

Memorandum

To: File (Jane Does #1 & 2 v. United States)
From: [REDACTED]
Re: Call with [REDACTED]
Date: June 13, 2019

On June 11, 2019, [REDACTED] and I had a call with [REDACTED] which lasted approximately 30 minutes. This call was a follow-up to a call I previously had with [REDACTED] in which I indicated that we were interested in identifying the victims he represented in the Jeffrey Epstein matter and determining whether any of those individuals is willing to speak with us about potential remedies in the CVRA civil litigation. [REDACTED] previously indicated that he had 16 clients from that matter; he maintained contact with some of those persons but had not had contact with others in many years.

During the June 11 call, he identified the following individuals as the 16 clients who retained him in connection with the Epstein matter:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]
8. [REDACTED]
9. [REDACTED]
10. [REDACTED]
11. [REDACTED]
12. [REDACTED] Jennifer P [REDACTED]
13. [REDACTED]
14. [REDACTED]
15. [REDACTED]
16. [REDACTED]

CT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, &

Of the 15 arguably current clients, [REDACTED] was able to reach six individuals to discuss our query. All six of those individuals declined to speak with us. He explained that all of them held the view that they would like to see Jeffrey Epstein prosecuted for his crimes, but that they are not willing to speak with law enforcement or otherwise participate in any criminal or civil litigation because any participation could compromise their anonymity, which is the thing they most highly value. Several victims had what he described as "PTSD," and he said they do not want to discuss the matter with law enforcement, nor do they want family or friends to know about their involvement with Epstein. The victims preferred that [REDACTED] speak for them because they do not want Epstein to know more about them or their communication with law enforcement. It is for these reasons as well that they have declined [REDACTED]' invitation to join and/or support the civil CVRA lawsuit.

All 16 of [REDACTED]'s clients availed themselves of the processes set forth in the NPA. They retained [REDACTED], who was selected and paid for through the procedures in the NPA, filed lawsuits pursuant to the federal statute set forth in the NPA, and Epstein did not contest liability as required by the NPA. The only issue was the amount that each of them could or should receive from Epstein.

[REDACTED] indicated that he and his team would continue to try and reach the remaining individuals and get their input on the outstanding question. We communicated that the deadline for our filing is June 24 and he indicated that he would get back to us before that date to convey any additional communications from the victims that he represents (or represented at that time). We offered to help him locate any victims for whom he did not have current contact information and pass that contact information to him to make his job easier. He said he would let us know if he needed assistance and thanked us for our efforts.