



LEOPOLD-KUVINTM
CONSUMER JUSTICE ATTORNEYS

January 7, 2010

Via Fax and Mail

Robert Critton, Esq.
Burman Critton, et. al.
303 Banyan Boulevard, Suite 400
West Palm Beach, FL 33401

Re: [REDACTED] v. JEFFREY EPSTEIN
OUR FILE NO.: 080303

Dear Bob:

Thank you for your letter of January 7, 2010. Initially, I find it interesting that you respond to my request for deposition dates of Mr. Goldsmith while ignoring all of my correspondence regarding the motion you currently have set for January 26, 2010. Regardless, I respectfully disagree with your analysis of what information Mr. Goldsmith may have that is relevant to my client's case.

As you will note in my Amended Complaint, we have alleged that there is a much larger conspiracy with respect to Mr. Epstein and his criminal sex organization. As you are well aware, my client was only one of many girls who were procured by Mr. Epstein in continuance of this illegal conspiracy. Further, other similar bad act evidence is relevant and admissible under Fla. Stat. §90.404.

It is clear from the evidence that has already been generated in this litigation that Mr. Goldsmith was having conversations directly with Mr. Epstein at or around the time of the police investigation. You further know, through the deposition of Chief Reiter, that Mr. Goldsmith was attempting to persuade Chief Reiter to drop his investigation of Mr. Epstein, so much so that he bordered on illegal conduct according to Chief Reiter. I believe that it is entirely reasonable that as a result of Mr. Goldsmith's conversations with Mr. Epstein, and his subsequent conversations with Chief Reiter, that he likely has relevant information regarding the illegal sexual enterprise being run by Mr. Epstein out of his home at or around the time that my client was taken there. It is also reasonable to assume that given Mr. Goldsmith's close relationship with Mr. Epstein that he may have been at the home when certain girls were taken there, and may have discussed the facts of this case and the prosecution of Mr. Epstein with him directly.