

[REDACTED]

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Subject: RE: Epstein

Thanks. [REDACTED] wants you and [REDACTED] in on the conference call, too, which means that we can't do the call until August 20th -- after the deadline we have already set. I don't know if I should say something or just wait patiently. What do you think? The agents and I were planning to go to New York on the 20th to track down the assistants and talk to other folks.

Tracking:

10

EFTA00179797

Recipient
[REDACTED]
[REDACTED] (0000 00)

Read
Read: 8/7/2007 4:06 PM

From: A. Salter [mailto:anna.salter@fbi.gov] 2007 3:23 PM

To: [REDACTED]
Subject: RE: Possible Retainer for a Federal Criminal Investigation/Prosecution

Hi,
I just faxed over a signed contract. However, I'm not sure what kind of consultation you are looking for, but generally if there are a lot of records, it takes more than 6 hours to read and report on them. In any case, I'm happy to set up a phone conference to get started. Is there anything you want to send me first in terms of records, or are there questions that you have that you are hoping I can speak to?

Next week I am gone Tuesday and Wednesday but here the other days. Anna Salter

From: [REDACTED]
Sent: Friday, May 18, 2007 1:00 PM

To: [REDACTED]
Subject: FW: Possible Retainer for a Federal Criminal Investigation/Prosecution

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Can you let me know about the contract and also when you might be available for a telephone conference? Perhaps we could do a short one to go over the background of the case and then I could send you some materials that we could discuss during a longer conference.

Thank you for your assistance.

From: A. Salter [mailto:anna.salter@fbi.gov]
Sent: Wednesday, April 18, 2007 8:27 AM

To: [REDACTED]
Subject: RE: Possible Retainer for a Federal Criminal Investigation/Prosecution

Hi,

These are all things I could testify about. Can you tell me the time-line?

I charge \$250/hour for everything: reading records, testifying, etc. For traveling I charge from the time I leave the house until I arrive at the hotel, and then again the next day from the time I leave the hotel until I return to the hotel or to my home. I don't ask for a retainer.

If that's acceptable, please give me a call at [REDACTED] at your convenience. Anna Salter

PS That email address is having trouble. Please send emails to [REDACTED]

From: [REDACTED]
Sent: Monday, April 16, 2007 10:50 AM
To: [REDACTED]
Subject: Possible Retainer for a Federal Criminal Investigation/Prosecution

Dear Dr. [REDACTED]

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I am considering undertaking a prosecution, and I am hoping that you would consider serving as an expert consultant and possible witness for the case. The types of issues that I am hoping you can address include:

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3. Traits of psychopathy.
4. Effects of abuse on victims.

When you have a chance, would you mind calling or e-mailing me? My direct dial number is shown below. You also can contact Special Agent [REDACTED] with the FBI, [REDACTED]

Thank you.

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Friday, May 18, 2007 3:08 PM
To: [REDACTED]
Subject: RE: Possible Retainer for a Federal Criminal Investigation/Prosecution

How about 9 am central time? I am still confused, however. Are you expecting me to fly to Florida to testify? Anna

From: [REDACTED] [mailto:[REDACTED]]
Sent: Friday, May 18, 2007 2:02 PM
To: [REDACTED]
Subject: FW: Possible Retainer for a Federal Criminal Investigation/Prosecution

Hi Dr. Salter – This really won't be a record-intensive case. How about if we talk on Monday and I can fill you in on what the case involves and where I think you can really help us. I am hoping you can help educate the jury on issues related to the victims and the perpetrator. I do not have any appointments scheduled for Monday, so any time that day will work for me. Just let me know when and what number I should use to call you.

Thank you again.

P.S. I keep trying to send mail to your tds.com e-mail address and it is returned to me as undeliverable.

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

From: A. Salter [mailto:[REDACTED]]
Sent: Friday, May 18, 2007 2:33 PM
To: [REDACTED]
Subject: RE: Possible Retainer for a Federal Criminal Investigation/Prosecution

Hi,

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

From: A. Salter [mailto:[REDACTED]]
Sent: Wednesday, April 18, 2007 8:27 AM
To: [REDACTED]
Subject: RE: Possible Retainer for a Federal Criminal Investigation/Prosecution

Hi,

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From: [REDACTED] ([REDACTED])
Sent: Monday, April 16, 2007 10:50 AM
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Thank you.

[REDACTED]
Assistant U.S. Attorney

[REDACTED]
Fax [REDACTED]
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Friday, May 18, 2007 3:02 PM
To: [REDACTED]
Subject: FW: Possible Retainer for a Federal Criminal Investigation/Prosecution

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Thank you again.

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[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone: [REDACTED]
Fax: [REDACTED]

From: A. Salter [mailto:[REDACTED]]
Sent: Friday, May 18, 2007 2:33 PM
To: [REDACTED]
Subject: RE: Possible Retainer for a Federal Criminal Investigation/Prosecution

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██████████
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone ██████████
Fax ██████████

From: A. Salter ██████████
Sent: Wednesday, April 18, 2007 8:27 AM
To: ██████████
Subject: RE: Possible Retainer for a Federal Criminal Investigation/Prosecution

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From: ██████████ (mailto:██████████)
Sent: Monday, April 16, 2007 10:50 AM
To: ██████████
Subject: Possible Retainer for a Federal Criminal Investigation/Prosecution

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Thank you.

[REDACTED]
Assistant U.S. Attorney

Fax [REDACTED]
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Friday, May 18, 2007 3:01 PM
To: 'A. Salter'
Subject: RE: Possible Retainer for a Federal Criminal Investigation/Prosecution

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West Palm Beach, FL 33401
Phone [REDACTED]
Fax [REDACTED]

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[REDACTED]
Assistant U.S. Attorney

Fax [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

Friday, May 18, 2007 2:33 PM
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West Palm Beach, FL 33401
Phone [REDACTED]
Fax [REDACTED]

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[REDACTED]
Assistant U.S. Attorney

Fax [REDACTED]
[REDACTED]

[REDACTED]

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[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone: [REDACTED]
Fax: [REDACTED]

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From: [REDACTED] [mailto:Ann.[REDACTED]]
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Thank you.

[REDACTED]
Assistant U.S. Attorney

Fax [REDACTED]
[REDACTED]

[REDACTED]
From: [REDACTED] (USAFLS)
Sent: Monday, May 14, 2007 10:52 AM
To: [REDACTED] (USAFLS)
Subject: Re: Operation Leap Year

[REDACTED],

You will not have approval to go forward tomorrow with an indictment or to proceed by complaint. [REDACTED] has your memo and leftcourt's letter but he is out of the district at the US Attorney's conference for the next several days.

I'm having trouble understanding - given how long this case has been pending - what the rush is. This is obviously a very significant case and [REDACTED] wants to take his time making sure he is comfortable before proceeding.

Sent from my BlackBerry Wireless Handheld

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

From: [REDACTED] <[REDACTED]>
To: [REDACTED] (USAFLS) <[REDACTED]>; [REDACTED] (USAFLS) <[REDACTED]>
Sent: Mon May 14 10:38:15 2007
Subject: Operation Leap Year

Good morning: I just received a call that Epstein's plane is flying from the Virgin Islands to Newark now, so it looks like Epstein is going to show up for his court appearance tomorrow. Can you let me know if the indictment is going tomorrow or, if not, whether we are authorized to proceed by Complaint?

Thank you.

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

[REDACTED]

From: [REDACTED]
Sent: Monday, May 14, 2007 10:38 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: Operation Leap Year

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Thank you.

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

Tracking:

Recipient

[REDACTED] (USAFLS)

[REDACTED] (USAFLS)

Read

Read: 5/14/2007 10:52 AM

Read: 5/14/2007 10:52 AM

[REDACTED]

From: [REDACTED] (USAFLS)
Sent: Friday, May 11, 2007 2:09 PM
To: [REDACTED]; [REDACTED] (USAFLS)
Subject: RE:

[REDACTED]

Is the pros memo the same as the earlier version that [REDACTED] emailed me? Also you reference Appendix A in your memo but it wasn't attached to my first memo.

Thanks,
[REDACTED]

From: [REDACTED]
Sent: Wednesday, May 09, 2007 5:36 PM
To: [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS)
Subject: RE:

Hi [REDACTED] and [REDACTED] – Toni and I finalized the forfeiture provisions this afternoon, so here is the indictment with the forfeiture language and another copy of the pros memo. [REDACTED] – I will sign the indictment and add it to the packet. Thanks.

<< File: 070507 Indictment with Forfeiture.wpd >> << File: Pros Memo 5-1-07.wpd >>

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

From: [REDACTED] (USAFLS)
Sent: Wednesday, May 09, 2007 5:17 PM
To: [REDACTED]
Subject:

Pls email me pros memo. Thanks.

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED] (USAFLS)
Thursday, May 10, 2007 9:52 AM
[REDACTED]
RE:

[REDACTED]
This is so wrong – on so many levels – that I don't know where to begin.

[REDACTED]
From: [REDACTED]
Sent: Thursday, May 10, 2007 9:51 AM
To: [REDACTED] (USAFLS)
Subject: FW:

Your guidance is sorely needed.

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone: [REDACTED]
Fax: [REDACTED]

[REDACTED]
From: [REDACTED] (USAFLS)
Sent: Thursday, May 10, 2007 9:49 AM
To: [REDACTED]
Subject:

[REDACTED]
I believe that Epstein's attys are scared of the victims they don't know. Epstein has no doubt told them that there were many. Thus I believe the frist indictment should contain only the victims they have nothing on at all. We can add in the other ones that have myspace pages and prior testimony in a superseder. I think for the first strike we should make all their nightmare's come true. Thoughts?

[REDACTED]
From:
Sent:
To:

[REDACTED] (USAFLS)
Thursday, May 10, 2007 9:49 AM
[REDACTED]

[REDACTED]
I believe that Epstein's attys are scared of the victims they don't know. Epstein has no doubt told them that there were many. Thus I believe the frist indictment should contain only the victims they have nothing on at all. We can add in the other ones that have myspace pages and prior testimony in a superseder. I think for the first strike we should make all their nightmare's come true. Thoughts?

[REDACTED]

From: [REDACTED]
Sent: Monday, May 07, 2007 3:41 PM
To: [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS)
Subject: Revised Indictment

Hi [REDACTED] – I caught a few typos today in the indictment, so here is a revised version (they didn't change any of the counts).

I don't think you sent the indictment to [REDACTED] yet, but if you want me to send it to him, please let me know. Thank you.



070507
Indictment.wpd

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

Tracking:

Recipient

[REDACTED] (USAFLS)

[REDACTED] (USAFLS)

Read

Read: 5/8/2007 12:37 PM

[REDACTED]
From: [REDACTED]
Sent: Thursday, May 03, 2007 4:29 PM
To: [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS)
Subject: FW: Litigative Consultant SOW

Hi [REDACTED] – Here is the amended Memo. The case is highly sensitive because of the large number of identifiable minors, so I have been very succinct. If you have any questions, you can call me at my direct dial (shown below). Thank you.



Lit Consultant
SOW short.wpd

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

From: [REDACTED] (USAFLS)
Sent: Wednesday, May 02, 2007 3:19 PM
To: [REDACTED]
Subject: FW: Litigative Consultant SOW

From: [REDACTED] (USAFLS)
Sent: Wednesday, May 02, 2007 3:16 PM
To: [REDACTED] (USAFLS)
Subject: Litigative Consultant SOW

[REDACTED]
Attach is the SOW for Litigative Consultant. Add the information needed and return via email.
You need to add a brief summary of case.

Thanks.

Tracking:

Recipient

([REDACTED]) (USAFLS)

([REDACTED]) (USAFLS)

Read

Read: 5/4/2007 8:08 AM

[REDACTED]
From: [REDACTED]
Sent: Thursday, May 03, 2007 12:05 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 2423(c) and 2423(d)

[REDACTED] asked that I respond to your inquiry.

Without knowing all of your facts, it does not appear to me that you can use the statute in the ways that you describe. Regarding the first question, I believe that the language of the statute clearly criminalizes engaging in illicit sexual conduct WHILE traveling in foreign commerce. The entire legislative history of the statute shows that it was designed to combat international sex tourism. Also the "travels in . . . and engages" language bears this out. However, it is not necessary to use 2423(c) to charge him if you know that his intent was to engage in sex with minors. If that is the case, you should charge 2423(b) because it is design to address BOTH interstate and foreign travel for the purpose of illicit sex.

Regarding the second question, I must respond with two questions. Can you prove that she arranged the travel and appointments for her own commercial or financial advantage? It sounds like she just doing what her boss in her legitimate job requested of her without additional benefit beyond her standard pay. If that is the case, you will have a great amount of difficulty proving the elements of your case. Can you prove that she purposely arranged appointments with underage prostitutes? Because 2423(f) defines illicit sexual conduct in two ways, both limiting the focus to sexual activity with minors, this is an important issue in deciding whether to charge the assistant. It is also an issue in determining whether your target will be able to raise the affirmative defense provided in 2423(g).

If you'd like to give me a call to talk more about this, please feel free to do so.

Good luck!

[REDACTED]
[REDACTED]
U.S. Department of Justice
Criminal Division - CEOS
[REDACTED]

From: [REDACTED] [mailto:[REDACTED]]
Sent: Thursday, May 03, 2007 10:47 AM
To: [REDACTED]
Subject: 2423(c) and 2423(d)

Hi [REDACTED] - Sorry to bother you. I am charging a case where a man traveled from out of state (and, on one occasion, from outside the country) to Palm Beach County to engage in prostitution with minors.

First question: The man clearly traveled in "foreign commerce" when he traveled from outside the U.S. directly to Palm Beach county, and he is a U.S. citizen. Do you think that we could charge 2423(c) even though the sexual activity occurred in the U.S.?

Second question: Do you know of anyone who has charged 2423(d)? The man's personal assistant set up the appointments with the prostitutes and also was in charge of organizing his travel, so I think a 2423(d) charge is warranted. One question is whether we should charge a separate count for each trip? Or charge only one count covering the entire 18-month period of activity?

[illegible]

Phone [REDACTED]

Fax

[REDACTED]

From: [REDACTED]
Sent: Thursday, May 03, 2007 10:47 AM
To: [REDACTED]
Subject: 2423(c) and 2423(d)

Hi [REDACTED] – Sorry to bother you. I am charging a case where a man traveled from out of state (and, on one occasion, from outside the country) to Palm Beach County to engage in prostitution with minors.

First question: The man clearly traveled in “foreign commerce” when he traveled from outside the U.S. directly to Palm Beach county, and he is a U.S. citizen. Do you think that we could charge 2423(c) even though the sexual activity occurred in the U.S.?

Second question: Do you know of anyone who has charged 2423(d)? The man’s personal assistant set up the appointments with the prostitutes and also was in charge of organizing his travel, so I think a 2423(d) charge is warranted. One question is whether we should charge a separate count for each trip? Or charge only one count covering the entire 18-month period of activity?

As always, thank you!

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

[REDACTED])
From: [REDACTED]
Sent: Wednesday, May 02, 2007 2:40 PM
To: [REDACTED] (USAFLS)
Subject: Emailing: Xpert Statement of Work Lit Consult.wpd
Attachments: Xpert Statement of Work Lit Consult.wpd

Hi [REDACTED] -- I changed it a bit. Thanks.

The message is ready to be sent with the following file or link attachments:

Xpert Statement of Work Lit Consult.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Tuesday, May 01, 2007 5:14 PM
[REDACTED] (USAFLS)
Your call

Hi [REDACTED] -- I got your message. I had already sent some stuff to [REDACTED], so I think she has what she and [REDACTED] need. If not, please let me know.

The big indictment package was turned in today, so hopefully [REDACTED] will have it by Thursday. May 15th is our target date.

Thanks.

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

Fax [REDACTED]
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Monday, April 23, 2007 7:56 PM
To: [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS)
Subject: RE: Eleventh Circuit Pattern Jury Instructions

Hi [REDACTED] -- The current version of the jury instruction for violating 18 USC 2422(b) (Offense Instruction 80) is currently drafted for the charge of ATTEMPTED enticement of a minor. Because attempt is a specific intent crime, an attempt requires that the defendant specifically intend to entice someone under 18, and the current pattern instruction includes a willfulness requirement. For the completed offense, however, the defendant only needs to knowingly use a computer to entice someone, and then the government has to prove that the person actually is under 18. The current pattern jury instruction also does not discuss enticement into prostitution.

So, the instruction for a completed offense should read:

First: That the Defendant knowingly used [the mail] [a computer] [describe other interstate facility as alleged in indictment] to persuade, induce, entice, or coerce an individual to engage in [prostitution] [sexual activity], as charged;

Second: That the individual whom the defendant enticed was less than eighteen (18) years of age at the time of the charged offense;

And [for cases not involving enticement into prostitution]

Third: That the Defendant and the individual engaged in sexual activity for which the Defendant could have been charged with a criminal offense under the law of [identify the state].

[REDACTED] and I have gone through all the cases on this for an upcoming indictment, so getting the 11th Circuit's attention would be wonderful. If you want the analysis, please let me know.

Thanks.

[REDACTED]
Assistant U.S. Attorney

Fax [REDACTED]
[REDACTED]@usdoj.gov

From: [REDACTED] (USAFLS)
Sent: Monday, April 23, 2007 11:29 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: Eleventh Circuit Pattern Jury Instructions

Judge Middlebrooks informed me on Friday that the Committee that reviews the Eleventh Circuit Pattern Jury Instructions will be meeting next week at the Eleventh Circuit Judicial Conference. The Committee will soon begin reviewing the current instructions, and Judge Middlebrooks has requested our input. If you have suggestions about the instructions as a whole please relay them to me within the next two days so that I can pass our general comments on to Judge Middlebrooks before the Judicial Conference. If you have any suggestions as to individuals or groups that the

Committee should contact for input regarding the instructions, please give me that information in the next two days as well. I would also like your thoughts on instructions that need to be revised or added. While all thoughts are welcome, it would really help if you attached instructions that you think should be included in the Pattern Instructions.

Tracking:

Recipient

██████████ (USAFLS)

██████████ (USAFLS)

Read

Read: 4/24/2007 9:13 AM

[REDACTED]

From: [REDACTED]
Sent: Friday, April 20, 2007 6:21 PM
To: [REDACTED]
Cc: genekuyrkendall@msn.com
Attachments: Epstein Ssheet.xls

Hey [REDACTED],

Here's the draft spreadsheet you requested ([REDACTED] data still needs to be added). Have a good weekend.

[REDACTED]

[REDACTED]
From: [REDACTED]
Sent: Friday, April 20, 2007 12:32 PM
To: [REDACTED]
Subject: FW: Possible Retainer for a Federal Criminal Investigation/Prosecution

Hi [REDACTED] -- My secretary, [REDACTED], will be calling to get your Social Security number, etc., so we can get funding approved. (I don't want to take up a lot of your time and then get into a fight with my Office.) I'll call you on Monday?

[REDACTED]
Assistant U.S. Attorney

Fax [REDACTED]
[REDACTED]

From: A. Salter [mailto:[REDACTED]]
Sent: Wednesday, April 18, 2007 8:27 AM
To: [REDACTED]
Subject: RE: Possible Retainer for a Federal Criminal Investigation/Prosecution

Hi,

These are all things I could testify about. Can you tell me the time-line?

I charge \$250/hour for everything: reading records, testifying, etc. For traveling I charge from the time I leave the house until I arrive at the hotel, and then again the next day from the time I leave the hotel until I return to the hotel or to my home. I don't ask for a retainer.

If that's acceptable, please give me a call at [REDACTED] at your convenience. Anna Salter

PS That email address is having trouble. Please send emails to [REDACTED]@[REDACTED]

From: [REDACTED] [mailto:[REDACTED]]
Sent: Monday, April 16, 2007 10:50 AM
To: [REDACTED]
Subject: Possible Retainer for a Federal Criminal Investigation/Prosecution

Dear Dr. Salter:

I am a federal prosecutor in West Palm Beach, Florida, and the District-wide coordinator of child exploitation cases for the U.S. Attorney's Office for the Southern District of Florida. I have been reviewing your book, Predators: Pedophiles, Rapists, & Other Sex Offenders, and have found it immensely informative.

I am considering undertaking a prosecution, and I am hoping that you would consider serving as an expert consultant and possible witness for the case. The types of issues that I am hoping you can address include:

1. Why victims do not report sexual abuse and, when discovered, why it may take several sessions for a victim to disclose all of the sexual activity that took place.
2. Different types of paraphilia -- in particular, describing a predator's interest in post-pubescent children (many people are asking why we should prosecute someone who didn't go after really young children).
3. Traits of psychopathy.
4. Effects of abuse on victims.

When you have a chance, would you mind calling or e-mailing me? My direct dial number is shown below. You also can contact Special Agent [REDACTED], with the FBI, [REDACTED].

Thank you.

[REDACTED]
Assistant U.S. Attorney

[REDACTED]
Fax [REDACTED]
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Friday, April 20, 2007 12:31 PM
To: A. Salter
Subject: RE: Possible Retainer for a Federal Criminal Investigation/Prosecution

Hi Anna -- My secretary, [REDACTED], will be calling to get your Social Security number, etc., so we can get funding approved. (I don't want to take up a lot of your time and then get into a fight with my Office.) I'll call you on Monday?

[REDACTED]
Assistant U.S. Attorney
[REDACTED]
Fax [REDACTED]
[REDACTED]

From: A. Salter [REDACTED]
Sent: Wednesday, April 18, 2007 8:27 AM
To: [REDACTED]
Subject: RE: Possible Retainer for a Federal Criminal Investigation/Prosecution

Hi,

These are all things I could testify about. Can you tell me the time-line?

I charge \$250/hour for everything: reading records, testifying, etc. For traveling I charge from the time I leave the house until I arrive at the hotel, and then again the next day from the time I leave the hotel until I return to the hotel or to my home. I don't ask for a retainer.

If that's acceptable, please give me a call at [REDACTED] at your convenience. Anna Salter

PS That email address is having trouble. Please send emails to [REDACTED].

From: [REDACTED] [mailto:[REDACTED]]
Sent: Monday, April 16, 2007 10:50 AM
To: [REDACTED]
Subject: Possible Retainer for a Federal Criminal Investigation/Prosecution

Dear Dr. Salter:

I am a federal prosecutor in West Palm Beach, Florida, and the District-wide coordinator of child exploitation cases for the U.S. Attorney's Office for the Southern District of Florida. I have been reviewing your book, Predators: Pedophiles, Rapists, & Other Sex Offenders, and have found it immensely informative.

I am considering undertaking a prosecution, and I am hoping that you would consider serving as an expert consultant and possible witness for the case. The types of issues that I am hoping you can address include:

1. Why victims do not report sexual abuse and, when discovered, why it may take several sessions for a victim to disclose all of the sexual activity that took place.
2. Different types of paraphilia -- in particular, describing a predator's interest in post-pubescent children (many people are asking why we should prosecute someone who didn't go after really young children).
3. Traits of psychopathy.
4. Effects of abuse on victims.

When you have a chance, would you mind calling or e-mailing me? My direct dial number is shown below. You also can contact Special Agent [REDACTED] with the FBI, at [REDACTED]

Thank you.

[REDACTED]
Assistant U.S. Attorney

[REDACTED]
Fax [REDACTED]
[REDACTED]

[REDACTED])
From: [REDACTED])
Sent: Monday, April 16, 2007 5:25 PM
To: [REDACTED]
Subject: FW: Possible Retainer for a Federal Criminal Investigation/Prosecution

Hi [REDACTED] -- Here are the questions that I have raised for the potential expert. Thank you.

The types of issues that I am hoping the expert can address include:

1. Why victims do not report sexual abuse and, when discovered, why it may take several sessions for a victim to disclose all of the sexual activity that took place.
2. Different types of paraphilia -- in particular, describing a predator's interest in post-pubescent children (many people are asking why we should prosecute someone who didn't go after really young children).
3. Traits of psychopathy.
4. Effects of abuse on victims.

Thank you.

[REDACTED]
Assistant U.S. Attorney

[REDACTED]
Fax [REDACTED]
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Monday, April 16, 2007 12:07 PM
To: [REDACTED]
Cc: [REDACTED] (USAFLS)
Subject: RE: [REDACTED] and [REDACTED]

Thank you so much!

[REDACTED] -- Can you prepare the final subpoenas?

[REDACTED]
Assistant U.S. Attorney

[REDACTED]
Fax [REDACTED]
[REDACTED]@ [REDACTED]

From: [REDACTED]
Sent: Monday, April 16, 2007 12:03 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: [REDACTED] and [REDACTED]

The immunity authorization letters for witness [REDACTED] and [REDACTED] has been faxed to your office at [REDACTED]
[REDACTED]

[REDACTED]
Legal Assistant
Witness Immunity Unit
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Monday, April 16, 2007 11:50 AM
To: [REDACTED]
Subject: Possible Retainer for a Federal Criminal Investigation/Prosecution

Dear Dr. Salter:

I am a federal prosecutor in West Palm Beach, Florida, and the District-wide coordinator of child exploitation cases for the U.S. Attorney's Office for the Southern District of Florida. I have been reviewing your book, Predators: Pedophiles, Rapists, & Other Sex Offenders, and have found it immensely informative.

I am considering undertaking a prosecution, and I am hoping that you would consider serving as an expert consultant and possible witness for the case. The types of issues that I am hoping you can address include:

1. Why victims do not report sexual abuse and, when discovered, why it may take several sessions for a victim to disclose all of the sexual activity that took place.
2. Different types of paraphilia -- in particular, describing a predator's interest in post-pubescent children (many people are asking why we should prosecute someone who didn't go after really young children).
3. Traits of psychopathy.
4. Effects of abuse on victims.

When you have a chance, would you mind calling or e-mailing me? My direct dial number is shown below. You also can contact Special Agent [REDACTED] with the FBI, [REDACTED]

Thank you.

[REDACTED]
Assistant U.S. Attorney

[REDACTED]
Fax: [REDACTED]
[REDACTED]

[REDACTED]
From: [REDACTED]
Sent: Tuesday, March 27, 2007 2:32 PM
To: [REDACTED] (USAFLS)
Subject: RE:

Hi [REDACTED] -- Thank you. The letter went out earlier today. I put a copy in your box.

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

Fax [REDACTED]
[REDACTED]@ [REDACTED]

From: [REDACTED] (USAFLS)
Sent: Monday, March 26, 2007 4:21 PM
To: [REDACTED]
Subject:

I told [REDACTED] we would send him a [REDACTED] letter this week. He said he would try to bring her in next week unless he had issues with the letter. Basically we should just tell him we are giving him 6001 immunity.

Also, I was thinking that seniors in High School start turning 18 in January. So that if you are getting messages from High School students during a school year between September and January, you can be assured none of them are 18. And even by graduation in June, 5/6 of the students in a Highschool will be under 18.

Tracking:

Recipient

L [REDACTED] (USAFLS)

Read

Deleted: 4/3/2007 11:25 AM

[REDACTED]

From: [REDACTED]
Sent: Friday, March 23, 2007 9:22 AM
To: [REDACTED]
Subject: RE: memory lane

Thank you, thank you, thank you!

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

[REDACTED]
Fax [REDACTED]
[REDACTED]

From: [REDACTED]
Sent: Thursday, March 22, 2007 5:24 PM
To: [REDACTED]
Subject: FW: memory lane

FYI

[REDACTED]

From: [REDACTED]
Sent: Thursday, March 22, 2007 4:46 PM
To: [REDACTED]
Subject: RE: memory lane

Your memory is correct:

United States v. Tobon-Builes, 706 F.2d 1092 (11th Cir. 1982) Conviction aff'd. Tobon's criminal liability stems not from any duty on his part to file CTRs but from his willful act of concealment of material facts so as to cause financial institutions to fail in their duty to file. The panel found support for this holding in 18 U.S.C. § 2(b) under which a person is punishable as a principal if they cause an unwitting and therefore innocent intermediary to commit the offense.

An authority of more general application is 18 USC § 2(b) on which *Tobon-Builes* relied – which is a bit different from the "aiding and abetting" principal embodied in § 2(a).

[REDACTED]

From: [REDACTED]
Sent: Thursday, March 22, 2007 4:37 PM
To: [REDACTED]
Subject: memory lane

[REDACTED]

Am I correct that *Tobon-Builes* was the 11th Circuit case holding that a smurf could be convicted of causing (aiding and abetting) a financial institution to fail to file a CTR? Do you think that an AUSA in Florida could rely on that case to argue that a person using a money remitter to send money from New York to Florida to finance a prostitution offense is guilty of causing the remitter to violate 1960b1C?



[REDACTED]

From: [REDACTED]
Sent: Thursday, March 22, 2007 5:24 PM
To: [REDACTED]
Subject: FW: memory lane

FYI

[REDACTED]

From: [REDACTED]
Sent: Thursday, March 22, 2007 4:46 PM
To: [REDACTED]
Subject: RE: memory lane

Your memory is correct:

United States [REDACTED]. *Tobon-Builes*, 706 F.2d 1092 (11th Cir. 1982) Conviction aff'd. Tobon's criminal liability stems not from any duty on his part to file CTRs but from his willful act of concealment of material facts so as to cause financial institutions to fail in their duty to file. The panel found support for this holding in 18 U.S.C. § 2(b) under which a person is punishable as a principal if they cause an unwitting and therefore innocent intermediary to commit the offense.

An authority of more general application is 18 USC § 2(b) on which *Tobon-Builes* relied – which is a bit different from the "aiding and abetting" principal embodied in § 2(a).

[REDACTED]

From: [REDACTED]
Sent: Thursday, March 22, 2007 4:37 PM
To: [REDACTED]
Subject: memory lane

[REDACTED]

Am I correct that *Tobon-Builes* was the 11th Circuit case holding that a smurf could be convicted of causing (aiding and abetting) a financial institution to fail to file a CTR? Do you think that an AUSA in Florida could rely on that case to argue that a person using a money remitter to send money from New York to Florida to finance a prostitution offense is guilty of causing the remitter to violate 1960b1C?

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Thursday, March 22, 2007 4:14 PM
To: [REDACTED]
Subject: RE: A Money Laundering Question

Aside from cases where there is a representation as to the nature of the money by a law enforcement agent (sting cases; 1956(a)(3)), or cases involving the international transfer of funds (intl money laundering; 1956(a)(2)(A)), all money laundering offenses under 1956 and 1957 require proof that the money actually was SUA proceeds. There is no provision, in other words, for "reverse money laundering" – i.e., the process of sending money from one place to another for the purpose of promoting a future criminal act. This is a problem in our money laundering statutes that we've asked Congress to fix. (Ironically, the State of Florida has a state reverse money laundering statute that might apply to your facts.)

There are some other possibilities, however. If the money was sent via a money remitter, there could be a violation of 1960(b)(1)(C) (sending funds through a money remitting business knowing that they were intended to be used for an illegal purpose). Also, since the end result of this transaction was the promotion of a prostitution offense, you could have a violation of 1952 (using a facility in interstate commerce to promote a state prostitution offense).

Please let me know if either of these work for you.

[REDACTED]

From: [REDACTED] [mailto:Ann.[REDACTED]]
Sent: Thursday, March 22, 2007 4:00 PM
To: [REDACTED]
Subject: RE: A Money Laundering Question

Thank you, [REDACTED] I must admit that your answer doesn't make me happy. Do you think that there is any other type of money laundering that I could charge?

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

From: [REDACTED]
Sent: Thursday, March 22, 2007 3:10 PM
To: [REDACTED]
Subject: RE: A Money Laundering Question

[REDACTED]
We have always taken the position that a sting offense – i.e., a violation of 1956a3 – requires proof of a representation that the property involved in the transaction was either A) SUA proceeds, or B) property used to facilitate. In other words, contrary to your construction of the statute, we think the representation element applies to both of the phrases that follow, and not just to the proceeds. I could go into detail regarding the elements of 1956(a)(3) and its legislative history if

necessary (we did a memo on this to counsel for one of the agencies many years ago), but I think the reason you haven't found any case law on this is that we've discouraged bringing any prosecutions based on this reading of the statute.

I suspect that this is not what you were hoping to hear, but that's how we see it.

Good luck with this,

[REDACTED]

From: [REDACTED] [mailto:Ann.f[REDACTED]]

Sent: Thursday, March 22, 2007 12:50 PM

To: [REDACTED]

Subject: A Money Laundering Question

Hi [REDACTED] -- One of our ICE Agents recommended that I contact you with this question. I have a target who transfers funds from a bank account in New York to a bank account in Florida. The target then asks his assistant in Florida to withdraw cash from the Florida account to pay underage prostitutes here in Florida. I would like to charge money laundering under 1956(a)(3)(A): "Whoever, with the intent (A) to promote the carrying on of specified unlawful activity; . . . conducts or attempts to conduct a financial transaction involving . . . property used to conduct or facilitate specified unlawful activity, shall be fined under this title or imprisoned for not more than 20 years or both."

I read the statute as NOT requiring either the use of criminal proceeds or an attempt to conceal the transactions, but I haven't found any cases that involve purely promotional money laundering. Can you help?

Thank you so much.

[REDACTED]

Assistant U.S. Attorney
500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401

Fax [REDACTED]
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Thursday, March 22, 2007 3:10 PM
To: [REDACTED]
Subject: RE: A Money Laundering Question

[REDACTED]
We have always taken the position that a sting offense – i.e., a violation of 1956a3 – requires proof of a representation that the property involved in the transaction was either A) SUA proceeds, or B) property used to facilitate. In other words, contrary to your construction of the statute, we think the representation element applies to both of the phrases that follow, and not just to the proceeds. I could go into detail regarding the elements of 1956(a)(3) and its legislative history if necessary (we did a memo on this to counsel for one of the agencies many years ago), but I think the reason you haven't found any case law on this is that we've discouraged bringing any prosecutions based on this reading of the statute.

I suspect that this is not what you were hoping to hear, but that's how we see it.

Good luck with this,
[REDACTED]

From: [REDACTED] [mailto:[REDACTED]]
Sent: Thursday, March 22, 2007 12:50 PM
To: [REDACTED]
Subject: A Money Laundering Question

Hi [REDACTED] -- One of our ICE Agents recommended that I contact you with this question. I have a target who transfers funds from a bank account in New York to a bank account in Florida. The target then asks his assistant in Florida to withdraw cash from the Florida account to pay underage prostitutes here in Florida. I would like to charge money laundering under 1956(a)(3)(A): "Whoever, with the intent (A) to promote the carrying on of specified unlawful activity; . . . conducts or attempts to conduct a financial transaction involving . . . property used to conduct or facilitate specified unlawful activity, shall be fined under this title or imprisoned for not more than 20 years or both."

I read the statute as NOT requiring either the use of criminal proceeds or an attempt to conceal the transactions, but I haven't found any cases that involve purely promotional money laundering. Can you help?

Thank you so much.

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

[REDACTED]
Fax [REDACTED]
[REDACTED]

[REDACTED]
From: [REDACTED]
Sent: Tuesday, January 30, 2007 9:04 AM
To: [REDACTED] (USAFLS)
Subject: RE: Epstein

Hi [REDACTED] -- I got a little side-tracked with the Judge Zloch thing, but I am going to try to spend all day today and tomorrow on the Epstein pros memo. In the meantime, [REDACTED] is making you a copy of the stuff that Gerald Lefcourt sent and a copy of the final Palm Beach police report. That doesn't include the interviews conducted by FBI, but it gives a good overview. [REDACTED] from FBI would like to attend the meeting. Let me know if you have any objection to that. Maybe [REDACTED] can come over at 1:00 on Thursday so we can do a "pre-meeting meeting"

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

[REDACTED]
Fax [REDACTED]
[REDACTED]

From: [REDACTED] (USAFLS)
Sent: Monday, January 29, 2007 4:55 PM
To: [REDACTED]
Subject: Epstein

Can I get a draft pros memo and anything else you think I should read before our meeting?

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Thursday, January 11, 2007 3:48 PM
[REDACTED] (USAFLS)
Lilly [REDACTED] Sanchez

[REDACTED] -- I just spoke with Lilly. They are going to give me nothing. I just get to listen to the pitch and hear about how the girls are liars and drug users. And the earliest that they can come to see me is the week after our "goal date."

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

[REDACTED]
Fax [REDACTED]
[REDACTED]

Tracking:

236

EFTA00179849

Recipient

[REDACTED] (USAFLS)

[REDACTED] (USAFLS)

Read

Read: 1/11/2007 4:00 PM

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Wednesday, January 10, 2007 7:26 AM
[REDACTED] (USAFLS)
RE: T/C with Lilly [REDACTED] Sanchez

Hi [REDACTED] -- I send Lilly a letter telling her that, as I mentioned in my earlier correspondence, I wanted to review the documents that she promised before we met and if she wanted me to review things before I made a presentation to the grand jury she should send them sooner rather than later. She just wants to "make a pitch" and not provide any information. I want the documents not the pitch.

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401
[REDACTED]
Fax: [REDACTED]
[REDACTED]

From: [REDACTED] (USAFLS)
Sent: Tuesday, January 09, 2007 5:20 PM
To: [REDACTED]
Subject: T/C with Lilly [REDACTED] Sanchez
[REDACTED]

Lilly [REDACTED] Sanchez called me. Based on her last conversation with you she was concerned an indictment was imminent and wanted to confirm that she would be given an opportunity to come in before and present the results of their own investigation to us and make a pitch. She said once they had an opportunity to do that, if we wanted to interview Epstein, that would be a possibility. I told her that she would be given the opportunity to do what she requested.

Tracking:

238

EFTA00179851

Recipient

[REDACTED] (USAFLS)

[REDACTED] (USAFLS)

[REDACTED]

Read

Read: 1/11/2007 11:48 AM

Read: 1/10/2007 7:38 AM

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Monday, December 11, 2006 2:25 PM
[REDACTED]
Meeting re Epstein

Hi [REDACTED] -- As promised, I am following up with you. Two FBI agents and I are traveling to New York on Thursday morning and will be there through Sunday. I remember that you are presenting an indictment on Friday, but is there any chance we could talk on Friday afternoon or early evening? And can you recommend a government-approved hotel?

Thank you so much!

[REDACTED]
Assistant U.S. Attorney
Southern District of Florida
500 S. Australian Ave, Ste 400
West Palm Beach, FL 33401

[REDACTED]
Fax [REDACTED]

From:
Sent:
To:
Subject:

[REDACTED]
Thursday, November 30, 2006 3:55 PM
[REDACTED]
Our discussion

Hi [REDACTED] -- Thank you for taking the time to speak with me today. I will follow up with you next week. All of my contact info is below.

[REDACTED]
Assistant U.S. Attorney
Southern District of Florida
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401

[REDACTED]
Fax [REDACTED]

[REDACTED]
From:

Sent:

To:

Subject:

Contacts:

[REDACTED]
Thursday, November 20, 2003 2:55 PM
[REDACTED]

Our discussion
[REDACTED]

Hi [REDACTED] -- Thank you for taking the time to speak with me today. I will follow up with you next week. All of my contact info is below.

[REDACTED]
Assistant U.S. Attorney
Southern District of Florida
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401

Fax [REDACTED]
[REDACTED]@ [REDACTED]

From:
Sent:
To:
Subject:

Tuesday, October 14, 2008 5:36 PM
[REDACTED] (USAEFS)
Re: Letter from [REDACTED]

Hi [REDACTED] I have lost my patience with Mr. [REDACTED]. He clearly is trying to use our litigation to affect the civil suits against Epstein. His letter states that he still wants to work out a resolution of our case but I think that everyone agrees that he has no remedy so I don't know what our incentive is to work with him anymore given his aggressive tactics. I agree with your strategy.

From: [REDACTED] (USAEFS)
To: [REDACTED]
Sent: Tue Oct 14 15:13:34 2008
Subject: Letter from [REDACTED]

[REDACTED]

Today I received the attached letter from [REDACTED] concerning the partially "false" statements made in the declaration accompanying our initial response to the victims' petition. [REDACTED] doesn't seem to know there's a difference between incorrect and false. As far as stipulating, I think we go forward with our initial strategy, the only relevant facts are that Epstein was charged in state court, pled guilty, and is now in jail.

[REDACTED]

<<[REDACTED]df>>

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED] (USAFLS)
Tuesday, October 14, 2008 3:14 PM
[REDACTED] (USAFLS)
Letter from [REDACTED]

[REDACTED]
Today I received the attached letter from [REDACTED] concerning the partially "false" statements made in the declaration accompanying our initial response to the victims' petition. [REDACTED] doesn't seem to know there's a difference between incorrect and false. As far as stipulating, I think we go forward with our initial strategy, the only relevant facts are that Epstein was charged in state court, pled guilty, and is now in jail.



908.pdf

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Friday, October 10, 2008 10:18 AM
[REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED]
[REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Epstein Press Coverage

FYI –

<http://www.palmbeachdailynews.com/news/content/news/2008/10/09/epstein1010.html>

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

[REDACTED]

From: [REDACTED]
Sent: Wednesday, October 08, 2008 2:17 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: [REDACTED] United States

Hi all – Here is the pleading that [REDACTED] and I filed today in response to the [REDACTED] Motion to Unseal the Non-Prosecution Agreement. Although the Petitioners' Motion asserts that they would provide notice of the motion to Epstein's attorneys, I think it would be prudent for us to send a copy to Roy and Jay. Please let me know if you agree.

Thank you.

Once Judge Marra decides this motion, I think we should move to dismiss the petition, otherwise [REDACTED] will try to use the case as a never-ending "wishing well" to keep making more and more outrageous requests of Judge Marra.



DE29_081008_R
p to Motn Unsea

[REDACTED]
Assistant U.S. Attorney
[REDACTED]
Fax [REDACTED]

Tracking:

Recipient

[REDACTED] (USAFLS)
[REDACTED] [REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] [REDACTED] (USAFLS)
[REDACTED] [REDACTED] (USAFLS)
[REDACTED] [REDACTED] (USAFLS)

Read

Read: 10/8/2008 3:46 PM
Read: 10/8/2008 2:29 PM
Read: 10/8/2008 2:46 PM

Read: 10/8/2008 2:17 PM
Read: 10/8/2008 3:50 PM

[REDACTED]

From: [REDACTED]
Sent: Tuesday, October 07, 2008 4:53 PM
To: [REDACTED] (USAFLS)
Subject: Response to Motn to Unseal.doc

Hi [REDACTED] – I made some changes, including trying to explain a bit more about how I was not misleading the court or the victims when I sent out the first notification letter. Let me know what you think and I can file it today, if you like. I think the deadline is Thursday.

Thank you!



Response to
Motn to Unseal.doc

[REDACTED]
From: [REDACTED]
Sent: Tuesday, October 07, 2008 3:20 PM
To: [REDACTED] (FBI)
Subject: Letters to LegAtts

Hi [REDACTED] – Just checking to see if they went out. The lawyers are coming up on Friday to interview some victims, and I would love to be able to tell them that we know where [REDACTED] is and anyone else whom we are missing. Thank you.

[REDACTED]
Assistant U.S. Attorney

[REDACTED]
Fax [REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Monday, October 06, 2008 2:34 PM
To: [REDACTED] (USAFLS)
Subject: Did you ever file the response in [REDACTED] United States?

If not, I will file it today. Thanks.

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

[REDACTED]

From: [REDACTED] (USAFLS)
Sent: Saturday, September 27, 2008 7:31 PM
To: [REDACTED]
Subject: Draft Response to Motion to Unseal

[REDACTED]

Here is my first attempt at a response to [REDACTED] motion to unseal. Please feel free to make any corrections.



victim_opp_Mot_
unseal.wpd

[REDACTED]

From: [REDACTED] (USAFLS)
Sent: Thursday, September 25, 2008 7:38 PM
To: [REDACTED]
Subject: Victims' Motion to Unseal

[REDACTED]

Edward's motion to unseal is rather odd, since the non-prosecution agreement was never filed under seal in the district court litigation. The reason the document is not public is because the parties entered into a confidentiality provision, not because the U.S. government filed it under seal. The purpose of the protective order was to preserve the confidentiality of the agreement, as the signatory parties envisioned.

[REDACTED]

[REDACTED]
From:
Sent:
To:
Subject:
Attachments:

[REDACTED]
Tuesday, September 23, 2008 3:04 PM
[REDACTED] (FBI)
RE: Yarbrough and Epstein stories
image001.gif

There aren't any attachments. The paper is quoting from part of Tein's motion to stay all of the civil suits. In that motion, Tein said that Epstein could still be subjected to federal prosecution if he violates any of the terms of his state agreement (like not serving his whole time or failing to register, etc., etc.)

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

From: [REDACTED] (FBI)
Sent: Tuesday, September 23, 2008 2:58 PM
To: [REDACTED]
Subject: Re: Yarbrough and Epstein stories

I can't open attachment. What plea violation are they talking about?

From: [REDACTED]
To: [REDACTED] (USAFSL); [REDACTED]
Sent: Tue Sep 23 14:50:56 2008
Subject: Yarbrough and Epstein stories

FYI -

From the Palm Beach Post:

WEST PALM BEACH - A federal judge sentenced Marion Yarbrough to 40 years in prison Friday for sexually abusing a 15-year-old West Palm Beach girl. According to the U.S. Attorney's Office, Yarbrough, of Kentucky, met the girl on a Web-based social site and arranged to have a Greyhound bus ticket wired to her. The girl traveled to Tennessee, and Yarbrough took her by car to Kentucky and repeatedly sexually abused her. U.S. District Court Judge Kenneth A. Marra also ordered Yarbrough to register as a sex offender and to have no unsupervised contact with children. Yarbrough previously had been charged in Kentucky with sexually abusing three other minors.

From Palm Beach Daily News:

Plea deal violation could net federal charges for convicted sex offender Jeffrey Epstein

Click-2-Listen

By MICHELE DARGAN
Daily News Staff Writer

Saturday, September 20, 2008

Convicted sex offender Jeffrey Epstein still faces the possibility of federal criminal charges if he violates any of the terms of his state plea agreement, according to federal court documents.

Although it was widely reported that federal prosecutors had agreed to drop their investigation of Epstein under his plea bargain, the documents show that the U.S. Attorney's Office agreed only to defer prosecution while Epstein completes his sentence.

Under the terms of the federal deferred-prosecution agreement, Epstein will have to comply with court orders and restrictions even up to 90 days after he completes the house arrest that will follow his 18-month jail term.

Epstein, 55, pleaded guilty June 30 to two felony counts: soliciting prostitution and procuring a person under 18 for prostitution. He is serving 18 months in jail to be followed by 12 months house arrest.

In addition to the criminal charges, there are nine federal and six state lawsuits pending against Epstein, all containing similar allegations: that Epstein, through his employees and assistants, brought minor girls to his Palm Beach home at 358 El Brillo Way for erotic massages and sometimes sex.

If Epstein violates any of the conditions of his state plea agreement during his sentence and up to 90 days after, the U.S. Attorney's Office "reserves the right to indict (or unseal an existing indictment against) Mr. Epstein," according to federal court documents filed by Epstein attorney Michael Tein.

Tein filed the documents in support of a motion asking U.S. District Judge Kenneth Marra to stay proceedings in a federal lawsuit by one of Epstein's victims until after Epstein completes all conditions of his sentence plus the three months.

If the lawsuit is not postponed, anything Epstein says in his defense could be used against him in a federal prosecution, Tein argued.

Marra denied the motion.

"The court sees no reason to delay this litigation for the next 33 months," he wrote. "After all, defendant is in control of his own destiny — it is up to him (and him alone) whether the plea agreement reached with the State of Florida is breached. If defendant does not breach the agreement, then he should have no concerns regarding his Fifth Amendment right against self-incrimination."

Under the conditions of his plea agreement, Epstein must register as a sex offender for life. While he is serving the 12 months of house arrest at his Palm Beach home, Epstein must:

- * Observe a 10 p.m. to 6 a.m. curfew.
- * Have no unsupervised contact with anyone younger than 18.
- * Neither view, own nor possess pornographic or sexual materials.

As a convicted sex offender, he will not be allowed to live within 1,000 feet of a school, playground or other place where children gather.

The federal deferred-prosecution agreement, which is tied to his state plea agreement, is under seal, but Tein's motion provided glimpses into the sealed agreement.

Paperwork filed by Tein discloses that "under the agreement, the USAO presently retains the continuing right to indict Mr. Epstein — or to unseal 'any' already-existing federal 'charges' that may already have been handed up by the federal grand jury and sealed — should he breach any of its provisions."

The Tein motion also indicates that the U.S. Attorney's agreement with Epstein requires that:

- * The grand jury's subpoenas remain outstanding.
- * The parties must maintain their evidence.
- * Any existing charges will not be dismissed until after Epstein has "fulfilled all the terms and conditions of the agreement."

The agreement also includes "a promise not to prosecute defendant Sarah Kellen only if Epstein successfully fulfills all the terms and conditions of the state agreement."

Kellen, Epstein's former assistant, was investigated for bringing the girls up to the room in his Palm Beach home where Epstein was waiting and for paying the girls afterward. She has not been charged.

Tein did not return calls on Friday.

██████████, special counsel to the U.S. Attorney, said via e-mail that the U.S. Attorney's Office had no comment on the agreement.

Hollywood attorney ██████████ is representing some of the victims in state and federal court. Marra recently granted ██████████' motion that he and two of his clients be allowed to see the sealed agreement.

██████████ — who is under orders by the judge not to discuss the contents of the agreement — says he intends to file a motion to unseal the agreement to the public.

"The public does have a right to know the terms of the agreement," ██████████ said. "These are very unusual circumstances where a prosecutor and a criminal defendant enter into a confidential agreement for the purpose of keeping it from the public."

Miami attorney ██████████, who represents six of the "██████████" in federal lawsuits, agreed.

"We anticipate trying to get that document unsealed," he said. "I think it's appropriate and should be seen, particularly by the victims, but I also think that the public should see it, too."

From Sun-Sentinel:

Kentucky man to serve 40 years for sexually abusing West Palm Beach girl, 15

Kentucky man to serve 40 years for abusing girl

By Missy Diaz | South Florida Sun-Sentinel

September 23, 2008

A Kentucky man will spend 40 years in federal prison followed by a lifetime on supervised release for sexually abusing a 15-year-old West Palm Beach girl he met over the Internet.

U.S. District Judge Kenneth Marra also ordered Marion Yarbrough to register as a sex offender and have no unsupervised contact with children.

Yarbrough, 35, met the teen last year on the mobile social networking site itsmy.com. During a series of online chats, Yarbrough told the girl he was 21. After chatting for several days, he wired the victim a Greyhound bus ticket to Tennessee, where he picked her up and drove her back to Kentucky. For two weeks, Yarbrough repeatedly sexually abused the teen, according to the U.S. Attorney's Office.

Yarbrough had previously been charged in Kentucky with sexually abusing three other minors. At the time of his arrest in this case, he had charges pending for the rape of a 12-year-old Kentucky girl. He is to be returned to Kentucky to face those charges.

[REDACTED]
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone [REDACTED]

Fax [REDACTED]

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Friday, September 19, 2008 4:06 PM [REDACTED] (USAFLS)
[REDACTED] (USAFLS) [REDACTED] (USAFLS)
RE: Working on a story on deadline re: Jeffrey Epstein

I certainly don't want to talk to her.

I am just finishing a press release for you on another case. You should have it soon.

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

From: [REDACTED] (USAFLS)
Sent: Friday, September 19, 2008 2:33 PM
To: [REDACTED]; [REDACTED] (USAFLS)
Subject: FW: Working on a story on deadline re: Jeffrey Epstein

I am going to be calling her back with a big no comment, unless I get different instructions from you about what's in the public record.

From: Michele Dargan [mailto:[REDACTED]]
Sent: Friday, September 19, 2008 2:31 PM
To: [REDACTED] (USAFLS)
Subject: Working on a story on deadline re: Jeffrey Epstein

[REDACTED],
I'm working on a story about the federal non-prosecution agreement that is part and parcel of the state plea agreement with Jeffrey Epstein.
I'd like to know why the U.S. Attorney's Office decided *not* to prosecute Epstein – because I do know, according to court records, that if he violates any portion of his state agreement that he can be federally prosecuted.

I wanted to know if I could speak with AUSA [REDACTED] for an answer to this question, since she was the AUSA on the case.

I am on deadline for today.

Thank you,
Michele

--
Michele Dargan, staff writer
Palm Beach Daily News
[REDACTED]

Tracking:

Recipient

[REDACTED] (USAFLS)

[REDACTED] (USAFLS)

[REDACTED] (USAFLS)

Read

Read: 9/19/2008 4:07 PM

Read: 9/19/2008 4:07 PM

[REDACTED]
From: [REDACTED]
Sent: Thursday, September 18, 2008 1:27 PM
To: [REDACTED] (USAFLS)
Subject: RE: My letter to the Bar

Thank you, ma'am.

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

From: [REDACTED] (USAFLS)
Sent: Thursday, September 18, 2008 1:24 PM
To: [REDACTED]
Subject: RE: My letter to the Bar

It looks good to me. I would have no changes. K

From: [REDACTED]
Sent: Thursday, September 18, 2008 1:18 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: My letter to the Bar

Did you all have a chance to take a look? Any changes or suggestions? And do you want me to show it to anyone else before it goes out?

Thanks.

(Here it is again in case you lost my other e-mail.)
<< File: Florida Bar Ltr re Ethics Opinion.wpd >>

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

[REDACTED]

From: [REDACTED]
Sent: Thursday, September 18, 2008 1:18 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: My letter to the Bar

Did you all have a chance to take a look? Any changes or suggestions? And do you want me to show it to anyone else before it goes out?

Thanks.

(Here it is again in case you lost my other e-mail.)



Florida Bar Ltr
re Ethics Opin...

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

Tracking:

40

EFTA00179872

Recipient

[REDACTED] (USAFLS)
[REDACTED] [REDACTED] (USAFLS)
[REDACTED] (USAFLS)

Read

Read: 9/19/2008 11:50 AM

Read: 9/18/2008 1:34 PM

[REDACTED]

From: [REDACTED]
Sent: Thursday, September 18, 2008 1:17 PM
To: [REDACTED]
Subject: My letter to the Bar

Hi [REDACTED] – Did you have a chance to review the letter? Do you have any changes or suggestions? I would like to send it out today, if possible.

Thank you.

A. [REDACTED] *Villafañe*
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone [REDACTED]
Fax [REDACTED]

From:
Sent:
To:
Subject:

[REDACTED]
[REDACTED]
Wednesday, September 17, 2008 5:06 PM
[REDACTED] (USAFLS); [REDACTED] (USAFLS)
[REDACTED] (USAFLS); [REDACTED] (USAFLS)
Letter to Florida Bar

Hi all – I have drafted the attached. [REDACTED] is out of town, so do you want anyone else to take a look before I send it out?

I have talked to one of [REDACTED]'s partners, and they are also drafting a letter.



Florida Bar Ltr
re Ethics Opin...

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

Tracking:

Recipient

[REDACTED] (USAFLS)
[REDACTED] [REDACTED] (USAFLS)
[REDACTED] (USAFLS)

Read

Read: 9/17/2008 6:09 PM

Read: 9/17/2008 5:09 PM

From:
Sent:
To:

Cc:
Subject:

[REDACTED] (USAFLS)
Wednesday, September 17, 2008 11:25 AM
[REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED]
[REDACTED] (USAFLS); [REDACTED] (USAFLS)
[REDACTED] (USAFLS)
RE: State [REDACTED] Jeffrey Epstein

Given the non-disclosure agreement, aren't we left with telling the SAO that we have agreed to not disclose so it wouldn't be proper for us to now agree that unsealing is appropriate. Ultimately, it's the SAO's call because they will get the Florida Public Records Act request and they were not a signatory to the agreement. We should also notify defense counsel so that they can take whatever actions they believe are appropriate. Wait till others have had a chance to weigh in on this issue.

From: [REDACTED]
Sent: Wednesday, September 17, 2008 10:50 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED]
Cc: [REDACTED] (USAFLS)
Subject: FW: State [REDACTED] Jeffrey Epstein

Will it never end? [REDACTED] sent the e-mail below to [REDACTED] this morning. How would you like to handle this issue?

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

From: [REDACTED] (USAFLS)
Sent: Wednesday, September 17, 2008 10:48 AM
To: [REDACTED]
Subject: FW: State [REDACTED] Jeffrey Epstein

From: [REDACTED] [mailto:[REDACTED]]
Sent: Wednesday, September 17, 2008 10:46 AM
To: [REDACTED] (USAFLS)
Subject: FW: State [REDACTED] Jeffrey Epstein

Please advise how you would like us to proceed. The agreement referred to is the Federal Non-Prosecution agreement sealed in the file by the judge at the time of the Epstein plea.

From: [REDACTED]
Sent: Tuesday, September 16, 2008 4:21 PM
To: [REDACTED]
Subject: FW: State [REDACTED] Jeffrey Epstein

How to proceed? [REDACTED]

From: Bryce Albu [mailto:[REDACTED]]
Sent: Tuesday, September 16, 2008 3:52 PM
To: [REDACTED]
Cc: Martin Reeder
Subject: State v. Jeffrey Epstein

Ms. [REDACTED],

We represent The Palm Beach Daily News. The newspaper recently discovered that a non-prosecution agreement (and an addendum thereto) was filed under seal pursuant to an agreed order entered in the above-referenced case. Because the records are sealed, we cannot assess the propriety of the decision to seal them or even whether the newspaper is interested in the information contained therein. I was hoping you would discuss with me the nature of the agreement and the basis for sealing it so that we can advise our client on whether it should pursue an order unsealing the agreement. Please call me at your earliest convenience.

Very truly yours,

C. Bryce Albu
Reeder & Reeder P.A.
250 S. Central Blvd., Suite 200
Jupiter, FL 33458
[REDACTED]
[REDACTED]

[REDACTED]
From: [REDACTED] (USAFLS)
Sent: Wednesday, September 17, 2008 11:22 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS)
Subject: RE: State v Jeffrey Epstein

I have reviewed the Agreement. We have no obligation to seek its continued sealing. Per my conversation with [REDACTED], she is going to notify Jack Goldberger that he has yet to file the remainder of the Agreement and that the unsealing issue is between him/Epstein and the SAO's office.

From: [REDACTED]
Sent: Wednesday, September 17, 2008 10:50 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS)
Subject: FW: State v Jeffrey Epstein

Will it never end? [REDACTED] sent the e-mail below to [REDACTED] this morning. How would you like to handle this issue?

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

From: [REDACTED] (USAFLS)
Sent: Wednesday, September 17, 2008 10:48 AM
To: [REDACTED]
Subject: FW: State v Jeffrey Epstein

From: [REDACTED] [mailto:Bkrische@sa15.state.fl.us]
Sent: Wednesday, September 17, 2008 10:46 AM
To: [REDACTED] (USAFLS)
Subject: FW: State v Jeffrey Epstein

Please advise how you would like us to proceed. The agreement referred to is the Federal Non-Prosecution agreement sealed in the file by the judge at the time of the Epstein plea.

From: [REDACTED]
Sent: Tuesday, September 16, 2008 4:21 PM
To: [REDACTED]
Subject: FW: State v Jeffrey Epstein

How to proceed? [REDACTED]

From: Bryce Albu [mailto: [REDACTED]]
Sent: Tuesday, September 16, 2008 3:52 PM
To: [REDACTED]
Cc: Martin Reeder
Subject: State v. Jeffrey Epstein

Ms. [REDACTED]

We represent The Palm Beach Daily News. The newspaper recently discovered that a non-prosecution agreement (and an addendum thereto) was filed under seal pursuant to an agreed order entered in the above-referenced case. Because the records are sealed, we cannot assess the propriety of the decision to seal them or even whether the newspaper is interested in the information contained therein. I was hoping you would discuss with me the nature of the agreement and the basis for sealing it so that we can advise our client on whether it should pursue an order unsealing the agreement. Please call me at your earliest convenience.

Very truly yours,

C. Bryce Albu
Reeder & Reeder P.A.
250 S. Central Blvd., Suite 200
Jupiter, FL 33458

[REDACTED]
[REDACTED]
[REDACTED]@ [REDACTED]

From:
Sent:
To:
Cc:
Subject:

Wednesday, September 17, 2008 10:50 AM
[redacted] (USAFLS); [redacted]
[redacted] (USAFLS)
[redacted] (USAFLS)
FW: State [redacted] Jeffrey Epstein

Will it never end? [redacted] sent the e-mail below to [redacted] this morning. How would you like to handle this issue?

[redacted]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone [redacted]
Fax [redacted]

From: [redacted] (USAFLS)
Sent: Wednesday, September 17, 2008 10:48 AM
To: [redacted]
Subject: FW: State [redacted] Jeffrey Epstein

From: [redacted] [mailto:[redacted]]
Sent: Wednesday, September 17, 2008 10:46 AM
To: [redacted] (USAFLS)
Subject: FW: State [redacted] Jeffrey Epstein

Please advise how you would like us to proceed. The agreement referred to is the Federal Non-Prosecution agreement sealed in the file by the judge at the time of the Epstein plea.

From: [redacted]
Sent: Tuesday, September 16, 2008 4:21 PM
To: [redacted]
Subject: FW: State [redacted] Jeffrey Epstein

How to proceed? [redacted]

From: Bryce Albu [mailto:[redacted]]
Sent: Tuesday, September 16, 2008 3:52 PM
To: [redacted]
Cc: Martin Reeder
Subject: State [redacted] Jeffrey Epstein

Ms. [redacted]

We represent The Palm Beach Daily News. The newspaper recently discovered that a non-prosecution agreement (and an addendum thereto) was filed under seal pursuant to an agreed order entered in the above-referenced case. Because the records are sealed, we cannot assess the propriety of the decision to seal them or even whether the newspaper is

interested in the information contained therein. I was hoping you would discuss with me the nature of the agreement and the basis for sealing it so that we can advise our client on whether it should pursue an order unsealing the agreement. Please call me at your earliest convenience.

Very truly yours,

C. Bryce Albu
Reeder & Reeder P.A.
250 S. Central Blvd., Suite 200
Jupiter, FL 33458
Direct Dial [REDACTED]
Facsimile [REDACTED]

Tracking:

Recipient

[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)

Read

Read: 9/17/2008 10:51 AM
Read: 9/17/2008 10:54 AM
Read: 9/17/2008 11:11 AM
Read: 9/19/2008 9:59 AM

Read: 9/17/2008 10:51 AM

Villafana, [REDACTED] C. (USAFLS)

From: [REDACTED] (USAFLS)
Sent: Wednesday, September 17, 2008 10:48 AM
To: [REDACTED]
Subject: FW: State [REDACTED] Jeffrey Epstein

From: [REDACTED] [mailto:[REDACTED]]
Sent: Wednesday, September 17, 2008 10:46 AM
To: [REDACTED] (USAFLS)
Subject: FW: State [REDACTED] Jeffrey Epstein

Please advise how you would like us to proceed. The agreement referred to is the Federal Non-Prosecution agreement sealed in the file by the judge at the time of the Epstein plea.

From: [REDACTED]
Sent: Tuesday, September 16, 2008 4:21 PM
To: [REDACTED]
Subject: FW: State [REDACTED] Jeffrey Epstein

How to proceed? [REDACTED]

From: Bryce Albu [mailto:[REDACTED]]
Sent: Tuesday, September 16, 2008 3:52 PM
To: [REDACTED]
Cc: Martin Reeder
Subject: State [REDACTED] Jeffrey Epstein

Ms. [REDACTED],

We represent The Palm Beach Daily News. The newspaper recently discovered that a non-prosecution agreement (and an addendum thereto) was filed under seal pursuant to an agreed order entered in the above-referenced case. Because the records are sealed, we cannot assess the propriety of the decision to seal them or even whether the newspaper is interested in the information contained therein. I was hoping you would discuss with me the nature of the agreement and the basis for sealing it so that we can advise our client on whether it should pursue an order unsealing the agreement. Please call me at your earliest convenience.

Very truly yours,

C. Bryce Albu
Reeder & Reeder P.A.
250 S. Central Blvd., Suite 200
Jupiter, FL 33458

[REDACTED]
[REDACTED]
[REDACTED]@[REDACTED]

From:

Sent:

To:

Subject:

Wednesday, September 17, 2008 10:43 AM

(USAFLS); S (USAFLS); L (USAFLS); A (USAFLS); H (USAFLS)
Communications from [redacted] re Epstein matter

Hi all - Today, [redacted] and [redacted] should receive hard copies of a letter I received from [redacted] yesterday. ([redacted] received her copy yesterday.) I had not intended to do much with it, but today I received a fax from [redacted] Josefsberg attaching a letter that he had received from [redacted]. I have scanned and attached both of the letters to this e-mail. In light of the two letters, I would like to get permission to contact the Florida Bar for a written staff opinion on the issue. I could only ask them to address the issue of my contacting the victims, but I recommend that we ask [redacted] if he wants to submit a written request at the same time regarding whether he can contact the victims.

I will note that, for those girls who we knew were represented, all communications were directed to their attorneys, and [redacted] J. knows that he cannot contact those girls directly.

Can you let me know if you have any objection to this? And, [redacted] are you willing to review my written request before it goes out?

Thank you.



080916 Ltr from 080915 Ltr from
[redacted] to Jose... [redacted] to Vill...

[redacted]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone [redacted]
Fax [redacted]

Tracking:

Recipient

[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (FBI)
[REDACTED] (FBI)

Read

Read: 9/17/2008 10:44 AM
Read: 9/17/2008 10:51 AM
Read: 9/17/2008 11:26 AM
Read: 9/19/2008 9:56 AM

[REDACTED]

From:
Sent:
To:
Subject:

[REDACTED] (FBI)
Monday, September 15, 2008 2:59 PM
[REDACTED]
Re: Do you know what school [REDACTED] or [REDACTED] attend?

Both attended [REDACTED]. Spoke with [REDACTED] - her address is [REDACTED]. I'll work on [REDACTED].

From: [REDACTED]
To: [REDACTED]
Sent: Mon Sep 15 14:56:07 2008
Subject: Do you know what school [REDACTED] or [REDACTED] attend?

[REDACTED]
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone [REDACTED]

Fax [REDACTED]

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED] (FBI)
Monday, September 15, 2008 10:55 AM
[REDACTED]
Re: [REDACTED]

[REDACTED] is going to come by your office tomorrow @ 200 to rcve her letter. I told her that u would leave it with the guard if u were unable to meet with her.

From:

To:

Cc:

Sent: Mon Sep 15 10:32:11 2008

Subject: RE: Hearing on Yarbrough's Motion to Continue
We are on for 1:00 tomorrow in front of Judge Marra.

[REDACTED] - I will see you there!

[REDACTED] llafaña
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone [REDACTED]
Fax [REDACTED]

From:

[REDACTED] [mailto:[REDACTED]]
Sent: Monday, September 15, 2008 10:03 AM

To:

Subject: RE: Hearing on Yarbrough's Motion to Continue

Let me know the time & I will be there!

Wasnt this previously set in June????

[REDACTED]

This message may contain confidential, privileged, and/or proprietary information. It is intended solely for the addressee(s) indicated above. Redistribution is forbidden without the permission from the sender. If you are not the intended recipient, you are hereby notified that any review, use, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. This e-mail message, without warrant or warning, and despite US law as set forth in the Foreign Intelligence Surveillance Act of 1978, may be subject to monitoring by the United States National Security Agency and/or the Department of Defense. Information contained herein may be used against any senders or recipients, now or in the future, in a public trial or secret tribunal

This communication does not constitute an agreement to represent the recipient and in no way shall be construed to create an attorney-client relationship where one has not already been contracted. Until a retainer has been paid and a retainer agreement has been signed, this office does not represent you.
Thank you.

Subject: Hearing on Yarbrough's Motion to Continue

Date: Mon, 15 Sep 2008 09:58:48 -0400

From: [REDACTED]@[REDACTED]

To: [REDACTED]; [REDACTED]

Hi all – I had a message from [REDACTED], Judge Marra's deputy, asking to set a hearing on the motion to continue for some time around lunch tomorrow (Tuesday). I don't know whether [REDACTED] got a similar message, but I am hoping that you can attend. He wants sixty more days, which is just absurd.
When I get a final time, I will let you all know.

Thanks,

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

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Friday, September 12, 2008 12:34 PM
[REDACTED]
Victim Notification Letter

Dear [REDACTED] – Please review the attached letter. If you have questions, I encourage you to contact Attorney [REDACTED] Josefsberg. His contact information is included in the letter.

With warmest regards,
[REDACTED]



Final Victim
Notification -- J...

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

[REDACTED]
From:

Sent:

To:

Subject:

[REDACTED]
Friday, September 12, 2008 11:04 AM

[REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED]

[REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)

Epstein -- FYI

Hi all – Three quick things.

FBI received a FOIA request from Mike Tein asking for everything – evidence, 302s, handwritten notes, etc.

FBI received a Florida Sunshine law request from Ted Leopold.

Epstein was in the newspaper yesterday because [REDACTED] filed two new lawsuits.

FBI counsel is responding to the two requests. [REDACTED] and [REDACTED] – Just wanted to let you know so you are on the lookout. I assume that we will receive similar requests.

Thank you.

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

Tracking:

68

EFTA00179891

Recipient

[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] [REDACTED] (USAFLS)
[REDACTED] [REDACTED] (USAFLS)
[REDACTED] [REDACTED] (USAFLS)

Read

Read: 9/12/2008 11:50 AM
Read: 9/12/2008 11:58 AM
Read: 9/12/2008 11:36 AM
Read: 9/12/2008 12:44 PM
Read: 9/12/2008 11:05 AM
Read: 9/12/2008 11:26 AM

[REDACTED]

From: [REDACTED] (USAWAW)
Sent: Monday, September 08, 2008 2:10 PM
To: [REDACTED]
Subject: RE: epstein

Hi and thanks very much

The suggestion of civil rights is really interesting since we have his employees who were coconspirators and I think I'll work on it more. And yes they ALL flew through Ft Lauderdale, changing plans there for the Bahamas.

I have a phone meeting this morning with Bruce Lyons – we're going to offer his client immunity and put her in GJ. I am concerned about him knowing a lot but she's an appropriate one to hear from.

Thanks

From: [REDACTED]
Sent: Friday, September 05, 2008 11:39 AM
To: [REDACTED] (USAWAW)
Subject: RE: epstein

Hi [REDACTED] – Sorry I didn't respond sooner. Epstein entered into a state plea agreement and a federal Non-Prosecution Agreement. We have a confidentiality provision in our Non-Prosecution Agreement, so I'm not sure I can send it to you. I can definitely say that Epstein will not talk to anyone. He is still facing a possibility of federal prosecution if he doesn't abide by the terms of our agreement and he is facing a slew of civil suits, and he would just never turn in one of his friends unless it meant a big benefit for him.

[REDACTED] has some familiarity with my case and [REDACTED] (the Chief) was a great ally during the prosecution, so I would recommend trying them. I worked with [REDACTED] at times throughout the investigation and she was amazing, but she is in the Civil Rights section now. If you think there is a way to bring a civil rights claim, (if you can find a co-conspirator you can probably do it), then definitely shoot her an e-mail.

Any chance that either Copperfield or the victim flew to the Bahamas via South Florida (Miami, Ft Lauderdale or West Palm)? Then I could pitch in.

If you have more facts or more victims and want me to think creatively about charging decisions, let me know.

[REDACTED]
Assistant U.S. Attorney

Fax [REDACTED]

From: [REDACTED] (USAWAW)
Sent: Friday, September 05, 2008 2:08 PM
To: [REDACTED]
Subject: epstein

Hi

Hope you're well and not under water. (1) Any chance you could send me a copy of Epstein's guilty plea? And do you think he would ever talk about copperfield? (2) Do you have the name of someone good and helpful in DOJ who really knows the sexual and/or violent crimes stuff?

Thanks We're still working on Copperfield – lots of acts but concerns about applicable law!

[REDACTED]

[REDACTED]
From: [REDACTED] (USAFLS)
Sent: Friday, September 05, 2008 5:59 PM
To: [REDACTED]
Subject: RE: Thank you

You deserved it!

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

From: [REDACTED]
Sent: Friday, September 05, 2008 5:45 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: Thank you

Dear [REDACTED] and [REDACTED]:

I wanted to thank you for the generous award today. It was completely unexpected. I didn't even know that I had been nominated until Wednesday and [REDACTED] just admitted today that she nominated me.

I want you to know that your support over the last 2 years means more to me than an award ever could. Thank you for your kindness and generosity.

Have a nice weekend and I will speak with you soon.

[REDACTED]

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

Friday, September 05, 2008 5:45 PM
[REDACTED] (USAFLS); [REDACTED] (USAFLS)
Thank you

Dear [REDACTED] and [REDACTED]:

I wanted to thank you for the generous award today. It was completely unexpected. I didn't even know that I had been nominated until Wednesday and [REDACTED] just admitted today that she nominated me.

I want you to know that your support over the last 2 years means more to me than an award ever could. Thank you for your kindness and generosity.

Have a nice weekend and I will speak with you soon.

[REDACTED]

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Wednesday, September 03, 2008 12:23 PM
[REDACTED] (USAFLS)
MySpace Contact

Hi [REDACTED]: Here is the MySpace page info: [REDACTED]

Dear [REDACTED]:

I am writing on behalf of [REDACTED], the Assistant U.S. Attorney in West Palm Beach who prosecuted the Jeffrey Epstein case. She needs to provide you with information regarding the resolution of the case, including the name and contact information of an attorney who can advise you and represent you for free in connection with any civil claim you want to make against Mr. Epstein. Can you please provide her with a telephone number and an e-mail address? She can be reached at [REDACTED]@[REDACTED]. Thank you.

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

[REDACTED]
[REDACTED]
From:
Sent:
To:
Cc:
Subject:

[REDACTED]
Wednesday, September 03, 2008 12:22 PM
[REDACTED] (USAFLS)
[REDACTED] (FBI) [REDACTED] (FBI)

Hi [REDACTED] - [REDACTED] just called me. Here is what he would like me to do:

1. Tell him the names of all of the victims.
2. Tell him the name of every witness we interviewed.
3. Turn over the statements of all of the people listed in (1) and (2).
4. Ask the Palm Beach County Jail to provide us with all of Epstein's e-mails and phone calls.
5. I stopped listening to the rest.

I told him "no" to all of the above. When he complained, I reminded him that he has subpoena power and he can get most of this stuff from Epstein.

I also asked him why I hadn't received any signed Protective Orders except his, and he said he hadn't shown a copy of it to anyone else yet.

I sent him a letter (I am sending a copy to you via inter-office) reminding him to send me the signed Protective Orders as he receives them, and telling him that he needs to sit down with you and me soon to decide how to resolve the case.

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

Tracking:

Recipient

[REDACTED] (USAFLS)
[REDACTED] (FBI)
[REDACTED] (FBI)

Read

Read: 9/3/2008 1:30 PM

[REDACTED]
From: [REDACTED] (USAFLS)
Sent: Wednesday, September 03, 2008 11:47 AM
To: [REDACTED]
Subject: RE: Hello

No problem. Hope you're feeling better.

We had a great time in Central New York. Aside from Syracuse and the campus, we took a side trip to the Finger Lakes which was beautiful. Hopefully, we'll get a chance to get to Ithaca on another trip.

Nicole seems to be doing well but it's too early to tell and it hasn't even turned cold yet.

From: [REDACTED]
Sent: Wednesday, September 03, 2008 10:13 AM
To: [REDACTED] (USAFLS)
Subject: Hello

Hi [REDACTED] – I am sorry that I was so distracted yesterday. I have been having awful migraines for the last four days.

I never heard about the trip to Syracuse. Is your daughter enjoying it so far? And is she prepared for the dreaded "lake effect snow"?

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

[REDACTED]
From: [REDACTED] (FBI)
Sent: Tuesday, September 02, 2008 5:45 PM
To: [REDACTED]
Subject: Re: Missing Contact Info for some of the victims

[REDACTED] wait on sending the letters to the addresses u rc'vd from Twiler. I will attempt to verify and get up todate. I know some are nolonger good. In MM 2mrow AM. Call u soon

From: [REDACTED]
To: [REDACTED]
Sent: Tue Sep 02 13:55:48 2008
Subject: RE: Missing Contact Info for some of the victims
Hi [REDACTED] - There are 7 girls that we need info for. Thanks.

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone: [REDACTED]
Fax: [REDACTED]

From: [REDACTED] (FBI)
Sent: Tuesday, September 02, 2008 1:52 PM
To: [REDACTED]
Subject: Re: Missing Contact Info for some of the victims

Yes, I will try to reach out to dad. I'll forward once I get it.

From: [REDACTED]
To: [REDACTED]; [REDACTED]
Sent: Tue Sep 02 13:50:51 2008
Subject: Missing Contact Info for some of the victims

I think that I am still missing contact info for

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone [REDACTED]

Fax [REDACTED]

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED] (FBI)
Tuesday, September 02, 2008 4:52 PM
[REDACTED]
Re: Missing Contact Info for some of the victims

Yes, I will try to reach out to dad. I'll forward once I get it.

From: [REDACTED]
To: [REDACTED]
Sent: Tue Sep 02 13:50:51 2008
Subject: Missing Contact Info for some of the victims

I think that I am still missing contact info for

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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

[REDACTED]

From: [REDACTED] (USAFLS)
Sent: Tuesday, September 02, 2008 1:33 PM
To: [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS)
Subject: RE: Please make sure that you are sitting down when you read this.

Something is up. No, I don't want copies of the letters. Thx. [REDACTED]

From: [REDACTED]
Sent: Tuesday, September 02, 2008 1:30 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS)
Subject: Please make sure that you are sitting down when you read this.

I spoke with [REDACTED] J. this morning, and it looks like Roy has come into the picture again as the voice of reason.

<< File: 080902 Lefkowitz Ltr to [REDACTED] >>

Do you want copies of the victim notification letters as they go out?

[REDACTED]
[REDACTED]
From:
Sent:
To:
Cc:
Subject:

Tuesday, September 02, 2008 1:20 PM
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)

Please make sure that you are sitting down when you read this.

I spoke with [REDACTED] J. this morning, and it looks like Roy has come into the picture again as the voice of reason.



080902
kowitz Ltr to Villa

Do you want copies of the victim notification letters as they go out?

Tracking:

Recipient

[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] [REDACTED] (USAFLS)
[REDACTED] (FBI)
[REDACTED] (FBI)

Read

Read: 9/2/2008 1:48 PM
Read: 9/2/2008 1:31 PM

[REDACTED]
[REDACTED]
From:
Sent:
To:
Cc:
Subject:

Tuesday, September 02, 2008 12:44 PM
[REDACTED] (USAFLS)
[REDACTED] (USAFLS); [REDACTED] (USAFLS)
RE: Revised Notification to Victims regarding right to see Epstein agreement.

Hi [REDACTED] – Jay's complaint was that we were "advertising" the fact that the victims are now entitled to see the agreement, and he saw that as a breach of the confidentiality clause. I agree with you that this is just an extra step that the victims have to take to get the agreement, but I think it balances Epstein's complaints with the Court's desire that we inform the victims.

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

From: [REDACTED] (USAFLS)
Sent: Tuesday, September 02, 2008 12:36 PM
To: [REDACTED]
Cc: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: RE: Revised Notification to Victims regarding right to see Epstein agreement.

[REDACTED]
Does Epstein's lawyer not want the victims to know that an agreement exists? It seems they are imposing an additional barrier, since the victims' lawyer will be able to review the order signed by Judge Marra. Once the attorney does that, I'm certain the attorney will want to obtain a copy of the Agreement. I'm not sure how this achieves any objective for Epstein, but if they're satisfied with that language, that's fine. As long as the victims know there is an agreement between Epstein and the U.S. Government, I believe we have complied with Judge Marra's order.

[REDACTED]
From: [REDACTED]
Sent: Tuesday, September 02, 2008 12:19 PM
To: [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: Revised Notification to Victims regarding right to see Epstein agreement.

Hi [REDACTED] – In light of the complaint of Mr. Epstein's counsel regarding my earlier notification language, I have revised it as follows:

"In addition, there has been litigation between the United States and two other victims regarding the disclosure of the entire agreement between the United States and Mr. Epstein. Mr. Josefsberg can provide further

guidance on this issue or, if [REDACTED] has selected another attorney to represent her in the context of civil litigation, that attorney can review the Court's order in the matter of *In re* [REDACTED] 1 and 2, S.D. Fl. Court File No. [REDACTED]-CIV-MARRA, and advise her accordingly."

What do you think? This was my original language:

"In addition, a judge has ordered that the United States make available to any designated victim (and/or her attorney) a copy of the actual agreement between Mr. Epstein and the United States, so long as the victim (and/or her attorney) reviews, signs, and agrees to be bound by a Protective Order entered by the Court. If [REDACTED] would like to review the Agreement, please let me know, and I will forward a copy of the Protective Order for her signature."

Thanks.

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

Tracking:

Recipient

██████████ (USAFLS)
██████████ (USAFLS)
██████████ (USAFLS)

Read

Read: 9/2/2008 12:46 PM
Read: 9/2/2008 12:57 PM
Read: 9/2/2008 1:09 PM

[REDACTED]

From: [REDACTED] (USAFLS)
Sent: Tuesday, September 02, 2008 12:36 PM
To: [REDACTED]
Cc: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: RE: Revised Notification to Victims regarding right to see Epstein agreement.

[REDACTED]

Does Epstein's lawyer not want the victims to know that an agreement exists? It seems they are imposing an additional barrier, since the victims' lawyer will be able to review the order signed by Judge Marra. Once the attorney does that, I'm certain the attorney will want to obtain a copy of the Agreement. I'm not sure how this achieves any objective for Epstein, but if they're satisfied with that language, that's fine. As long as the victims know there is an agreement between Epstein and the U.S. Government, I believe we have complied with Judge Marra's order.

[REDACTED]

From: [REDACTED]
Sent: Tuesday, September 02, 2008 12:19 PM
To: [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: Revised Notification to Victims regarding right to see Epstein agreement.

Hi [REDACTED] – In light of the complaint of Mr. Epstein's counsel regarding my earlier notification language, I have revised it as follows:

"In addition, there has been litigation between the United States and two other victims regarding the disclosure of the entire agreement between the United States and Mr. Epstein. Mr. Josefsberg can provide further guidance on this issue or, if [REDACTED] has selected another attorney to represent her in the context of civil litigation, that attorney can review the Court's order in the matter of *In re* [REDACTED] 1 and 2, S.D. Fl. Court File No. [REDACTED]-CIV-MARRA, and advise her accordingly."

What do you think? This was my original language:

"In addition, a judge has ordered that the United States make available to any designated victim (and/or her attorney) a copy of the actual agreement between Mr. Epstein and the United States, so long as the victim (and/or her attorney) reviews, signs, and agrees to be bound by a Protective Order entered by the Court. If [REDACTED] would like to review the Agreement, please let me know, and I will forward a copy of the Protective Order for her signature."

Thanks.

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

[REDACTED]
From: [REDACTED]
Sent: Tuesday, September 02, 2008 12:19 PM
To: [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: Revised Notification to Victims regarding right to see Epstein agreement.

Hi [REDACTED] – In light of the complaint of Mr. Epstein's counsel regarding my earlier notification language, I have revised it as follows:

"In addition, there has been litigation between the United States and two other victims regarding the disclosure of the entire agreement between the United States and Mr. Epstein. Mr. Josefsberg can provide further guidance on this issue or, if [REDACTED] has selected another attorney to represent her in the context of civil litigation, that attorney can review the Court's order in the matter of *In re [REDACTED] 1 and 2*, S.D. Fl. Court File No. [REDACTED]-CIV-MARRA, and advise her accordingly."

What do you think? This was my original language:

"In addition, a judge has ordered that the United States make available to any designated victim (and/or her attorney) a copy of the actual agreement between Mr. Epstein and the United States, so long as the victim (and/or her attorney) reviews, signs, and agrees to be bound by a Protective Order entered by the Court. If [REDACTED] would like to review the Agreement, please let me know, and I will forward a copy of the Protective Order for her signature."

Thanks.

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

Tracking:

Recipient

[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)

Read

Read: 9/2/2008 12:25 PM
Read: 9/2/2008 12:24 PM
Read: 9/2/2008 1:08 PM

[REDACTED]

From: [REDACTED] (USAFLS)
Sent: Tuesday, September 02, 2008 11:48 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (FBI); [REDACTED] (FBI)
Subject: RE: No response from Jay

I don't have an objection either.

From: [REDACTED] (USAFLS)
Sent: Tuesday, September 02, 2008 11:04 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (FBI); [REDACTED] (FBI)
Subject: RE: No response from Jay

I'll defer to [REDACTED] but I do not.

From: [REDACTED]
Sent: Tuesday, September 02, 2008 10:52 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (FBI); [REDACTED] (FBI)
Subject: No response from Jay

Hi all – Hope you had a nice weekend. Jay and Roy have not responded to my last letter. I spoke with [REDACTED] Josefsberg today, and he has a lot of great ideas. He spoke with Roy last week and it sounds like they are working out the details, but no documents have been signed.

I would like to send the letters out to the victims today. Do you have any objection?

Thanks.

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

[REDACTED]
[REDACTED]
From: [REDACTED] (USAFLS)
Sent: Tuesday, September 02, 2008 11:04 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (FBI); [REDACTED] (FBI)
Subject: RE: No response from Jay

I'll defer to [REDACTED] but I do not.

From: [REDACTED]
Sent: Tuesday, September 02, 2008 10:52 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (FBI); [REDACTED] (FBI)
Subject: No response from Jay

Hi all – Hope you had a nice weekend. Jay and Roy have not responded to my last letter. I spoke with [REDACTED] Josefsberg today, and he has a lot of great ideas. He spoke with Roy last week and it sounds like they are working out the details, but no documents have been signed.

I would like to send the letters out to the victims today. Do you have any objection?

Thanks.

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

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Tuesday, September 02, 2008 10:59 AM
[REDACTED] (USAFLS)
RE: No response from Jay

Correct. He complained about my description of the litigation, even though I quoted directly from the agreement, and he did not want me to disclose the fact that Judge Marra ordered us to make the full agreement available to all of the victims. He also didn't answer my question about which lawyer should be cc'd on the letter.

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

From: [REDACTED] (USAFLS)
Sent: Tuesday, September 02, 2008 10:54 AM
To: [REDACTED]
Subject: RE: No response from Jay

Jay hasn't "approved" the letters I presume ?

From: [REDACTED]
Sent: Tuesday, September 02, 2008 10:52 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (FBI); [REDACTED] (FBI)
Subject: No response from Jay

Hi all – Hope you had a nice weekend. Jay and Roy have not responded to my last letter. I spoke with Bob Josefsberg today, and he has a lot of great ideas. He spoke with Roy last week and it sounds like they are working out the details, but no documents have been signed.

I would like to send the letters out to the victims today. Do you have any objection?

Thanks.

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

[REDACTED]
[REDACTED]
From: [REDACTED]
Sent: Tuesday, September 02, 2008 10:52 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (FBI); [REDACTED] (FBI)
Subject: No response from Jay

Hi all – Hope you had a nice weekend. Jay and Roy have not responded to my last letter. I spoke with Bob Josefsberg today, and he has a lot of great ideas. He spoke with Roy last week and it sounds like they are working out the details, but no documents have been signed.

I would like to send the letters out to the victims today. Do you have any objection?

Thanks.

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

Tracking:

Recipient

[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] [REDACTED] (USAFLS)
[REDACTED] (FBI)
[REDACTED] (FBI)

Read

Read: 9/2/2008 10:52 AM
Read: 9/2/2008 11:04 AM

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

Tuesday, September 02, 2008 10:50 AM
[REDACTED] (FBI); [REDACTED] (FBI); [REDACTED] (FBI)

Importance:

High

Hi [REDACTED] - Sorry I didn't get back to you last week. Can you tell [REDACTED] that she can contact Bob Josefsberg at [REDACTED]. He can represent her in civil litigation or settlement and she will not have to pay his fees. I am preparing a letter to go out today, so if she can wait a day or two, we will get it to her as soon as possible.

Thank you.

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

From:
Sent:
To:
Subject:

[REDACTED]
[REDACTED]
Thursday, August 28, 2008 4:10 PM
[REDACTED] (USAFLS)
RE: addendum

Thank you!!

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone: [REDACTED]
Fax: [REDACTED]

From: [REDACTED] (USAFLS)
Sent: Thursday, August 28, 2008 4:07 PM
To: [REDACTED]
Subject: addendum

<< File: epstein addendum 10 30.pdf >>

Tracking:

Recipient

[REDACTED] (USAFLS)

Read

Read: 8/28/2008 4:12 PM

Recipient

[REDACTED]

Roy BLACK

[REDACTED] (USAFLS)

[REDACTED] (USAFLS)

[REDACTED] (USAFLS)

[REDACTED] (USAFLS)

Read

Read: 8/26/2008 1:38 PM

Read: 8/26/2008 1:50 PM

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Tuesday, August 26, 2008 1:24 PM
[REDACTED] (USAFLS)
RE: Letter to Jay

Great. It is headed to you shortly.

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

From: [REDACTED] (USAFLS)
Sent: Tuesday, August 26, 2008 9:53 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: RE: Letter to Jay

[REDACTED]
It's fine with one suggestion. Near the end when you say "if it comes to our attention that Mr. Epstein has breached the terms of the Agreement, the Office intends to enforce its right to indict Mr. Epstein." How about softening it just a tad to "the Office intends to enforce its rights pursuant to the Agreement." Otherwise, you're good to go.

[REDACTED]
From: [REDACTED]
Sent: Tuesday, August 26, 2008 9:22 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: Letter to Jay

Hi guys – Is it alright to send out? I received one comment from [REDACTED] and have changed the letter to reflect that. Can you let me know if you have any other changes? I am off to mag court but shouldn't be gone too long. Thank you.

<< File: 080826 [REDACTED] Ltr to Lefkowitz and Black with [REDACTED] change.wpd >>

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

Phone [REDACTED]
Fax [REDACTED]

[REDACTED]
From:
Sent:
To:

[REDACTED]
Tuesday, August 26, 2008 1:09 PM
[REDACTED]



Lefkowitz
080826001.pdf

[REDACTED]
Assistant U.S. Attorney
[REDACTED]

[REDACTED]
From: [REDACTED] (USAFLS)
Sent: Tuesday, August 26, 2008 9:53 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Cc:
Subject: RE: Letter to Jay

[REDACTED]
It's fine with one suggestion. Near the end when you say "if it comes to our attention that Mr. Epstein has breached the terms of the Agreement, the Office intends to enforce its right to indict Mr. Epstein." How about softening it just a tad to "the Office intends to enforce its rights pursuant to the Agreement." Otherwise, you're good to go.

[REDACTED]
From: [REDACTED]
Sent: Tuesday, August 26, 2008 9:22 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: Letter to Jay

Hi guys – Is it alright to send out? I received one comment from [REDACTED] and have changed the letter to reflect that. Can you let me know if you have any other changes? I am off to mag court but shouldn't be gone too long. Thank you.

<< File: 080826 [REDACTED] Ltr to Lefkowitz and Black with [REDACTED] change.wpd >>

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

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Tuesday, August 26, 2008 9:22 AM
[REDACTED] (USAFLS); [REDACTED] (USAFLS)
Letter to Jay

Hi guys – Is it alright to send out? I received one comment from [REDACTED] and have changed the letter to reflect that. Can you let me know if you have any other changes? I am off to mag court but shouldn't be gone too long. Thank you.



380826 [REDACTED]
Ltr to Lefkow...

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

Tracking:

Recipient

[REDACTED] (USAFLS)
[REDACTED] (USAFLS)

Read

Read: 8/26/2008 9:45 AM

Read: 8/26/2008 9:43 AM

[REDACTED]
From: [REDACTED] (USAFLS)
Sent: Monday, August 25, 2008 6:05 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS);
Subject: [REDACTED] (USAFLS)
RE: Emailing: 080826 [REDACTED] Ltr to Lefkowitz and Black.wpd

It might be easier to ask them to provide Josefsberg the letter directly, so you don't have to deal with it.

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

From: [REDACTED]
Sent: Monday, August 25, 2008 5:33 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS);
Subject: Emailing: 080826 [REDACTED] Ltr to Lefkowitz and Black.wpd

Please let me know if you have any changes. Thank you.

The message is ready to be sent with the following file or link attachments:

080826 [REDACTED] Ltr to Lefkowitz and Black.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Subject:
Attachments:

(S) [REDACTED] August 25, 2008 5:22 PM
[REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
(USAFLS) [REDACTED]
Emailing 080826 [REDACTED] Ltr to Lefkowitz and Black.wpd
080826 [REDACTED] Ltr to Lefkowitz and Black.wpd

Please let me know if you have any changes. Thank you.

The message is ready to be sent with the following file or link attachments:

080826 [REDACTED] Ltr to Lefkowitz and Black.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Recipient

[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)

Read

Read: 8/25/2008 5:43 PM
Read: 8/25/2008 5:45 PM

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Monday, August 25, 2008 4:41 PM
[REDACTED] (USAFLS)
[REDACTED] Joesersberg

Hi [REDACTED] – He has not heard back from Epstein's folks either. I will draft a letter to Jay regarding the victim list and will raise the issue again.

Thanks.

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

Tracking:

Recipient
[REDACTED] (USAFLS)

Read
Read: 8/25/2008 4:41 PM

[REDACTED]
[REDACTED]
From: [REDACTED]
Sent: Monday, August 25, 2008 2:20 PM
To: [REDACTED] (USAFLS)
Subject: RE: Letter re Epstein and Protective Order

Yes, that was my plan. I will send it out today. Thanks.

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

From: [REDACTED] (USAFLS)
Sent: Monday, August 25, 2008 2:18 PM
To: [REDACTED]
Subject: RE: Letter re Epstein and Protective Order

[REDACTED]
I have not sent [REDACTED] the Agreement, and would appreciate it if you could take care of that. Are we sending out parts I and II, and leaving out the December 2007 letter? Thanks.

[REDACTED]
From: [REDACTED]
Sent: Monday, August 25, 2008 1:54 PM
To: [REDACTED] (USAFLS)
Subject: RE: Letter re Epstein and Protective Order

Hi [REDACTED] – Thank you for your response. Did you ever send the agreement to [REDACTED]? Do you want me to do that?

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

From: [REDACTED] (USAFLS)
Sent: Monday, August 25, 2008 10:25 AM

To: [REDACTED]; [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED]
[REDACTED] (USAFLS)
Subject: RE: Letter re Epstein and Protective Order

[REDACTED],
During our telephonic hearing, I received the clear impression that Judge Marra wanted the other victims (non-parties to the [REDACTED] litigation), would be given the opportunity to see the Agreement, subject to each one agreeing to be bound by the protective order. I believe it would be contrary to Judge Marra's intent for us to go through the trouble of creating a mechanism for the other non-party victims to have access to the Agreement, and then not tell them there is an Agreement.

Also, does CVRA impose any obligation on us, independent of what Judge Marra ordered, to advise the victims of the Agreement?

[REDACTED]
From: [REDACTED]
Sent: Monday, August 25, 2008 9:48 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED]
(USAFLS)
Subject: Letter re Epstein and Protective Order

Good morning, everyone.

I have attached a letter from Jay Lefkowitz that came in by fax on Friday night. The good news is that they seem to be in agreement regarding Mr. Josefsberg. Most of the letter doesn't really require a comment, but I wanted to get [REDACTED] feedback regarding the notification to the victims of their right to see the agreement. Here is the language from my proposed victim notification letter:

"In addition, a judge has ordered that the United States make available to any designated victim (and/or her attorney) a copy of the actual agreement between Mr. Epstein and the United States, so long as the victim (and/or her attorney) reviews, signs, and agrees to be bound by a Protective Order entered by the Court. If [REDACTED] would like to review the Agreement, please let me know, and I will forward a copy of the Protective Order for her signature."

Lefkowitz objects, but I am wondering whether [REDACTED] agrees that the spirit of our discussions with Judge Marra requires such a notification. If we make the entire agreement available to Mr. Josefsberg and he conveys that information to all of his clients, the concern becomes moot, I suppose.

Lastly, from my discussion with [REDACTED], it appears that the Office does not want to add to the list the names of victims identified after the date of signing the September agreement unless our investigation had provided enough information that we were prepared to include them in the indictment – i.e., the New York girls – and that you do not want me to re-add [REDACTED] to the list, even though we have extensive corroboration of her involvement with Epstein. Can someone please confirm?

Thank you all.

<< File: 080822 Lefkowitz ltr to [REDACTED] >>

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

Tracking:

Recipient
[REDACTED] (USAFLS)

Read
Read: 8/25/2008 2:21 PM

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Monday, August 25, 2008 1:54 PM
[REDACTED] (USAFLS)
RE: Letter re Epstein and Protective Order

Hi [REDACTED] – Thank you for your response. Did you ever send the agreement to [REDACTED]? Do you want me to do that?

A. [REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone [REDACTED]
Fax [REDACTED]

From: [REDACTED] (USAFLS)
Sent: Monday, August 25, 2008 10:25 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: RE: Letter re Epstein and Protective Order

[REDACTED]
During our telephonic hearing, I received the clear impression that Judge Marra wanted the other victims (non-parties to the [REDACTED] litigation), would be given the opportunity to see the Agreement, subject to each one agreeing to be bound by the protective order. I believe it would be contrary to Judge Marra's intent for us to go through the trouble of creating a mechanism for the other non-party victims to have access to the Agreement, and then not tell them there is an Agreement.

Also, does CVRA impose any obligation on us, independent of what Judge Marra ordered, to advise the victims of the Agreement?

[REDACTED]
From: [REDACTED]
Sent: Monday, August 25, 2008 9:48 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: Letter re Epstein and Protective Order

Good morning, everyone.

I have attached a letter from Jay Lefkowitz that came in by fax on Friday night. The good news is that they seem to be in agreement regarding Mr. Josefsberg. Most of the letter doesn't really require a comment, but I

wanted to get [REDACTED] feedback regarding the notification to the victims of their right to see the agreement. Here is the language from my proposed victim notification letter:

"In addition, a judge has ordered that the United States make available to any designated victim (and/or her attorney) a copy of the actual agreement between Mr. Epstein and the United States, so long as the victim (and/or her attorney) reviews, signs, and agrees to be bound by a Protective Order entered by the Court. If [REDACTED] would like to review the Agreement, please let me know, and I will forward a copy of the Protective Order for her signature."

Lefkowitz objects, but I am wondering whether [REDACTED] agrees that the spirit of our discussions with Judge Marra requires such a notification. If we make the entire agreement available to Mr. Josefsberg and he conveys that information to all of his clients, the concern becomes moot, I suppose.

Lastly, from my discussion with [REDACTED] it appears that the Office does not want to add to the list the names of victims identified after the date of signing the September agreement unless our investigation had provided enough information that we were prepared to include them in the indictment – i.e., the New York girls – and that you do not want me to re-add [REDACTED] to the list, even though we have extensive corroboration of her involvement with Epstein. Can someone please confirm?

Thank you all.

<< File: 080822 Lefkowitz ltr to [REDACTED] >>

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

Recipient
[REDACTED] (USAFSL)

Read
Read: 8/25/2008 2:17 PM

[REDACTED]

From: [REDACTED] (USAFLS)
Sent: Monday, August 25, 2008 10:25 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: RE: Letter re Epstein and Protective Order

[REDACTED]

During our telephonic hearing, I received the clear impression that Judge Marra wanted the other victims (non-parties to the [REDACTED] litigation), would be given the opportunity to see the Agreement, subject to each one agreeing to be bound by the protective order. I believe it would be contrary to Judge Marra's intent for us to go through the trouble of creating a mechanism for the other non-party victims to have access to the Agreement, and then not tell them there is an Agreement.

Also, does CVRA impose any obligation on us, independent of what Judge Marra ordered, to advise the victims of the Agreement?

[REDACTED]

From: [REDACTED]
Sent: Monday, August 25, 2008 9:48 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED]
Subject: Letter re Epstein and Protective Order

Good morning, everyone.

I have attached a letter from Jay Lefkowitz that came in by fax on Friday night. The good news is that they seem to be in agreement regarding Mr. Josefsberg. Most of the letter doesn't really require a comment, but I wanted to get [REDACTED] feedback regarding the notification to the victims of their right to see the agreement. Here is the language from my proposed victim notification letter:

"In addition, a judge has ordered that the United States make available to any designated victim (and/or her attorney) a copy of the actual agreement between Mr. Epstein and the United States, so long as the victim (and/or her attorney) reviews, signs, and agrees to be bound by a Protective Order entered by the Court. If [REDACTED] would like to review the Agreement, please let me know, and I will forward a copy of the Protective Order for her signature."

Lefkowitz objects, but I am wondering whether [REDACTED] agrees that the spirit of our discussions with Judge Marra requires such a notification. If we make the entire agreement available to Mr. Josefsberg and he conveys that information to all of his clients, the concern becomes moot, I suppose.

Lastly, from my discussion with [REDACTED], it appears that the Office does not want to add to the list the names of victims identified after the date of signing the September agreement unless our investigation had provided enough information that we were prepared to include them in the indictment – i.e., the New York girls – and that you do not want me to re-add [REDACTED] to the list, even though we have extensive corroboration of her involvement with Epstein. Can someone please confirm?

Thank you all.

<< File: 080822 Lefkowitz ltr to [REDACTED] >>

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

[REDACTED]
From: [REDACTED]

Sent: Monday, August 25, 2008 9:48 AM

To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)

Subject: Letter re Epstein and Protective Order

Good morning, everyone.

I have attached a letter from Jay Lefkowitz that came in by fax on Friday night. The good news is that they seem to be in agreement regarding Mr. Josefsberg. Most of the letter doesn't really require a comment, but I wanted to get [REDACTED] feedback regarding the notification to the victims of their right to see the agreement. Here is the language from my proposed victim notification letter:

"In addition, a judge has ordered that the United States make available to any designated victim (and/or her attorney) a copy of the actual agreement between Mr. Epstein and the United States, so long as the victim (and/or her attorney) reviews, signs, and agrees to be bound by a Protective Order entered by the Court. If [REDACTED] would like to review the Agreement, please let me know, and I will forward a copy of the Protective Order for her signature."

Lefkowitz objects, but I am wondering whether [REDACTED] agrees that the spirit of our discussions with Judge Marra requires such a notification. If we make the entire agreement available to Mr. Josefsberg and he conveys that information to all of his clients, the concern becomes moot, I suppose.

Lastly, from my discussion with [REDACTED], it appears that the Office does not want to add to the list the names of victims identified after the date of signing the September agreement unless our investigation had provided enough information that we were prepared to include them in the indictment – i.e., the New York girls – and that you do not want me to re-add [REDACTED] to the list, even though we have extensive corroboration of her involvement with Epstein. Can someone please confirm?

Thank you all.



080822

kowitz ltr to Villa

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

Tracking:

134

EFTA00179944

Recipient

[REDACTED] USAFLS)
[REDACTED] USAFLS)
[REDACTED] USAFLS)
[REDACTED] K [REDACTED] USAFLS)
[REDACTED] [REDACTED] USAFLS)

Read

Read: 8/25/2008 9:56 AM

Read: 8/25/2008 9:49 AM

Read: 8/25/2008 10:11 AM

Recipient

[REDACTED]

Roy BLACK

[REDACTED] (USAFLS)

[REDACTED] (USAFLS)

[REDACTED] (USAFLS)

[REDACTED] (USAFLS)

Read

Read: 8/21/2008 6:35 PM

Read: 8/21/2008 5:46 PM

From:
Sent:
To:
Subject:
Attachments:

Thursday, August 21, 2008 1:08 PM
(USAFLS)
Emailing: 080820 [REDACTED] Ltr to Lefkowitz and Black w [REDACTED] edits.wpd
080820 [REDACTED] Ltr to Lefkowitz and Black w [REDACTED] edits.wpd

Here you go, [REDACTED]. Let me know if it looks alright.

Thanks.

The message is ready to be sent with the following file or link attachments:

080820 [REDACTED] Ltr to Lefkowitz and Black w [REDACTED] edits.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Tracking:

Recipient

[REDACTED] (USAFLS)

[REDACTED] (USAFLS)

Read

Read: 8/21/2008 1:49 PM

Read: 8/21/2008 1:10 PM

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED] (USAFLS)
Thursday, August 21, 2008 9:28 AM
[REDACTED] (USAFLS)
RE: Are these alright to send out to Jay and Roy?

No. Sorry, have been tied up. I looked at everything yesterday but what you wrote and then got busy when your email came.

From: [REDACTED]
Sent: Thursday, August 21, 2008 9:29 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: Are these alright to send out to Jay and Roy?

<< File: Amended Final Victim Notification -- [REDACTED] final.wpd >> << File: 080820 [REDACTED] Ltr to Lefkowitz and Black.wpd >>

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

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Thursday, August 21, 2008 9:31 AM
[REDACTED] (USAFLS)
Notification to other victims

Hi [REDACTED] – This is the language that I intend to include in the new victim notification letters. Can you let me know if it sounds alright?

In addition, a judge has ordered that the United States make available to any designated victim (and/or her attorney) a copy of the actual agreement between Mr. Epstein and the United States, so long as the victim (and/or her attorney) reviews, signs, and agrees to be bound by a Protective Order entered by the Court. If [REDACTED] would like to review the Agreement, please let me know, and I will forward a copy of the Protective Order for her signature.

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

Tracking:

141

EFTA00179950

Recipient
[REDACTED] (USAFLS)

Read
Read: 8/21/2008 9:38 AM

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

Thursday, August 21, 2008 9:20 AM
[REDACTED] (USAFLS); [REDACTED] (USAFLS)
Are these alright to send out to Jay and Roy?



Amended Final 080820 [REDACTED]
Victim Notificat... Ltr to Lefkow...

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

Tracking:

143

EFTA00179952

Recipient
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)

Read
Read: 8/21/2008 9:37 AM
Read: 8/21/2008 12:23 PM

[REDACTED]
From:
Sent:
To:
Subject:

(USAWAW)
Wednesday, August 20, 2008 5:54 PM
[REDACTED]
sex criminals

Hi [REDACTED],

Well I'm still working on the Copperfield matter but some of the higher ups are very very uncomfortable with it. One question came up about his connection with Epstein . Do you think Epstein would ever talk or cooperate ? Any provision for that in his state plea agreement?

How do I contact his lawyer/the state prosecutor/etc.

Thanks and consider yourself lucky, I think, to have your famous offender off of your hands.

Good luck with TS/Hurricane Fay!

[REDACTED]
From WDWB but at the Nac this week.

[REDACTED]
From:

Sent:

To:

Subject:

Attachments:

Wednesday, August 20, 2008 4:25 PM

[REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED]

(USAFLS)

Emailing: Amended Final Victim Notification [REDACTED] final.wpd

Amended Final Victim Notification -- [REDACTED] final.wpd

I have attached a draft amended victim notification, which I will enclose with the letter to Jay that I forwarded earlier. Please let me know if you have any questions or changes.

Thank you.

The message is ready to be sent with the following file or link attachments:

Amended Final Victim Notification -- [REDACTED] final.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

[REDACTED]
[REDACTED]
From: [REDACTED]
Sent: Wednesday, August 20, 2008 4:25 PM
To: [REDACTED]
Subject: RE: Proposed Order in [REDACTED] 1 and 2 [REDACTED] United States

You are the best, my dear! I hope you did alright with the storm. Everyone here did fine.

[REDACTED]
Assistant U.S. Attorney
500 S. Australian Ave, Suite 400
West Palm Beach, FL 33401
Phone: [REDACTED]
Fax: [REDACTED]

From: [REDACTED]@uscourts.gov [mailto:[REDACTED]]
Sent: Wednesday, August 20, 2008 4:20 PM
To: [REDACTED]
Subject: Re: Proposed Order in [REDACTED] 1 and 2 [REDACTED] United States

No need to refile it. The order is on the judge's desk waiting to be signed.

[REDACTED]
Judge Marra's Chambers
West Palm Beach, FL
[REDACTED]

[REDACTED]
[REDACTED]

08/20/2008 04:14 PM

To: [REDACTED]
cc
Subject: Proposed Order in [REDACTED] 1 and 2 [REDACTED] United States

Hi [REDACTED] - [REDACTED] forwarded a proposed protective order in the [REDACTED] case on Friday, but we never received a signed order. I think it might be because he didn't formally file it via CM/ECF, so if you want me to re-file it, I will do so right away.

Thank you!

[REDACTED]

Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone [REDACTED]

Fax [REDACTED]

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Wednesday, August 20, 2008 4:13 PM
[REDACTED]
Proposed Order in [REDACTED] 1 and 2, United States

Hi [REDACTED] - [REDACTED] forwarded a proposed protective order in the [REDACTED] case on Friday, but we never received a signed order. I think it might be because he didn't formally file it via CM/ECF, so if you want me to re-file it, I will do so right away.

Thank you!

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

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
[REDACTED]
Wednesday, August 20, 2008 4:06 PM
[REDACTED] (USAFLS)
Did you ever get the signed Protective Order from Judge Marra?

Hi [REDACTED] -- I am wondering if the Protective Order got lost in the shuffle. Let me know and I will contact his CRD to check up on it.

Thank you.

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

Tracking:

150

EFTA00179959

Recipient
[REDACTED] (USAFLS)

Read
Read: 8/20/2008 4:11 PM

[REDACTED]
From:

Sent:

To:

Subject:

Attachments:

[REDACTED]
Wednesday, August 20, 2008 3:47 PM

[REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED]

(USAFLS) [REDACTED] Ltr to Lefkowitz and Black.wpd

Emailing: 080820 [REDACTED] Ltr to Lefkowitz and Black.wpd

I have attached my proposed response to Jay Lefkowitz. Please let me know if you have any changes, I would like to try to get this out today, if possible.

The message is ready to be sent with the following file or link attachments:

080820 [REDACTED] Ltr to Lefkowitz and Black.wpd

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Tracking:

152

EFTA00179961

Recipient

A [REDACTED] (USAFLS)
S [REDACTED] (USAFLS)
S [REDACTED] (USAFLS)
A [REDACTED] (USAFLS)

Read

Read: 8/20/2008 3:50 PM
Read: 8/20/2008 4:17 PM

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

Wednesday, August 20, 2008 9:24 AM
[REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED]
(USAFLS)
Response from Jay Lefkowitz

Hi all – Jay sent this by fax on Monday evening. I am off to mag court, but should be back around 11:30.
My first thought is, if they wish to limit the list to those girls identified prior to the signing of the non-pros agreement, that is fine, but then I get to prosecute him on the rest.
I am going to send Jay a quick e-mail telling him that I just got his fax because of the closure of the office and I will respond more fully this afternoon or tomorrow morning.



080818
kowitz Ltr to Villa

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

Tracking:

160

EFTA00179963

Recipient

[REDACTED] USAFLS)
[REDACTED] USAFLS)
[REDACTED] USAFLS)
[REDACTED] USAFLS)
[REDACTED] (FBI)
[REDACTED] (FBI)

Read

Read: 8/20/2008 9:29 AM

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Wednesday, August 20, 2008 9:24 AM

[REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Response from Jay Lefkowitz

Hi all – Jay sent this by fax on Monday evening. I am off to mag court, but should be back around 11:30.
My first thought is, if they wish to limit the list to those girls identified prior to the signing of the non-pros agreement, that is fine, but then I get to prosecute him on the rest.
I am going to send Jay a quick e-mail telling him that I just got his fax because of the closure of the office and I will respond more fully this afternoon or tomorrow morning.



080818
kowitz Ltr to Villa

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

[REDACTED]
From:
Sent:
To:
Subject:

Villafana, [REDACTED] C. (USAFLS)
Tuesday, August 19, 2008 12:06 PM
[REDACTED] (USAFLS)
J

Hi [REDACTED]. I hope your flight went alright. The wind up here has been awful. The Podhurst firm is closed today so I will try [REDACTED] tomorrow morning.
Take care.

[REDACTED]
[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Monday, August 18, 2008 2:54 PM
[REDACTED] (USAFLS)
Are you free?

Hi [REDACTED] – I know that Miami is closed, but if you have a moment, can you give me a call at my desk? [REDACTED]

Thanks.

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

Tracking:

164

EFTA00179967

Recipient
[REDACTED] (USAFLS)

Read
Read: 8/18/2008 2:59 PM

[REDACTED]

From:
Sent:
To:
Subject:

[REDACTED] (FBI)
Monday, August 18, 2008 12:42 PM
[REDACTED]
Re: Victim List

Sorry for the delay. I discussed with [REDACTED], we believe that is everyone at least everyone that was forthcoming. It appears a FOIA has been filed. I'm trying to ensure no docs are provided @ this time. It appears they were specific wanting JE's employees 302s.

From: [REDACTED]
To: [REDACTED]
Sent: Fri Aug 15 12:15:38 2008
Subject: Victim List

Hi guys – If we were going to expand our list to include victims we know about but weren't ready to charge in an indictment, who would we include besides [REDACTED]?

[REDACTED]
Assistant U.S. Attorney

500 S. Australian Ave, Suite 400

West Palm Beach, FL 33401

Phone [REDACTED]

Fax [REDACTED]

[REDACTED]
From: [REDACTED] (USAFLS)
Sent: Friday, August 15, 2008 4:53 PM
To: [REDACTED]
Subject: FW: [REDACTED] # 1 and # 2. United States, Case No. [REDACTED]-CIV-MARRA/JOHNSON

[REDACTED]
I filed this earlier this afternoon.

From: [REDACTED] (USAFLS)
Sent: Friday, August 15, 2008 3:23 PM
To: 'marra@flsd.uscourts.gov'
Subject: [REDACTED] # 1 and # 2. United States, Case No. [REDACTED]-CIV-MARRA/JOHNSON

Hon. Kenneth A. Marra
United States District Judge

Dear Judge Marra:

Pursuant to the Court's direction at the conclusion of yesterday's Status Conference, attached please find a proposed Order to Produce and Protective Order which has been reviewed and agreed to by counsel for petitioners and the government.

Respectfully,

[REDACTED] A. [REDACTED]
Assistant U.S. Attorney



Protective
Order_final.wpd

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED] Marie C. (USAFLS)
Friday, August 15, 2008 4:51 PM
[REDACTED] (USAFLS)
Filing the proposed order

Hi [REDACTED] – Are you going to file the proposed order? If not, please e-mail whatever the final, final is and I will file it with the Court. Thanks.

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

[REDACTED]
From:
Sent:
To:
Subject:

[REDACTED]
Friday, August 15, 2008 4:51 PM
[REDACTED] (USAFLS)
Got your message

Sounds like good news. I'll call you on Monday unless a firestorm breaks over the weekend.

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

Tracking:

Recipient
[REDACTED] (USAFLS)

Read
Read: 8/15/2008 4:51 PM

Recipient

[REDACTED]

Roy BLACK

[REDACTED]

(USAFLS)

[REDACTED]

(USAFLS)

[REDACTED]

(USAFLS)

[REDACTED]

(USAFLS)

[REDACTED]

(USAFLS)

Read

Read: 8/15/2008 2:13 PM

Read: 8/15/2008 2:24 PM

[REDACTED]
From:
Sent:
To:
Cc:
Subject:

[REDACTED] (USAFLS)
Friday, August 15, 2008 2:05 PM
[REDACTED]
[REDACTED] (USAFLS)
RE: New proposed response to Jay

Something which is a nullity lacks any legal import. If it has been withdrawn, then the item had import at one time, but it no longer does. If the December 2007 letter is viewed as an offer, there was no acceptance, or it has been rejected. Consequently, the offer no longer has an legal import.

We are obligated to provide a copy of the non-prosecution agreement to petitioners, whatever that agreement is. If the December 2007 letter never became a part of the agreement, and the government and Epstein are in agreement as to that issue, then we can produce the September 2007 agreement and the addendum. Are we at that point?

[REDACTED]
-----Original Message-----

From: [REDACTED]
Sent: Friday, August 15, 2008 1:54 PM
To: [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS)
Subject: FW: New proposed response to Jay
Importance: High

[REDACTED] -- If we call it "a nullity" instead of "withdrawn" how does that affect the issue with the [REDACTED]?

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

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

From: [REDACTED] (USAFLS)
Sent: Friday, August 15, 2008 1:52 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: RE: New proposed response to Jay

[REDACTED],

Please substitute the word "withdrawn" in the first sentence with "a nullity"

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

From: [REDACTED]
Sent: Friday, August 15, 2008 1:49 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: RE: New proposed response to Jay

Here is my proposal after speaking with [REDACTED]

Dear Jay and Roy:

Thank you for your response to my earlier e-mail. Our communications with Mr. Black and later with Mr. Lefkowitz were solely to determine what Mr. Epstein considered to be the terms of the Non-Prosecution Agreement. We appreciate your answering our question with finality. You have now made clear that Mr. Epstein did not accept the December modification, and accordingly, the offer to make that modification is hereby withdrawn.

Pursuant to our Agreement, I will prepare an Amended Notification that contains the names of additional identified victims. As you know, Judge Davis had selected the Podhurst firm to serve as the attorney representative for the victims. Assuming that Mr. Josefsberg is still amenable to the appointment, we will provide him with the victim list so that he may begin his service.

Finally, as you are aware, the United States has been ordered to produce the Non-Prosecution Agreement. In accordance with that Order, we will produce the September Agreement with the October Addendum signed by your client. We understand that Mr. Goldberger did not provide the state court with a true copy of the complete Agreement, and he should take steps to correct that error.

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

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

From: [REDACTED] (USAFLS)
Sent: Friday, August 15, 2008 1:34 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: Re: New proposed response to Jay

Shouldn't we formally withdraw the offer as opposed to considering it a nullity ?

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

From: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED]

To: [REDACTED] (USAFLS); [REDACTED] (USAFLS)

Sent: Fri Aug 15 11:55:13 2008

Subject: RE: New proposed response to Jay

How about a slightly different version:

Thank you for your response. Our communications with Roy Black and later with you were solely to determine what Mr. Epstein considered to be the terms of the Non-Prosecution Agreement. We appreciate your answering our question with finality. You have now made clear that Mr. Epstein did not accept the December modification, and accordingly, we will now consider that modification to be a nullity.

Pursuant to our Agreement, I will prepare an Amended Notification that contains the name of additional identified victims. In accordance with Paragraph 7B, please provide me with a proposed written submission to the Special Master by Monday afternoon.

Finally, as you are aware, the United States has been ordered to produce the Non-Prosecution Agreement. In accordance with that Order, we will produce the September Agreement with the October Addendum signed by your client. We understand that Mr. Goldberg may not have provided the state court with a true copy of the complete Agreement, and he should take steps to correct that error.

From: [REDACTED]
Sent: Friday, August 15, 2008 11:42 AM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: New proposed response to Jay

Dear Jay:

Thank you for your response. Our communications with Roy Black and later with you were solely to determine what Mr. Epstein considered to be the terms of the Non-Prosecution Agreement. You have now made clear that Mr. Epstein did not accept the December modification and does not intend to perform the obligations set forth therein. The Office is not going to continue negotiating the terms of the Agreement. We only sought finality and you have answered our question. Accordingly, the December proposed modification is hereby withdrawn.

The United States has been ordered to produce the Non-Prosecution Agreement and, in accordance with that Order, will produce the September Agreement with the October Addendum signed by your client. Mr. Goldberger should be advised that we

understand he has not provided the state court with a true copy of the complete Agreement, and he should take steps to correct that error. I will prepare an Amended Notification that contains the name of additional identified victims and will provide that to you promptly.

In accordance with Paragraph 7B of the Agreement, please provide me with a proposed written submission to the Special Master by Monday afternoon. We will expect a showing of good faith in the selection of the attorney representative and all other terms of the Agreement and excessive delays, like those that have occurred in the past, will be considered a breach of that duty of good faith.

Sincerely,

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

[REDACTED]
From: [REDACTED]
Sent: Friday, August 15, 2008 1:54 PM
To: [REDACTED] (USAFLS)
Cc: [REDACTED] (USAFLS)
Subject: FW: New proposed response to Jay
Importance: High

[REDACTED] -- If we call it "a nullity" instead of "withdrawn" how does that affect the issue with the [REDACTED]?

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

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

From: [REDACTED] (USAFLS)
Sent: Friday, August 15, 2008 1:52 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: RE: New proposed response to Jay

[REDACTED],
Please substitute the word "withdrawn" in the first sentence with "a nullity"

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

From: [REDACTED]
Sent: Friday, August 15, 2008 1:49 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: RE: New proposed response to Jay

Here is my proposal after speaking with [REDACTED].

Dear Jay and Roy:

Thank you for your response to my earlier e-mail. Our communications with Mr. Black and later with Mr. Lefkowitz were solely to determine what Mr. Epstein considered to be the terms of the Non-Prosecution Agreement. We appreciate your answering our question with finality. You have now made clear that Mr. Epstein

did not accept the December modification, and accordingly, the offer to make that modification is hereby withdrawn.

Pursuant to our Agreement, I will prepare an Amended Notification that contains the names of additional identified victims. As you know, Judge Davis had selected the Podhurst firm to serve as the attorney representative for the victims. Assuming that Mr. Josefsberg is still amenable to the appointment, we will provide him with the victim list so that he may begin his service.

Finally, as you are aware, the United States has been ordered to produce the Non-Prosecution Agreement. In accordance with that Order, we will produce the September Agreement with the October Addendum signed by your client. We understand that Mr. Goldberger did not provide the state court with a true copy of the complete Agreement, and he should take steps to correct that error.

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

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

From: [REDACTED] (USAFLS)
Sent: Friday, August 15, 2008 1:34 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: Re: New proposed response to Jay

Shouldn't we formally withdraw the offer as opposed to considering it a nullity ?

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

From: [REDACTED] (USAFLS)
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Sent: Fri Aug 15 11:55:13 2008
Subject: RE: New proposed response to Jay

How about a slightly different version:

Thank you for your response. Our communications with Roy Black and later with you were solely to determine what Mr. Epstein considered to be the terms of the Non-Prosecution Agreement. We appreciate your answering our question with finality. You have now made clear that Mr. Epstein did not accept the December modification, and accordingly, we will now consider that modification to be a nullity.

Pursuant to our Agreement, I will prepare an Amended Notification that contains the name of additional identified victims. In accordance with Paragraph 7B,

please provide me with a proposed written submission to the Special Master by Monday afternoon.

Finally, as you are aware, the United States has been ordered to produce the Non-Prosecution Agreement. In accordance with that Order, we will produce the September Agreement with the October Addendum signed by your client. We understand that Mr. Goldberg may not have provided the state court with a true copy of the complete Agreement, and he should take steps to correct that error.

From: [REDACTED]
Sent: Friday, August 15, 2008 11:42 AM
To: [REDACTED] (USAFSL); [REDACTED] (USAFSL); [REDACTED] (USAFSL); [REDACTED] (USAFSL); [REDACTED] (USAFSL)
Subject: New proposed response to Jay

Dear Jay:

Thank you for your response. Our communications with Roy Black and later with you were solely to determine what Mr. Epstein considered to be the terms of the Non-Prosecution Agreement. You have now made clear that Mr. Epstein did not accept the December modification and does not intend to perform the obligations set forth therein. The Office is not going to continue negotiating the terms of the Agreement. We only sought finality and you have answered our question. Accordingly, the December proposed modification is hereby withdrawn.

The United States has been ordered to produce the Non-Prosecution Agreement and, in accordance with that Order, will produce the September Agreement with the October Addendum signed by your client. Mr. Goldberger should be advised that we understand he has not provided the state court with a true copy of the complete Agreement, and he should take steps to correct that error. I will prepare an Amended Notification that contains the name of additional identified victims and will provide that to you promptly.

In accordance with Paragraph 7B of the Agreement, please provide me with a proposed written submission to the Special Master by Monday afternoon. We will expect a showing of good faith in the selection of the attorney representative and all other terms of the Agreement and excessive delays, like those that have occurred in the past, will be considered a breach of that duty of good faith.

Sincerely,

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

Fax 5 [REDACTED]

Tracking:

186

EFTA00179982

Recipient
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)

Read
Read: 8/15/2008 1:55 PM
Read: 8/15/2008 1:57 PM

[REDACTED]
From: [REDACTED] (USAFLS)
Sent: Friday, August 15, 2008 1:52 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: RE: New proposed response to Jay

[REDACTED],
Please substitute the word "withdrawn" in the first sentence with "a nullity"

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

From: [REDACTED]
Sent: Friday, August 15, 2008 1:49 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
Subject: RE: New proposed response to Jay

Here is my proposal after speaking with [REDACTED].

Dear Jay and Roy:

Thank you for your response to my earlier e-mail. Our communications with Mr. Black and later with Mr. Lefkowitz were solely to determine what Mr. Epstein considered to be the terms of the Non-Prosecution Agreement. We appreciate your answering our question with finality. You have now made clear that Mr. Epstein did not accept the December modification, and accordingly, the offer to make that modification is hereby withdrawn.

Pursuant to our Agreement, I will prepare an Amended Notification that contains the names of additional identified victims. As you know, Judge Davis had selected the Podhurst firm to serve as the attorney representative for the victims. Assuming that Mr. Josefsberg is still amenable to the appointment, we will provide him with the victim list so that he may begin his service.

Finally, as you are aware, the United States has been ordered to produce the Non-Prosecution Agreement. In accordance with that Order, we will produce the September Agreement with the October Addendum signed by your client. We understand that Mr. Goldberger did not provide the state court with a true copy of the complete Agreement, and he should take steps to correct that error.

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

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

From: [REDACTED] (USAFSL)
Sent: Friday, August 15, 2008 1:34 PM
To: [REDACTED] (USAFSL); [REDACTED] (USAFSL); [REDACTED] (USAFSL); [REDACTED] (USAFSL); [REDACTED] (USAFSL)
Subject: Re: New proposed response to Jay

Shouldn't we formally withdraw the offer as opposed to considering it a nullity ?

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From: [REDACTED] (USAFSL)
To: [REDACTED] (USAFSL); [REDACTED] (USAFSL); [REDACTED] (USAFSL); [REDACTED] (USAFSL)
Sent: Fri Aug 15 11:55:13 2008
Subject: RE: New proposed response to Jay

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Pursuant to our Agreement, I will prepare an Amended Notification that contains the name of additional identified victims. In accordance with Paragraph 7B, please provide me with a proposed written submission to the Special Master by Monday afternoon.

Finally, as you are aware, the United States has been ordered to produce the Non-Prosecution Agreement. In accordance with that Order, we will produce the September Agreement with the October Addendum signed by your client. We understand that Mr. Goldberg may not have provided the state court with a true copy of the complete Agreement, and he should take steps to correct that error.

From: [REDACTED]
Sent: Friday, August 15, 2008 11:42 AM
To: [REDACTED] (USAFSL); [REDACTED] (USAFSL); [REDACTED] (USAFSL); [REDACTED] (USAFSL)
Subject: New proposed response to Jay

Dear Jay:

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In accordance with Paragraph 7B of the Agreement, please provide me with a proposed written submission to the Special Master by Monday afternoon. We will expect a showing of good faith in the selection of the attorney representative and all other terms of the Agreement and excessive delays, like those that have occurred in the past, will be considered a breach of that duty of good faith.

Sincerely,

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

[REDACTED]
From: [REDACTED]
Sent: Friday, August 15, 2008 1:49 PM
To: [REDACTED] (USAFLS); [REDACTED] (USAFLS); [REDACTED]
(USAFLS); [REDACTED] (USAFLS)
Subject: RE: New proposed response to Jay

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Assistant U.S. Attorney
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West Palm Beach, FL 33401
Phone [REDACTED]
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Subject: Re: New proposed response to Jay

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To: [REDACTED]; [REDACTED] (USAFLS); [REDACTED]
(USAFLS); [REDACTED] (USAFLS); [REDACTED] (USAFLS)
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Sincerely,

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

Recipient

[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)
[REDACTED] (USAFLS)

Read

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