

[REDACTED]

From: [REDACTED]
Sent: Friday, September 26, 2008 2:05 PM
To: bertpatton@podhurst.com; MERCEDES C. ESTRADA
Subject: Civil Cases Involving Jeffrey Epstein

Hi all – I just received Bert’s voicemail message. I do not know all of the case numbers of cases involving Jeffrey Epstein. If you go to the District Court’s PACER site, and search for the party name of Jeffrey Epstein, they will all come up. The press also has reported that some cases were recently filed in Palm Beach County state court. You can do a similar search on the Clerk of Court’s website to find all of the state court cases.

Thank you.

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

[REDACTED]

From: Jay Lefkowitz [JLefkowitz@kirkland.com]
Sent: Wednesday, October 08, 2008 2:40 PM
To: [REDACTED]; Roy Black
Cc: [REDACTED]
Subject: Re: Jane Does [REDACTED], United States

Thank you for sending this.

Jay

From: [REDACTED]
Sent: 10/08/2008 02:37 PM AST
To: <RBlack@RoyBlack.com>; Jay Lefkowitz
Cc: " [REDACTED]"; Karen Atkinson@usdoj.gov; [REDACTED]; Dexter.Lee@usdoj.gov
Subject: Jane Does [REDACTED], United States

Dear Roy and Jay:

I am attaching the United States' Response to the Petitioners' Motion to Unseal the Non-Prosecution Agreement, which was filed in the victims' rights suit filed against the United States by Attorney Brad Edwards on behalf of two of the victims. In his motion to unseal, Attorney Edwards stated that he would provide notice of his motion to counsel for Mr. Epstein. I do not know if he actually did so.

In our response, we oppose the Petitioners' motion, and point out that Mr. Edwards has filed a civil suit against Mr. Epstein and that litigation regarding the Non-Prosecution Agreement is more appropriate in that forum where the real party in interest (Mr. Epstein) is a party to the suit.

<<DE29_081008_Resp to Motn Unseal.pdf>>

[REDACTED]

Assistant U.S. Attorney

561 209-1047

Fax 561 820-8777

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communication in error, please notify us immediately by
return e-mail or by e-mail to postmaster@kirkland.com, and
destroy this communication and all copies thereof,
including all attachments.

[REDACTED]

From: [REDACTED]
Sent: Wednesday, October 08, 2008 2:38 PM
To: RBlack@RayBlack.com; Jay Lefkowitz
Cc: [REDACTED]
Subject: Jane Does, United States

Dear Roy and Jay:

I am attaching the United States' Response to the Petitioners' Motion to Unseal the Non-Prosecution Agreement, which was filed in the victims' rights suit filed against the United States by Attorney Brad Edwards on behalf of two of the victims. In his motion to unseal, Attorney Edwards stated that he would provide notice of his motion to counsel for Mr. Epstein. I do not know if he actually did so.

In our response, we oppose the Petitioners' motion, and point out that Mr. Edwards has filed a civil suit against Mr. Epstein and that litigation regarding the Non-Prosecution Agreement is more appropriate in that forum where the real party in interest (Mr. Epstein) is a party to the suit.



DE29_081008_R
p to Motn Unsea

[REDACTED]
Assistant U.S. Attorney
561 209-1047
Fax 561 820-8777

Tracking:

[REDACTED]

From: Lilly [REDACTED] Sanchez [LAS@FOWLER-WHITE.COM]
Sent: Friday, December 01, 2006 8:40 AM
To: [REDACTED]
Subject: JE

[REDACTED] -
I hope that the two weeks you will be out of the district is for a well-deserved vacation. I have been so busy lately that I am also looking forward to taking some time off closer to the end of the year.

I am planning to be out of the office the weeks of Dec. 18 and Dec. 25 to spend much quality time with my son who is now 8 years old and growing up too fast. Since it looks like we will miss each other before the New Year, I will be in touch at that time and hopefully we will be able to meet shortly thereafter. In the interim, I will check on the document requests you made and get back to you. Regards.

Lilly [REDACTED] Sanchez, Esq.
FOWLER WHITE BURNETT P.A.
Espirito Santo Plaza, 14th Floor
1395 Brickell Avenue
Miami, Florida 33131-3302
Telephone: (305) 789-9200
Direct Dial: (305) 789-9279
Facsimile: (305) 789-9201
lsanchez@fowler-white.com

>>> "[REDACTED] c. (USAPLS)"
<[REDACTED]> 11/17/2006 9:22 AM >>> Hi Lilly -- This is the correct e-mail address. I hope that you received the letter that I faxed yesterday. I will be out of the office today, but I will be back on Monday.

Thank you.

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, Florida
Phone 561 209-1047
Fax 561 820-8777
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Tuesday, May 22, 2007 6:33 PM
To: [REDACTED]
Subject: FW: Jeffrey Epstein

fyi

From: [REDACTED]
Sent: Tuesday, May 22, 2007 6:32 PM
To: 'Gerald Lefcourt'
Subject: RE: Jeffrey Epstein

I have your letter. I think we are on the same page, but to be sure I do want to clarify that we spoke the other week and I did say that if you want to meet with me again, I am ready to do so. The wording of your letter, however, suggests implicitly that I agreed to contact you before a decision is made to seek an indictment of Mr. Epstein. If that was your understanding, then please allow me to clarify. Our investigation is ongoing and if we decide to seek an indictment, we don't intend to call Mr. Epstein's representatives to let him know that. Of course, in the interim, if you would like to make a presentation to us, we are willing to listen.

Along those lines, given the fact that we have already met once, with schedules being what they are, it makes sense for our criminal chief, [REDACTED], to be included when you make another presentation, rather than working up the chain incrementally. I realize you were being respectful in not attempting to leapfrog over me, which I appreciate. I will pass on your request to meet with the U.S. Attorney as well, but can't commit for him one way or another. When you have some dates in mind, let me know and I will try to set up a meeting in Miami.

From: Gerald Lefcourt [mailto:GBL@lefcourtlaw.com]
Sent: Tuesday, May 22, 2007 2:05 PM
To: [REDACTED]
Cc: [REDACTED] C. (USAFS); Lilly [REDACTED] Sanchez
Subject: Jeffrey Epstein

[REDACTED] attached is a letter seeking meetings, as discussed with you, but with others if it is not resolved. Thanks for your attention. Could you email back so that I know you have received this letter?

Gerald B. Lefcourt
Gerald B. Lefcourt, P.C.
148 E. 78th Street
New York, New York 10021
Tel. [REDACTED]
Fax [REDACTED]
gbl@lefcourtlaw.com

[REDACTED]

From: [REDACTED] C. (USAFLS)
Sent: Monday, February 12, 2007 3:43 PM
To: Lilly [REDACTED] Sanchez
Subject: RE: Epstein Matter

Thank you, Lilly.

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401
561 820-8711
Fax 561 820-8777
[REDACTED]

From: Lilly Ann Sanchez [mailto:LAS@FOWLER-WHITE.COM]
Sent: Monday, February 12, 2007 1:45 PM
[REDACTED]
Subject: Re: Epstein Matter

[REDACTED]
i received your email. i will speak to gerry and get back to you shortly on both items.
hope you are well.
regards

Lilly [REDACTED] Sanchez, Esq.
FOWLER WHITE BURNETT P.A.
Espirito Santo Plaza, 14th Floor
1395 Brickell Avenue
Miami, Florida 33131-3302
Telephone: (305) 789-9200
Direct Dial: (305) 789-9279
Facsimile: (305) 789-9201
lsanchez@fowler-white.com

/// [REDACTED] C. (USAFLS) [REDACTED] @usdoj.gov 2/12/2007 12:24 PM ///

Hi Lilly -- Please let Gerry know that I took his comments to heart and I am re-reviewing all of the tapes. I noticed that he had transcripts of at least some of the tapes. Any chance you would be willing to share those with me? It would make the review oh so much quicker.

And, could you send me the list of the lawyers who represent current or former employees? Before you ask, Rule 6(e) requires that I keep matters before the grand jury secret, so I cannot tell you who or what I am subpoenaing. If the subpoenaed party (or his/her attorney) decides to disclose that information to you, that is his/her prerogative, but I can't do it.

Thank you very much.

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Ste 400

West Palm Beach, FL 33401
561 820-8711
Fax 561 820-8777
[REDACTED]

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[REDACTED]

From: Lilly Ann Sanchez [LAS@FOWLER-WHITE.COM]
Sent: Monday, February 12, 2007 1:45 PM
To: [REDACTED]
Subject: Re: Epstein Matter

[REDACTED]
I received your email. I will speak to gerry and get back to you shortly on both items.
hope you are well.
regards

Lilly Ann Sanchez, Esq.
FOWLER WHITE BURNETT P.A.
Espirito Santo Plaza, 14th Floor
1395 Brickell Avenue
Miami, Florida 33131-3302
Telephone: (305) 789-9200
Direct Dial: (305) 789-9279
Facsimile: (305) 789-9201
lsanchez@fowler-white.com

[REDACTED]

Hi Lilly -- Please let Gerry know that I took his comments to heart and I am re-reviewing all of the tapes. I noticed that he had transcripts of at least some of the tapes. Any chance you would be willing to share those with me? It would make the review oh so much quicker.

And, could you send me the list of the lawyers who represent current or former employees? Before you ask, Rule 6(e) requires that I keep matters before the grand jury secret, so I cannot tell you who or what I am subpoenaing. If the subpoenaed party (or his/her attorney) decides to disclose that information to you, that is his/her prerogative, but I can't do it.

Thank you very much.

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401
561 820-8711
Fax 561 820-8777
[REDACTED]@usdoj.gov

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[REDACTED]

From: [REDACTED]
Sent: Monday, February 12, 2007 12:25 PM
To: Sanchez, Lilly Ann (lsanchez@fowler-white.com)
Subject: Epstein Matter

Contacts: Lilly Ann Sanchez

Hi Lilly -- Please let Gerry know that I took his comments to heart and I am re-reviewing all of the tapes. I noticed that he had transcripts of at least some of the tapes. Any chance you would be willing to share those with me? It would make the review oh so much quicker.

And, could you send me the list of the lawyers who represent current or former employees? Before you ask, Rule 6(e) requires that I keep matters before the grand jury secret, so I cannot tell you who or what I am subpoenaing. If the subpoenaed party (or his/her attorney) decides to disclose that information to you, that is his/her prerogative, but I can't do it.

Thank you very much.

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401
561 820-8711
Fax 561 820-8777
[REDACTED]@usdoj.gov

[REDACTED]

From: [REDACTED], [REDACTED] C. (USAFLS)
Sent: Friday, February 02, 2007 3:29 PM
To: BigJimLaw@aol.com
Subject: RE: [REDACTED]

Hi Jim -- I just received your letter. It, of course, contains a number of topics, but I will address only the first. I have conferred with our victim-witness coordinator, who tells me that we can reimburse Ms. [REDACTED] for childcare expenses. I need an estimate to prepare the request and then, after the testimony, if Ms. [REDACTED] provides me with the amount of money that she actually paid, we can reimburse that amount.

As for the remainder of the letter, I am a big believer in actions speaking louder than words, so the only way to prove that I am exercising independent judgment is to do so. I intend to do a thorough independent investigation so that I can make a reasoned decision about the matter. I cannot do that if witnesses who are not targets refuse to speak to me, even with assurances that their statements will not be used against them.

As soon as I know the grand jury's schedule, I will call you with the time.

Thank you.

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401
561 820-8711
Fax 561 820-8777
[REDACTED]@usdoj.gov

From: BigJimLaw@aol.com [mailto:BigJimLaw@aol.com]
Sent: Friday, February 02, 2007 9:36 AM
To: [REDACTED], [REDACTED] C. (USAFLS)
Subject: Re: [REDACTED]

I just wrote you a letter confirming that Ms. [REDACTED] will be at the grand jury room with me. Please keep me informed as to the time. I must warn you, my letter is critical of your office, although not at all critical of you. If you change your mind about forcing Ms. [REDACTED] to appear, please e-mail or call at once so she does not have to make arrangements for child care to be in court. Thanks, Jim Eisenberg

██████████, ██████████ ██████████ C. (USAFLS)

From: BigJimLaw@aol.com
Sent: Friday, February 02, 2007 9:36 AM
To: ██████████ ██████████ C. (USAFLS)
Subject: Re: ██████████

I just wrote you a letter confirming that Ms. ██████████ will be at the grand jury room with me. Please keep me informed as to the time. I must warn you, my letter is critical of your office, although not at all critical of you. If you change your mind about forcing Ms. ██████████ to appear, please e-mail or call at once so she does not have to make arrangements for child care to be in court. Thanks, Jim Eisenberg

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Friday, February 02, 2007 9:02 AM
To: James ██████████ Eisenberg (bigjimlaw@aol.com)
Subject: ██████████

Contacts: James ██████████ Eisenberg

Hi Jim -- Will Ms. ██████████ appear at the grand jury on Tuesday? I believe that we will start at 1:00, but I won't know for certain until later today or Monday.

Thank you.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401
561 820-8711
Fax 561 820-8777
██

██████████, ██████████ ██████████ C. (USAFLS)

From: Lilly Ann Sanchez [LAS@FOWLER-WHITE.COM]
Sent: Friday, January 05, 2007 4:05 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Cc: Gerald Lefcourt
Subject: Jeffrey Epstein

██████████
hope you had a great holiday season. Gerald Lefcourt and I would like to speak with you early next week on the Epstein matter. if you provide me with some convenient dates and times for us to call you, i will coordinate with Gerry and confirm same.
regards

Lilly Ann Sanchez, Esq.
FOWLER WHITE BURNETT P.A.
Espirito Santo Plaza, 14th Floor
1395 Brickell Avenue
Miami, Florida 33131-3302
Telephone: (305) 789-9200
Direct Dial: (305) 789-9279
Facsimile: (305) 789-9201
lsanchez@fowler-white.com

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██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Thursday, February 15, 2007 3:51 PM
To: Lilly Ann Sanchez
Subject: RE: JE

Great. We will see you then.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401
561 820-8711
Fax 561 820-8777
██

From: Lilly Ann Sanchez [mailto:LAS@FOWLER-WHITE.COM]
Sent: Thursday, February 15, 2007 3:41 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: RE: JE

absolutely not.....in that case, gerry and i may come in jeans.

Lilly Ann Sanchez, Esq.
FOWLER WHITE BURNETT P.A.
Espirito Santo Plaza, 14th Floor
1395 Brickell Avenue
Miami, Florida 33131-3302
Telephone: (305) 789-9200
Direct Dial: (305) 789-9279
Facsimile: (305) 789-9201
lsanchez@fowler-white.com

>>> "██████████, ██████████ ██████████ C. (USAFLS)" <██████████@usdoj.gov> 2/15/2007 3:20 PM >>>
Hi Lilly -- This is a silly question but I know some people from an earlier generation get upset. The agents and I had set aside next week to go through all the tapes, so we are setting up a warroom and I was planning to just wear jeans. Do you think Gerry would be offended?

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401
561 820-8711
Fax 561 820-8777
██@usdoj.gov

From: Lilly Ann Sanchez [mailto:LAS@FOWLER-WHITE.COM]
Sent: Thursday, February 15, 2007 3:18 PM
To: [REDACTED], [REDACTED] C. (USAFLS)
Subject: JE

confirmed meeting on Tuesday at 10am with gerry lefcourt.
see you then.
safe trip.

Lilly Ann Sanchez, Esq.
FOWLER WHITE BURNETT P.A.
Espirito Santo Plaza, 14th Floor
1395 Brickell Avenue
Miami, Florida 33131-3302
Telephone: (305) 789-9200
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██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Thursday, February 15, 2007 3:21 PM
To: Lilly Ann Sanchez
Subject: RE: JE

Hi Lilly -- This is a silly question but I know some people from an earlier generation get upset. The agents and I had set aside next week to go through all the tapes, so we are setting up a warroom and I was planning to just wear jeans. Do you think Gerry would be offended?

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401
561 820-8711
Fax 561 820-8777
██████████@usdoj.gov

From: Lilly Ann Sanchez [mailto:LAS@FOWLER-WHITE.COM]
Sent: Thursday, February 15, 2007 3:18 PM
To: ██████████, Ann ██████████ C. (USAFLS)
Subject: JE

confirmed meeting on Tuesday at 10am with gerry lefcourt.
see you then.
safe trip.

Lilly Ann Sanchez, Esq.
FOWLER WHITE BURNETT P.A.
Espirito Santo Plaza, 14th Floor
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contact the sender by reply E-mail and destroy all copies of the original message. Thank you.

██████████, ██████████ ██████████ C. (USAFLS)

From: Lilly Ann Sanchez [LAS@FOWLER-WHITE.COM]
Sent: Thursday, February 15, 2007 3:18 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: JE

confirmed meeting on Tuesday at 10am with gerry lefcourt.
see you then.
safe trip.

Lilly Ann Sanchez, Esq.
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Espirito Santo Plaza, 14th Floor
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██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Tuesday, February 13, 2007 4:41 PM
To: Bruce M. Lyons (brucelyons@aol.com)
Subject: Adrianna Ross

Contacts: Bruce M. Lyons

Hi Bruce -- I was hoping I could get that factual proffer from you so I can see what the Office wants to do regarding immunity.

On a totally unrelated note, are you related to Dennis Lyons from the Chicago area?

Thank you.

A. ██████████
██████████y
561 209-1047
Fax 561 820-8777
██████████@usdoj.gov

Villafana, [REDACTED] Marie C. (USAFLS)

From: [REDACTED] C. (USAFLS)
Sent: Friday, February 23, 2007 1:37 PM
To: Sanchez, Lilly Ann (lsanchez@fowler-white.com)
Subject: Transcripts

Hi Lilly -- I talked to Nesbitt, and we would like to get the transcripts of [REDACTED] and [REDACTED], if possible. Thank you very much for interceding on our behalf.

Have a very good weekend.

A. [REDACTED]
Assistant U.S. Attorney
561 209-1047
Fax 561 820-8777
[REDACTED].mar[REDACTED]a@usdoj.gov

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Wednesday, April 25, 2007 5:39 PM
To: BruceLyons@aol.com
Subject: RE: Epstein Corporations
Attachments: Hyperion Subpoena001.pdf; JEJE Subpoena001.pdf

Hi Bruce -- I tried faxing these a couple of times but your fax machine wasn't picking up, so I just scanned them in.

These are the JEJE and Hyperion Subpoenas. I will wait to hear from you about the other items. Thank you.

A. ██████████ ██████████
Assistant U.S. Attorney
561 209-1047
Fax 561 820-8777
██████████@usdoj.gov

From: BruceLyons@aol.com [mailto:BruceLyons@aol.com]
Sent: Wednesday, April 25, 2007 4:49 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: Re: Epstein Corporations

I will get you the information on his NY counsel and find out the other info you request.

See what's free at AOL.com.

[REDACTED], [REDACTED] C. (USAFLS)

From: [REDACTED], [REDACTED] C. (USAFLS)
Sent: Wednesday, April 25, 2007 11:49 AM
To: info@ctadvantage.com
Subject: Service on a Delaware Corporation

Dear Sir or Madam:

I have a federal grand jury subpoena that needs to be served on a Delaware corporation for which CT Corporation is listed as the registered agent. Do you accept service via facsimile and/or via e-mail?

Thank you for your kind assistance.

A. [REDACTED]
Assistant U.S. Attorney
561 209-1047
Fax 561 820-8777
[REDACTED]

[REDACTED] C. (USAFLS)

From: [REDACTED] C. (USAFLS)
Sent: Wednesday, February 28, 2007 11:28 AM
To: BigJimLaw@aol.com
Subject: [REDACTED]

Hi Jim -- Your favorite AUSA contacting you about your favorite client. I hope all is well. I reviewed the proffer and I will make the request to Washington. I will be out of town next week, but hopefully will have an answer by the time I return. Thank you.

A. [REDACTED]
Assistant U.S. Attorney
561 209-1047
Fax 561 820-8777
[\[REDACTED\]llafana@usdoj.gov](mailto:[REDACTED]llafana@usdoj.gov)

██████████, ██████████ C. (USAFLS)

From: Gerald Lefcourt [GBL@lefcourtlaw.com]
Sent: Wednesday, July 18, 2007 5:19 PM
To: ██████████, ██████████ C. (USAFLS)
Cc: Lilly Ann Sanchez; Roy BLACK
Subject: RE: Jeffrey Epstein
Attachments: 2007-07-18 ██████████ re NES subpoena.pdf

██████████ please consider this letter in response to the subpoena to NES.

Gerald B. Lefcourt
Gerald B. Lefcourt, P.C.
148 E. 78th Street
New York, New York 10021
Tel. ██████████
Fax ██████████
gbl@lefcourtlaw.com

-----Original Message-----

From: ██████████, ██████████ C. (USAFLS) [mailto:██████████]
Sent: Wednesday, July 04, 2007 4:07 PM
To: Lilly Ann Sanchez
Cc: Gerald Lefcourt
Subject: RE: Jeffrey Epstein

Dear Lilly and Gerry: Thank you for your e-mail and your message. This e-mail was supposed to have gone out yesterday while I was in trial. I have no objection to the two-week extension with respect to NES, New York Strategy Group, and Epstein Virgin Islands Foundation.

With respect to the subpoena to the investigator, I would like to get the computer equipment as soon as possible. If you prefer to simply turn over the equipment without anyone appearing before the grand jury that is fine. If we proceed that way, we can defer litigating the issue of the applicability of the attorney-client and/or work product privilege to information related to how and why the equipment was removed. I will be in trial this week, so please contact Jason Richards at the FBI directly at 561 833-7517.

I look forward to your July 11th submission. If you would like to discuss the possibility of a federal resolution of Mr. Epstein's case that could run concurrently with any state resolution, please leave a message on my voicemail at the office (561 209-1047) and I will get back to you after trial has ended for the day.

Thank you.

A. ██████████
Assistant U.S. Attorney

561 209-1047

-----Original Message-----

From: Lilly Ann Sanchez [mailto:LAS@FOWLER-WHITE.COM]
Sent: Friday, June 29, 2007 4:05 PM
To: [REDACTED], [REDACTED] C. (USAFLS)
Cc: Gerald Lefcourt
Subject: Jeffrey Epstein

[REDACTED]-

As i stated in my earlier voicemail today, we were calling to request a two-week extension on the return date of the following outstanding subpoenas:

1. NES
2. NY Strategy
3. Investigator Riley
4. Certification for St. Thomas entity

We will be providing an additional submission to the Office by July 11 and hope to be able to reach a state-based resolution shortly thereafter.

as your voicemail to me indicated, you would not oppose a one to two-week extension. accordingly, we would like to extend the return date two weeks-- to July 24.

regards

Lilly Ann Sanchez, Esq.
FOWLER WHITE BURNETT P.A.
Espirito Santo Plaza, 14th Floor
1395 Brickell Avenue
Miami, Florida 33131-3302
Telephone: (305) 789-9200
Direct Dial: (305) 789-9279
Facsimile: (305) 728-7579
lsanchez@fowler-white.com

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ C. (USAFLS)
Sent: Friday, July 06, 2007 9:25 AM
To: 'Sanchez, Lilly Ann (lsanchez@fowler-white.com)'; Gerald Lefcourt
Subject: Extension of Time re Computer Subpoena

Hi Lilly and Gerry – I hope you are enjoying your time off. Your request to extend the time to respond to the Riley and Riley-Kiraly subpoenas is fine. I will schedule time with the grand jury on July 17th, so if you intend to move to quash the subpoenas, please file your papers not later than July 16th.

FYI--United States District Judge Middlebrooks is assigned to handle matters related to the relevant grand jury. As I am sure you know, pursuant to Fed. R. Crim. P. 6(e)(6), any such motion must be filed under seal.

Thank you.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████ ██████████ C. (USAFLS)
Sent: Wednesday, July 04, 2007 4:07 PM
To: 'Lilly Ann Sanchez'
Cc: Gerald Lefcourt
Subject: RE: Jeffrey Epstein

Dear Lilly and Gerry: Thank you for your e-mail and your message. This e-mail was supposed to have gone out yesterday while I was in trial. I have no objection to the two-week extension with respect to NES, New York Strategy Group, and Epstein Virgin Islands Foundation.

With respect to the subpoena to the investigator, I would like to get the computer equipment as soon as possible. If you prefer to simply turn over the equipment without anyone appearing before the grand jury that is fine. If we proceed that way, we can defer litigating the issue of the applicability of the attorney-client and/or work product privilege to information related to how and why the equipment was removed. I will be in trial this week, so please contact Jason Richards at the FBI directly at 561 833-7517.

I look forward to your July 11th submission. If you would like to discuss the possibility of a federal resolution of Mr. Epstein's case that could run concurrently with any state resolution, please leave a message on my voicemail at the office (561 209-1047) and I will get back to you after trial has ended for the day.

Thank you.

A. ██████████ ██████████
Assistant U.S. Attorney
561 209-1047

-----Original Message-----

From: Lilly Ann Sanchez [mailto:LAS@FOWLER-WHITE.COM]
Sent: Friday, June 29, 2007 4:05 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Cc: Gerald Lefcourt
Subject: Jeffrey Epstein

██████████ -
As i stated in my earlier voicemail today, we were calling to request a two-week extension on the return date of the following outstanding subpoenas:

1. NES
2. NY Strategy
3. Investigator Riley
4. Certification for St. Thomas entity

We will be providing an additional submission to the Office by July 11 and hope to be able to reach a state-based resolution shortly thereafter.

as your voicemail to me indicted, you would not oppose a one to two-week extension. accordingly, we would like to extend the return date two weeks-- to July 24.
regards

Lilly Ann Sanchez, Esq.
FOWLER WHITE BURNETT P.A.
Espirito Santo Plaza, 14th Floor
1395 Brickell Avenue
Miami, Florida 33131-3302
Telephone: (305) 789-9200
Direct Dial: (305) 789-9279
Facsimile: (305) 728-7579
lsanchez@fowler-white.com

Tracking:

100

08-80736-CV_MARRA

002143

EFTA00227257

██████████ C. (USAFLS)

From: Lilly Ann Sanchez [LAS@FOWLER-WHITE.COM]
Sent: Friday, June 29, 2007 4:05 PM
To: ██████████ C. (USAFLS)
Cc: Gerald Lefcourt
Subject: Jeffrey Epstein

██████████ -
As i stated in my earlier voicemail today, we were calling to request a two-week extension on the return date of the following outstanding subpoenas:

1. NES
2. NY Strategy
3. Investigator Riley
4. Certification for St. Thomas entity

We will be providing an additional submission to the Office by July 11 and hope to be able to reach a state-based resolution shortly thereafter.

as your voicemail to me indicted, you would not oppose a one to two-week extension. accordingly, we would like to extend the return date two weeks-- to July 24.

regards

Lilly Ann Sanchez, Esq.
FOWLER WHITE BURNETT P.A.
Espirito Santo Plaza, 14th Floor
1395 Brickell Avenue
Miami, Florida 33131-3302
Telephone: (305) 789-9200
Direct Dial: (305) 789-9279
Facsimile: (305) 728-7579
lsanchez@fowler-white.com

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████ ██████████ C. (USAFLS)
Sent: Monday, June 25, 2007 4:54 PM
To: Sanchez, Lilly Ann (lsanchez@fowler-white.com)
Subject: Your letter

Hi Lilly – I did get a copy of your letter, thanks. I will see you tomorrow morning.

Regards,

██████████

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Wednesday, June 13, 2007 5:48 PM
To: GBL@leftcourtlaw.com; Sanchez, Lilly Ann (lsanchez@fowler-white.com)
Subject: Another Corporation

Dear Gerry and Lilly: Sorry to trouble you yet again, but are you authorized to accept service of a subpoena for NES, LLC?

Thank you again.

A. ██████████ ██████████
Assistant U.S. Attorney
561 209-1047

██████████, ██████████ ██████████ C. (USAFLS)

From: Faith A. Friedman [FFriedman@lefcourtlaw.com]
Sent: Tuesday, June 12, 2007 5:45 PM
To: ██████████, ██████████ C. (USAFLS)
Cc: Gerald Lefcourt
Subject: Subpoenas dated May 31, 2007, to J. Epstein Virgin Islands Foundation, Inc.; J. Epstein & Co., Inc.; Epstein Interests; and Financial Trust Company, Inc.
Attachments: 2007-06-12 to ██████████ w subpoena material.pdf

Dear Ms. ██████████:

At Mr. Lefcourt's request, I hereby provide you with responses to the subpoenas served on the above entities all of which were dated May 31, 2007. I note that the original, along with the documents referenced therein, was sent to your office this afternoon by Federal Express. If you do not receive these items or have any questions please do not hesitate to contact Mr. Lefcourt.

Very truly yours,

Faith A. Friedman, Esq.
Law Offices of Gerald B. Lefcourt, P.C.
148 East 78th Street
New York, New York 10021
██████████ x327
email: ffriedman@lefcourtlaw.com

██████████, ██████████ C. (USAFLS)

From: ██████████, ██████████ C. (USAFLS)
Sent: Thursday, May 31, 2007 8:26 PM
To: Gerald Lefcourt
Cc: Ball, Shawn (USAFLS)
Subject: RE: Representation of Financial Trust Company, Inc., J. Epstein & Company, Inc., and other corporate entities

Hi Gerry – Sorry. I was out and then I had to start trial. You will receive them tomorrow. Thank you again.

A. ██████████
Assistant U.S. Attorney
561 209-1047

From: Gerald Lefcourt [mailto:GBL@lefcourtlaw.com]
Sent: Thursday, May 31, 2007 11:56 AM
To: ██████████, ██████████ C. (USAFLS)
Cc: Lilly Ann Sanchez
Subject: RE: Representation of Financial Trust Company, Inc., J. Epstein & Company, Inc., and other corporate entities

██████████, when we spoke last Thursday I agreed to accept service of a subpoena (without promising I would represent Financial Trust depending on what was being requested) that I think you said you would fax. This is just to let you know that I never received any fax to that end -- just in case it was sent somewhere else in error.

Gerald B. Lefcourt
Gerald B. Lefcourt, P.C.
148 E. 78th Street
New York, New York 10021
Tel. ██████████
Fax ██████████
gbl@lefcourtlaw.com

From: ██████████, ██████████ C. (USAFLS) [mailto:██████████]
Sent: Tuesday, May 22, 2007 7:14 PM
To: Gerald Lefcourt
Subject: Representation of Financial Trust Company, Inc., J. Epstein & Company, Inc., and other corporate entities

Dear Gerry: I noticed that, at least as of July 2005, you have served as counsel to Financial Trust Company, Inc. in connection with litigation. Can you let me know if you still represent Financial Trust Company, Inc., and if you represent J. Epstein & Company, Inc., J. Epstein Virgin Islands Foundation, Inc., and/or Epstein Interests?

If you represent any or all of those entities, are you willing to accept service of subpoenas via fax?

Thank you for your assistance.

██████████

A. [REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone 561 209-1047

Fax 561 820-8777

██████████ C. (USAFLS)

From: Gerald Lefcourt [GBL@lefcourtlaw.com]
Sent: Thursday, May 31, 2007 11:56 AM
To: ██████████, ██████████ C. (USAFLS)
Cc: Lilly ██████████ Sanchez
Subject: RE: Representation of Financial Trust Company, Inc., J. Epstein & Company, Inc., and other corporate entities

██████████, when we spoke last Thursday I agreed to accept service of a subpoena (without promising I would represent Financial Trust depending on what was being requested) that I think you said you would fax. This is just to let you know that I never received any fax to that end -- just in case it was sent somewhere else in error.

Gerald B. Lefcourt
Gerald B. Lefcourt, P.C.
148 E. 78th Street
New York, New York 10021
Tel. ██████████
Fax ██████████
gbl@lefcourtlaw.com

From: ██████████, ██████████ C. (USAFLS) [mailto:Ann. ██████████]
Sent: Tuesday, May 22, 2007 7:14 PM
To: Gerald Lefcourt
Subject: Representation of Financial Trust Company, Inc., J. Epstein & Company, Inc., and other corporate entities

Dear Gerry: I noticed that, at least as of July 2005, you have served as counsel to Financial Trust Company, Inc. in connection with litigation. Can you let me know if you still represent Financial Trust Company, Inc., and if you represent J. Epstein & Company, Inc., J. Epstein Virgin Islands Foundation, Inc., and/or Epstein Interests?

If you represent any or all of those entities, are you willing to accept service of subpoenas via fax?

Thank you for your assistance.

██████████
A. ██████████ ██████████

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone 561 209-1047

Fax 561 820-8777

[REDACTED], [REDACTED] C. (USAFLS)

From: [REDACTED]
Sent: Thursday, May 24, 2007 9:25 AM
To: [REDACTED], [REDACTED] C. (USAFLS)
Subject: FW: Jeffrey Epstein

Please put in your file. thx

From: Gerald Lefcourt [mailto:GBL@lefcourtlaw.com]
Sent: Wednesday, May 23, 2007 5:00 PM
To: [REDACTED]
Subject: RE: Jeffrey Epstein

Thanks for the email. I will get back to you as to timing of the meeting.

Gerald B. Lefcourt
Gerald B. Lefcourt, P.C.
148 E. 78th Street
New York, New York 10021
Tel. [REDACTED]
Fax [REDACTED]
gbL@lefcourtlaw.com

From: [REDACTED] [mailto:Andrew.Lourie@usdoj.gov]
Sent: Tuesday, May 22, 2007 6:32 PM
To: Gerald Lefcourt
Subject: RE: Jeffrey Epstein

I have your letter. I think we are on the same page, but to be sure I do want to clarify that we spoke the other week and I did say that if you want to meet with me again, I am ready to do so. The wording of your letter, however, suggests implicitly that I agreed to contact you before a decision is made to seek an indictment of Mr. Epstein. If that was your understanding, then please allow me to clarify. Our investigation is ongoing and if we decide to seek an indictment, we don't intend to call Mr. Epstein's representatives to let him know that. Of course, in the interim, if you would like to make a presentation to us, we are willing to listen.

Along those lines, given the fact that we have already met once, with schedules being what they are, it makes sense for our criminal chief, [REDACTED], to be included when you make another presentation, rather than working up the chain incrementally. I realize you were being respectful in not attempting to leapfrog over me, which I appreciate. I will pass on your request to meet with the U.S. Attorney as well, but can't commit for him one way or another. When you have some dates in mind, let me know and I will try to set up a meeting in Miami.

From: Gerald Lefcourt [mailto:GBL@lefcourtlaw.com]
Sent: Tuesday, May 22, 2007 2:05 PM
To: [REDACTED]
Cc: [REDACTED] C. (USAFLS); Lilly [REDACTED] Sanchez
Subject: Jeffrey Epstein

█, attached is a letter seeking meetings, as discussed with you, but with others if it is not resolved. Thanks for your attention. Could you email back so that I know you have received this letter?

Gerald B. Lefcourt
Gerald B. Lefcourt, P.C.
148 E. 78th Street
New York, New York 10021
Tel. █
Fax █
gbl@lefcourtlaw.com

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Tuesday, May 22, 2007 7:14 PM
To: GBL@lefcourtlaw.com
Subject: Representation of Financial Trust Company, Inc., J. Epstein & Company, Inc., and other corporate entities

Dear Gerry: I noticed that, at least as of July 2005, you have served as counsel to Financial Trust Company, Inc. in connection with litigation. Can you let me know if you still represent Financial Trust Company, Inc., and if you represent J. Epstein & Company, Inc., J. Epstein Virgin Islands Foundation, Inc., and/or Epstein Interests?

If you represent any or all of those entities, are you willing to accept service of subpoenas via fax?

Thank you for your assistance.

██████████

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Tuesday, May 22, 2007 7:12 PM
To: GBL@lefcourtlaw.com
Subject: Representation of Financial Trust Company, Inc., J. Epstein & Company, Inc., and other corporate entities

Dear Gerry: I noticed that, at least as of July 2005, you have served as counsel to Financial Trust Company, Inc. in connection with litigation. Can you let me know if you still represent Financial Trust Company, Inc., and if you represent J. Epstein & Company, Inc., J. Epstein Virgin Islands Foundation, Inc., and/or Epstein Interests?

If you represent any or all of those entities, are you willing to accept service of subpoenas via fax?

Thank you for your assistance.

██████████

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Tracking:

██████████ C. (USAFLS)

From: ██████████
Sent: Thursday, August 02, 2007 12:56 PM
To: ██████████ (USAFLS); ██████████ C. (USAFLS); ██████████
Subject: FW: JE -- letter
Attachments: ██████████

FYI

-----Original Message-----

From: Lilly ██████ Sanchez [mailto:las@FOWLER-WHITE.COM]
Sent: Thursday, August 02, 2007 12:38 PM
To: ██████████
Cc: Jacqueline Borrero
Subject: JE -- letter

██████ - please see attached and confirm receipt.
i am also having letter hand-delivered to you and alex.
regards

Lilly Ann Sanchez, Esq.
FOWLER WHITE BURNETT P.A.
Espirito Santo Plaza, 14th Floor
1395 Brickell Avenue
Miami, Florida 33131-3302
Telephone: (305) 789-9200
Direct Dial: (305) 789-9279
Facsimile: (305) 789-9201
lsanchez@fowler-white.com

TAX MATTERS- IRS Circular 230 Disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any tax advice contained in this communication (including attachments) was not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein. If you would like such advice, please contact us.*

***Attention: The information contained in this E-mail message is attorney privileged and confidential information intended only for the use of the individual(s) named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please contact the sender by reply E-mail and destroy all copies of the original message. Thank you.

██████████, ██████████ C. (USAFLS)

From: Roy BLACK [RBLACK@royblack.com]
Sent: Wednesday, August 06, 2008 1:49 PM
To: ██████████, ██████████ C. (USAFLS)
Subject: Re: Follow-up on last week's call

Ok. Will do.

-----Original Message-----

From: "██████████, ██████████ C. (USAFLS)" <██████████>
To: Roy BLACK <RBLACK@royblack.com>
Cc: ██████████ >

Sent: 8/6/2008 1:38:23 PM
Subject: RE: Follow-up on last week's call

Hi Roy -- Hope your trip is going well. Are you available today at 4:30 Eastern (1:30 Pacific)? If so, please call my office at the number below, and Karen and I can both be reached there.

Thank you.

A. ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: Roy BLACK [mailto:RBLACK@royblack.com]
Sent: Tuesday, August 05, 2008 11:40 PM
To: ██████████, ██████████ C. (USAFLS)
Cc: ██████████
Subject: Re: Follow-up on last week's call

██████████ I just got back to my computer. Sorry it took awhile to respond. I am available tomorrow to call you. Let me know what time to call. Remember I am 3 hours behind you so email me the time in the am and I will call. Thanks Roy

>>> "██████████, ██████████ C. (USAFLS)" <██████████>
08/05/08 1:01 PM >>>

Hi Roy - Are you available late this afternoon to do a follow-up on last week's call? If today does not work, can you let us know about your availability tomorrow, as well?

Thank you.

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Tracking:

311

08-80736-CV_MARRA

002159

EFTA00227273

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████
Sent: Thursday, August 23, 2007 11:27 AM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: FW: ██████████

fyi

From: ██████████
Sent: Thursday, August 23, 2007 11:27 AM
To: 'lsanchez@fowler-white.com'
Subject:

Dear Lilly,

Following up on our conversation yesterday, given that Roy Black will be on vacation through Labor Day, we are agreeable to jointly requesting that Judge Marra set the hearing regarding the subpoena during the week of September 11. You may make this representation to the Court on our behalf.

With respect to the September 4 return date for Ms. Groff, the agents who served the subpoena were left with the impression, based upon her statements, that she already had an attorney. If this is the case, that attorney should contact ██████████ to discuss any issues he/she has with the return date. If Ms. Groff does not have an attorney and you intend to procure her one, then please let ██████████ know. If you are unable to find one quickly and need an extra week, ██████████ has informed me that she is agreeable to extending the subpoena return date to September 11th as well. However, if she is not already represented, please attempt to procure the attorney as soon as possible so that he or she has time to get up to speed in advance of the 11th. We would like to avoid the need for further extensions.

We will wait to hear from you regarding Ms. Groff, but otherwise the above should resolve all the issues raised by telephone yesterday.

Regards,

██████████

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Monday, August 13, 2007 1:18 PM
To: 'RBlack@RoyBlack.com'
Subject: Epstein Computer Litigation

Hi Roy – I have conferred with the appropriate people, and we are not willing to agree to a stay on your Motion to Quash.

Regards,

██████████

A. ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Monday, August 06, 2007 12:53 PM
To: ██████████
Subject: RE: Did the letter go out on Friday?

Thank you! I hope the first day is going well.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: ██████████ [mailto:██████████]
Sent: Monday, August 06, 2007 12:36 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: Re: Did the letter go out on Friday?

Yes, I emailed it and then sent hard copies to everyone including you. And thanks for your congrats. I wish you all the best with the case.

██████████
Kobre & Kim LLP and Affiliates
800 Third Avenue
New York, New York 10022
Tel ██████████
Fax ██████████
www.kobrekim.com

-----Original Message-----

From: ██████████, ██████████ ██████████ C. (USAFLS)
To: ██████████
Sent: Mon Aug 06 11:23:35 2007
Subject: Did the letter go out on Friday?

Hi ██████████ - Sorry to bother you now that you are gone. (Congratulations!) Did the letter to Lilly go out on Friday?

Thank you, and best of luck with your new venture.

A. ██████████ ██████████
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone 561 209-1047

Fax 561 820-8777

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██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Monday, August 06, 2007 11:24 AM
To: ██████████ (██████████)
Subject: Did the letter go out on Friday?

Hi ██████████ – Sorry to bother you now that you are gone. (Congratulations!) Did the letter to Lilly go out on Friday?

Thank you, and best of luck with your new venture.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████ C. (USAFLS)

From: ██████████ C. (USAFLS)
Sent: Monday, August 06, 2007 11:21 AM
To: ██████████
Subject: Did the letter go out on Friday?

Hi ██████████ – Sorry to bother you now that you are gone. (Congratulations!) Did the letter to Lilly go out on Friday?

Thank you, and best of luck with your new venture.

A. ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ C. (USAFLS)
Sent: Monday, September 08, 2008 9:46 AM
To: jherman@hermanlaw.com; ahorowitz@hermanlaw.com
Subject: Correspondence for your clients

Dear Jeff and Adam: I apologize, but the attached letters were sent to your offices on September 2nd, but were just returned for insufficient postage. I will send the originals out by FedEx today.

I received a call, I believe from Mr. Mermelstein, asking why I had sent a letter to a represented party. The enclosed letters are for those victims whom I know to be represented by you. If you undertake representation of any other victims, please let me know so that I may keep that in my records. I expect that you will share these letters with your clients so that they may decide how they wish to proceed.

Regards,



080902 Final
rs to Herman Cl.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: [REDACTED], [REDACTED] C. (USAFLS) [mailto:[REDACTED]]
Sent: Wednesday, August 27, 2008 6:47 PM
To: Brad Edwards
Subject: Epstein

Hi Brad – I haven't received a signed protective order from you yet, so I haven't sent over the agreement. Can you fax it to me and then I will get the agreement out to you? I will be out of the office in the morning but back in the afternoon.

Thanks.

A. [REDACTED]

Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Tracking:

██████████, ██████████ ██████████ C. (USAFLS)

From: Brad Edwards [be@bradedwardslaw.com]
Sent: Thursday, August 28, 2008 9:33 AM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: RE: Epstein

It has already been faxed to you. Please let me know if you do not receive it. Also, I would appreciate it if you could fax it to me as well as mail it, as I would really like to see it today if at all possible. Thanks

Brad Edwards, Esquire
Law Office of Brad Edwards & Associates
2028 Harrison Street
Suite 202
Hollywood, Florida 33020
Telephone: 954-414-8033 (Broward)
305-935-2011 (Miami-Dade)
Facsimile: 954-924-1530(Broward)
305/935-4227 (Miami-Dade)
e-mail: be@bradedwardslaw.com

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From: ██████████, ██████████ ██████████ C. (USAFLS) [mailto:██████████]
Sent: Wednesday, August 27, 2008 6:47 PM
To: Brad Edwards
Subject: Epstein

Hi Brad – I haven't received a signed protective order from you yet, so I haven't sent over the agreement. Can you fax it to me and then I will get the agreement out to you? I will be out of the office in the morning but back in the afternoon.

Thanks.

A. ██████████ ██████████
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone 561 209-1047

Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: Brad Edwards [be@bradedwardslaw.com]
Sent: Wednesday, August 27, 2008 6:59 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: RE: Epstein

Hi ██████████,

I did not know you needed that from me first. The last email I received from Mr. Lee indicated that you do not need the acknowledgement from us prior to disclosure of the agreement, or at least that is how I understood it. So I have just been waiting to receive it. We must have gotten our wires crossed. Either way, no big deal. I have signed it, and I just sent an email to my secretary to fax it to you first thing tomorrow. If you get an opportunity to call me tomorrow afternoon, I would appreciate it. Thanks

Sincerely,

Brad Edwards, Esquire
Law Office of Brad Edwards & Associates
2028 Harrison Street
Suite 202
Hollywood, Florida 33020
Telephone: 954-414-8033 (Broward)
305-935-2011 (Miami-Dade)
Facsimile: 954-924-1530 (Broward)
305/935-4227 (Miami-Dade)
e-mail: be@bradedwardslaw.com

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From: ██████████, ██████████ ██████████ C. (USAFLS) [mailto:██████████]
Sent: Wednesday, August 27, 2008 5:47 PM
To: Brad Edwards
Subject: Epstein

Hi Brad – I haven't received a signed protective order from you yet, so I haven't sent over the agreement. Can you fax it to me and then I will get the agreement out to you? I will be out of the office in the morning but back in the afternoon.

Thanks.

A. [REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone 561 209-1047

Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Wednesday, August 27, 2008 6:47 PM
To: be@bradedwardslaw.com
Subject: Epstein

Hi Brad – I haven't received a signed protective order from you yet, so I haven't sent over the agreement. Can you fax it to me and then I will get the agreement out to you? I will be out of the office in the morning but back in the afternoon.

Thanks.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Wednesday, August 27, 2008 6:36 PM
To: be@bradedwards.com
Subject: Epstein

Hi Brad – I haven't received a signed protective order from you yet, so I haven't sent over the agreement. Can you fax it to me and then I will get the agreement out to you? I will be out of the office in the morning but back in the afternoon.

Thanks.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Thursday, August 21, 2008 5:32 PM
To: lefkowitz@kirkland.com; Roy BLACK
Cc: ██████████
Subject: Jeffrey Epstein

Dear Jay and Roy – I have attached a letter in response to Jay’s letter of August 18, 2008, and an Order we received today in the Jane Doe ██████████ United States litigation.



080821 ██████████
ltr to Lefkow...



DE26_080821_P
Protective Order.p..

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Tracking:

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Wednesday, August 20, 2008 3:19 PM
To: bertpatton@podhurst.com
Subject: Epstein Civil Cases

Hi Bert – Here is a chart with all of the information. Please let Mr. Josefsberg know that Mr. Epstein has to answer all of the Complaints in the Jeffrey Herman cases by September 4th. Thank you.



EPSTEIN CIVIL
IGATION CASES

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ C. (USAFLS)

From: Jay Lefkowitz [JLefkowitz@kirkland.com]
Sent: Wednesday, August 20, 2008 9:35 AM
To: ██████████ C. (USAFLS)
Cc: ██████████
Subject: Re: Your fax

Thanks ██████████.

We are working on something and will share it with you.

Good luck with the weather.

From: "██████████, ██████████ C. (USAFLS)" [██████████@██████████.gov]
Sent: 08/20/2008 09:28 AM AST
To: Jay Lefkowitz
Cc: "██████████" <Karen.Atkinson@usdoj.gov>
Subject: RE: Your fax

P.S. In the meanwhile, if you would like to propose language for our joint submission, I am happy to look that over.

A. ██████████ ██████████

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone 561 209-1047

Fax 561 820-8777

From: ██████████, ██████████ C. (USAFLS)
Sent: Wednesday, August 20, 2008 9:26 AM
To: Jay Lefkowitz
Cc: ██████████
Subject: Your fax

Good morning, Jay.

Our office has been closed since Monday afternoon due to the Tropical Storm, so I just received your fax. I have to be in Court this morning, but I will turn my attention to your response upon my return and will get back to you later today or tomorrow morning.

Thank you.

A. [REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone 561 209-1047

Fax 561 820-8777

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██████████, ██████████ ██████████ C. (USAFLS)

From: Brad Edwards [be@bradedwardslaw.com]
Sent: Friday, August 15, 2008 2:49 PM
To: ██████████); Paul Cassell
Cc: ██████████, ██████████ C. (USAFLS)
Subject: RE: Draft Protective Order - slight tweak

It looks ok. Go ahead and submit it. While we would disagree with your statement that our proposed order goes well beyond what is at issue, since it actually covers very thoroughly the ruling by Judge Marra yesterday, at this point we feel that time is of the essence and we will agree with you submitting your proposed order as is. I think we all heard Judge Marra and are thus all clear as to the terms of the protective order and what is required.

I would prefer that there is some language that the protective order is entered without prejudice to petitioners (seems like it would go in paragraph b), but if you are unable to incorporate it in your order, then I am sure there is a record from yesterday that could be used to help us get relief from the protective order at a later hearing. Anyway, thanks for preparing the order. We will look out for the "agreement". Thanks

From: ██████████ [mailto:Dexter.Lee@usdoj.gov]
Sent: Friday, August 15, 2008 1:24 PM
To: Paul Cassell; Brad Edwards
Cc: ██████████, ██████████ C. (USAFLS)
Subject: RE: Draft Protective Order - slight tweak

Judge Cassell and Brad,

I have incorporated the change suggested by Judge Cassell to paragraph (c). I also added language in paragraph (e), referring to other victims, which also provides for petitioners' counsel to promptly provide a copy of the acknowledgment to the U.S. Attorney's Office. The government has no doubts that counsel for petitioners will ensure the authorized recipients are aware of the protective order and agree to abide by it, prior to disclosure. We do not require the acknowledgment in writing prior to the non-prosecution agreement being disclosed to an authorized recipient.

We believe the petitioners' proposed protective order goes well beyond what is at issue, the government's disclosure of the non-prosecution agreement, conditioned on limited dissemination of the document upon receipt by petitioners.

Consequently, we believe the attached proposed order, incorporating your revisions, is appropriate for the task at hand. Thanks.

██████████

From: Paul Cassell [mailto:cassellp@LAW.UTAH.EDU]
Sent: Friday, August 15, 2008 12:21 PM
To: Brad Edwards; ██████████
Cc: ██████████, ██████████ C. (USAFLS)
Subject: RE: Draft Protective Order - slight tweak

Hello ██████████ and ██████████,

First, I don't know if we've been formally introduced. Nice to meet you ... electronically at least.

Second, on the language -- As Brad mentioned, we need to see this document quite quickly in view of the Government's representations yesterday that Epstein is trying to ignore the agreement. As a result - - and in view of the difficulty of making immediate contact with our clients -- I propose one change. Instead of this:

Prior to producing the documents to Petitioners' counsel, a copy of this Order must be provided to counsel and their clients, who must review and acknowledge their receipt of and agreement to abide by the terms of this Order, and who must provide a copy of that acknowledgment to the USAO.

How about this:

Before counsel for Petitioner's show the agreement to their clients or discuss the specific terms with them, they must provide a copy of this Order to Petitioners, who must review and acknowledge their receipt of and agreement to abide by the terms of this Order. Counsel for Petitioner's must promptly provide a copy of that acknowledgment to the USAO.

I assume that the USAO is not concerned about us as attorneys somehow ignoring the Court's protective order, so this change would focus in on the non-law trained clients.

Paul G. Cassell
Ronald M. Boyce Presidential Professor of Law

[Redacted signature block containing an email address symbol @]

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████
Sent: Friday, August 15, 2008 2:24 PM
To: Paul Cassell; Brad Edwards
Cc: ██████████, ██████████ C. (USAFLS)
Subject: RE: Draft Protective Order - slight tweak
Attachments: Protective Order_v2.doc

Judge Cassell and Brad,

I have incorporated the change suggested by Judge Cassell to paragraph (c). I also added language in paragraph (e), referring to other victims, which also provides for petitioners' counsel to promptly provide a copy of the acknowledgment to the U.S. Attorney's Office. The government has no doubts that counsel for petitioners will ensure the authorized recipients are aware of the protective order and agree to abide by it, prior to disclosure. We do not require the acknowledgment in writing prior to the non-prosecution agreement being disclosed to an authorized recipient.

We believe the petitioners' proposed protective order goes well beyond what is at issue, the government's disclosure of the non-prosecution agreement, conditioned on limited dissemination of the document upon receipt by petitioners.

Consequently, we believe the attached proposed order, incorporating your revisions, is appropriate for the task at hand. Thanks.

██████████

From: Paul Cassell [mailto:cassellp@LAW.UTAH.EDU]
Sent: Friday, August 15, 2008 12:21 PM
To: Brad Edwards; ██████████
Cc: ██████████, ██████████ C. (USAFLS)
Subject: RE: Draft Protective Order - slight tweak

Hello ██████████ and ██████████,

First, I don't know if we've been formally introduced. Nice to meet you ... electronically at least.

Second, on the language -- As Brad mentioned, we need to see this document quite quickly in view of the Government's representations yesterday that Epstein is trying to ignore the agreement. As a result - and in view of the difficulty of making immediate contact with our clients -- I propose one change. Instead of this:

Prior to producing the documents to Petitioners' counsel, a copy of this Order must be provided to counsel and their clients, who must review and acknowledge their receipt of and agreement to abide by the terms of this Order, and who must provide a copy of that acknowledgment to the USAO.

How about this:

Before counsel for Petitioner's show the agreement to their clients or discuss the specific terms with them, they must provide a copy of this Order to Petitioners, who must review and acknowledge their

[REDACTED], [REDACTED] C. (USAFLS)

From: [REDACTED] C. (USAFLS)
Sent: Friday, August 15, 2008 2:12 PM
To: lefkowitz@kirkland.com; Roy BLACK
Cc: [REDACTED]
Subject: Response to your e-mail

Dear Jay and Roy:

Please see the attached. Thank you.



080815 [REDACTED]
Ltr to Lefkow...

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Tracking:

175

08-80736-CV_MARRA

002188

EFTA00227302

[REDACTED] C. (USAFLS)

From: [REDACTED]
Sent: Friday, August 15, 2008 11:41 AM
To: be@BradEdwardsLaw.com
Cc: [REDACTED], [REDACTED] C. (USAFLS)
Subject: Draft Protective Order

Brad,

Attached please find a draft protective order regarding the disclosure of the non-prosecution agreement to you and Jane Does 1 and 2. Please let us know if there are any changes you wish to make. Thanks.



Protective
Order.doc

██████████, ██████████ ██████████ C. (USAFLS)

From: Jack Goldberger [jgoldberger@agwpa.com]
Sent: Wednesday, September 17, 2008 12:59 PM
To: ██████████, ██████████ C. (USAFLS)
Cc: Jay Lefkowitz; RBlack@RoyBlack.com; Barry Krischer; ██████████ (USAFLS); ██████████
Subject: Re: Letter concerning Epstein and the Palm Beach Daily News

We will deal with the state. To answer your? The addendum has been filed
Jack Goldberger

Sent from my iPhone

On Sep 17, 2008, at 12:15 PM, "██████████, ██████████ ██████████ C. (USAFLS)" <██████████>
wrote:

Gentlemen: Please review the attached letter. Thank you.

<<Lefkowitz 080917.pdf>>

A. ██████████

Assistant U.S. Attorney

561 209-1047

<Lefkowitz 080917.pdf>

[REDACTED] C. (USAFLS)

From: [REDACTED] C. (USAFLS)
Sent: Wednesday, September 17, 2008 12:04 PM
To: Jay Lefkowitz; Jack Alan Goldberger (jgoldberger@agwpa.com); RBlack@RoyBlack.com
Cc: Barry Krischer; [REDACTED] (USAFLS); [REDACTED]; [REDACTED]
Subject: Letter concerning Epstein and the Palm Beach Daily News

Gentlemen: Please review the attached letter. Thank you.



Lefkowitz
080917.pdf

A. [REDACTED]
Assistant Attorney
561 209-1047

[REDACTED], [REDACTED], [REDACTED] C. (USAFLS)

From: [REDACTED], [REDACTED] C. (USAFLS)
Sent: Wednesday, September 17, 2008 12:00 PM
To: Barry Krischer
Cc: Lanna Belohlavek (lbelohla@sa15.state.fl.us); [REDACTED]; [REDACTED]
(USAFLS); [REDACTED]
Subject: Your inquiry regarding the Epstein case

Hi Barry – The Non-Prosecution Agreement contains a confidentiality provision that requires us to inform Mr. Epstein's counsel before making any disclosure – even a compulsory disclosure. I am cc'ing you on a letter to Jay Lefkowitz, Roy Black, and Jack Goldberger informing them of the request and asking them, as parties to the criminal case, to contact you regarding a possible suit by the Shiny Sheet.

On another note, I also will be informing them that I believe that they still have not filed the complete agreement with the Court, as required by the Judge at the hearing.

Thank you very much for reaching out to us when you received this request, and if you need any help from us, please let us know.

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

[REDACTED] C. (USAFLS)

From: [REDACTED] C. (USAFLS)
Sent: Thursday, May 22, 2008 3:38 AM
To: [REDACTED]
Subject: Fw: confidential communication

----- Original Message -----

From: [REDACTED] (USAFLS)
To: [REDACTED], [REDACTED] C. (USAFLS)
Sent: Mon May 19 15:37:30 2008
Subject: RE: confidential communication

[REDACTED]

-----Original Message-----

From: [REDACTED], [REDACTED] C. (USAFLS)
Sent: Monday, May 19, 2008 3:37 PM
To: Acosta, Alex (USAFLS); [REDACTED]; [REDACTED] (USAFLS)
Subject: Re: confidential communication

[REDACTED]

----- Original Message -----

From: Acosta, Alex (USAFLS)
To: [REDACTED] (USAFLS); Campos, Cyndee (USAFLS); [REDACTED], [REDACTED] C. (USAFLS)
Sent: Mon May 19 12:40:32 2008
Subject: FW: confidential communication

For your records.

From: Jay Lefkowitz [mailto:JLefkowitz@kirkland.com]
Sent: Monday, May 19, 2008 10:54 AM
To: Acosta, Alex (USAFLS)
Subject: confidential communication

Dear Alex:

I am writing to you because I have just received the attached letter from Drew Oosterbaan. In light of that letter, and given the critical new evidence discussed below, I would like to request a meeting with you, mindful of our July

1026

8 deadline, at your earliest opportunity. Given your personal involvement in this matter to date, and the fact that at this juncture it is clear that CEOS has referred the matter back to you, I respectfully request that you not shunt me off to one of your staff. You and I have both spent a great deal of time on this matter, and I know that we both would like to resolve this matter in a way that bestows integrity both on the Department and the process.

In our prior discussions, you expressed that you were "not unsympathetic" to our various federalism concerns, but stated that because you serve within the "unitary Executive," you believed your hands were tied by Main Justice. You were also extremely gracious in stating that you did not want the United States to be "unfair". Although CEOS limited its assessment to the federal statutes your Office had brought forth and to the application of those laws to the facts as presented, it is abundantly clear from Drew's letter that Main Justice is not directing this prosecution. In fact, CEOS plainly acknowledged that a federal prosecution of Mr. Epstein would involve a "novel application" of federal statutes and that our arguments against federal involvement are "compelling." Moreover, the language used by Drew in his concluding paragraph, that he cannot conclude that a prosecution by you in this case "would be an abuse of discretion" is hardly an endorsement that you move forward.

Moreover, as you know, Drew made clear that the scope of his review did not extend to the other significant issues we have raised with you, such as the undo interest by some members of your staff with the financial and civil aspects of this matter, or with the inappropriate discussion one member of your Office had with a senior reporter at the New York Times. (In fact, I have met with that reporter and have reviewed copious notes of his conversation with Mr. Weinstein). At this stage, we have no alternative but to raise our serious concerns regarding the issues Drew refused to address with the Deputy or, if necessary, the Attorney General, because we believe those issues have significantly impacted the investigation and any recommendation by your staff to proceed with an indictment. That being said, it would obviously be much more constructive and efficient if we could resolve this matter directly with you in the advance of further proceedings in Washington.

Because it is clear that national policy, as determined by Main Justice, is not driving this case, the resolution of this matter is squarely, and solely, your responsibility. I know you want to do the right thing, and it is because you have made clear to me on several occasions that you will always look at all of the relevant and material facts that I call the following to your attention. New information that has come to light strongly suggests that the facts of this case cannot possibly implicate a federal prosecutorial priority. Due to established state procedures and following the initiation of multiple civil lawsuits, Mr. Epstein's counsel was able to take limited discovery of certain women in this matter. The sworn statements provided by these women all confirm that federal prosecution is not appropriate in this case.

The consistent representations of witnesses such as [REDACTED], Brittney Beale, [REDACTED], and [REDACTED], and the civil complainants and their attorneys, confirm the following key points: First, there was no telephonic

communication that met the requirements of § 2422(b). For example, as many other witnesses have stated, Ms. Beale testified in no unclear terms that there was never any discussion over the phone about her coming over to Mr. Epstein's home to engage in sexual activity: "The only thing that ever occurred on any of these phone calls [with ██████████ or another assistant] was, 'Are you willing to come over,' or, 'Would you like to come over and give a massage.'" Beale Tr. A at 15. Second, the underage women who visited Mr. Epstein have testified that they lied about their age in order to gain admittance into his home and women who brought their underage friends to Mr. Epstein counseled them to lie about their ages as well. Ms. ██████████ stated the following: "I would tell my girlfriends just like Carolyn approached me. Make sure you tell him you're 18. Well, these girls that I brought, I know that they were 18 or 19 or 20. And the girls that I didn't know and I don't know if they were lying or not, I would say make sure that you tell him you're 18." ██████████ Tr. at 22. Third, there was no routine or habit suggesting an intent to transform a massage into an illegal sexual act. For instance, Ms. Laduke stated that Mr. Epstein "never touched [her] physically" and that all she did was "massage[] his back, his chest and his thighs and that was it." Laduke Tr. at 12-13. Finally, as you are well aware, there was no force, coercion, fraud, violence, drugs, or even alcohol present in connection with Mr. Epstein's encounters with these women.

The civil suits confirm that the plaintiffs did not discuss engaging in sexually-related activities with anyone prior to arriving at Mr. Epstein's residence. This reinforces the fact that no telephonic or Internet persuasion, inducement, enticement or coercion of any kind occurred. Furthermore, Mr. Herman, the attorney for most of the civil complainants, was quoted in the Palm Beach Post as saying that "it doesn't matter" that his clients lied about their ages and told Mr. Epstein that they were 18 or 19. In short, the new evidence establishing that the women deliberately lied about their age because they knew Mr. Epstein did not want anyone under 18 in his house directly undercuts the claim that Mr. Epstein willfully blinded himself as to their ages. Willful blindness is not a substitute for evidence of knowledge nor is it a negligence standard. It requires proof beyond reasonable doubt of deliberate intent and specific action to hide one's knowledge. There is absolutely no such evidence of that here, so it is not even a jury issue. Furthermore, willful ignorance cannot constitute the required mens rea for a crime of conspiracy or aiding and abetting.

Through the recent witness statements, we have also discovered another serious issue that implicates the integrity of the federal investigation. We have learned that FBI Special Agent Kurkendayl attempted to convince these adult women, now in their twenties, that they were in fact "victims" even though the women themselves strongly disagreed with this characterization. This conduct, once again, goes to the heart of the integrity of the investigation. In a sworn statement, Ms. Beale was highly critical of the overreaching by federal law enforcement officers in this case. She testified—in no uncertain terms—that she does not, and never did, feel like a "victim," despite the fact that the FBI repeatedly tried to convince her otherwise.

I am mindful of the fact that we have a state court date of July 8 on which either to enter a plea or to commence trial. As I review the trial options with

Mr. Epstein, I certainly want to make sure I do everything within my power to obviate a need for trial through a reasonable alternative resolution. Although it is clear that CEOS is not directing a prosecution here, and has stated only that you have the authority to commence such a prosecution, I am well aware that the decision whether to proceed, subject to any further process in Washington, is now within your discretion. I think the new facts should greatly influence your decision and accordingly, I hope you will agree to meet with me, both to discuss the new evidence and to discuss a resolution to this matter once and for all. I am available to meet with you at your earliest convenience subject to our mutual availability.

Respectfully,

Jay

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██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ C. (USAFLS)
Sent: Thursday, August 14, 2008 4:21 PM
To: 'lefkowitz@kirkland.com'; 'Roy BLACK'
Cc: ██████████
Subject: Hearing with Judge Marra

Dear Jay and Roy:

We just finished our hearing with Judge Marra. He has ordered us to make the Agreement available to the plaintiffs in this case pursuant to a protective order limiting the disclosure to the victims and their counsel only. He further has ordered that we have to make the agreement available to any other identified victim and her attorney, so long as they also agree to be bound by the protective order. Judge Marra stated that the plaintiffs can litigate the issue of further disclosure directly with Mr. Epstein in the context of their civil suits.

When I receive the Court's order and a signed protective order, I will provide them to you.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Tracking:

234

08-80736-CV_MARRA

002199

EFTA00227313

██████████, ██████████ C. (USAFLS)

From: ██████████, ██████████ C. (USAFLS)
Sent: Thursday, August 14, 2008 3:27 PM
To: 'Jay Lefkowitz'
Cc: ██████████); 'Roy BLACK'
Subject: RE: Follow-up point

Dear Jay:

The modification contained in the December letter is clear and simple, that is why we were not surprised by Mr. Epstein's and his attorneys' actions affirming acceptance of the modification. Mr. Epstein's acceptance of the modification by pleading guilty was equally clear and simple -- it followed written communications from Mr. Sloman and myself that read: "Mr. Epstein has until the close of business on Monday, June 30, 2008, to comply with the terms and conditions of the agreement between the United States and Mr. Epstein (as modified by the U.S. Attorney's December 19th letter to Ms. Sanchez), including entry of a guilty plea, sentencing, and surrendering to begin his sentence of imprisonment."

As clearly stated in the December letter, only those "individuals whom [the United States] was prepared to name in an Indictment as victims of an enumerated offense" are the beneficiaries of the agreement. That is the list of names that I provided to Messrs. Goldberger and Tein following the change of plea. Under the September/October agreement, all "individuals whom [the United States] has identified as victims" are the beneficiaries, so I would prepare a supplement to the earlier list to include identified victims whom we were not yet prepared to name in an indictment.

Again, as stated in the letter, the modification replaces paragraphs 7 and 8 of the Agreement, including paragraphs 7A through 7C that are included in the October Addendum. This means that Mr. Epstein's waiver of "his right to contest damages up to an amount as agreed to between the identified individual and Epstein" will no longer exist, nor will Mr. Epstein's obligation to pay for the victims' counsel. Paragraphs 9 and 10 are still in effect. This includes the statement that there is no admission of civil or criminal liability, and that, "[e]xcept as to those individuals who elect to proceed EXCLUSIVELY under 18 USC § 2255, . . . Epstein's signature [cannot] be construed as admissions or evidence of civil or criminal liability." This addresses your question regarding exclusivity.

I don't think that Mr. Epstein has to make any constructive admissions of conviction. He only needs to admit that the 32 girls whose names I have provided to Mr. Goldberger are "victims" of an offense listed in 18 U.S.C. 2255.

Please let me know if you have any additional questions. Thank you.

A. ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Jay Lefkowitz [mailto:JLefkowitz@kirkland.com]
Sent: Thursday, August 14, 2008 2:39 PM
To: ██████████, ██████████ C. (USAFLS)

Cc: [REDACTED]; lefkowitz@kirkland.com
Subject: Re: Follow-up point

[REDACTED] - In reviewing your December proposal, there are a couple of things I don't understand.

What limits are placed upon individuals who proceed under 2255 as if "Mr. Epstein had been tried federally and convicted of an enumerated offense." In other words, what individuals would have this right? And would these individual only have this right if they proceeded exclusively under 2255? Also, to what enumerated offenses do you think would Mr. Epstein have to make constructive admissions of conviction? and how many such offenses? And against whom? Remember that while you may have investigated various offenses, he only plead guilty to certain state crimes.

Finally, would paragraphs 8-10 of the September Agreement still be operative?

I am trying hard to understand what you have intended by the December letter. Alex has says he thinks it benefits Jeffrey, and I am open to understanding it that way. But I would like some clarity on these issues.

Thanks -- Jay

[REDACTED] C. (USAFLS)"
<[REDACTED]>

To <lefkowitz@kirkland.com>
cc "[REDACTED]" <Karen.Atkinson@usdoj.gov>
Subject Follow-up point

08/14/2008 12:44 PM

Hi Jay - I forgot to mention that I can no longer argue that the Court shouldn't force us to produce the agreement because we have already provided the victims with the relevant portion when I now understand from you that I have NOT provided them with the relevant portion.

A. [REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone 561 209-1047

Fax 561 820-8777

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destroy this communication and all copies thereof,
including all attachments.

Tracking:

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08-80736-CV_MARRA

002202

EFTA00227316

[REDACTED] C. (USAFLS)

From: Jay Lefkowitz [JLefkowitz@kirkland.com]
Sent: Thursday, August 14, 2008 2:39 PM
To: [REDACTED] C. (USAFLS)
Cc: [REDACTED]; lefkowitz@kirkland.com
Subject: Re: Follow-up point

[REDACTED] - In reviewing your December proposal, there are a couple of things I don't understand.

What limits are placed upon individuals who proceed under 2255 as if "Mr. Epstein had been tried federally and convicted of an enumerated offense." In other words, what individuals would have this right? And would these individual only have this right if they proceeded exclusively under 2255? Also, to what enumerated offenses do you think would Mr. Epstein have to make constructive admissions of conviction? and how many such offenses? And against whom? Remember that while you may have investigated various offenses, he only plead guilty to certain state crimes.

Finally, would paragraphs 8-10 of the September Agreement still be operative?

I am trying hard to understand what you have intended by the December letter. Alex has says he thinks it benefits Jeffrey, and I am open to understanding it that way. But I would like some clarity on these issues.

Thanks -- Jay

[REDACTED] C. (USAFLS)"

To <lefkowitz@kirkland.com>
cc "[REDACTED]" <Karen.Atkinson@usdoj.gov>
Subject Follow-up point

08/14/2008 12:44 PM

Hi Jay – I forgot to mention that I can no longer argue that the Court shouldn't force us to produce the agreement because we have already provided the victims with the relevant portion when I now understand from you that I have NOT provided them with the relevant portion.

A. [REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone 561 209-1047

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[REDACTED], [REDACTED] C. (USAFLS)

From: [REDACTED], [REDACTED] C. (USAFLS)
Sent: Thursday, August 14, 2008 12:43 PM
To: lefkowitz@kirkland.com
Cc: [REDACTED]
Subject: Follow-up point

Hi Jay – I forgot to mention that I can no longer argue that the Court shouldn't force us to produce the agreement because we have already provided the victims with the relevant portion when I now understand from you that I have NOT provided them with the relevant portion.

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Thursday, August 14, 2008 12:28 PM
To: Jay Lefkowitz
Subject: RE: Telephone Call

Fine.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Jay Lefkowitz [mailto:JLefkowitz@kirkland.com]
Sent: Thursday, August 14, 2008 12:26 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Cc: ██████████ ██████████
Subject: Re: Telephone Call

How about 10 minutes?

From: "██████████, ██████████ ██████████ C. (USAFLS)" [████████████████████]
Sent: 08/14/2008 12:19 PM AST
To: Jay Lefkowitz
Cc: "██████████ ██████████" <Karen.Atkinson@usdoj.gov>
Subject: Telephone Call

Hi Jay – Can you give me a specific time for the call so that I can conference call you and Karen?

Thank you.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

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██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Thursday, August 14, 2008 11:33 AM
To: Roy BLACK
Subject: Call with Jay Lefkowitz

Hi Roy – Sorry to bother you early in the morning. Jay Lefkowitz is supposed to call soon to discuss the agreement. We would prefer to have you on the call as well.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: Jay Lefkowitz [JLefkowitz@kirkland.com]
Sent: Wednesday, August 13, 2008 10:00 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Cc: Roy BLACK
Subject: Re: Electronic Copy of my Fax

Thx ██████████ - speak tomorrow. I will call you around 1130-1200.

Jay

From: "██████████, ██████████ ██████████ C. (USAFLS)" [██]
Sent: 08/13/2008 06:20 PM AST
To: Jay Lefkowitz
Cc: "Roy BLACK" <RBLACK@royblack.com>
Subject: Electronic Copy of my Fax

Jay – Here is a scanned version of the fax, in case you have already left.

<<Lefkowitz 080813008.pdf>>

A. ██████████ ██████████

Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

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██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Wednesday, August 13, 2008 6:21 PM
To: lefkowitz@kirkland.com
Cc: Roy BLACK
Subject: Electronic Copy of my Fax

Jay – Here is a scanned version of the fax, in case you have already left.



Lefkowitz
080813008.pdf

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: Jay Lefkowitz [JLefkowitz@kirkland.com]
Sent: Wednesday, August 13, 2008 4:40 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)

██████████ -

Are you reachable?

Thanks -- Jay

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[REDACTED], [REDACTED] [REDACTED] C. (USAFLS)

From: [REDACTED], [REDACTED] C. (USAFLS)
Sent: Wednesday, August 13, 2008 3:28 PM
To: Roy BLACK
Cc: [REDACTED]
Subject: Jeffrey Epstein

Dear Roy –

Judge Marra has set us for a status conference tomorrow afternoon in Jane Doe [REDACTED] United States. Given Judge Marra's past rulings, I anticipate that he may order us to turn over the agreement, so we need to get this issue resolved today, if at all possible.

Thank you,

[REDACTED]
A. [REDACTED] [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Tracking:

267

08-80736-CV_MARRA

002213

EFTA00227327

[REDACTED], [REDACTED] C. (USAFLS)

From: Roy BLACK [RBLACK@royblack.com]
Sent: Tuesday, August 12, 2008 3:45 PM
To: [REDACTED], [REDACTED] C. (USAFLS)
Subject: Re: Call

Ok. I will call at 4:15 your time.

-----Original Message-----

From: "[REDACTED], [REDACTED] C. (USAFLS)" <[REDACTED]>
To: Roy BLACK <RBLACK@royblack.com>

Sent: 8/12/2008 3:42:04 PM
Subject: Call

Hi Roy - Karen is tied up until 4:15. Can we call you then? Or would you like to call us?

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Tuesday, August 12, 2008 3:42 PM
To: Roy BLACK
Subject: Call

Hi Roy – Karen is tied up until 4:15. Can we call you then? Or would you like to call us?

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Tuesday, August 12, 2008 12:07 PM
To: Roy BLACK
Subject: RE: Jeffrey Epstein

Hi Roy -- Can you give me a call? We need to discuss something.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: Roy BLACK [mailto:RBLACK@royblack.com]
Sent: Monday, August 11, 2008 11:40 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: Jeffrey Epstein

██████████: I have conferred with the lawyers on the team. They all thank you for agreeing to oppose any disclosure of the 9/24/07 agreement. We firmly believe this document is not discoverable in the civil cases. However if the court rules against you on this we request that you further ask that any disclosure be subject to a strong protective order prohibiting dissemination to anyone except counsel to the petitioners. We are particularly concerned because civil lawyers are more apt to publicize something like this than those of us who litigate on the criminal side of the docket. You may recall one lawyer standing on the bridge to palm beach railing over his misconceptions of the case. This is the typical vehicle they use to get more plaintiffs. You had also asked what documents were disclosed in the state court. As part of counsels obligation to fully disclose any promises or inducements which led to the plea agreement, the 9/24/07 agreement was filed with the court. It was filed under seal. Once again I want to re-assure you that Mr. Epstein and his counsel intend to stand by their agreements. If you or anyone in the USAO have any concern about a possible breach please call or email me again so we can discuss any dispute or misunderstanding and allay any concerns. Thanks again. Roy

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Tuesday, August 12, 2008 11:12 AM
To: Lanna Belohlavek
Subject: Epstein

Hi Lanna – Sorry to be a bother, but we need to file our response with the Court this week, so I really need a copy of what was filed in your case and also the procedures to obtain the transcript of the change of plea hearing.

Thank you.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ C. (USAFLS)

From: ██████████, ██████████ C. (USAFLS)
Sent: Tuesday, August 12, 2008 9:08 AM
To: Roy BLACK
Subject: RE: Jeffrey Epstein

Roy, thank you for your response and your assistance. I will forward your request to ██████████ Lee, who is representing the United States in the civil suit.

Can you please ask Jack Goldberger to send me an exact copy of what was filed under seal in the state court? I want to insure that all of us are presenting the same packet of documents as the final agreement.

Regards,
██████████

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: Roy BLACK [mailto:RBLACK@royblack.com]
Sent: Monday, August 11, 2008 11:40 PM
To: ██████████, ██████████ C. (USAFLS)
Subject: Jeffrey Epstein

██████████: I have conferred with the lawyers on the team. They all thank you for agreeing to oppose any disclosure of the 9/24/07 agreement. We firmly believe this document is not discoverable in the civil cases. However if the court rules against you on this we request that you further ask that any disclosure be subject to a strong protective order prohibiting dissemination to anyone except counsel to the petitioners. We are particularly concerned because civil lawyers are more apt to publicize something like this than those of us who litigate on the criminal side of the docket. You may recall one lawyer standing on the bridge to palm beach railing over his misconceptions of the case. This is the typical vehicle they use to get more plaintiffs. You had also asked what documents were disclosed in the state court. As part of counsels obligation to fully disclose any promises or inducements which led to the plea agreement, the 9/24/07 agreement was filed with the court. It was filed under seal. Once again I want to re-assure you that Mr. Epstein and his counsel intend to stand by their agreements. If you or anyone in the USAO have any concern about a possible breach please call or email me again so we can discuss any dispute or misunderstanding and allay any concerns. Thanks again. Roy

Tracking:

283

08-80736-CV_MARRA

002219

EFTA00227333

██████████, ██████████ ██████████ C. (USAFLS)

From: Roy BLACK [RBLACK@royblack.com]
Sent: Monday, August 11, 2008 11:40 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: Jeffrey Epstein

██████████: I have conferred with the lawyers on the team. They all thank you for agreeing to oppose any disclosure of the 9/24/07 agreement. We firmly believe this document is not discoverable in the civil cases. However if the court rules against you on this we request that you further ask that any disclosure be subject to a strong protective order prohibiting dissemination to anyone except counsel to the petitioners. We are particularly concerned because civil lawyers are more apt to publicize something like this than those of us who litigate on the criminal side of the docket. You may recall one lawyer standing on the bridge to palm beach railing over his misconceptions of the case. This is the typical vehicle they use to get more plaintiffs. You had also asked what documents were disclosed in the state court. As part of counsels obligation to fully disclose any promises or inducements which led to the plea agreement, the 9/24/07 agreement was filed with the court. It was filed under seal. Once again I want to re-assure you that Mr. Epstein and his counsel intend to stand by their agreements. If you or anyone in the USAO have any concern about a possible breach please call or email me again so we can discuss any dispute or misunderstanding and allay any concerns. Thanks again. Roy

[REDACTED], [REDACTED] C. (USAFLS)

From: [REDACTED] C. (USAFLS)
Sent: Thursday, August 07, 2008 4:36 PM
To: Roy BLACK
Subject: RE: Notification of Possible Compelled Disclosure of the Non-Prosecution Agreement

Thank you, Roy. Your help is greatly appreciated.

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: Roy BLACK [mailto:RBLACK@royblack.com]
Sent: Thursday, August 07, 2008 4:34 PM
To: [REDACTED], [REDACTED] C. (USAFLS)
Subject: Re: Notification of Possible Compelled Disclosure of the Non-Prosecution Agreement

[REDACTED] I am working on this and will get back to you.

-----Original Message-----

From: "[REDACTED], [REDACTED] C. (USAFLS)" <[REDACTED]>
To: Roy BLACK <RBLACK@royblack.com>
Cc: [REDACTED] (USAFLS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>

Sent: 8/7/2008 3:57:52 PM
Subject: Notification of Possible Compelled Disclosure of the Non-Prosecution Agreement

Dear Roy:

In accordance with paragraph 13 of the Non-Prosecution Agreement, I am providing notice of possible compulsory process commanding the disclosure of the Agreement. As I'm sure you know, two of Mr. Epstein's victims have filed suit against the United States alleging that the government violated their rights as victims by not consulting them prior to entering into the Non-Prosecution Agreement.

As part of their response to one of the government's filings, the victims asked the Court to order the production of the Non-Prosecution Agreement. The deadline for the government to respond is August 15th and we intend to oppose the motion based upon the confidentiality provision. I have attached a copy of the victims' pleading for your review.

In connection with this, we want to make certain that we are making consistent representations to the judiciary regarding the contents of the Agreement. I know

that Jack Goldberger filed the Agreement under seal in the state court in accordance with the state judge's order. Can you provide us with a copy of what Jack filed, so that, if we are ordered by the federal court to disclose the agreement, it is exactly the same as what has been filed in the state court?

Thank you again for your assistance.

Regards,

██████████

<<DE19_080801_Victims' Resp to Notice.pdf>>

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Tracking:

292

08-80736-CV_MARRA

002223

EFTA00227337

Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Thursday, August 07, 2008 3:58 PM
To: Roy BLACK
Cc: ██████████; ██████████
Subject: Notification of Possible Compelled Disclosure of the Non-Prosecution Agreement

Dear Roy:

In accordance with paragraph 13 of the Non-Prosecution Agreement, I am providing notice of possible compulsory process commanding the disclosure of the Agreement. As I'm sure you know, two of Mr. Epstein's victims have filed suit against the United States alleging that the government violated their rights as victims by not consulting them prior to entering into the Non-Prosecution Agreement.

As part of their response to one of the government's filings, the victims asked the Court to order the production of the Non-Prosecution Agreement. The deadline for the government to respond is August 15th and we intend to oppose the motion based upon the confidentiality provision. I have attached a copy of the victims' pleading for your review.

In connection with this, we want to make certain that we are making consistent representations to the judiciary regarding the contents of the Agreement. I know that Jack Goldberger filed the Agreement under seal in the state court in accordance with the state judge's order. Can you provide us with a copy of what Jack filed, so that, if we are ordered by the federal court to disclose the agreement, it is exactly the same as what has been filed in the state court?

Thank you again for your assistance.

Regards,



DE19_080801_VI
victims' Resp to N..

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Tracking:

296

08-80736-CV_MARRA

002226

EFTA00227340

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: Roy BLACK [RBLACK@royblack.com]
Sent: Tuesday, August 05, 2008 11:40 PM
To: ██████████ C. (USAFLS)
Cc: ██████████
Subject: Re: Follow-up on last week's call

██████████ I just got back to my computer. Sorry it took awhile to respond. I am available tomorrow to call you. Let me know what time to call. Remember I am 3 hours behind you so email me the time in the am and I will call. Thanks Roy

>>> "██████████, ██████████ ██████████ C. (USAFLS)" <██████████>
08/05/08 1:01 PM >>>

Hi Roy - Are you available late this afternoon to do a follow-up on last week's call? If today does not work, can you let us know about your availability tomorrow, as well?

Thank you.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Tuesday, August 05, 2008 3:29 PM
To: Lanna Belohlavek (lbelohla@sa15.state.fl.us)
Subject: Question re Epstein -- Sorry to bother

Hi Lanna – Sorry to bother you, but a question has come up over here. I know that you filed the Non-Prosecution Agreement with the United States. Did you file the version that I emailed to you (the three-part agreement) or a different version?

Thank you.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: Roy BLACK [RBLACK@royblack.com]
Sent: Wednesday, July 30, 2008 2:45 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: Re: Jeffrey Epstein

I am in the mountains and the cell doesn't work well. I will get to a landline at 4 and call you.

-----Original Message-----

From: "██████████, ██████████ ██████████ C. (USAFLS)" <██████████>
To: Roy BLACK <RBLACK@royblack.com>
Cc: Karen (USAFLS) Atkinson <Karen.Atkinson@usdoj.gov>

Sent: 7/30/2008 2:43:11 PM
Subject: RE: Jeffrey Epstein

Can Karen and I call you on your cell at 4:00 Florida time? I just need your number. Or you can call us at Karen's desk -- 561 209-1014.

Thank you.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: Roy BLACK [mailto:RBLACK@royblack.com]
Sent: Wednesday, July 30, 2008 2:38 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: Re: Jeffrey Epstein

Ok. I am on the road in california and can call in about an hour or so.

-----Original Message-----

From: "██████████, ██████████ ██████████ C. (USAFLS)" <██████████>
To: Roy BLACK <RBLACK@royblack.com>

Sent: 7/30/2008 2:31:56 PM
Subject: RE: Jeffrey Epstein

Hi Roy -- It relates to the performance of the criminal Non-Prosecution Agreement.

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: Roy BLACK [mailto:RBLACK@royblack.com]
Sent: Wednesday, July 30, 2008 1:18 PM
To: [REDACTED], [REDACTED] C. (USAFLS)
Subject: Re: Jeffrey Epstein

I am out of town. What is it about?

>>> "[REDACTED], [REDACTED] C. (USAFLS)" <[REDACTED]>
07/30/08 11:44 AM >>>

Dear Roy: Are you available this afternoon to discuss the Epstein matter?
Please let me know what time works best for you.

Thank you.

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Subject: Re: Jeffrey Epstein

I am out of town. What is it about?

>>> "[REDACTED], [REDACTED] C. (USAFLS)" <[REDACTED]>
07/30/08 11:44 AM >>>

Dear Roy: Are you available this afternoon to discuss the Epstein matter?
Please let me know what time works best for you.

Thank you.

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

[REDACTED] C. (USAFLS)

From: [REDACTED] C. (USAFLS)
Sent: Wednesday, July 30, 2008 2:32 PM
To: Roy BLACK
Subject: RE: Jeffrey Epstein

Hi Roy -- It relates to the performance of the criminal Non-Prosecution Agreement.

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: Roy BLACK [mailto:RBLACK@royblack.com]
Sent: Wednesday, July 30, 2008 1:18 PM
To: [REDACTED], [REDACTED] C. (USAFLS)
Subject: Re: Jeffrey Epstein

I am out of town. What is it about?

>>> "[REDACTED], [REDACTED] C. (USAFLS)" <[REDACTED]>
07/30/08 11:44 AM >>>

Dear Roy: Are you available this afternoon to discuss the Epstein matter?
Please let me know what time works best for you.

Thank you.

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

[REDACTED] C. (USAFLS)

From: Jay Lefkowitz [JLefkowitz@kirkland.com]
Sent: Friday, August 15, 2008 10:53 AM
To: [REDACTED] C. (USAFLS)
Cc: [REDACTED]; Roy BLACK; Martin Weinberg
Subject: Re: Follow-up point

[REDACTED] - thanks for responding to my email. You have narrowed down some of the implementation issues.

As I told you this morning, we cannot accept your contention that Mr. Epstein is bound by an agreement he didn't sign as opposed to one he did sign, particularly in light of my written communications to your office dated December 21, 2007 and December 26, 2007. However, before we can make a determination whether to adopt the December language as you have now explained it, we need to confer with our client, which we will be able to do within the next two weeks.

I look forward to speaking with you soon to resolve these issues.

Jay

From: "[REDACTED] C. (USAFLS)" [REDACTED]
Sent: 08/14/2008 03:27 PM AST
To: Jay Lefkowitz
Cc: "[REDACTED]" <Karen.Atkinson@usdoj.gov>; "Roy BLACK"
<RBLACK@royblack.com>
Subject: RE: Follow-up point

Dear Jay:

The modification contained in the December letter is clear and simple, that is why we were not surprised by Mr. Epstein's and his attorneys' actions affirming acceptance of the modification. Mr. Epstein's acceptance of the modification by pleading guilty was equally clear and simple -- it followed written communications from Mr. Sloman and myself that read: "Mr. Epstein has until the close of business on Monday, June 30, 2008, to comply with the terms and conditions of the agreement between the United States and Mr. Epstein (as modified by the U.S. Attorney's December 19th letter to Ms. Sanchez), including entry of a guilty plea, sentencing, and surrendering to begin his sentence of imprisonment."

As clearly stated in the December letter, only those "individuals whom [the United States] was prepared to name in an Indictment as victims of an enumerated offense" are the beneficiaries of the agreement. That is the list of names that I provided to Messrs. Goldberger and Tein following the change of plea. Under the September/October agreement, all "individuals whom [the United States] has identified as victims" are the beneficiaries, so I would prepare a supplement to the earlier list to include identified victims whom we were not yet prepared to name in an indictment.

Again, as stated in the letter, the modification replaces paragraphs 7 and 8 of the Agreement, including paragraphs 7A through 7C that are included in the October Addendum. This means that Mr. Epstein's waiver of "his right to contest damages up to an amount as agreed to between the identified individual and Epstein"

will no longer exist, nor will Mr. Epstein's obligation to pay for the victims' counsel. Paragraphs 9 and 10 are still in effect. This includes the statement that there is no admission of civil or criminal liability, and that, "[e]xcept as to those individuals who elect to proceed EXCLUSIVELY under 18 USC § 2255, . . . Epstein's signature [cannot] be construed as admissions or evidence of civil or criminal liability." This addresses your question regarding exclusivity.

I don't think that Mr. Epstein has to make any constructive admissions of conviction. He only needs to admit that the 32 girls whose names I have provided to Mr. Goldberger are "victims" of an offense listed in 18 U.S.C. 2255.

Please let me know if you have any additional questions. Thank you.

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Jay Lefkowitz [mailto:JLefkowitz@kirkland.com]
Sent: Thursday, August 14, 2008 2:39 PM
To: [REDACTED]; C. (USAFLS)
Cc: [REDACTED]; lefkowitz@kirkland.com
Subject: Re: Follow-up point

[REDACTED] - In reviewing your December proposal, there are a couple of things I don't understand.

What limits are placed upon individuals who proceed under 2255 as if "Mr. Epstein had been tried federally and convicted of an enumerated offense." In other words, what individuals would have this right? And would these individual only have this right if they proceeded exclusively under 2255? Also, to what enumerated offenses do you think would Mr. Epstein have to make constructive admissions of conviction? and how many such offenses? And against whom? Remember that while you may have investigated various offenses, he only plead guilty to certain state crimes.

Finally, would paragraphs 8-10 of the September Agreement still be operative?

I am trying hard to understand what you have intended by the December letter. Alex has says he thinks it benefits Jeffrey, and I am open to understanding it that way. But I would like some clarity on these issues.

Thanks -- Jay

[REDACTED] C. (USAFLS)"

08/14/2008 12:44 PM

To <lefkowitz@kirkland.com>
cc [REDACTED]" <Karen.Atkinson@usdoj.gov>
Subject Follow-up point

Hi Jay -- I forgot to mention that I can no longer argue that the Court shouldn't force us to produce the agreement because we have already provided the victims with the relevant portion when I now understand from you that I have NOT provided them with the relevant portion.

A. [REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone 561 209-1047

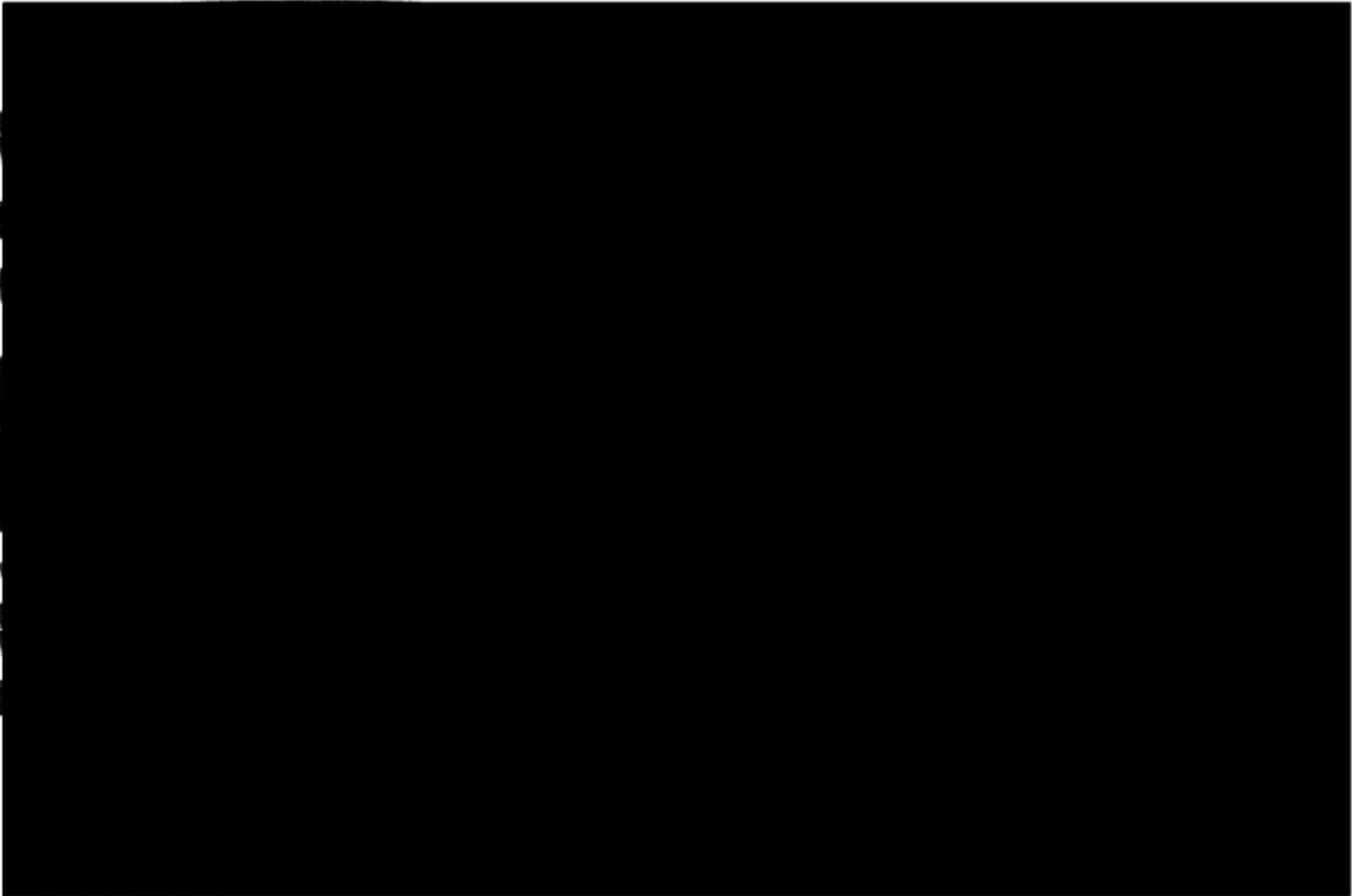
Fax 561 820-8777

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██████████ Marie C. (USAFLS)

From: ██████████ C. (USAFLS)
Sent: Friday, August 15, 2008 11:08 AM
To: Acosta, Alex (USAFLS); ██████████ (USAFLS); Senior, Robert (USAFLS); ██████████
Subject: FW: Follow-up point



Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Jay Lefkowitz [mailto:JLefkowitz@kirkland.com]
Sent: Friday, August 15, 2008 10:53 AM
To: ██████████ C. (USAFLS)
Cc: ██████████; Roy BLACK; Martin Weinberg
Subject: Re: Follow-up point

██████████ - thanks for responding to my email. You have narrowed down some of the implementation issues.

As I told you this morning, we cannot accept your contention that Mr. Epstein is bound by an agreement he

didn't sign as opposed to one he did sign, particularly in light of my written communications to your office dated December 21, 2007 and December 26, 2007. However, before we can make a determination whether to adopt the December language as you have now explained it, we need to confer with our client, which we will be able to do within the next two weeks.

I look forward to speaking with you soon to resolve these issues.

Jay

From: "[REDACTED], [REDACTED] C. (USAFLS)" [REDACTED]
Sent: 08/14/2008 03:27 PM AST
To: Jay Lefkowitz
Cc: "[REDACTED]" <Karen.Atkinson@usdoj.gov>; "Roy BLACK"
<RBLACK@royblack.com>
Subject: RE: Follow-up point

Dear Jay:

The modification contained in the December letter is clear and simple, that is why we were not surprised by Mr. Epstein's and his attorneys' actions affirming acceptance of the modification. Mr. Epstein's acceptance of the modification by pleading guilty was equally clear and simple -- it followed written communications from Mr. Sloman and myself that read: "Mr. Epstein has until the close of business on Monday, June 30, 2008, to comply with the terms and conditions of the agreement between the United States and Mr. Epstein (as modified by the U.S. Attorney's December 19th letter to Ms. Sanchez), including entry of a guilty plea, sentencing, and surrendering to begin his sentence of imprisonment."

As clearly stated in the December letter, only those "individuals whom [the United States] was prepared to name in an Indictment as victims of an enumerated offense" are the beneficiaries of the agreement. That is the list of names that I provided to Messrs. Goldberger and Tein following the change of plea. Under the September/October agreement, all "individuals whom [the United States] has identified as victims" are the beneficiaries, so I would prepare a supplement to the earlier list to include identified victims whom we were not yet prepared to name in an indictment.

Again, as stated in the letter, the modification replaces paragraphs 7 and 8 of the Agreement, including paragraphs 7A through 7C that are included in the October Addendum. This means that Mr. Epstein's waiver of "his right to contest damages up to an amount as agreed to between the identified individual and Epstein" will no longer exist, nor will Mr. Epstein's obligation to pay for the victims' counsel. Paragraphs 9 and 10 are still in effect. This includes the statement that there is no admission of civil or criminal liability, and that, "[e]xcept as to those individuals who elect to proceed EXCLUSIVELY under 18 USC § 2255, . . . Epstein's signature [cannot] be construed as admissions or evidence of civil or criminal liability." This addresses your question regarding exclusivity.

I don't think that Mr. Epstein has to make any constructive admissions of conviction. He only needs to admit that the 32 girls whose names I have provided to Mr. Goldberger are "victims" of an offense listed in 18 U.S.C. 2255.

Please let me know if you have any additional questions. Thank you.

A. [REDACTED] Villafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Jay Lefkowitz [mailto:JLefkowitz@kirkland.com]
Sent: Thursday, August 14, 2008 2:39 PM
To: [REDACTED] C. (USAFLS)
Cc: [REDACTED]; lefkowitz@kirkland.com
Subject: Re: Follow-up point

[REDACTED] - In reviewing your December proposal, there are a couple of things I don't understand.

What limits are placed upon individuals who proceed under 2255 as if "Mr. Epstein had been tried federally and convicted of an enumerated offense." In other words, what individuals would have this right? And would these individual only have this right if they proceeded exclusively under 2255? Also, to what enumerated offenses do you think would Mr. Epstein have to make constructive admissions of conviction? and how many such offenses? And against whom? Remember that while you may have investigated various offenses, he only plead guilty to certain state crimes.

Finally, would paragraphs 8-10 of the September Agreement still be operative?

I am trying hard to understand what you have intended by the December letter. Alex has says he thinks it benefits Jeffrey, and I am open to understanding it that way. But I would like some clarity on these issues.

Thanks -- Jay

[REDACTED] C. (USAFLS)"
<[REDACTED]>

To <lefkowitz@kirkland.com>
cc [REDACTED] <Karen.Atkinson@usdoj.gov>
Subject Follow-up point

08/14/2008 12:44 PM

Hi Jay – I forgot to mention that I can no longer argue that the Court shouldn't force us to produce the agreement because we have already provided the victims with the relevant portion when I now understand from you that I have NOT provided them with the relevant portion.

A. [REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone 561 209-1047

Fax 561 820-8777

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Tracking:

Villafana, [REDACTED] C. (USAFLS)

From: [REDACTED] C. (USAFLS)
Sent: Wednesday, September 17, 2008 9:56 AM
To: mestrada@podhurst.com
Subject: Letter you requested.

Hi Mercy – Here is the letter to [REDACTED] I will e-mail the updated log to you this afternoon.



Final Victim
Notification -- J...

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

██████████, ██████████ ██████████ C. (USAFLS)

From: Gerald Lefcourt [GBL@lefcourtlaw.com]
Sent: Wednesday, June 20, 2007 3:50 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: RE: Cover Letter and Subpoena

I am in receipt of your letter dated June 18, 2007 in which, among other things, you ask if I would be willing to accept service on behalf of New York Strategy Group, Inc. I write to inform you that New York Strategy Group, Inc. is not Mr. Epstein's company and accordingly I cannot accept service on its behalf. If you have any questions please feel free to contact me.

Gerald B. Lefcourt
Gerald B. Lefcourt, P.C.
148 E. 78th Street
New York, New York 10021
Tel. ██████████.0400
Fax ██████████
gbl@lefcourtlaw.com

From: ██████████, ██████████ ██████████ C. (USAFLS) [██████████@usdoj.gov]
Sent: Monday, June 18, 2007 1:10 PM
To: Gerald Lefcourt
Cc: lsanchez@fowler-white.com; ██████████
Subject: Cover Letter and Subpoena

Gerry and Lilly – Here is the subpoena and letter that we discussed earlier. Please let me know that you have received these.

Thank you.

<<070618 Lefcourt-Sanchez ltr re NES Subpoena.pdf>>

<<Scanned NES LLC subpoena.pdf>>

A. ██████████ ██████████

Assistant U.S. Attorney

561 209-1047

██████████, ██████████ C. (USAFLS)

From: ██████████, ██████████ C. (USAFLS)
Sent: Thursday, July 05, 2007 7:13 AM
To: Ball, Shawn (USAFLS)
Subject: FW: Jeffrey Epstein

Hi Shawn -- I got a message from Lilly that she is out of the office. Can you give her a call on her cell phone (786 218-0243) and just give her the gist of this e-mail?

Thanks.

A. ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

-----Original Message-----

From: ██████████, ██████████ C. (USAFLS)
Sent: Wednesday, July 04, 2007 4:07 PM
To: 'Lilly Ann Sanchez'
Cc: Gerald Lefcourt
Subject: RE: Jeffrey Epstein

Dear Lilly and Gerry: Thank you for your e-mail and your message. This e-mail was supposed to have gone out yesterday while I was in trial. I have no objection to the two-week extension with respect to NES, New York Strategy Group, and Epstein Virgin Islands Foundation.

With respect to the subpoena to the investigator, I would like to get the computer equipment as soon as possible. If you prefer to simply turn over the equipment without anyone appearing before the grand jury that is fine. If we proceed that way, we can defer litigating the issue of the applicability of the attorney-client and/or work product privilege to information related to how and why the equipment was removed. I will be in trial this week, so please contact Jason Richards at the FBI directly at 561 833-7517.

I look forward to your July 11th submission. If you would like to discuss the possibility of a federal resolution of Mr. Epstein's case that could run concurrently with any state resolution, please leave a message on my voicemail at the office (561 209-1047) and I will get back to you after trial has ended for the day.

Thank you.

A. ██████████
Assistant U.S. Attorney

561 209-1047

-----Original Message-----

From: Lilly Ann Sanchez [mailto:LAS@FOWLER-WHITE.COM]
Sent: Friday, June 29, 2007 4:05 PM
To: [REDACTED], [REDACTED] C. (USAFLS)
Cc: Gerald Lefcourt
Subject: Jeffrey Epstein

[REDACTED]-

As i stated in my earlier voicemail today, we were calling to request a two-week extension on the return date of the following outstanding subpoenas:

1. NES
2. NY Strategy
3. Investigator Riley
4. Certification for St. Thomas entity

We will be providing an additional submission to the Office by July 11 and hope to be able to reach a state-based resolution shortly thereafter.

as your voicemail to me indicated, you would not oppose a one to two-week extension. accordingly, we would like to extend the return date two weeks-- to July 24.

regards

Lilly Ann Sanchez, Esq.
FOWLER WHITE BURNETT P.A.
Espirito Santo Plaza, 14th Floor
1395 Brickell Avenue
Miami, Florida 33131-3302
Telephone: (305) 789-9200
Direct Dial: (305) 789-9279
Facsimile: (305) 728-7579
lsanchez@fowler-white.com

[REDACTED], [REDACTED] C. (USAFLS)

From: [REDACTED] C. (USAFLS)
Sent: Tuesday, May 22, 2007 7:02 PM
To: [REDACTED]
Subject: FW: Jeffrey Epstein

[REDACTED]
A. [REDACTED] ~~Titafana~~
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: [REDACTED]
Sent: Tuesday, May 22, 2007 6:33 PM
To: [REDACTED], [REDACTED] C. (USAFLS)
Subject: FW: Jeffrey Epstein

fyi

From: [REDACTED]
Sent: Tuesday, May 22, 2007 6:32 PM
To: 'Gerald Lefcourt'
Subject: RE: Jeffrey Epstein

I have your letter. I think we are on the same page, but to be sure I do want to clarify that we spoke the other week and I did say that if you want to meet with me again, I am ready to do so. The wording of your letter, however, suggests implicitly that I agreed to contact you before a decision is made to seek an indictment of Mr. Epstein. If that was your understanding, then please allow me to clarify. Our investigation is ongoing and if we decide to seek an indictment, we don't intend to call Mr. Epstein's representatives to let him know that. Of course, in the interim, if you would like to make a presentation to us, we are willing to listen.

Along those lines, given the fact that we have already met once, with schedules being what they are, it makes sense for our criminal chief, [REDACTED] Menchel, to be included when you make another presentation, rather than working up the chain incrementally. I realize you were being respectful in not attempting to leapfrog over me, which I appreciate. I will pass on your request to meet with the U.S. Attorney as well, but can't commit for him one way or another. When you have some dates in mind, let me know and I will try to set up a meeting in Miami.

From: Gerald Lefcourt [mailto:GBL@lefcourtlaw.com]
Sent: Tuesday, May 22, 2007 2:05 PM
To: [REDACTED]
Cc: [REDACTED] C. (USAFLS); Lilly [REDACTED] Sanchez
Subject: Jeffrey Epstein

■■■■, attached is a letter seeking meetings, as discussed with you, but with others if it is not resolved. Thanks for your attention. Could you email back so that I know you have received this letter?

Gerald B. Lefcourt
Gerald B. Lefcourt, P.C.
148 E. 78th Street
New York, New York 10021
Tel. ■■■■
Fax ■■■■
gbl@lefcourtlaw.com

Tracking:

150

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[REDACTED] C. (USAFLS)

From: Gerald Lefcourt [GBL@lefcourtlaw.com]
Sent: Tuesday, May 22, 2007 2:05 PM
To: [REDACTED]
Cc: [REDACTED] C. (USAFLS); Lilly [REDACTED] Sanchez
Subject: Jeffrey Epstein
Attachments: 2007-05-22 letter to AUSA Lourie.pdf

[REDACTED], attached is a letter seeking meetings, as discussed with you, but with others if it is not resolved. Thanks for your attention. Could you email back so that I know you have received this letter?

Gerald B. Lefcourt
Gerald B. Lefcourt, P.C.
148 E. 78th Street
New York, New York 10021
Tel. [REDACTED]
Fax [REDACTED]
gbl@lefcourtlaw.com

██████████, ██████████ C. (USAFLS)

Sent: Tuesday, November 27, 2007 1:55 PM
To: Jay Lefkowitz
Cc: Acosta, Alex (USAFLS)
Subject: Epstein

Jay,

Please accept my apologies for not getting back to you sooner but I was a little under the weather yesterday. I hope that you enjoyed your Thanksgiving.

Regarding the issue of due diligence concerning Judge Davis' selection, I'd like to make a few observations. First, Guy Lewis has known for some time that Judge Davis was making reasonable efforts to secure Aaron Podhurst and Bob Josephsberg for this assignment. In fact, when I told you of Judge Davis's selection during our meeting last Wednesday, November 21st, you and Professor Dershowitz seemed very comfortable, and certainly not surprised, with the selection. Podhurst and Josephsberg are no strangers to nearly the entire Epstein defense team including Guy Lewis; Lili ██████████ Sanchez, Roy Black, and, apparently, Professor Dershowitz who said he knew Mr. Josephsberg from law school. Second, Podhurst and Josephsberg have long-standing stellar reputations for their legal acumen and ethics. It's hard for me to imagine how much more vetting needs to be done.

The United States has a statutory obligation (Justice for All Act of 2004) to notify the victims of the anticipated upcoming events and their rights associated with the agreement entered into by the United States and Mr. Epstein in a timely fashion. Tomorrow will make one full week since you were *formally* notified of the selection. I must insist that the vetting process come to an end. Therefore, unless you provide me with a *good faith* objection to Judge Davis's selection by COB tomorrow, November 28, 2007, I will authorize the notification of the victims. Should you give me the go-ahead on Podhurst and Josephsberg selection by COB tomorrow, I will simultaneously send you a draft of the letter. I intend to notify the victims by letter after COB Thursday, November 29th. Thanks,

Jeff

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West Palm Beach, FL 33401

Phone 561 209-1047

Fax 561 820-8777

Tracking:

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██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Thursday, September 06, 2007 9:28 AM
To: GBL@lefcourtlaw.com
Subject: Beller, Gany and NES appearances

Hi Gerry – I am writing to confirm that the NES witnesses will appear as scheduled on Tuesday, September 11th. Can you please confirm?

Thank you.

A. ██████████ ██████████
Assistant U.S. Attorney
561 209-1047

...ow. Thanks,

-----Original Message-----

From: Jay Lefkowitz [mailto:JLefkowitz@kirkland.com]

Sent: Friday, November 16, 2007 2:00 PM

To: [REDACTED] (USAFLS)

Subject:

Jeff - Beyond my letter the other day, and your email to me from a few weeks ago, is there anything else you need from me regarding the plea and sentencing dates.

As we discussed, and as we have confirmed, the Court has told us she will handle both at the same time (plea before sentencing, obviously), and to the agreed-upon counts, on Jan 4. I trust I have cleared up any confusion regarding Jan 7.

Thx. Jay

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██████████ C. (USAFLS)

From: ██████████ C. (USAFLS)
Sent: Tuesday, November 20, 2007 10:28 AM
To: Krischer, Barry (LEO); 'Lanna Belohlavek'
Cc: ██████████
Subject: Confirmation of Epstein plea date

Hi Barry and Lanna – I just wanted to reconfirm the plea and sentencing date for Epstein. Rolando thought that Barry said December 16th, which is a Sunday. Can you send me the correct date and time?

Thank you, and have a great Thanksgiving.

A. ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

Tracking:

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EFTA00227372

[REDACTED] C. (USAFLS)

From: Lanna Belohlavek [Lbelohla@sa15.state.fl.us]
Sent: Thursday, December 06, 2007 3:05 PM
To: [REDACTED] C. (USAFLS)
Subject: Epstein

[REDACTED]

Could you please outline what factual basis you think fits the procuring statute for the plea conference. I am trying to finalize the paperwork.

Lanna

██████████ C. (USAFLS)

From: ██████████ C. (USAFLS)
Sent: Thursday, December 06, 2007 3:36 PM
To: Lanna Belohlavek
Subject: RE: Epstein

Hi Lanna --

I can put something together. I assume something short and sweet? And has a date been set?

A. ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Lanna Belohlavek [mailto:Lbelohla@sa15.state.fl.us]
Sent: Thursday, December 06, 2007 3:05 PM
To: ██████████, ██████████ C. (USAFLS)
Subject: Epstein

██████████

Could you please outline what factual basis you think fits the procuring statute for the plea conference. I am trying to finalize the paperwork.

Lanna

██████████, ██████████ ██████████ C. (USAFLS)

From: Lanna Belohlavek [Lbelohla@sa15.state.fl.us]
Sent: Thursday, December 06, 2007 4:47 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: RE: Epstein

Yep, something short and sweet with no names. The date is Dec. 21. Lanna

From: ██████████, ██████████ ██████████ C. (USAFLS) [mailto:██████████]
Sent: Thursday, December 06, 2007 3:36 PM
To: Lanna Belohlavek
Subject: RE: Epstein

Hi Lanna –

I can put something together. I assume something short and sweet? And has a date been set?

A. ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Lanna Belohlavek [mailto:Lbelohla@sa15.state.fl.us]
Sent: Thursday, December 06, 2007 3:05 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: Epstein

██████████
Could you please outline what factual basis you think fits the procuring statute for the plea conference. I am trying to finalize the paperwork.

Lanna

██████████, ██████████ ██████████ C. (USAFLS)

From: ██████████, ██████████ ██████████ C. (USAFLS)
Sent: Thursday, December 06, 2007 5:07 PM
To: 'Lanna Belohlavek'
Subject: RE: Epstein

Hi Lanna – I will send it to you tomorrow morning. What time will the hearing be? And it is Judge McSorley, right?

Thank you!

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Lanna Belohlavek [mailto:Lbelohla@sa15.state.fl.us]
Sent: Thursday, December 06, 2007 4:47 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: RE: Epstein

Yep, something short and sweet with no names. The date is Dec. 21. Lanna

From: ██████████, ██████████ ██████████ C. (USAFLS) [mailto:██]
Sent: Thursday, December 06, 2007 3:36 PM
To: Lanna Belohlavek
Subject: RE: Epstein

Hi Lanna –

I can put something together. I assume something short and sweet? And has a date been set?

A. ██████████ ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

From: Lanna Belohlavek [mailto:Lbelohla@sa15.state.fl.us]
Sent: Thursday, December 06, 2007 3:05 PM
To: ██████████, ██████████ ██████████ C. (USAFLS)
Subject: Epstein

██████████

Could you please outline what factual basis you think fits the procuring statute for the plea conference. I am trying to finalize the paperwork.

Lanna

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██████████ C. (USAFLS)

From: ██████████ C. (USAFLS)
Sent: Thursday, December 13, 2007 10:03 AM
To: lefkowitz@kirkland.com
Cc: ██████████); ██████████ (USAFLS); Acosta, Alex (USAFLS)
Subject: Correspondence

Dear Jay: Please review the enclosed. I look forward to seeing you tomorrow.



071213 ██████████
Ltr to Lefkow...

A. ██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone 561 209-1047
Fax 561 820-8777

[REDACTED] C. (USAFLS)

From: [REDACTED] (USAFLS)
Sent: Tuesday, February 26, 2008 9:34 AM
To: [REDACTED] C. (USAFLS)
Subject: Confidential

FYI

From: [REDACTED] (USAFLS)
Sent: Monday, February 25, 2008 7:43 PM
To: JLefkowitz@kirkland.com
Cc: [REDACTED]
Subject: Epstein

Jay,

The Section Chief of DOJ's Child Exploitation Obscenity Section (CEOS) notified me today that he will review the matter involving your client Jeffrey Epstein. The Section Chief has indicated that he is ready to proceed immediately, and I understand you are in the process of providing him this week with a summary of issues to be reviewed, and expect to meet with him next week.

The Section Chief also indicated that you would be calling this Office regarding the upcoming March 3, 2008 court date in the Fifteenth Judicial Circuit, in and for Palm Beach County. As you know, the Agreement entered into by your client originally provided that the United States Attorney's Office for the Southern District of Florida (this Office) would defer prosecution if your client pled guilty to enumerated state charges by October 26, 2007. Since then, that date has been postponed for a number of reasons. At this juncture, it would not be reasonable to keep the current March 3rd date as a deadline for compliance with the Agreement. That said, this Office is very concerned about additional delays. Despite this concern, I want to assure you that if counsel for Mr. Epstein meets with CEOS next week (the week of March 3rd), this Office will extend the time for compliance with the Agreement to provide CEOS time to engage in a thorough review.

It goes without saying that in the event that CEOS decides that a federal prosecution should not be undertaken against Mr. Epstein, this Office will close its investigation. However, should CEOS disagree with Mr. Epstein's position, Mr. Epstein shall have one week to abide by the terms and conditions of the September 24, 2007 Agreement as amended by letter from United States Attorney Acosta to Jay Lefkowitz.

[REDACTED]
First Assistant U.S. Attorney

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Southern District of Florida

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