doe 2.
- C. Jane Doe 3.
- D. Jane Doe 4.
- E. Jane Doe 5.
- F. Jane Doe 6.
- G. Jane Doe 7.
- H. Jane Doe 8.
- I. Jane Doe 9.
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GG. Jane Doe 33.

6. In light of the Court's rulings in the above-captioned case, the following persons are not "[a] person accused of the crime" within the meaning of 18 U.S.C. § 3711(d)1(1) of the CVRA:

A. A. Jane Doe 1.
B. Jane Doe 2.
C. Jane Doe 3.
D. Jane Doe 4.
E. Jane Doe 5.
F. Jane Doe 6.
G. Jane Doe 7.
H. Jane Doe 8.
I. Jane Doe 9.
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FF. Jane Doe 32.
GG. Jane Doe 33.

DEFINITIONS

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

The term "documents" or "communications" 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, offers, notations of any sort of conversation, telephone calls, meetings or other communications, bulletins, printed matter, computer print-outs, teletypes, facsimiles, invoices, work sheets 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 "victims" 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, and all victims identified in attachment to the non-prosecution agreement entered into by Epstein, and another 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, the Southern District of New York, the District of New Mexico, and the District of the U.S. Virgin Islands, and the Federal Bureau of Investigation), the Federal Aviation Administration, the Bureau of Immigration and Customs Enforcement, and any 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.

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

PRIVILEGE LOG

If you believe that any request for admission 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 a specific identification of the privilege being asserted and the basis for the privilege.

DATED: December 29, 2015

Respectfully Submitted,

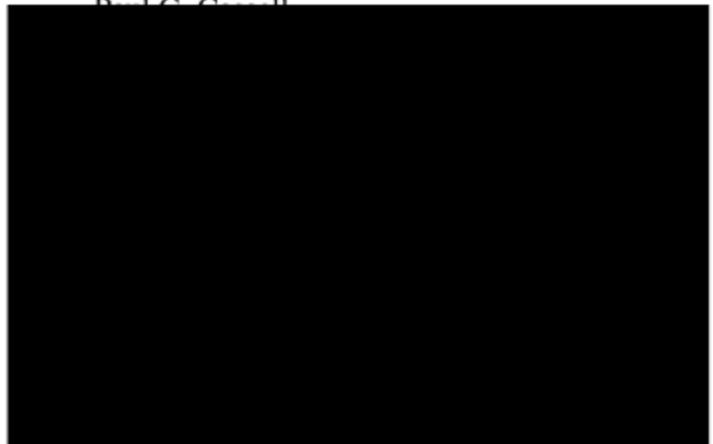
s/ Bradley J. Edwards



P.L.

and

B. J. C. C. C.



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