



U.S. Department of Justice

United States Attorney  
Southern District of Florida

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500 South Australian Ave., Suite 400  
West Palm Beach, FL 33401

Facsimile: [REDACTED]

August 16, 2007

VIA FACSIMILE

Gerald Lefcourt, Esq.  
Gerald P. Lefcourt, P.C.  
[REDACTED]

Re: Subpoena to Custodian of Records, NES, LLC

Dear Mr. Lefcourt:

I write in response to your letter of July 18, 2007 regarding the grand jury subpoena issued to the Custodian of Records for NES, LLC. I have attached an identical subpoena containing a return date of September 11, 2007, and subpoenas for two NES employees, Eric Gany and Harry Beller. If you will not be representing Messrs. Gany and Beller, please let me know.

First, as I mentioned in my earlier correspondence, a properly executed declaration from the Custodian of Records is needed, and, if no documents responsive to a particular request exist, the Custodian should certify that under penalty of perjury.

Second, you write that NES has no documents responsive to Requests 1 through 5. I know that NES has several credit card accounts for the benefit of the persons who manage Mr. Epstein's properties, including Janusz Banasiak and Alfredo Rodriguez. I also know that NES regularly receives money from an account that is used to pay expenses at 358 El Brillo Way and also wires money to that same account. Those wire transfers fall within the time period called for by the subpoena and number in the hundreds of thousands of dollars. If NES does not maintain records of its banking activities, then I would like to see a copy of its document retention policy, so I have added that to the Attachment to the Subpoena.

Third, Mr. Menchel's comment to you about potential money laundering charges related only to a resolution of the case. In other words, if the sex offense case is resolved, the Office would close its investigation into other areas as well. The matter has not been, and it does not appear that it will be, resolved so the money laundering investigation continues, and Request Number 6 will not be withdrawn. The request is not overbroad and is stated with particularity, so please comply with the request by the new deadline.

GERALD LEFCOURT, ESQ.  
AUGUST 16, 2007  
PAGE 2 OF 2

With respect to paragraph 7, the information provided regarding the pilots came from the corporate records of Hyperion and JEGE, Inc., not NES. However, I have provided a shorter list in the new subpoena attachment.

I also have enclosed another certification for the Custodian of Records' signature.

Thank you again for your assistance.

Sincerely,

R. Alexander Acosta  
United States Attorney

By:

[REDACTED]  
Assistant United States Attorney

cc: [REDACTED], FBI (with enclosures)

# United States District Court

SOUTHERN DISTRICT OF FLORIDA

TO: Custodian of Records  
NES, LLC

**SUBPOENA TO TESTIFY  
BEFORE GRAND JURY**  
FGJ 07-103(WPB)/No. OLY-65/2

SUBPOENA FOR:

PERSON

DOCUMENTS OR OBJECT[S]

**YOU ARE HEREBY COMMANDED** to appear and testify before the Grand Jury of the United States District Court at the place, date and time specified below.

**PLACE:**

United States District Courthouse  
701 Clematis Street  
West Palm Beach, Florida 33401

**ROOM:**

Grand Jury Room

**DATE AND TIME:**

September 11, 2007  
1:00 pm\*

**YOU ARE ALSO COMMANDED** to bring with you the following document(s) or object(s):

**THE DOCUMENTS AND OBJECTS LISTED ON ATTACHMENT A.**

\*Please coordinate your compliance with this subpoena and confirm the date, time, and location of your appearance with S/A [REDACTED], Federal Bureau of Investigation, Telephone: [REDACTED]

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

CLERK

(BY) DEPUTY CLERK



DATE:

August 16, 2007

This subpoena is issued upon application  
of the United States of America

[REDACTED]

Name, Address and Phone Number of Assistant U.S. Attorney  
[REDACTED], Assistant U.S. Attorney  
500 So. Australian Avenue, Suite 400  
West Palm Beach, FL 33401-6235  
Tel: [REDACTED]  
Fax: [REDACTED]

\*If not applicable, enter "none."

To be used in lieu of AO110

FORM ORD-227  
JAN.86

**ATTACHMENT TO SUBPOENA OLY-65/2**  
**NES, LLC**

1. For the period of January 1, 2003 to the present, all calendars, agendas, daily diaries, or other records of appointments, travel meetings and the like, kept by or on behalf of Jeffrey Epstein, [REDACTED], [REDACTED], Lesley Groff, and/or [REDACTED]. This request includes information that is kept in physical "hard copy" and/or electronic form, whether stored on a personal computer, database server, cellular telephone, "Blackberry" unit, personal digital assistant ("PDA") or other handheld electronic device, or in any other electronic form, and all metadata included within the electronic/physical files.
  
2. For the period of January 1, 2003 to the present, all address books, contact lists, or other records of names, telephone numbers, addresses, and/or e-mail addresses kept by or on behalf of Jeffrey Epstein, [REDACTED], [REDACTED], Lesley Groff, and/or [REDACTED]. This request includes information that is kept in physical "hard copy" and/or electronic form, whether stored on a personal computer, database server, cellular telephone, "Blackberry" unit, personal digital assistant ("PDA") or other handheld electronic device, or in any other electronic form, and all metadata included within the electronic/physical files.
  
3. For the period of January 1, 2003 to the present, all e-mails, instant messages, text messages, meeting invitations, and any other electronic communication sent by Jeffrey Epstein, [REDACTED], [REDACTED], Lesley Groff, and/or [REDACTED] to Jeffrey Epstein, [REDACTED], [REDACTED], Lesley Groff, and/or [REDACTED]. This request includes information that is kept in physical "hard copy" and/or electronic form, whether stored on a personal computer, database server, cellular telephone, "Blackberry" unit, personal digital assistant ("PDA") or other handheld electronic device, or in any other electronic form, and all metadata included within the electronic/physical files.
  
4. For the period of January 1, 2003 to the present, all documents and information referring or relating to the transfer of funds to or from any account owned by NES, LLC to or from any bank account used for the maintenance of the property located at 358 El Brillo Way, Palm Beach, Florida, or for the payment of any person working at 358 El Brillo Way, Palm Beach, Florida.

5. For the period of January 1, 2003 to the present, all documents and information referring or relating to the transfer of funds to or from any account owned by NES, LLC to or from any bank account on which Janusz Banasiak and/or Alfredo Rodriguez had or has check-writing authority and/or access to via debit/ATM card.
6. For the period of January 1, 2003 to the present, all documents and information referring or relating to the transfer of fund to or from any account owned by NES, LLC to or from any account owned by JEGB, Inc., Jeffrey E. Epstein, Hyperion Air, Inc., Financial Trust Co., New York Strategy Group, Inc., J. Epstein Virgin Islands Foundations, Inc., and/or Epstein Interests.
7. For the period of January 1, 2003 to the present, the names of all employees and all corporate directors, board members, and shareholders.
8. For the period of January 1, 2003 to the present, copies of all W-2s and/or 1099s for the following persons: Jeffrey Epstein, [REDACTED], Lesley Groff, [REDACTED], [REDACTED], Janusz Banasiak, Alfredo Rodriguez, Harry Beller, [REDACTED], and Eric T. Gany.
9. Any and all document retention and/or destruction policies.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

IN RE FEDERAL GRAND JURY SUBPOENA  
OLY-65/2  
ADDRESSED TO NES, LLC

CERTIFICATION REGARDING DOMESTIC RECORDS  
OF REGULARLY CONDUCTED ACTIVITY

I, the undersigned, \_\_\_\_\_, declare that I am employed by  
NES, LLC in the position of \_\_\_\_\_, and, by reason of my position,  
am authorized and qualified to make this declaration.

1. In my employment with NES, LLC, I am familiar with the business records it  
maintains.

2. I certify that the records attached to this certification:

- (a) were made at or near the time of the occurrence of the matters set forth  
therein, by or from information transmitted by, a person with knowledge of  
those matters;
- (b) were kept in the course of regularly conducted business activity; and
- (c) were made by the regularly conducted activity as a regular practice.

2. Among the records so maintained are the attached records itemized in Appendix A  
(Document Inventory).

3. I further certify that the documents attached hereto are responsive to Grand Jury  
Subpoena 65/2 served upon NES, LLC.

4. I further certify that NES, LLC has no documents responsive to request number(s)

\_\_\_\_\_ in Grand Jury Subpoena number 65/2. [Fill in or strike out as appropriate.]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing information is true and correct.

Executed this \_\_\_\_\_ day of \_\_\_\_\_, 2007.

Place of execution: \_\_\_\_\_

\_\_\_\_\_  
Signature

# United States District Court

SOUTHERN DISTRICT OF FLORIDA

TO: HARRY BELLER  
NES, LLC

## SUBPOENA TO TESTIFY BEFORE GRAND JURY

FGJ 07-103(WPB)/No. OLY-75

SUBPOENA FOR:

PERSON

DOCUMENTS OR OBJECT[S]

**YOU ARE HEREBY COMMANDED** to appear and testify before the Grand Jury of the United States District Court at the place, date and time specified below.

<b>PLACE:</b> United States District Courthouse 701 Clematis Street West Palm Beach, Florida 33401	<b>ROOM:</b> Grand Jury Room  <b>DATE AND TIME:</b> September 11, 2007 1:00 pm*
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**YOU ARE ALSO COMMANDED** to bring with you the following document(s) or object(s):

\*Please coordinate your compliance with this subpoena and confirm the date, time, and location of your appearance with S/A [REDACTED], Federal Bureau of Investigation, Telephone: [REDACTED]

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

CLERK   (BY) DEPUTY CLERK	  DATE: August 16, 2007
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This subpoena is issued upon application of the United States of America [REDACTED]	Name, Address and Phone Number of Assistant U.S. Attorney [REDACTED], Assistant U.S. Attorney 500 So. Australian Avenue, Suite 400 West Palm Beach, FL 33401-6235 Tel: [REDACTED] Fax: [REDACTED]
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\*If not applicable, enter "none."

To be used in lieu of AO110

**United States District Court**  
SOUTHERN DISTRICT OF FLORIDA

TO: ERIC GANY  
NES, LLC

**SUBPOENA TO TESTIFY  
BEFORE GRAND JURY**  
FGJ 07-103(WPB)/No. OLY-76

SUBPOENA FOR:



PERSON



DOCUMENTS OR OBJECT[S]

**YOU ARE HEREBY COMMANDED** to appear and testify before the Grand Jury of the United States District Court at the place, date and time specified below.

<b>PLACE:</b> United States District Courthouse 701 Clematis Street West Palm Beach, Florida 33401	<b>ROOM:</b> Grand Jury Room  <b>DATE AND TIME:</b> September 11, 2007 1:00 pm*
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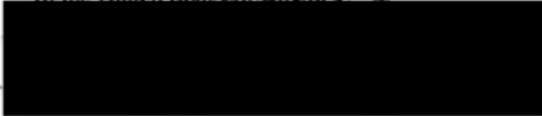
**YOU ARE ALSO COMMANDED** to bring with you the following document(s) or object(s):

\*Please coordinate your compliance with this subpoena and confirm the date, time, and location of your appearance with S/A [REDACTED], Federal Bureau of Investigation, Telephone: [REDACTED].

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

CLERK   (BY) DEPUTY CLERK		<b>DATE:</b> August 16, 2007
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This subpoena is issued upon application of the United States of America



Name, Address and Phone Number of Assistant U.S. Attorney  
[REDACTED], Assistant U.S. Attorney  
500 So. Australian Avenue, Suite 400  
West Palm Beach, FL 33401-6235  
Tel: [REDACTED]  
Fax: [REDACTED]

\*If not applicable, enter "none."



U.S. Department of Justice

United States Attorney  
Southern District of Florida

[Redacted]  
500 S. Australian Ave, 4th Floor  
West Palm Beach, Florida 33401  
Facsimile [Redacted]

FACSIMILE COVER SHEET

TO: Gerald Lescourt, Esq.

DATE: August 16, 2007

FAX NO. [Redacted]

# OF PAGES: 10

PHONE NO. [Redacted]

RE: NES, LLC

FROM: [Redacted], Assistant U.S. Attorney

PHONE NO. [Redacted]

COMMENTS: