

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

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

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

**Plaintiffs**

**v.**

**UNITED STATES,**

**Defendants**

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**JANE DOE #1 AND JANE DOE #2'S SUPPLEMENTAL REQUEST FOR ADMISSIONS  
TO THE GOVERNMENT REGARDING VARIOUS ISSUES**

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:

**BACKGROUND**

On September 26, 2011, the Court denied the victims' motion to have their facts accepted (DE 99 at 11). At the same time, however, the Court has ordered discovery to develop the factual record concerning the summary judgment motion (DE 99 at 11). The Court reserved ruling on the victims' motion for an order directing the Government not to suppress relevant evidence (DE 99 at 11). The Court allowed the victims to propound requests for admission to the Government.

**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. The United States Attorney's Office received information that Police Chief Reiter was concerned about the Government's treatment of Epstein's victims and/or other aspects of the Government handling of the Epstein investigation.
2. Ed Nucci communicated with Police Chief Reiter and informed him of the possibility the Office would issue a "target letter" to him for matters related to the Jeffrey Epstein case.
3. Ed Nucci discussed with Police Chief Reiter circumstances in which he (Reiter) could be the target of federal criminal investigation.  
The United States Attorney's office prepared a target letter for Police Chief Reiter related to the Jeffrey Epstein case.
4. The U.S. Attorneys' Office for the Southern District of Florida or other components of the Justice Department received information that [REDACTED] was discussing or had discussed a potential future employment opportunity or business relationship connected to Jeffrey Epstein before Jeffrey Epstein entered his state court guilty plea.
5. The FBI received information that [REDACTED] was discussing or had discussed potential future employment opportunities or business relationships connected to Jeffrey Epstein before Jeffrey Epstein entered his state court guilty plea.
6. The FBI and/or the Justice Department received information that, after leaving his employment at the U.S. Attorneys Office for the Southern District of Florida, [REDACTED] benefitted financially or otherwise from a connection to Jeffrey Epstein
7. The U.S. Attorneys' Office for the Southern District of Florida or other components of the Justice Department received information that [REDACTED] was discussing or had discussed potential future employment opportunities or business relationship connected to Jeffrey Epstein before Jeffrey Epstein entered his state court guilty plea.
8. The FBI received information that [REDACTED] was discussing or had discussed a potential future employment opportunity or business relationship connected to Jeffrey Epstein before Jeffrey Epstein entered his state court guilty plea.
9. The FBI and/or the Justice Department received information that, after leaving his employment at the U.S. Attorneys Office for the Southern District of Florida, [REDACTED] benefitted financially or otherwise from a connection to Jeffrey Epstein
10. Employees of the FBI discussed with each other a concern that an employee or employees in the U.S. Attorney's Office for the Southern District of Florida was discussing possible employment benefits or other favors that he might receive after the Epstein case was concluded.
11. The Government possesses, or has knowledge or information (including telephone logs, photographs, emails or statement(s) of other credible sources) about an actual, potential or indirect personal or business relationship between Jeffrey Epstein and:
  - (a) [REDACTED]
  - (b) [REDACTED]

12. The FBI has information, including emails, regarding possible improper influences brought to bear on the U.S. Attorney's Office for the Southern District of Florida in connection with the Epstein case.

## **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, 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 "connected" means linked to related in any way, including having any social, professional or commercial relationship. With regard to employment opportunities connected to Epstein, the term includes (but is not limited to) referrals to potential clients, leads for potential clients, or providing any other information that might lead to a favorable business opportunity.

The term "relationship" means any type of connection in any fashion, including commercial, personal, and social connections.

The term "Epstein's victims" means any person that the Government identified as a possible victim of a sex offense committed by Jeffrey Epstein, including Jane Doe #1, Jane Doe #2, 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, and any and all parts or components of 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.

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

The term "U.S. Attorney's Office" means the U.S. Attorney's Office for the Southern District of Florida and includes all branch offices within the Southern District of Florida.

### **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: August 29, 2016

Respectfully Submitted,

s/ Bradley J. Edwards  
Bradley J. Edwards  
FARMER, JAFFE, WEISSING,  
EDWARDS, FISTOS & LEHRMAN, P.L.  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, Florida 33301



*and*

Paul G. Cassell  
*Pro Hac Vice*  
S.J. Quinney College of Law at the  
University of Utah  
332 S. 1400 E.  
Salt Lake City, UT 84112



[REDACTED]  
Attorneys for Jane Doe #1 and Jane Doe #2

**CERTIFICATE OF SERVICE**

The foregoing document was served on December 1, 2011, on the following persons via US Mail

and electronic mail to:

[REDACTED]  
Assistant U.S. Attorneys  
500 S. Australian Ave., Suite 400  
West Palm Beach, FL 33401

[REDACTED]  
Attorneys for the Government