

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 08-80736-CIV-Marra/Matthewman

JANE DOE #1 and JANE DOE #2,

Petitioners,

■

UNITED STATES OF AMERICA,

Respondent.

**UNITED STATES' RESPONSE TO
PETITIONERS' FIRST REQUEST FOR ADMISSIONS TO THE GOVERNMENT**

The United States (hereinafter the "government") hereby responds to *Jane Doe #1 and Jane Doe #2's First Request for Admissions to the Government Regarding Questions Relevant to Their Pending Action Concerning the Crime Victims Rights Act* (hereinafter the "*Request for Admissions*"), and states as follows:*

1. The government admits that the FBI and the U.S. Attorney's Office for the Southern District of Florida ("USAO") conducted an investigation into Jeffrey Epstein ("Epstein") and developed evidence and information in contemplation of a potential federal prosecution against Epstein for many federal sex offenses. Except as otherwise admitted above, the government denies Request No. 1.

* The government's response is confined to Request No. 1 through Request No. 26 in the "Discovery Requested" section of the *Request for Admissions* and does not intend to respond to assertions in any other section of the *Request for Admissions* (including the "Background" section), none of which appear to separately state any matter calling for an admission. Nonetheless, the government denies the assertion that the government has declined the request of Jane Doe #1 and Jane Doe #2 to stipulate to undisputed facts in this case.

2. (a) The government admits that, after Epstein's attorneys learned of the notification that the government planned to provide to Jane Doe #2, who claimed that she was not a victim, Epstein's attorneys contacted the USAO and objected to the procedures for notification and the legal bases therefor. The government further admits that the USAO considered those objections when evaluating what notification to provide to victims. Except as otherwise admitted above, the government denies Request No. 2(a).
- (b) Admitted.
- (c) The government admits that, as a result of objections lodged by Epstein's attorneys, the government reevaluated the notifications that it had intended to provide to victims and, as a result of that reevaluation, the USAO altered the scope, nature, and timing of notifications that it had contemplated providing to victims. With regard to Jane Doe #2, the government further admits that, as a result of representations made by Jane Doe #2 that she was not a victim and objections lodged by Epstein's attorneys, the USAO stopped making notifications to Jane Doe #2. Except as otherwise admitted above, the government denies Request No. 2(c).
- (d) The government admits that, after the USAO received objections to victim notifications from Epstein's counsel and reevaluated its victim notification obligations, the USAO altered the language that was ultimately contained in the July 9, 2008 notification letter to Jane Doe #1 in care of Bradley Edwards. Except as otherwise admitted above, the government denies Request No. 2(d).

(e) The government admits that, at least in part as a result of objections lodged by Epstein's lawyers to victim notifications, the USAO reevaluated its obligations to provide notifications to victims, and Jane Doe #1 was thus not told that the USAO had entered into a non-prosecution agreement with Epstein until after the agreement was signed. The government further admits that Jane Doe #2 was not told that the USAO had entered into a non-prosecution agreement with Epstein until after the agreement was signed, but denies that the USAO did not inform Jane Doe #2 as a result of any negotiations involving Epstein or any objections lodged by Epstein's lawyers; the USAO did not consider Jane Doe #2 a victim after she informed the USAO and the FBI that she was not a victim of any offense committed by Epstein, and, as a result, the USAO did not consider informing Jane Doe #2 about the non-prosecution agreement. Except as otherwise admitted above, the government denies Request No. 2(e).

3. Denied.

4. Denied.

5. The government admits that, during the negotiations with Jeffrey Epstein regarding the non-prosecution agreement, at least one experienced attorney within the USAO subscribed to the position that the CVRA required notifications to the victims in this case and that position was communicated to Epstein's counsel. To the extent that Request No. 5 seeks admissions regarding the positions held by attorneys within the USAO that were not communicated to non-government personnel regarding whether or not the CVRA ultimately required notifications to the victims in this case, the government objects to Request No. 5 as violative of the deliberative process privilege.

6. (a) Denied.
(b) Denied.
(c) Admitted.
(d) Admitted.
(e) Admitted to the extent that the reference to "Lillian Sanchez" was meant to refer to Lilly Ann Sanchez.
(f) Admitted.
(g) Admitted.
7. The government admits that, on about January 10, 2008, when Jane Doe #1 and Jane Doe #2 were sent letters advising them that "this case is currently under investigation," the U.S. Attorney's Office had already signed a non-prosecution agreement with Jeffrey Epstein, but that, on that date, the non-prosecution agreement nonetheless remained in a state of some flux and was subject to being set aside as Epstein was challenging the propriety of the non-prosecution agreement and seeking further review from the Department of Justice.
8. Denied.
9. (a) The government admits that, at Epstein's insistence, the USAO agreed to a provision in the non-prosecution agreement that provided as follows: "The parties anticipate that this agreement will not be made part of any public record. If the United States receives a Freedom of Information Act request or any compulsory process commanding the disclosure of the agreement, it will provide notice to Epstein before making that disclosure." Except as otherwise admitted above, the government denies Request No. 9(a).

- (b) Admitted.
 - (c) Denied.
 - (d) Denied.
 - (e) The government admits that, during the period from September 24, 2007 through June 2008, the USAO did not notify Jane Doe #2 of the existence of the non-prosecution agreement. The government further admits that, although FBI agents notified Jane Doe #1 of the existence and substance of the agreement at the request of the USAO on or about October 27, 2007, no employee of the USAO personally notified Jane Doe #1 of the existence of the non-prosecution agreement during the period from September 24, 2007 through June 2008. Except as otherwise admitted above, the government denies Request No. 9(c).
10. (a) Admitted. Because Request No. 10 appears directed solely to the communications between FBI agents and Jane Doe #1 during their meeting on or about October 26, 2007, the government responses to Requests No. 10(b) through 10(g) address only that meeting.
- (b) The government admits that, on or about October 26, 2007, FBI agents explained to Jane Doe #1 that Epstein would plead guilty to state charges for procuring minors to engage in prostitution; that Epstein would be required to register as a sex offender; that Jane Doe #1 would be entitled to seek damages from Epstein; and that, if she desired, Jane Doe #1 would be entitled to use the services of an attorney at no expense to her in seeking those damages from Epstein. The government denies that the FBI agents explained that the state charges “involv[ed] another victim.”

(c) The government denies that the FBI agents did not explain to Jane Doe #1 that an agreement had already been signed; denies that the FBI agents did not explain to Jane Doe #1 that the agreement resolved the investigation of the federal case involving Jane Doe #1; and denies that the FBI agents did not explain to Jane Doe #1 other terms of that agreement. Except as otherwise admitted above, the government denies Request No. 10(c).

(d) Denied.

(e) Denied.

(f) Denied.

(g) Denied.

11. The government admits that, on or about November 28, 2007, A. Marie Villafaña of the USAO sent a draft of a crime victim notification letter to Jay Lefkowitz, counsel for Jeffrey Epstein, and that the draft notification letter stated, in part: "I am writing to inform you that the federal investigation of Jeffrey Epstein has been completed, and Mr. Epstein and the U.S. Attorney's Office have reached an agreement containing the following terms" The government further admits that, in part as a result of objections lodged by Epstein's lawyers, the USAO reevaluated its obligations to provide notifications to victims, and, as a result of that reevaluation and other considerations and developments, the USAO never sent victims the draft notification letter that was sent to Jay Lefkowitz on or about November 28, 2007. Except as otherwise admitted above, the government denies Request No. 11.

12. The government admits that, prior to July 3, 2008, the USAO had already entered a binding non-prosecution agreement with Jeffrey Epstein. The government is without

knowledge of precisely when “Bradley J. Edwards was working on a letter to the U.S. Attorney’s Office concerning the need to federally prosecute Epstein for sex offenses committed against Jane Doe #1 and Jane Doe #2,” and, accordingly, the government denies the assertion that Edwards worked on that letter on July 3, 2008. Except as otherwise admitted above, the government denies Request No. 12.

13. (a) The government admits that, when Epstein pled guilty to state charges on June 30, 2008, Jane Doe #2 had not been informed by the USAO of the existence of the non-prosecution agreement. The government further admits that, although the USAO, through FBI agents, had notified Jane Doe #1 of the existence of the non-prosecution agreement prior to Epstein’s June 30, 2008 guilty plea, no employee of the USAO had personally notified Jane Doe #1 at that time of the existence of the non-prosecution agreement. Except as otherwise admitted above, the government denies Request No. 13(a).
- (b) The government denies that, by the time of Epstein’s June 30, 2008 guilty plea, an attorney for the government working at the USAO had not already conferred with Jane Doe #1 and Jane Doe #2 about their opinions regarding how the federal investigation and potential prosecution of Epstein should proceed. The government admits that the USAO had not conferred with Jane Doe #2 about the non-prosecution agreement prior to Epstein’s June 30, 2008 guilty plea. The government further admits that, although the USAO had communicated with Jane Doe #1 about the non-prosecution agreement through FBI agents prior to Epstein’s June 30, 2008 guilty plea, no employee of the USAO had personally conferred with Jane Doe #1 about the non-prosecution agreement prior to

Epstein's guilty plea. Except as otherwise admitted above, the government denies Request No. 13(b).

(c) Although the government was aware that Jane Doe #2 had been represented by counsel paid for by Epstein, the government is unaware of the extent of Epstein's defense attorneys' awareness of the USAO's communications with Jane Doe #1 and Jane Doe #2 about the agreement, as described in the responses to Requests No. 13(a) and 13(b), and therefore can neither deny nor admit Request No. 13(c). Except as otherwise admitted above and in the responses to Requests No. 13(a) and 13(b), the government denies Request No. 13(c).

(d) The government admits that Epstein's attorneys negotiated with the USAO for a provision in the non-prosecution agreement that ultimately provided as follows: "The parties anticipate that this agreement will not be made part of any public record. If the United States receives a Freedom of Information Act request or any compulsory process commanding the disclosure of the agreement, it will provide notice to Epstein before making that disclosure." Except as otherwise admitted above, the government denies Request No. 13(d).

14. The government admits that, when Epstein was pleading guilty to the state charges discussed in the non-prosecution agreement, the USAO and Epstein's defense attorneys sought to keep the document memorializing the non-prosecution agreement confidential, but denies that they sought at that time to keep the existence of the non-prosecution agreement confidential. Except as otherwise admitted above, the government denies Request No. 14.

15. (a) The government admits that, while Bruce E. Reinhart was an Assistant U.S. Attorney, he learned confidential, non-public information about the Epstein matter.

(b) The government admits that, while Bruce E. Reinhart was an Assistant U.S. Attorney, he discussed the Epstein matter with another Assistant U.S. Attorney working on the Epstein matter.

(c) Denied.

16. Admitted.

17. Admitted.

18. (a) Denied.

(b) Denied.

19. To the extent that Request No. 19 is directed to the business or personal relationships of the 93 U.S. Attorneys and over 5,400 Assistant U.S. Attorneys serving across this country, or the countless individuals who have formerly served as U.S. Attorneys and Assistant U.S. Attorneys throughout this nation, the government objects to Request No. 19 as overly broad and burdensome and not calculated to lead to or involve information relevant to the instant matter. The government denies possessing or having any knowledge or information about a personal or business relationship between Jeffrey Epstein and either the U.S. Attorney or any Assistant U.S. Attorney serving in the Southern District of Florida. Except as otherwise admitted above, the government denies Request No. 19.

20. Admitted.

21. Denied.

22. (a) Admitted.

(b) Admitted.

(c) Admitted.

23. The government admits that the non-prosecution agreement signed by the USAO and Jeffrey Epstein currently blocks the USAO from prosecuting sex offenses committed by Epstein against Jane Doe #1 and Jane Doe #2 in the Southern District of Florida from in or around 2001 through in or around September 2007, provided that those offenses are set out on pages 1 and 2 of the non-prosecution agreement, were the subject of the joint investigation by the FBI and the USAO, or arose from the federal grand jury investigation. Except as otherwise admitted above, the government denies Request No. 23.

24. Admitted; Jeffrey Epstein provided valuable consideration to the federal government through the non-prosecution agreement he entered with the USAO.

25. Denied.

26. The government objects to Request No. 26 because it seeks information protected from disclosure by the law enforcement investigative privilege.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *United States' Response to Petitioners' First Request for Admissions to the Government* was served via CM/ECF on this 19th day of July, 2013, on the parties and counsel appearing on the attached service list.

/s/ Dexter A. Lee
Assistant United States Attorney

SERVICE LIST

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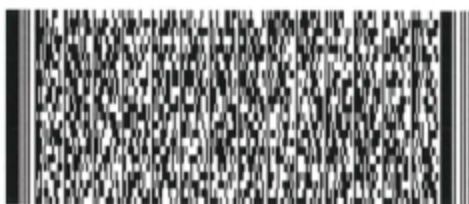
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This is correct.

Hi Maggie —

Can you send
these two

Fed Exes?

I don't need any
copies.

Thank you!

PRIVILEGE LOG

Bates Range	Description	Privilege(s) Asserted
Box #1 P-000001 thru P-000039	File folder entitled "CORR RE GJ SUBPOENAS" containing correspondence related to various grand jury subpoenas and attorney (Villafañá) handwritten notes	6(e) Work Product
Box #1 P-000040 thru P-000549	Operation Leap Year Grand Jury Log containing subpoenas OLY-01 through OLY-81, correspondence and research related to enforcement of same, documents produced in response to some subpoenas; and attorney (Villafañá) handwritten notes	6(e) Work Product Contains documents subject to investigative privilege Also contains documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-000550 thru P-000621	File folder entitled "Ritz Compact Flash SW" containing copies of a sealed search warrant application, warrant, and supporting documents	6(e) Contains information subject to investigative privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
Box #1 P-000622 thru P-000693	File folder entitled "PNY Technologies Compact Flash SW" containing copies of a sealed search warrant application, warrant, and supporting documents	6(e) Contains information subject to investigative privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
Box #1 P-000694 thru P-000781	File folder entitled "JE Corporations" containing attorney research on Epstein-owned corporations and prior litigation	Work Product Contains information subject to investigative privilege
Box #1 P-000782 thru P-000803	File folder entitled "Capital One" containing subpoena and correspondence	6(e)
Box #1 P-000804 thru P-000854	File folder entitled "DTG Operations/Dollar Rent-a-Car" containing subpoena and responsive documents	6(e) Contains documents and information subject to investigative privilege Also contains documents and information subject to privacy rights of victims who are not parties to this litigation

Bates Range	Description	Privilege(s) Asserted
Box #1 P-000855 thru P-000937	File folder entitled "JP Morgan Chase" containing subpoena, correspondence, and responsive documents	6(e) Contains documents and information subject to investigative privilege
Box #1 P-000938 thru P-000947	File folder entitled "Washington Mutual" containing subpoena, correspondence, and responsive documents	6(e) Contains documents and information subject to investigative privilege
Box #1 P-000948 thru P-000982	File folder entitled "Computer Search &" containing legal research on computer search and handwritten notes on indictment preparation	Work Product Attorney-Client Contains information subject to investigative privilege. Also contains information subject to privacy rights of victims who are not parties to this litigation
Box #1 P-000983 thru P-001007	File folder entitled "Attorney Notes from Document Review" containing typed and handwritten attorney (Villafañe) notes, target letters, correspondence re grand jury subpoena	Work product 6(e) Contains information subject to investigative privilege. Also contains information subject to privacy rights of victims who are not parties to this litigation
Box #1 P-001008 thru P-001056	File folder entitled "Notes from Fed Ex Records" containing handwritten and typed attorney (Villafañe) notes and screen shots of FedEx subpoena response electronic file	Work Product 6(e) Contains information subject to investigative privilege. Also contains information subject to privacy rights of victims who are not parties to this litigation
Box #1 P-001057 thru P-001959	File folder entitled "Colonial Bank Records" containing records received in response to grand jury subpoena	6(e) Contains information subject to investigative privilege
Box #1 P-001960 Thru P-002089	File folder entitled "OLY Grand Jury Log Vol 2: OLY-51 THROUGH" containing subpoenas numbered OLY-51 through OLY-81 with related correspondence	6(e) Contains information subject to investigative privilege. Also contains information subject to privacy rights of victims who are not parties to this litigation

Bates Range	Description	Privilege(s) Asserted
Box #1 P-002090 Thru P-002169	File folder entitled "Epstein Corporate Records: OLY-51, OLY-52, OLY-53, OLY-54" containing subpoenas, records received in response to subpoenas, and related correspondence	6(e) Contains information and documents subject to investigative privilege
Box #1 P-002170 Thru P-002246	File folder entitled "Colonial Bank" containing subpoenas, correspondence related to subpoenas, records received in response to subpoenas	6(e) Contains information and documents subject to investigative privilege
Box #1 P-002247 Thru P-002265	File folder entitled "JEJE & Hyperion from Goldberger OLY-46 & OLY-47" containing documents received in response to subpoenas	6(e) Contains information and documents subject to investigative privilege
Box #1 P-002266 Thru P-002386	Indictment preparation binder containing: Grand jury subpoena log, evidence/activity summary chart, witness/victim names and contact list, attorney (Villafañe) handwritten notes, 302s, portions of state investigative file, attorney (Villafañe) typed notes, of individuals listed as "Additional victims"	Work product 6(e) Contains information and documents subject to investigative privilege. Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-002387 Thru P-002769	Indictment preparation binder containing: Grand jury subpoena log, evidence/activity summary chart, witness/victim names and contact list, attorney (Villafañe) handwritten notes, 302s, portions of state investigative file, attorney (Villafañe) typed notes, relevant pieces of grand jury materials, telephone records/flight records analysis charts, victim/witness photographs, DAVID records, NCICs, and related materials for persons identified as Jane Does #15, 16, 17, 18, 19, Past Employees, Misc. Witnesses	Work product 6(e) Contains information and documents subject to investigative privilege. Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-002770 Thru P-003211	Indictment preparation binder containing: witness/victim list with identifying information, sexual activity summary, telephone call summary chart, attorney (Villafañe) handwritten notes, 302s, portions of state investigative file, attorney (Villafañe) typed notes, relevant pieces of grand jury materials, telephone records/flight records analysis charts, victim/witness photographs, DAVID records, NCICs, and related materials for persons identified as Jane Does #1, 2, 3, 4, 5, 6, 7, 8	Work product 6(e) Contains information and documents subject to investigative privilege. Also contains information and documents subject to privacy rights of victims who are not parties to this litigation

Bates Range	Description	Privilege(s) Asserted
Box #1 P-003212 Thru P-003545	Indictment preparation binder containing meta-analysis charts of telephone/flight/grand jury information for a number of victim/witnesses, Nadia Marcinkova, and Adriana Mucinska	Work product 6(e) Contains information and documents subject to investigative privilege. Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-003546 Thru P-003552	FBI Reports of March 2008 interviews of additional witness/victim located in New York	Work product 6(e) Contains information and documents subject to investigative privilege. Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-003553 Thru P-003555B	Printout of filenames from Federal Express subpoena response with Attorney notations	Work product 6(e)
Box #1 P-003556 Thru P-003562	Document entitled "Identified Numbers" with accompanying handwritten attorney list compiled from grand jury materials and attorney analysis of records	Work product 6(e) Contains information subject to investigative privilege
Box #1 P-003563 Thru P-003629	Folder entitled "Flight Manifests" containing manifests received pursuant to grand jury subpoena	6(e) Contains information and documents subject to investigative privilege
Box #1 P-003630 Thru P-003633	File folder entitled "Recent Attorney Notes" containing handwritten attorney (Villafañe) notes regarding document review and case strategy	Work product 6(e) Investigative privilege Deliberative process
Box #1 P-003634 Thru P-003646	File folder bearing victim name containing FBI interview report from May 2008, telephone activity report with attorney (Villafañe) handwritten notes, related grand jury material	Work product Attorney-client privilege 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation

Bates Range	Description	Privilege(s) Asserted
Box #1 P-003647 Thru P-003651	File folder entitled "Summary of Sexual Activity" containing chart bearing handwritten title "Sexual Activity – Summary" with meta-analysis of information, sorted by name of each victim/witness, including name and identifying information of each victim/witness	Work product 6(e) Investigative privilege Deliberative process Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-003652 Thru P-003663	File folder entitled "Victim Civil Suits"	Not privileged. Produced to counsel for Petitioners
Box #1 P-003664 Thru P-003678	File folder entitled "Research re JE Websites" containing attorney research	Work product
Box #1 P-003679 Thru P-003680	File folder entitled "Serene Cano (N.Y. AUSA)" containing attorney (Villafañe) handwritten notes	Work product
Box #1 P-003681 Thru P-003687	File folder entitled "Dr. Anna Salter" containing attorney (Villafañe) memo to expert witness and handwritten attorney notes	Work product Investigative privilege
Box #1 P-003688 Thru P-003693	File folder entitled "I[] G[] Interview" containing attorney handwritten notes of interview, and attorney handwritten notes regarding potential charges	Work product Investigative privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
Box #1 P-003694 Thru P-003711	File folder entitled "Research re Travel for Prostitution" containing attorney (Villafañe) handwritten notes regarding grand jury presentation, chart entitled "Brought to Epstein's House" with handwritten notes, Message Pad meta-analysis chart, summary of evidence related to one victim/witness, and relevant grand jury information	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-003712	Empty file folder bearing name of victim/witness	Investigative privilege Also contains information subject to privacy rights of victim who is not a party to this litigation

Bates Range	Description	Privilege(s) Asserted
Box #1 P-003713 Thru P-003746	File folder entitled "T[] M[]" containing grand jury subpoenas, motion and order to compel testimony, and correspondence regarding same	6(e) Documents under seal pursuant to court order
Box #1 P-003747 Thru P-003751	File folder entitled "Adriana Ross" containing subpoena and correspondence regarding same	6(e)
Box #1 P-003752 Thru P-004295	File folder entitled "PBPD Investigative File" obtained via subpoena	6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-004296 Thru P-004350	File folder bearing name of victim/witness containing meta-analysis chart showing telephone calls, travel, and grand jury materials relevant to possible charges	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-004351 Thru P-004381	File folder entitled "Daniel [REDACTED] Documents 53909-004" containing attorney research related to bias issue	Work product
Box #1 P-004382 Thru P-004478	File Folder entitled "FEDEX" containing documents obtained via subpoena	6(e) Investigative privilege
Box #1 P-004479 Thru P-004551	File Folder entitled "State of Delaware Records" containing documents obtained in preparation for indictment	6(e) Investigative privilege Work product
Box #1 P-004552 Thru P-004555	File folder entitled "Jet Blue Records" containing documents obtained via subpoena	6(e) Work product Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-004556 Thru P-004560	File folder entitled "FL EMPLOYMENT RECORDS" containing FDLE records on targets and witnesses obtained at attorney request	Investigative privilege Work product

Bates Range	Description	Privilege(s) Asserted
Box #1 P-004561 Thru P-004565	Filed folder entitled "JANUSZ BANASIAK" containing attorney (Villafaña) handwritten notes of interview	Work product Investigative privilege
Box #1 P-004566 Thru P-004716	File folder entitled "JANUSZ BANASIAK RECORDS 23-0001 THROUGH 23-" containing documents obtained via subpoena	6(e) Work product Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-004717 Thru P-004722	File folder entitled "IGOR ZINOVIEV" containing attorney research regarding witness	Work product Investigative privilege
Box #1 P-004723 Thru P-004725	File folder entitled "BEAR STEARNS RESEARCH" containing attorney research regarding potential witness and subpoena recipient	Work Product Investigative privilege
Box #1 P-004726 Thru P-004819	File folder entitled "LAWSUITS INVOLVING EPSTEIN CORP'S" containing attorney research regarding Epstein's past personal and business litigative practices	Work Product Investigative privilege
Box #1 P-004820 Thru P-004959	Filed folder entitled "SEC RECORDS" containing attorney research regarding Epstein financial relationships	Work Product Investigative privilege
Box #1 P-004960 Thru P-005059	File folder entitled "Message Pads" containing selected items from evidence obtained via subpoena	Work Product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-005060 Thru P-005081	File folder bearing name of victim/witness containing correspondence with counsel for victim/witness, attorney witness outline with attorney handwritten notes, attorney handwritten notes regarding witness reports and case preparation	Work Product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-005082 Thru P-005083	File folder entitled "New York Trip" containing attorney notes re witness interview	Work product Investigative privilege

Bates Range	Description	Privilege(s) Asserted
	P-005084 thru P-005107 are non responsive documents and have been removed	
Box #1 P-005108 Thru P-005193	File folder entitled "ANNA SALTER" containing attorney research on select expert, use of experts at trials in child exploitation cases, and additional research materials on offenders and victims	Work product Investigative privilege
Box #1 P-005194 Thru P-005300	File folder entitled "Extra Copies" containing meta-analysis chart and 302's of victim/witnesses used in preparing indictment package	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-005301 Thru P-005331	File folder entitled "JUAN ALESSI STATEMENT" containing transcript obtained via subpoena	6(e) Investigative privilege
Box #1 P-005332 Thru P-005341	File folder entitled "KEN LANNING" containing attorney research on select expert, including attorney handwritten notes	Work product Investigative privilege
Box #1 P-005342 Thru P-005387	File folder entitled "Info re Planes" containing correspondence regarding subpoenas and documents received in response to subpoenas	6(e) Investigative privilege
Box #1 P-005388 Thru P-005442	File folder entitled "Police Reports & PC Affidavit" containing portions of police reports with attorney notes, related phone records, a list entitled "Victims" with identifying information and attorney handwritten notes, photographs and DAVID information, and additional attorney research regarding Epstein sexual activity	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-005443 Thru P-005496	File folder entitled "[Victim name] Transcript of Interview & GJ Transcript"	6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #1 P-005497 Thru P-005556	File folder entitled "Bear Stearns Subpoena Resp." containing material received in response to subpoena	6(e) Investigative privilege

Bates Range	Description	Privilege(s) Asserted
Box #1 P-005557 Thru P-005576	U.S. Attorney's Office Criminal Case File Jacket containing file opening documents, expert witness payment documents	Work product Deliberative process
Box #1 P-005578 Thru P-005583	U.S. Attorney's Office Asset Forfeiture Case File Jacket containing file opening and file closing documents	Work product Deliberative process
Box #1 P-005584 Thru P-005606	File folder entitled "6001 Immunity Request" containing internal memoranda seeking witness immunity and correspondence with counsel for witness regarding same	6(e) Work product and deliberative process (as to internal memoranda) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #2 P-005607 Thru P-005914	File folder entitled "MASTER PHONE RECORDS" containing meta-analysis of all phone, travel, and grand jury data for all victim/witnesses for indictment preparation	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #2 P-005915 Thru P-005977	File folder bearing name of victim/witness containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #2 P-005978 Thru P-006050	File folder bearing name of victim/witness containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #2 P-006051 Thru P-006065	File folder bearing name of victim/witness containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation

Bates Range	Description	Privilege(s) Asserted
Box #2 P-006066 Thru P-006220	File folder entitled "JANE DOE #4" containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #2 P-006221 Thru P-006222	File folder entitled "JANE DOE #12" containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #2 P-006223 Thru P-006522	File folder entitled "CORRECTED PHONE RECORDS 5/31/07" containing meta-analysis of all phone, travel, and grand jury data related to all victims/witnesses for indictment preparation	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #2 P-006523 Thru P-006802	File folder entitled "[Victim Name] Phone Records" containing telephone records received in response to subpoena	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #2 P-006803 Thru P-006860	File folder entitled "Lists of Identified Phone Numbers" containing charts of information culled from grand jury materials, interviews, and other investigation, with attorney handwritten notes, and information to issue follow-up grand jury subpoena	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #2 P-006861 Thru P-007785	File folder entitled "EPSTEIN/KELLEN CELL PHONE RECORDS" containing documents received via subpoena with attorney handwritten notes and highlighting	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation

Bates Range	Description	Privilege(s) Asserted
Box #2 P-007786 Thru P-008120	Folder entitled "OLY GRAND JURY LOG: OLY-01 THROUGH OLY-50" containing subpoenas, correspondence regarding same, 6(e) letters, attorney handwritten notes regarding records received in response to subpoenas	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #2 P-008121 Thru P-008139	Handwritten flight logs received in response to subpoena	6(e) Investigative privilege
Box #2 P-008140 Thru P-008298	Grand jury presentation folder containing attorney handwritten notes, typed outline with additional handwritten notes, complete indictment package dated 2/19/2008, victim list with identifying information, photographs, and summary of activity	Work product 6(e) Investigative privilege Also contains information and documents subject to privacy rights of victims who are not parties to this litigation
Box #2 P-008299 Thru P-008363	File folder entitled "FINAL AGREEMENTS" containing subfolder entitled "Agrmts Filed in State Court" (P-008300-P-008327 [not being withheld as privileged – have been produced to opposing counsel]); signed Non-Prosecution Agreement, Addendum, and operative portion of 12/19/2007 Sanchez-Acosta letter (P-008328-P-008343 [not being withheld as privileged – have been produced to opposing counsel]); subfolder entitled "12/19/07 Acosta-Sanchez Ltr" containing unredacted copies of that letter (P-008344-P-008363 [pursuant to Court's Order, not being withheld as privileged – will be produced to opposing counsel upon lift of stay by 11 th Circuit])	
Box #2 P-008364 Thru P-008382	File folder entitled "Lacerda Immunity Request" containing internal memoranda, Justice Department documentation, and subpoena regarding immunity request	6(e) Work Product Deliberative Process Investigative privilege
Box #2 P-008383 Thru P-008516	File folder containing March 18, 2008 grand jury presentation materials, including "Operation Leap Year Revised Indictment Summary Chart (by victim)," grand jury materials, draft indictments, victim reference list, grand jury subpoena log	Work product 6(e) Investigative privilege Deliberative process Also contains information and documents subject to privacy rights of victims who are not parties to this litigation

Bates Range	Description	Privilege(s) Asserted
Box #2 P-008517 Thru P-008535	6/25/2007 Letter from Gerald Lefcourt to Jeffrey Sloman and Andrew Lourie [pursuant to Court's Order, not being withheld as privileged – will be produced to opposing counsel upon lift of stay by 11 th Circuit]	
Box #2 P-008536 Thru P-008542	Handwritten attorney notes to prepare for interview of Jane Doe #2	Work product Investigative Privilege Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-008543 Thru P-008549	Handwritten attorney notes regarding May 8, 2007 grand jury presentation	Work product 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-008550 Thru P-008615	File folder entitled "Most Recent Indictment & Good Cases" containing draft indictment and legal research	Work product 6(e) Investigative privilege Deliberative process Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-008616 Thru P-008686	File folder entitled "FBI Summary Charts" containing chart prepared at direction of AUSA, containing victim names, identifying information, summary of activity, and other information relevant to indictment	Work product Attorney-Client Privilege 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-008687 Thru P-008776	File folder entitled "[Victim name]/Jane Doe #4" containing phone records and meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Contains information and documents subject to privacy rights of victims who are not parties to this suit
Box #2 P-008777 Thru P-008808	File folder entitled "[Victim name]/Jane Doe #5" containing handwritten notes and meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit

Bates Range	Description	Privilege(s) Asserted
Box #2 P-008809 Thru P-008847	File folder entitled "[Victim name]/Jane Doe #6" containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-008848 Thru P-008862	File folder entitled "[Victim name]/Jane Doe #7" containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-008863 Thru P-008890	File folder entitled "[Victim name]/Jane Doe #8" containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-008891 Thru P-009103	File folder entitled "Certified Copy of State Case" containing certified copy of Epstein state criminal cases and change of plea transcript [not being withheld as privileged – copy provided to opposing counsel]	
Box #2 P-009104 Thru P-009111	File folder entitled "Meeting Timeline" containing Villafaña typed notes summarizing meetings with opposing counsel prepared at request of R. Alexander Acosta, with handwritten correction and typed guideline estimate	Work product Deliberative process
Box #2 P-009112 Thru P-009113	11/26/2008 Email from Roy Black to A. Marie Villafaña and Karen Atkinson re Jeffrey Epstein (work release) [pursuant to Court's Order, not being withheld as privileged – will be produced to opposing counsel upon lift of stay by 11 th Circuit]	
Box #2 P-009114 Thru P-009115	7/3/2008 Email from A. Marie Villafaña to Col. M. Gauger at PBSO re Epstein work release with attachment [not being withheld as privileged – produced to opposing counsel]	
Box #2 P-009116 Thru P-009125	12/6/2007 Letter from Jeffrey Sloman to Jay P. Lefkowitz re Jeffrey Epstein (victim notification) [pursuant to Court's Order, not being withheld as privileged – will be produced to opposing counsel upon lift of stay by 11 th Circuit]	

Bates Range	Description	Privilege(s) Asserted
Box #2 P-009126 Thru P-009134	File folder entitled "[Victim name]/Jane Doe #9" containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-009135 Thru P-009141	File folder entitled "[Victim name]/Jane Doe #13" containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-009141A Thru P-009141C	File folder entitled "[Victim name]/Jane Doe #12" containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-009142 Thru P-009152	File folder entitled "Adriana 'Mucinka' Ross" containing meta-analysis of all phone, travel, and grand jury data related to that individual for indictment preparation	Work product 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-009153 Thru P-009156	File folder entitled "Nadia Marcinkova" containing meta-analysis of all phone, travel, and grand jury data related to that individual for indictment preparation	Work product 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-009157 Thru P-009208	File folder entitled "[Victim name]/Jane Doe #1" containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-009209 Thru P-009213	File folder entitled "[Victim name]/Jane Doe #2" containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit

Bates Range	Description	Privilege(s) Asserted
Box #2 P-009214 Thru P-009271	File folder entitled "[Victim name]/Jane Doe #3" containing meta-analysis of all phone, travel, and grand jury data related to that victim/witness for indictment preparation	Work product 6(e) Investigative privilege Contains information subject to privacy rights of victims who are not parties to this suit
Box #2 P-009272 Thru P-009354	File folder entitled "Purpose of Travel Cases" containing attorney research and handwritten notes	Work product
Box #2 P-009355 Thru P-009403	File folder entitled "Interstate Commerce Cases" containing attorney research and handwritten notes	Work product
Box #2 P-009404 Thru P-009536	File folder entitled "Attorney Conflict Research" containing attorney research and handwritten notes	Work product
Box #2 P-009537 Thru P-009574	File folder entitled "Mann Act/Travel to Have Sex w/Minor" containing attorney research and handwritten notes	Work product
Box #2 P-009575 Thru P-009603	File folder entitled "Travel Act" containing attorney research and handwritten notes	Work Product
Box #2 P-009604 Thru P-009711	File folder entitled "Florida Prostitution/Lewdness Statutes" containing attorney research and handwritten notes	Work Product
Box #2 P-009712 Thru P-009819	Booklet entitled "Attorney General Guidelines for Victim and Witness Assistance" [not being withheld as privileged – produced to opposing counsel]	
Box #2 P-009820 Thru P-009965	File folder entitled "Corporate Liability Rsrch" containing attorney research and handwritten notes	Work Product
Box #2 P-009966 Thru P-010096	File folder entitled "Research re Knowledge of Age Unnecessary" containing attorney research and handwritten notes and copy of grand jury subpoena	Work Product 6(e)

Bates Range	Description	Privilege(s) Asserted
Box #2 P-010097 Thru P-010276	File folder entitled "Money Laundering" containing attorney research and handwritten notes	Work Product
Box #2 P-010277 Thru P-010394	File folder entitled "1960 & Aiding/Abetting" containing attorney research and handwritten notes	Work Product
Box #2 P-010395 Thru P-010488	File folder entitled "18 USC § 2255 Cases" containing attorney research and handwritten notes	Work Product
Box #2 P-010489 Thru P-010509	File folder entitled "Research re Overt Acts & Witness Testimony" containing attorney research and handwritten notes	Work Product
Box #2 P-010510 Thru P-010525	File folder entitled "Extradition" containing attorney research and handwritten notes	Work Product
Box #2 P-010526 Thru P-010641	File folder entitled "Rsrch re Crime Victims Rights" containing attorney research, handwritten notes, draft victim notification letter, and draft correspondence to Jay Lefkowitz (Also contains a November 28, 2007 letter from Kenneth Starr to Alice S. Fisher; and a November 29, 2007 letter from Jay Lefkowitz to R. Alexander Acosta (P-010528 thru P-010530 and P-010556 thru P-010559). Pursuant to the Court's Order, these will be produced to opposing counsel upon lift of stay by 11 th Circuit)	Work Product Deliberative Process
Box #2 P-010642 Thru P-01650	File folder entitled "Immunity" containing attorney research on granting immunity to witnesses	Work Product
Box #2 P-010651 Thru P-010659	File folder entitled "Research re G.J. Transcript" containing attorney research and draft pleadings re compelling production of grand jury transcript with subpoena	Work Product 6(e) Deliberative process
Box #2 P-010660 Thru P-010757	File folder entitled "Research re GJ Transcript" containing grand jury subpoena, 6(e) letters, attorney research and correspondence related to subpoena	Work Product 6(e)

Bates Range	Description	Privilege(s) Asserted
Box #2 P-010758 Thru P-010793	File folder entitled "Original Proposed Ind." containing draft indictment	Work Product 6(e) Deliberative process
Box #2 P-010794 Thru P-010829	File folder entitled "Epstein" containing sample indictments and attorney research re potential charges with attorney notes	Work Product
Box #2 P-010830 Thru P-010853	File folder entitled "1591 & Money Laundering" containing attorney research and handwritten notes	Work Product
Box #2 P-010854 Thru P-010876	File folder entitled "18 USC 2425" containing attorney research and handwritten notes	Work Product
Box #2 P-010877 Thru P-010920	File folder entitled "Knowledge of Age" containing attorney research and handwritten notes	Work Product
Box #2 P-010921 Thru P-011049	File folder entitled "2423(b) Constitutionality and Purpose of Travel" containing attorney research and handwritten notes	Work Product
Box #2 P-011050 Thru P-011212	File folder entitled "Mistake not a Defense" containing attorney research and handwritten notes	Work Product
Box #2 P-011213 Thru P-011237	File folder entitled "Research re 'Pandering'" containing attorney research and handwritten notes	Work Product
Box #2 P-011238 Thru P-011319	File folder entitled "Research re Grand Jury Instructions" containing attorney research and handwritten notes	Work Product 6(e)
Box #2 P-011320 Thru P-011361	File folder entitled "Telephone = Facility of Commerce" containing attorney research and handwritten notes	Work Product
Box #2 P-011362 Thru P-011374	File folder entitled "Def of Prostitution" containing attorney research and handwritten notes	Work Product

Bates Range	Description	Privilege(s) Asserted
Box #2 P-011375 Thru P-011456	File folder entitled "Relevant Florida Statutes" containing attorney research and handwritten notes	Work Product
Box #2 P-011457 Thru P-011626	File folder entitled "Unit of Prosecution Research" containing attorney research and handwritten notes	Work Product
Box #3 P-011627 Thru P-011662	File folder entitled "Attorney Notes" containing attorney handwritten and typed notes	Work Product
Box #3 P-011663 Thru P-011698 and P-012189 thru P-012361 (gap was scanning error)	File folder entitled "Drafts" containing draft indictments with attorney handwritten notes, draft internal memoranda, relevant witness interview reports and grand jury material and attorney handwritten notes	6(e) Work Product Deliberative Process Investigative Privilege Contains information subject to privacy rights of victims who are not parties to this
Box #3 P-011699 Thru P-011777	File folder entitled "6/9/09 Signed Indictment" containing signed indictment package dated 6/9/2009 with corrections	6(e) Work product Deliberative process
Box #3 P-011778 Thru P-011788	File folder entitled "6/12/09 Victim Notif. Log" containing chart with victim contact information and attorney notes regarding dates and type of contacts	Work product
Box #3 P-011789 Thru P-011879	File folder entitled "Breach Memo" containing memorandum analyzing breach of Non-Prosecution Agreement with attachments	Work product Deliberative process
Box #3 P-011880 Thru P-011922	File folder entitled "Overt Act Lists" containing handwritten notes cross-checking all overt acts alleged in draft indictment by victim and typed overt act summary charts for indictment preparation	Work product Attorney-client privilege Deliberative process 6(e)

Bates Range	Description	Privilege(s) Asserted
Box #3 P-011923 Thru P-011966	Folder entitled "Responses to Arguments from JE Counsel" containing: ■ 7/13/2007 letter from Lilly Ann Sanchez to Andrew Lourie with handwritten attorney (Lourie) notes; ■ 6/25/2007 letter from Gerald Lefcourt to Jeffrey Sloman, Matt Menchal, Andrew Lourie, and Marie Villafañã with handwritten attorney (Villafañã) notes; ■ 6/25/2007 email from Andrew Lourie to Matt Menchel and Marie Villafañã entitled "Thoughts on Lefcourt's letter" Handwritten and typed attorney (Villafañã) notes regarding main themes raised by Epstein counsel	Work product Deliberative process 6(e) Attorney-Client Privilege
Box #3 P-011967 Thru P-012016	Composition book entitled "Operation Leap Year" containing attorney handwritten notes regarding investigation and case strategy	Work product Investigative privilege 6(e) Contains information subject to privacy rights of victims who are not parties to this litigation
Box #3 P-012017 Thru P-012055	Motion of Jeffrey Epstein to Intervene and to Quash Grand Jury Subpoenas and Incorporated Memorandum of Law	6(e)
Box #3 P-012056 Thru P-012088	Affidavit of Roy Black, Esq. in Support of Motion of Jeffrey Epstein to Intervene and to Quash Grand Jury Subpoenas	6(e)
Box #3 P-012089 Thru P-012129	United States' Response to Motion of Jeffrey Epstein to Intervene and to Quash Grand Jury Subpoenas and Cross-Motion to Compel	6(e)
Box #3 P-012130 Thru P-012150	Declaration of Joseph Recarey	6(e)
Box #3 P-012151 Thru P-012167	Ex Parte Declaration Number One in Support of United States' Response to Motion to Quash Subpoenas	6(e) Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation

Bates Range	Description	Privilege(s) Asserted
Box #3 P-012168 Thru P-012170	Ex Parte Declaration Number Two in Support of United States' Response to Motion to Quash Subpoenas	6(e) Investigative Privilege
Box #3 P-012171 Thru P-012173	Supplement to Ex Parte Declaration Number One in Support of United States' Response to Motion to Quash Subpoenas	6(e) Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
Box #3 P-012174 Thru P-012176	Draft of September 2009 letter from Marie Villafaña to Roy Black regarding breach of Non Prosecution Agreement with handwritten attorney (Villafaña) notes	Work Product Attorney-Client Privilege Deliberative Process
Box #3 P-012177 Thru P-012178	Undated handwritten attorney (Villafaña) notes regarding negotiations and allegations	Work Product Attorney-Client Privilege Deliberative Process
Box #3 P-012179 Thru P-012188	File Folder entitled "FBI G.J. Log" containing copy of FBI grand jury subpoena log with attorney (Villafaña) handwritten notes	6(e) Work Product Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
Box #3 P-012362 Thru P-012451	File folder entitled "Key Documents" containing correspondence between AUSA and case agent regarding indictment prep questions, victim identification information, corrections to draft indictment, indictment preparation timeline, key grand jury material	6(e) Work Product Attorney-Client privilege Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
Box #3 P-012451 Thru P-012452	File folder entitled "Victim List" containing list of victims with dates of birth and age information	Work Product Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation

Bates Range	Description	Privilege(s) Asserted
Box #3 P-012453 Thru P-012623	Complete indictment package marked "Originals 12/12/07"	Work-product Deliberative process 6(e) Also contains documents subject to investigative privilege Also contains documents subject to privacy rights of victims who are not parties to this litigation
Box #3 P-012624 Thru P-012653	Folder entitled "(Victims) Additional 302's" containing reports of interviews conducted in June 2007, October 2007, and March 2008.	Investigative Privilege Also contains documents subject to privacy rights of victims who are not parties to this litigation
Box #3 P-012654 Thru P-012864	3-ring binder entitled "Child Molesters: A Behavioral Analysis" with attorney (Villafañá) handwritten notes	Work-product
Box #3 P-012865 Thru P-013226	Indictment preparation binder containing: witness/victim list with identifying information, sexual activity summary, telephone call summary chart, attorney (Villafañá) handwritten notes, 302s, portions of state investigative file, attorney (Villafañá) typed notes, relevant pieces of grand jury materials, telephone records/flight records analysis charts, victim/witness photographs, DAVID records, NCICs, and related materials for persons identified as Jane Does #9, 10, 11, 12, 13, 14	Work Product Deliberative Process 6(e) Also contains documents subject to investigative privilege Also contains documents subject to privacy rights of victims who are not parties to this litigation
Box #3 P-013227	April 23, 2008 Memo from Jeffrey Sloman to Office of Professional Responsibility re Self Reporting, Corrected Version of the previously submitted April 21, 2008 Letter to OPR	Privacy Act
Box #3 P-013226 Thru P-013230	April 21, 2008 Letter from Jeffrey Sloman to Office of Professional Responsibility re Self Reporting	Privacy Act
Box #3 P-013231 Thru P-013239	April 22, 2008 Letter from A. Marie Villafañá to Office of Professional Responsibility re Self-Report of Allegation of Conflict of Interest	Privacy Act

Bates Range	Description	Privilege(s) Asserted
Box #3 P-013240 Thru P-013247	April 21, 2008 Letter from Jeffrey Sloman to Office of Professional Responsibility re Self Reporting with attachments	Privacy Act
Box #3 P-013248 Thru P-013251	Emails between Richard Sudder, Assistant General Counsel, Executive Office for United States Attorneys, and Benjamin Greenberg, First Assistant U.S. Attorney, Southern District of Florida, regarding Formal Notice of Office-wide Recusal of Southern District of Florida dated August 24 and August 29, 2011	Attorney-Client Privilege
Box #3 P-013252 Thru P-013253	Emails between Richard Sudder, Assistant General Counsel, Executive Office for United States Attorneys, and Benjamin Greenberg, First Assistant U.S. Attorney, Southern District of Florida, regarding Recusal matter, dated July 28, August 3, and August 24, 2011	Attorney-Client Privilege
Box #3 P-013254 Thru P-013257	Emails between Richard Sudder, Assistant General Counsel, Executive Office for United States Attorneys, and Benjamin Greenberg, First Assistant U.S. Attorney, Southern District of Florida, regarding Formal Notice of Office-wide Recusal of Southern District of Florida dated August 24 and August 29, 2011	Attorney-Client Privilege
Box #3 P-013258 Thru P-013259	Emails between Richard Sudder, Assistant General Counsel, Executive Office for United States Attorneys, and Benjamin Greenberg, First Assistant U.S. Attorney, Southern District of Florida, regarding Formal Notice of Office-wide Recusal of Southern District of Florida dated July 28 and August 3, 2011	Attorney-Client Privilege
Box #3 P-013260 Thru P-013262	Email from Richard Sudder, Assistant General Counsel, Executive Office for United States Attorneys, to Wifredo Ferrer (U.S. Attorney, SDFL), Robert O'Neill (U.S. Attorney, MDL), Benjamin Greenberg, (FAUSA, SDFL), and Lee Bentley (FAUSA, MDL) regarding Formal Notice of Office-wide Recusal of Southern District of Florida dated August 24, 2011. CC's David Margolis (ODAG), Jay Macklin (USAEO), Thomas Anderson (USAEO), [REDACTED] Tapken (USAEO), James Read (USAEO)	Attorney-Client Privilege

Bates Range	Description	Privilege(s) Asserted
Box #3 P-013263 Thru P-013271	Emails between Richard Sudder, Assistant General Counsel, Executive Office for United States Attorneys, and Benjamin Greenberg, First Assistant U.S. Attorney, Southern District of Florida, regarding recusal of Southern District of Florida, dated July 29, 2011, with attached memorandum from A. Marie Villafaña to Benjamin Greenberg summarizing Jeffrey Epstein Investigation	Attorney-Client Privilege Deliberative Process Work Product
Box #3 P-013272 Thru P-013278	Emails between Peter Mason, Executive Office for United States Attorneys, and Dexter Lee, Southern District of Florida, seeking advice regarding office-wide recusal, dated December 16 and 17, 2010, with attached letter from Paul Cassell to Wifredo A. Ferrer, dated December 10, 2010	Attorney-Client Privilege



U.S. Department of Justice

United States Attorney
Southern District of Florida

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July 19, 2013

DELIVERY BY FEDERAL EXPRESS

Brad Edwards, Esq.,
Farmer Jaffe Weissing Edwards Fistos Lehrman
425 N Andrews Ave Ste 2
Fort Lauderdale, FL 33301-3268

Re: Jane Doe #1 and Jane Doe #2 United States

Dear Brad:

Enclosed please find:

- (1) One DVD containing documents Bates Stamped 000001 thru 000979;
- (2) Documents bearing Bates Nos. P-003652 thru P-003663;
- (3) Documents bearing Bates Nos. P-008300 thru P-008343;
- (4) Documents bearing Bates Nos. P-008891 thru P-009103;
- (5) Documents bearing Bates Nos. P-009114 thru P-009115;
- (6) Documents bearing Bates Nos. P-009712 thru P-009819;
- (7) A copy of the Privilege Log that was filed with the Court; and
- (8) A copy of the Responses to your Requests for Admissions that were filed with the Court.

Please let me know if you have any difficulties with any of the copies.

Sincerely,

Wifredo A. Ferrer
United States Attorney

By:


A. Marie Villafañá
Assistant United States Attorney

cc: Dexter Lee, Esq.

EFTA00191237

SECOND SUPPLEMENTAL PRIVILEGE LOG

Bates Range	Description	Privilege(s) Asserted
Box #4 P-013970 thru P-		
1	5/18/2007 email from Marie Villafaña to Matt Menchel informing him of intent to subpoena Roy Black's private investigator and steps taken to obtain DOJ authorization	Work Product 6(e) Deliberative Process Investigative Privilege
2	5/21/2007 email from Marie Villafaña to Myesha Braden (CEOS) re 2423(b) charging question	Work Product 6(e) Deliberative Process Investigative Privilege
3	5/21/2007 email from Marie Villafaña to Matt Menchel and Jeff Sloman regarding guidance on grand jury presentation	Work Product 6(e) Deliberative Process
4	6/12/2007-7/6/2007 series of emails between Marie Villafaña and AUSAs Serene Nakano and James Cott re an earlier unrelated investigation of Epstein	Work Product Investigative Privilege Privacy Act
5	7/3/2007-7/13/2007 email chain between Matt Menchel and Marie Villafaña regarding disagreement on Menchel's plea negotiations and written request for meeting between USAO management and victims	6(e) Work Product Deliberative Process Investigative Privilege
6	7/16/2007 email from Marie Villafaña to Matt Menchel and Andrew Lourie regarding correspondence from Roy Black and Motion to Quash	6(e) Work Product Deliberative Process Investigative Privilege
7	7/18/2007 emails from Marie Villafaña to Andrew Lourie and Matt Menchel regarding Motion to Quash grand jury subpoena and supporting affidavit filed by Roy Black	6(e) Work Product Deliberative Process Investigative Privilege
8	7/19/2007 email chain between Marie Villafaña, Andrew Lourie, Matt Menchel, S/A Jason Richards and S/A Eliasib Ortiz regarding potential service of target letters	6(e) Work Product Deliberative Process Investigative Privilege Attorney-Client Privilege
9	7/26/2007 email from Marie Villafaña to Matt Menchel and Andrew Lourie regarding proposed changes to the indictment	6(e) Work Product Deliberative Process Investigative Privilege

Bates Range	Description	Privilege(s) Asserted
10	8/2/2007 email drom Marie Villafaña to Jeff Sloman, Matt Menchel, and Andrew Lourie with draft response to Epstein counsel regarding agreement	Work Product Deliberative Process Investigative Privilege
11	7/31/2007-8/2/2007 email chain between Jeff Sloman, Matt Menchel, Andrew Lourie, and Marie Villafaña regarding plea negotiations	Work Product Deliberative Process Investigative Privilege
12	8/3/2007 Email from Marie Villafaña to Matt Menchel, Andrew Lourie, Jeff Sloman, and Karen Atkinson regarding draft response to correspondence from Epstein counsel and planned investigative steps if agreement cannot be reached.	Work Product Deliberative Process Investigative Privilege
13	Emails dated 8/6/2007 from Marie Villafaña to Cyndee Campos/Frederica Devlin and Jeff Sloman regarding Matt Menchel's correspondence prior to his departure.	Work Product Deliberative Process
14	8/7/2007 email chain between Marie Villafaña, Cyndee Campos, and Alex Acosta regarding meeting to discuss Epstein matter	Work Product Deliberative Process Investigative Privilege
15	8/7/2007 email from Marie Villafaña to Andy Lourie regarding deadline set for Epstein plea and Epstein's plan to demand a meeting with CEOS.	Work Product Deliberative Process Investigative Privilege
16	8/7/2007 email from Marie Villafaña to Andrew Oosterbaan regarding Epstein meeting	Work Product Deliberative Process Investigative Privilege
17	8/7/2007 email chain from Jeff Sloman to Andrew Oosterbaan, Marie Villafaña, and Alex Acosta regarding Epstein meeting	Work Product Deliberative Process Investigative Privilege
18	8/8/2007 emails between Marie Villafaña and Andrew Oosterbaan (CEOS) regarding case staffing and plea negotiations	Work Product Deliberative Process Investigative Privilege
19	8/8/2007 email chain between Andrew Oosterbaan, Alex Acosta, Marie Villafaña, Cyndee Campos, Jeff Sloman, and Andrew Lourie regarding "The meeting on Epstein"	Work Product Deliberative Process Investigative Privilege
20	8/10/2007 Electronic correspondence from Marie Villafaña to expert witness regarding topics for expert testimony	Work Product
21	9/21/2007 emails between Marie Villafaña and Andrew Lourie, Rolando Garcia, Karen Atkinson, and John McMillan regarding revisions to the non-prosecution agreement	Work Product Deliberative Process

Bates Range	Description	Privilege(s) Asserted
22	9/24/2007 series of emails between Marie Villafañá, Alex Acosta, and Andrew Lourie regarding plea negotiations and revisions to non-prosecution agreement	Work Production Deliberative Process
23	9/23/2007-9/24/2007 series of emails between Alex Acosta, Marie Villafañá, Andrew Lourie, Rolando Garcia, and Jeff Sloman regarding proposed revisions to non-prosecution agreement	Work Product Deliberative Process
24	4/29/2008 email from Marie Villafañá to Robert Senior, Jeff Sloman, Karen Atkins, on Rolando Garcia re grand jury presentation	Work Product 6(e) Deliberative Process Investigative Privilege
25	5/23/2008-5/27/2008 emails between Marie Villafañá, Robert Senior, Jeff Sloman, Karen Atkinson, Nesbitt Kuyrkendall (FBI), and Jason Richards (FBI) re status of investigation, indictment review, grand jury preparation, and Epstein's attempt to revisit plea negotiations	Work Product 6(e) Deliberative Process Investigative Privilege
26	5/22/2007 email from Andy Lourie to Matt Menchel and Jeff Sloman (cc: Marie Villafañá) re letter received from Gerald Lefcourt discussing a meeting to discuss Epstein investigation	Work Product Deliberative Process
27	5/23/2007 email from Jason Richards to Marie Villafañá re extradition research	Work Product A/C privilege Investigative Privilege
28	5/23/2007 emails between Karen Atkinson and Marie Villafañá regarding decision to meet with counsel for Epstein	Work Product Deliberative Process
29	4/2/2008 emails between Marie Villafañá, Alex Acosta, Jeff Sloman, Karen Atkinson, Robert Senior, Rolando Garcia, and Nesbitt Kuyrkendall regarding efforts by Jay Lefkowitz and Ken Starr to speak with Alex Acosta and instructions to direct question to Marie Villafañá and Karen Atkinson	Deliberative Process Work Product Attorney-Client Privilege
30	3/19/2008-3/21/2008 emails between Marie Villafañá, Drew Oosterbaan (CEOS), [REDACTED] Gelber (CEOS), Jeff Sloman, and Robert Senior about meeting between Epstein counsel and CEOS and follow-up questions	Work Product 6(e) Deliberative Process Investigative Privilege

Bates Range	Description	Privilege(s) Asserted
31	4/4/2008-4/7/2008 emails between Marie Villafañá, Robert Senior, Andrew Oosterbaan, and Jeff Sloman regarding status of CEOS review of Epstein matter	Work Product 6(e) Deliberative Process
32	4/11/2008-4/23/2008 emails between Marie Villafañá, Jeff Sloman, and Dexter Lee regarding self-reporting to OPR false allegations of ethics violations	Work Product Deliberative Process Privacy Act
33	5/15/2008-5/16/2008 emails between Jeff Sloman, Marie Villafañá, and Robert Senior regarding receiving final approval from DC	Work Product Deliberative Process
34	5/7/2008-5/9/2008 emails between Marie Villafañá, Robert Senior, Jeff Sloman, Nesbitt Kuyrkendall, and Jason Richards regarding awaiting approval from DC and status of ongoing investigation	Work Product 6(e) Deliberative Process Attorney-Client Privilege Investigative Privilege
35	5/2/2008 emails between Robert Senior, Marie Villafañá, Karen Atkinson, Nesbitt Kuyrkendall, and Jason Richards regarding developments in Epstein investigation and impact on grand jury presentation	6(e) Work Product Attorney-Client Privilege Investigative Privilege Deliberative Process
36	4/29/2008-5/2/2008 emails between Marie Villafañá and Jeff Sloman regarding contact by Epstein counsel and victims and draft letter to counsel for Epstein	6(e) Work Product Deliberative Process Investigative Privilege
37	11/29/2006-12/1/2006 emails between Marie Villafañá and prison employee regarding attempted contact with potential witness	Work Product Investigative Privilege Privacy Act
38	7/19/2007 email from Marie Villafañá to Andrew Lourie and Matt Menchel regarding planned service of target letters	Work Product 6(e) Investigative Privilege Deliberative Process
39	5/18/2007 emails between Marie Villafañá and expert witness regarding securing pre-indictment consultation contract	Work Product 6(e) Investigative Privilege
40	7/3/2007-7/4/2007 emails between Marie Villafañá and Andrew Lourie regarding extension of time to respond to subpoenas requested by Lilly Ann Sanchez and possible resolution of case	6(e) Work Product Investigative Privilege Deliberative Process
41	9/19/2007-9/20/2007 emails between Marie Villafañá, Andrew Lourie, and Rolando Garcia regarding plea negotiations with counsel for Epstein	Work Product Deliberative Process

Bates Range	Description	Privilege(s) Asserted
42	6/26/2007 email from Marie Villafaña to Jeff Sloman, Matt Menchel, and Andrew Lourie addressing arguments regarding interstate nexus for 2422(b) charges	Work Product Deliberative Process
43	3/28/2008 emails between Marie Villafaña, Nesbitt Kuyrkendall, Jeff Sloman, Robert Senior, and Karen Atkinson regarding status of DC review of case and preparing for grand jury presentation	Work Product 6(e) Investigative Privilege Deliberative Process
44	7/31/2007 email from Marie Villafaña to Jeff Sloman, Matt Menchel, and Andrew Lourie summarizing proposed plea terms as per Menchel recommendation	Work Product Deliberative Process
45	8/8/2007 email from Marie Villafaña to Drew Oosterbaan regarding plea negotiations, guideline calculations, and assistance in preparing case for trial	Work Product Investigative Privilege Deliberative Process
46	8/8/2007 email from Marie Villafaña to Alex Acosta, Cyndee Campos, Jeff Sloman, Andrew Lourie, and Drew Oosterbaan regarding planning meeting with Epstein counsel and service of target letters	Work Product 6(e) Investigative Privilege Deliberative Process
47	6/14/2007-6/21/2007 emails between Marie Villafaña, Karen Atkinson, Andrew Lourie, Matt Menchel, and Jeff Sloman regarding addendum to Pros Memo, grand jury presentation and changes to indictment, and meeting with counsel for Epstein	6(e) Work Product Deliberative Process Investigative Privilege
48	8/2/2007 emails between Matt Menchel, Jeff Sloman, Andy Lourie, and Marie Villafaña regarding letter received from Lilly Ann Sanchez	Work Product Deliberative Process
49	3/19/2008-3/27/2008 emails between Jeff Sloman, Bob Senior, Karen Atkinson, Rolando Garcia, Nesbitt Kurykendall, and Jason Richards regarding waiting for DC's decision regarding Epstein's challenges to NPA; status of ongoing investigation; problems with Epstein's counsel contacting victims in the guise of deposing them for the state criminal action; and securing pro bono counsel for those victims to represent them in connection with the depositions	Work Product Deliberative Process Investigative Privilege 6(e)

Bates Range	Description	Privilege(s) Asserted
50	3/31/2008 emails between Marie Villafañá, Jeff Sloman, Robert Senior, and Nesbitt Kuyrkendall regarding status of ongoing investigation, planned presentation to grand jury, continued delay in awaiting decision from Washington, DC, and problems with victims being harassed	6(e) Work Product Deliberative Process Investigative Privilege
51	4/10/2008-4/18/2008 emails between Marie Villafañá, Robert Senior, Karen Atkinson, Nesbitt Kuyrkendall, and Jeff Sloman about continued delay in presenting case to grand jury due to failure to receive decision from DC, status of grand jury presentation and ongoing investigation	6(e) Work Product Deliberative Process Investigative Privilege
52	4/21/2008-5/1/2008 emails between Marie Villafañá, Robert Senior, Jeff Sloman, Karen Atkinson, Nesbitt Kuyrkendall, and Drew Oosterbaan about continued delay in presenting case to grand jury due to failure to receive decision from DC, status of grand jury presentation and ongoing investigation, staffing of case for purposes of trial, and meeting to prepare for grand jury presentation	6(e) Work Product Deliberative Process Investigative Privilege
53	5/19/2008-5/22/2008 emails between Marie Villafañá, Karen Atkinson, Robert Senior, and Jeff Sloman regarding preparation for grand jury presentation; communication with S/A Kuyrkendall regarding plea negotiations; and status of ongoing investigation	6(e) Work Product Deliberative Process Investigative Privilege
54	8/15/2008 email from Marie Villafañá to Alex Acosta, Jeff Sloman, Robert Senior, Karen Atkinson, and Dexter Lee containing draft response to 8/15/2008 email from Jay Lefkowitz regarding implementation of the NPA. (Redacted version produced to opposing counsel)	Work Product Deliberative Process
55	12/3/2007-12/5/2007 correspondence between Alex Acosta, Jeff Sloman, Marie Villafañá, Nesbitt Kuyrkendall, Cyndee Campos, and Annette Castillo about drafting and sending the 12/4/2007 Acosta letter to Ken Starr	Work Product Deliberative Process 6(e) Attorney-Client Privilege

Bates Range	Description	Privilege(s) Asserted
56	12/18/2007 emails from other AUSAs to Marie Villafaña regarding other instances of charging 2422(b) based only on the use of a telephone	Work Product 6(e)
57	11/28/2007 correspondence between Marie Villafaña, Andrew Lourie, Drew Oosterbaan, and Rolando Garcia regarding Lefkowitz 11/27/2007 email discussing presentation to DAAG	Work Product Deliberative Process
58	11/19/2007-11/28/2007 emails between Marie Villafaña, Nesbitt Kuyrkendall, Jason Richards, and Jeff Sloman regarding drafting victim notification letter of upcoming plea	Work Product Deliberative Process Attorney-Client Privilege 6(e) Also contains information subject to privacy rights of victims who are not parties to this litigation
59	12/11/2007 email from Marie Villafaña to Jeff Sloman and Alex Acosta regarding call with lawyer for Jane Doe #2 (T.M.)	Work Product Deliberative Process
60	12/3/2007 emails between Marie Villafaña, Alex Acosta, and Jeff Sloman regarding history of plea negotiations and drafting response to correspondence from Jay Lekowitz and Ken Starr	Work Product Deliberative Process
61	8/10/2007 email from Marie Villafaña to Andrew Lourie regarding target letters and staying motion to compel production of computers	Work Product
62	8/30/2007 email from Marie Villafaña to Jeff Sloman, Andrew Lourie, Drew Oosterbaan, John McMillan, and Karen Atkinson regarding press coverage of meeting with Ken Starr	Work Product
63	9/4/2007-9/6/2007 emails between Marie Villafaña and Jeff Sloman regarding planned participation of FBI ASAIC at 9/7/2007 meeting with Epstein defense team	Work Product Deliberative Process
64	9/6/2007 emails between Marie Villafaña, Jeff Sloman, Andrew Lourie Drew Oosterbaan, and Rolando Garcia regarding status of plea negotiations, draft agreements, and need to confer with victims	Work Product Deliberative Process

Bates Range	Description	Privilege(s) Asserted
65	9/11/2007 emails between Marie Villafaña, John McMillan, Drew Oosterbaan, Nesbitt Kuyrkendall, and Jason Richards regarding changes to the draft indictment and status of plea negotiations	Work Product Deliberative Process Investigative Privilege Attorney-Client Privilege
66	9/10/2007-9/11/2007 emails between Marie Villafaña, Alex Acosta, and Jeff Sloman regarding modifications to the proposed Non-Prosecution Agreement	Work Product Deliberative Process
67	9/13/2007 emails from Marie Villafaña to Andrew Lourie, Alex Acosta, Jeff Sloman, Rolando Garcia, and Karen Atkinson regarding plea to federal charges recommending 18 USC 403 or 1512(d), or 47 USC 223(a)(1)(B); response that Epstein was only willing to plead to assault on the plane; and rejection of facts supporting assault on the plane charge	Work Product Deliberative Process
68	9/13/2007-9/14/2007 emails regarding Marie Villafaña research regarding victim trust fund set up in Alaska child exploitation case	Work Product
69	9/17/2007-9/19/2007 emails between Marie Villafaña, Rolando Garcia, Andrew Lourie, Alex Acosta, Karen Atkinson, and John McMillan regarding negotiations of a federal plea and a non-prosecution agreement	Work Product Deliberative Process
70	9/20/2007 emails between Marie Villafaña and Andrew Lourie regarding plea agreement to federal charges and factual proffer	Work Product Deliberative Process
71	9/20/2007-9/24/2007 emails between Alex Acosta, Marie Villafaña, and Andrew Lourie regarding revisions to the non-prosecution agreement	Work Product Deliberative Process
72	9/21/2007 email from Marie Villafaña to Alex Acosta, Rolando Garcia, Karen Atkinson, and Andrew Lourie regarding review of Epstein indictment package	Work Product Deliberative Process
73	9/24/2007 emails between Marie Villafaña and Rolando Garcia regarding notifying Palm Beach Police Chief and victims about agreement	Work Product Deliberative Process

Bates Range	Description	Privilege(s) Asserted
74	9/24/2007-9/25/2007 emails between Alex Acosta, Marie Villafañá, Andrew Lourie, and Rolanda Garcia regarding Lefkowitz email about keeping agreement from becoming public and confidentiality provision in agreement	Work Product Deliberative Process
75	10/5/2007-10/16/2007 emails between Marie Villafañá, Jeff Sloman, and Alex Acosta re selection of Special Master and negotiation of revision/addendum to Non-Prosecution Agreement	Work Product Deliberative Process
76	11/14/2007-11/19/2007 emails between AMCV, Jason Richards, Jeff Sloman, Rolando Garcia, Alex Acosta, and Karen Atkinson regarding communications with State Attorney's Office and Sheriff's Office in an attempt to insure that Epstein was ineligible for work release	WP DP Attorney-Client Privilege
77	11/19/2007 emails between AMCV, Jeff Sloman, and Rolando Garcia about efforts by Epstein's counsel to change date for change of plea	WP DP
78	11/8/2007-11/14/2007 emails between AMCV, Jeff Sloman, Karen Atkinson, and Jason Richards regarding response to objections raised by Epstein counsel and efforts to change date for guilty plea	WP DP Attorney-Client Privilege
79	10/31/2007 email from Nesbitt Kurykendall to AMCV regarding attempts to interview additional witnesses/victims	WP Attorney-Client Privilege IP 6(e) Also contains information subject to privacy rights of victims who are not parties to this litigation
80	10/22/2007-10/31/2007 emails between Jeff Sloman, Alex Acosta, and AMCV regarding negotiation of Addendum to Non-Prosecution Agreement and drafting of correspondence regarding scope of Special Master's duties and selection criteria	WP DP
81	10/19/2007 emails between Jeff Sloman and AMCV regarding Special Master's Selection of Attorney Representative	WP DP

Bates Range	Description	Privilege(s) Asserted
82	10/18/2007 emails between AMCV and Jeff Sloman regarding Epstein's request to delay his change of plea	WP DP
83	11/2/2007-11/5/2007 emails between AMCV and Jeff Sloman regarding drafting 11/5/2007 letter from Sloman to Lefkowitz	WP DP
84	11/5/2007-11/7/2007 emails from AMCV to Jeff Sloman inquiring about status of matter and contact by Epstein investigators with victims	WP DP
85	12/6/2007 emails between AMCV, Andrew Lourie, Cyndee Campos, Jeff Sloman, Alex Acosta, Karen Atkinson, and Nesbitt Kuyrkendall regarding correspondence from Ken Starr, request for a meeting from Epstein counsel, and need to notify victims of upcoming plea	WP DP
86	12/6/2007-12/7/2007 emails between AMCV, Cyndee Campos, Karen Atkinson, Jeff Sloman, and Alex Acosta regarding draft victim notification letter	WP DP
87	9/10/2007-14/2007 emails between AMCV, Andrew Lourie, Jeff Sloman, Karen Atkinson, Rolando Garcia, Shawn Ball, and Alex Acosta regarding final plea negotiations, finalizing details with State Attorney's Office and final revisions to indictment package	WP DP 6(e) IP
88	9/10/2007 email from AMCV to Jeff Sloman and John McMillan regarding Acosta inquiry about FBI investigation into State grand jury proceeding	WP 6(e) IP
89	11/29/2007-12/1/2007 emails between AMCV, Alex Acosta, Jeff Sloman, Cyndee Campos, and Andrew Lourie regarding draft response to Jay Lefkowitz and victim notification letters	WP DP
90	12/6/2007-12/7/2007 emails between AMCV, Nesbitt Kuyrkendall, Jason Richards, Jeff Sloman, Cyndee Campos, Annette Castillo, Karen Atkinson, and Shawn Ball regarding request from State Attorney's Office for draft plea proffer	WP DP 6(e) Attorney-Client Privilege IP

Bates Range	Description	Privilege(s) Asserted
91	12/14/2007 email from AMCV to Jeff Sloman, Alex Acosta, and Janice LeClainche regarding state cases mentioned by Epstein's counsel	WP DP
92	12/14/2007 email from AMCV to Alex Acosta, Jeff Sloman, Rolando Garcia, and Karen Atkinson with draft letters to State Attorney's Office and victims	WP DP
93	12/9/2007-12/12/2007 emails between AMCV, Jeff Sloman, Jason Richards, Nesbitt Kuyrkendall, Annette Castillo, Karen Atkinson, and Rolando Garcia regarding drafting response to personal attacks and upcoming meeting with Ken Starr	WP DP
94	12/12/2007 emails between AMCV, Frederica Devlin, and Bob Senior regarding planning indictment review	WP DP 6(e)
95	12/17/2007 email from AMCV to Jeff Sloman inquiring about case status and informing Sloman regarding agent concern about victim notifications	WP DP
96	3/10/2008-3/12/2008 emails between AMCV, Robert Senior, Myesha Braden, Krishna Patel, Nesbitt Kuyrkendall, E.J. Yera, and Karen Atkinson about Epstein attempts to contact victims and finding counsel for victims	WP DP Attorney-client privilege
97	3/12/2008-3/17/2008 emails between AMCV, Nesbitt Kuyrkendall and E.J. Yera regarding search warrant application and execution of search warrant	WP Attorney client privilege IP Also contains information subject to privacy rights of victims who are not parties to this litigation
98	3/14/2008-3/17/2008 emails between AMCV, Nesbitt Kuyrkendall, Jason Richards, and Robert Senior regarding corrections to indictment package and proposed grand jury presentation	WP DP 6(e) Attorney-Client Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation

Bates Range	Description	Privilege(s) Asserted
99	3/14/2008-3/19/2008 emails between AMCV, Nesibtt Kuyrkendall, Jason Richards, Robert Senior, Jeff Sloman, Karen Atkinson, and Rolando Garcia about Epstein attempts to contact victims and finding counsel for victims	WP DP Attorney-client privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
100	3/14/2008 emails between AMCV, Rolando Garcia, Karen Atkinson, Frederica Devlin, and Shawn Ball regarding complete indictment package for Robert Senior final review	WP DP 6(e)
101	3/12/2008 emails between AMCV, Drew Oosterbaan, and Myesha Braden regarding CEOS meeting with Epstein counsel	WP
102	3/5/2008-3/6/2008 emails between AMCV, Alex Acosta, Jeff Sloman, Drew Oosterbaan, Robert Senior, Myesha Braden, Rolando Garcia, and Karen Atkinson regarding meeting in DC, additional information to prepare for meeting, and new information from ongoing investigation	WP DP 6(e) IP
103		

SUPPLEMENTAL PRIVILEGE LOG

Bates Range	Description	Privilege(s) Asserted
Suppl. Box #3 P-013279 Thru P-013280	8/15/08 Emails between A. Acosta and A. Marie Villafaña, R. Senior, D. Lee and K. Atkinson re proposed correspondence to Jay Lefkowitz	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013281	Handwritten note re Epstein investigation	Attorney-Client Privilege Work Product Investigative privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
Suppl. Box #3 P-013282 Thru P-013283	7/9/08 Email from A. Marie Villafaña to A. Acosta, J. Sloman, K. Atkinson, and FBI re proposed response to Goldberger letter re victim notification	Attorney-Client Privilege Work product Deliberative Process
Suppl. Box #3 P-013284	7/10/08 Emails between J. Sloman and A. Marie Villafaña, K. Atkinson, and FBI re proposed response to Goldberger's letter re victim notification	Attorney-Client Privilege Work Product / Deliberative Process
Suppl. Box #3 P-013285 Thru P-013289	File folder entitled "8/5/08 AMCV e-mail re correct agrmt" containing 8/5/08 email from A. Marie Villafaña to A. Acosta, J. Sloman, R. Senior, K. Atkinson re "Jeffrey Epstein Agreement" discussing 6/24/08 email from A. Marie Villafaña to R. Black and J. Goldberger concerning the binding nature of the Agreement	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-013290 Thru P-013292	File folder entitled "8/14/08 E-mail from Lefk to AMCV" containing (undated) emails from A. Marie Villafaña to R. Senior, J. Sloman, A. Acosta, K. Atkinson, D. Lee re draft response to 8/14/08 email from J. Lefkowitz regarding "the December 2007 proposal"	Attorney-Client Privilege Work Product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box #3 P-013293 Thru P-013299	File folder entitled "8/15/08 AMCV e-mail re Agrmt" containing 8/15/08 e-mails from A. Marie Villafaña to A. Acosta, J. Sloman, R. Senior, K. Atkinson, D. Lee re follow up on Agreement and from A. Acosta to Ann Marie Villafana on issue of Special Master with attached 8/15/08 emails from A. Marie Villafaña to A. Acosta, J. Sloman, R. Senior, K. Atkinson, D. Lee re Agreement; 8/15/08 email from J. Lefkowitz to A. Marie Villafana, K. Atkinson, R. Black, M. Weinberg re Agreement; 8/14/08 emails from A. Marie Villafaña to J. Lefkowitz, K. Atkinson, R. Black re interpretation of Agreement; email from J. Lefkowitz to A. Marie Villafaña, K. Atkinson re questions re Agreement; email from A. Marie Villafaña to J. Lefkowitz, K. Atkinson re production of Agreement to victims	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-013300 Thru P-013303	File folder entitled "8/18/08 Lefkowitz Ltr to AMCV" containing A. Marie Villafaña's handwritten draft notes for proposed letter to J. Lefkowitz; 5/22/07 e-mail from A. Lourie to M. Menchel, J. Sloman, A. Marie Villafaña re meeting with G. Lefcourt with attached email from G. Lefcourt re solicitation for meetings	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013304 Thru P-013325	File folder entitled "6/25/07 Lefcourt to Sloman & Lourie containing 6/25/07 letter (with handwritten notes by A. Marie Villafaña) from G. Lefcourt to J. Sloman, M. Menchel, A. Lourie, A. Marie Villafaña addressing reasons for not prosecuting Epstein; handwritten outline by A. Marie Villafaña of possible response to letter	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013326 Thru P-013329	File folder entitled "9/17/07 Villafaña to Lefkowitz containing 9/17/07 e-mail from A. Marie Villafaña to R. Garcia, A. Lourie and from R. Garcia to A. Marie Villafaña concerning status of plea negotiations	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013330 Thru P-013333	File folder entitled "11/8/07 Lefkowitz to Sloman" containing 11/8/07 letter from J. Lefkowitz re issues arising during pendency of matter with attorney handwritten notes	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013334 Thru P-013337	File folder entitled "11/13/07 Sloman to Lefkowitz (was this sent?)" containing draft 11/13/07 letter from J. Sloman responding to J. Lefkowitz's letter	Attorney-Client Privilege Work Product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box #3 P-013338 Thru 013341	File folder entitled "12/6/07 Sloman to Lefkowitz" containing 12/5/07 faxed letter w/ cover sheet from K. Starr and J. Lefkowitz to A. Acosta	[Not considered privileged. Will be produced to opposing counsel upon lifting of stay]
Suppl. Box #3 P-013342 Thru P-013350	File folder entitled "12/05/07 Starr to Acosta" containing drafts of 11/30/07 letters from A. Acosta to K. Starr and from J. Sloman to J. Lefkowitz re performance and victim notification with handwritten notes and edits by A. Marie Villafaña	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-13351 Thru P-013361	File folder entitled "12/21/07 Lefkowitz to Acosta" containing handwritten notes by A. Marie Villafaña, 12/21/07 letter from J. Lefkowitz to A. Acosta re performance of NPA and appeal to Washington with attorney handwritten notes	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013362 Thru P-013366	File folder labeled "12/26/07 Lefkowitz to Acosta" containing 2 copies of draft letter from A. Acosta to J. Lefkowitz (with 12/28/07 fax header)	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-013367 Thru P-013372	File folder labeled "Draft ltr from Sloman to Lefkowitz re termination" containing draft letter dated "April , 2008" from J. Sloman to J. Lefkowitz concerning the compliance with the Agreement	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013373 Thru P-013503	File folder labeled "6/3/08 Sloman Submission to the DAG" containing 6/3/08 letter from J. Sloman to Mark Filip, Office of the DAG, cc'd to R. Senior, A. Marie Villafaña, K. Atkinson, re Jeffrey Epstein, detailing events concerning the Agreement and thereafter and with relevant attachments	Attorney-Client Privilege Deliberative Process Work Product Investigative privilege
Suppl. Box #3 P-013504 Thru P-013507	File folder labeled "Mtg w/ Ken Starr, RAA, JS, Drew" containing handwritten notes by A. Marie Villafaña	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013508 Thru P-013514	File folder labeled "Internal Corr." containing 11/28/07 e-mails from J. Sloman to A. Marie Villafaña re responding to 11/28/07 e-mail from J. Lefkowitz to J. Sloman regarding victim notification with attachments	Attorney-Client Privilege Work Product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box #3 P-013515 Thru P-013525	Draft 11/30/07 letter from A. Acosta to K. Starr cc'd to J. Sloman and A. Marie Villafaña re compliance with Agreement and internal emails from J. Sloman, A. Acosta, and A. Lourie re items to address in letter	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-013526 Thru P-013527	5/23/07 e-mail from A. Marie Villafaña to K. Atkinson re draft proposed internal e-mail about handling of case and attached email correspondence between Andrew Lourie and G. Lefcourt	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-013528 Thru P-013530 P-013532 Thru P-013537	Handwritten notes by A. Marie Villafana dated 9/21 re telephone conference with possible victim representative, conflict check with names and email listed, list of names of potential victim representatives, payment discussion, and guideline calculation, email containing contact info for potential victim representative, draft Non Prosecution Agreement dated 9/10/07 4:17 pm	Work Product
Suppl. Box #3 P-013531	Typed note addressed to "Dear David" re response to grand jury subpoena	6(e) Investigative privilege
Suppl. Box #3 P-013538 Thru P-013553	File folder labeled "Notes Re Post-Agreement Communications" containing handwritten notes by A. Marie Villafaña	Work Product Deliberative Process
Suppl. Box #3 P-013554 Thru	File folder labeled "E-mails Re Plea Negotiations" containing: ■ 11/28/07 e-mail from A. Lourie to A. Marie Villafaña, A. Oosterbaan, R. Garcia re non-prosecution agreement, with attached correspondence; ■ 9/19/07 e-mail from A. Marie Villafaña to A. Lourie, R. Garcia, K. Atkinson re negotiating strategy, with attached correspondence; ■ 9/18/07 e-mail from A. Marie Villafaña to A. Acosta, A. Lourie, R. Garcia, K. Atkinson, J. McMillan re negotiating strategy; ■ 9/17/07 e-mail from A. Marie Villafaña to A. Acosta re negotiation; ■ 9/17/07 e-mail from A. Marie Villafaña to R. Garcia, A. Acosta, A. Lourie, K. Atkinson, J. McMillan re negotiations; ■ 9/17/07 e-mail from A. Marie Villafaña to	Attorney-Client Privilege Work Product Deliberative Process Investigative Privilege

Bates Range	Description	Privilege(s) Asserted
	R. Garcia, A. Lourie re negotiation strategy; ■ 9/14/07 e-mail from A. Marie Villafaña to J. Sloman, A. Acosta, R. Garcia, A. Lourie, K. Atkinson, S. Ball re proposed plea agreement and Information; ■ 9/14/07 e-mail from A. Marie Villafaña to J. Sloman, A. Acosta, A. Lourie, R. Garcia, K. Atkinson, J. McMillan, S. Ball re plea negotiations; ■ 9/13/07 e-mail from A. Marie Villafaña to K. Atkinson, S. Ball, J. McMillan re indictment package; ■ 9/13/07 e-mail from A. Marie Villafaña to A. Oosterbaan re trust agreement with attached correspondence; ■ 9/13/07 e-mail from A. Marie Villafaña to A. Oosterbaan re trust agreement; ■ 9/13/07 e-mail from A. Marie Villafaña to R. Garcia, J. Sloman re conference call with J. Lefkowitz; ■ 9/13/07 e-mail from A. Marie Villafaña to A. Lourie re plea negotiations with attached correspondence; ■ 9/13/07 e-mail from A. Marie Villafaña to A. Lourie re charging strategy with attached correspondence; ■ 9/13/07 e-mail from A. Marie Villafaña to K. Atkinson, S. Ball, J. McMillan re indictment package; ■ 9/13/07 e-mail from A. Marie Villafaña to A. Acosta, J. Sloman, R. Garcia, K. Atkinson, A. Lourie re plea negotiations; ■ 9/11/07 e-mail from A. Marie Villafaña to A. Lourie re meeting w/ G. Lefcourt with attached correspondence; ■ 9/11/07 e-mail from A. Marie Villafaña to A. Lourie re revised Agreement with attached correspondence; ■ 9/11/07 e-mail from A. Marie Villafaña to J. Sloman re non-prosecution agreement edits with attached correspondence; ■ 9/11/07 e-mail from A. Marie Villafaña to A. Oosterbaan re status of negotiations with attached correspondence;	

Bates Range	Description	Privilege(s) Asserted
	■ 9/10/07 e-mail from A. Marie Villafaña to J. Sloman re negotiations; 9/10/07 e-mail from A. Marie Villafaña to J. Sloman, J. McMillan re state grand jury proceedings; ■ 9/17/07 e-mail from A. Acosta to A. Marie Villafaña, R. Garcia, A. Lourie, K. Atkinson, J. McMillan re draft Agreement with attached correspondence; ■ 9/14/07 e-mail from J. Sloman to A. Marie Villafaña, A. Acosta, R. Garcia, A. Lourie, K. Atkinson, S. Ball, re finalizing documents; ■ 9/14/07 e-mail from A. Lourie to A. Marie Villafaña re charging strategy with attached correspondence; ■ 9/13/07 e-mail from A. Oosterbaan to A. Marie Villafaña re setting up trust fund; ■ 9/13/07 e-mail from A. Lourie to A. Marie Villafaña re final negotiations with attached correspondence; ■ 9/11/07 e-mail from A. Lourie to A. Marie Villafaña re scheduling a meeting regarding finalizing the agreement with attached correspondence; ■ 9/11/07 e-mail from J. Sloman to A. Marie Villafaña re non-prosecution agreement edits with attached correspondence; ■ 9/11/07 e-mail from J. Sloman to A. Marie Villafaña re non-prosecution agreement edits with attached correspondence; ■ 9/11/07 e-mail from A. Oosterbaan to A. Marie Villafaña re negotiations with attached correspondence; ■ 9/17/07 e-mail from A. Marie Villafaña to R. Garcia, A. Lourie re negotiation strategy	
Suppl. Box #3 P-013609 Thru P-013615	File folder entitled "[] Target Letter" containing copy of signed letter and contact info for counsel for target	6(e) Investigative Privilege

Bates Range	Description	Privilege(s) Asserted
Suppl. Box #3 P-013616 Thru P-013621	File folder entitled "Atty Notes re Revised Indictment" containing handwritten notes by A. Marie Villafaña	Attorney-Client Privilege Deliberative Process Work Product Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
Suppl. Box #3 P-013622 Thru P-013643	File folder entitled "Research Re Possible Misdemeanors" containing attorney research	Work product
Suppl. Box #3 P-013644 Thru P-013653	File folder entitled "Notes Re Plea Negotiations" containing 9/17/07 e-mail from A. Marie Villafaña to J. Richards, N. Kuyrkendall re status update; undated and typed handwritten notes by A. Marie Villafaña re items to be completed on case, strength of case, victim interviews, summary of evidence, guidelines calculations	Attorney-Client Privilege Work Product Deliberative Process Investigative privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
Suppl. Box #3 P-013654 Thru P-013745	File folder entitled "Plea Agreement Drafts" containing several draft plea agreements some with handwritten notes by A. Marie Villafaña; copies of draft non-prosecution agreement some with handwritten notes by A. Marie Villafaña; copy of a draft Information	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-0013747 Thru P-013810	File folder entitled "Draft Non-Prosecution Agreements" containing several draft non-prosecution agreements some with handwritten notes by A. Marie Villafaña; plea sheet State Circuit Court; copies of draft Information; draft plea proffer; draft motion and order to seal; draft penalty sheet; draft plea agreement	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box 3 P-013811 Thru P-013833	File folder entitled "Information Packet Drafts" containing several drafts of Informations, and complete draft Information packet	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box 3 P-013834 Through P-013835	Two pages of filed document, D.E. 62, page 2 of 54 and page 6 of 54, containing handwritten attorney notes	atty work-product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013836 Thru P-013837	Palm Beach Daily News Article, "Attorneys want Jeffrey Epstein Agreement Thrown Out," with attorney's notes written on margin	Atty work-product
Suppl. Box 3 P-013838 Thru P-013841	Letter from Paul Cassell to Wifredo A. Ferrer, December 10, 2010, Subject: Request for Investigation of Jeffrey Epstein Prosecution, with underlines, written notes, and comments by DOJ attorney	Atty work-product
Suppl. Box 3 P-013842	Email from Dexterr Lee to Ruth Plagenhoef (OPR), February 25, 2011, 4:31 p.m., Re: Request for OPR Investigation – Jeffrey Epstein Non-Prosecution Agreement	Atty work-product Atty-client privilege
Suppl. Box 3 P-013843 Thru P-013844	E-mail, Marie Villafana to Andrew Lourie, Rolando Garcia, and Karen Atkinson, September 19, 2007, 4:33 p.m., RE: Plea Agreement	Atty work-product atty-client privilege
Suppl. Box 3 P-013845 Thru P-013846	E-mail, Andrew Lourie to Marie Villafana, September 19, 2007, 4:21 p.m., RE: Epstein, with internal U.S. Attorney's Office e-mails attached	Atty work-product
Suppl. Box 3 P-013847 Thru P-013849	E-mail, Marie Villafana to Andrew Lourie, Rolando Garcia, and Karen Atkinson, September 18, 2007, 11:43 a.m., RE: Draft Agreements?, with e-mail from Jay Lefkowitz (September 18, 2007, 11:09 a.m.) attached	Atty work-product
Suppl. Box 3 P-013850	E-mail, Marie Villafana to Alex Acosta, Andrew Lourie, Rolando Garcia, Karen Atkinson, and John McMillan, September 18, 2007, 9:31 a.m., RE: Epstein Negotiations	Atty work-product
Suppl. Box 3 P-013851 Thru P-013853	E-mail, Marie Villafana to Rolando Garcia and Andrew Lourie, September 17, 2007, 10:35 a.m., RE: Epstein [providing update re plea negotiations]	Atty work-product
Suppl. Box 3 P-013854	E-mail, Marie Villafana to Andrew Oosterbaan, September 13, 2007, 8:10 p.m., RE: Epstein, with e-mail from Andrew Oosterbaan (September 13, 2007, 7:54 p.m.), attached	Atty work-product
Suppl. Box 3 P-013855	E-mail, Marie Villafana to Jeff Sloman and Andrew Lourie, September 10, 2007, 5:24 p.m., RE: FBI	Atty work-product Atty-client privilege
Suppl. Box 3 P-013856 Thru P-013857	E-mail, Marie Villafana to Jeff Sloman, September 6, 2007, 5:47 p.m., RE: Epstein, with e-mail from Jeff Sloman (September 6, 2007, 5:35 p.m.), attached	Atty work-product Atty-client privilege

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013858	Email, Marie Villafana to Jeff Sloman, September 6, 2007, 9:29 a.m., Re: Meeting on Friday	atty work-product
Suppl. Box 3 P-013859 Through P-013860	Email, Gerald Lefcourt to Marie Villafana, Lilly Ann Sanchez, Roy Black, re: Jeffrey Epstein	[Not considered privileged. Will be produced to opposing counsel upon lifting of stay]
Suppl. Box 3 P-013861 Thru P-013865	E-mail, Marie Villafana to Matthew Menchel, July 13, 2007, 3:14 p.m., RE: Epstein, with e-mail from Menchel (July 5, 2007, 3:30 p.m.), Villafana to Menchel (July 4, 2007, 5:16 p.m.), and Sloman to Villafana (July 3, 2007, 1:47 p.m.), attached	Atty work-product atty-client privilege
Suppl. Box 3 P-013866	E-mail, Marie Villafana to Jeff Sloman, Matthew Menchel, Andrew Lourie, Karen Atkinson, and Shawn Ball, July 3, 2007, 6:26 a.m., RE: Epstein	Atty work-product
Suppl. Box 3 P-013867 Thru P-013868	E-mail, Marie Villafana to Matthew Menchel, June 21, 2007, 3:24 p.m., RE: Meeting Next Week, with e-mails from Menchel to Villafana (June 21, 2007, 2:58 p.m.), and Villafana to Menchel (June 21, 2007, 1:37 p.m.), attached	Atty work-product
Suppl. Box 3 P-013869	E-mail, Marie Villafana to Matthew Menchel, Jeff Sloman, Andrew Lourie, and Karen Atkinson, June 18, 2007, 5:04 p.m., RE: Epstein	Atty work-product
Suppl. Box 3 P-013870 Thru P-013871	E-mail, Andrew Lourie to Marie Villafana, May 24, 2007, 9:25 a.m., FW: Jeffrey Epstein, with e-mail from Gerald Lefcourt to Andrew Lourie (May 23, 2007, 5:00 p.m.), Andrew Lourie to Gerald Lefcourt (May 22, 2007, 6:32 p.m.), and Gerald Lefcourt to Andrew Lourie Marie Villafana, and Lilly Ann Sanchez (May 22, 2007, 2:05 p.m.), attached	Atty work-product
Suppl. Box 3 P-013872	E-mail, Andrew Lourie to Matthew Menchel, Jeff Sloman, and Marie Villafana, May 22, 2007, 3:11 p.m., FW: Jeffrey Epstein, with e-mail from Lefcourt to Lourie, Villafana, and Lilly Ann Sanchez (May 22, 2007, 2:05 p.m.), attached	Atty work-product
Suppl. Box 3 P-013873	E-mail Menchel to Villafana and Lourie, May 14, 2007, 10:52 a.m., RE: Operation Leap Year, with e-mail from Villafana to Lourie and Menchel (May 14, 2007, 10:38 a.m.), attached	Atty work-product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013874 Through P-013875	Inadvertently marked as privileged, will be produced	
Suppl. Box 3 P-013876 Thru P-013877	E-mail, Villafana to Lourie, Garcia, and Atkinson, September 19, 2007, 4:33 p.m., RE: Draft Plea Agreement, with e-mail from Lefkowitz to Villafana (September 19, 2007, 3:44 p.m.), and Lefkowitz to Villafana (September 19, 2007, 3:35 p.m.) attached	Atty work-product
Suppl. Box 3 P-013878 Thru P-013879	E-mail, Lourie to Villafana, September 19, 2007, 4:21 p.m., RE: Epstein, with e-mails from Villafana to Lourie and Garcia (September 19, 2007, 4:13 p.m.), Villafana to Lourie and Garcia (September 19, 2007, 4:05 p.m.), and Lourie to Villafana and Garcia (September 19, 2007, 3:50 p.m.), Villafana to Lourie (September 19, 2007, 2:36 p.m.), Lourie to Villafana (September 19, 2007, 2:33 p.m.), and Villafana to Lourie and Garcia (September 19, 2007, 2:31 p.m.), attached	Atty work-product
Suppl. Box 3 P-013880 Thru P-013882	E-mail, Villafana to Lourie, Garcia, and Atkinson, September 18, 2007, 11:43 a.m., RE: Draft Agreements?, with e-mails from Villafana to Lourie, Garcia and Atkinson (September 18, 2007, 11:18 a.m.), Lefkowitz to Villafana (September 18, 2007, 11:09 a.m.), and Villafana to Lefkowitz (September 18, 2007, 9:14 a.m.), and Lefkowitz to Villafana (September 18, 2007, 8:59 a.m.), attached	Atty work-product
Suppl. Box 3 P-013883	E-mail, Villafana to Acosta, Lourie, Garcia, Atkinson, and McMillan, September 18, 2007, 9:31 a.m., RE: Epstein Negotiations	Atty work-product
Suppl. Box 3 P-013884 Thru P-013886	E-mail, Villafana to Garcia and Lourie, September 17, 2007 10:35 a.m., RE: Epstein, with e-mail from Garcia (September 17, 2007, 10:26 a.m.), attached	Atty work-product
Suppl. Box 3 P-013887	E-mail, Marie Villafana to Andrew Oosterbaan, September 13, 2007, 8:10 p.m., RE: Epstein, with e-mail from Andrew Oosterbaan (September 13, 2007, 7:54 p.m.), attached	Atty work-product
Suppl. Box 3 P-013888	E-mail, Marie Villafana to Jeff Sloman and Andrew Lourie, September 10, 2007, 5:24 p.m., RE: FBI	Atty work-product Atty-client privilege

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013889 Thru P-013890	E-mail, Marie Villafana to Jeff Sloman, September 6, 2007, 5:47 p.m., RE: Epstein, with e-mail from Jeff Sloman (September 6, 2007, 5:35 p.m.), attached	Atty work-product Atty-client privilege
Suppl. Box 3 P-013891	Email, Marie Villafana to Jeff Sloman, September 6, 2007, 9:29 a.m., Re: Meeting on Friday	atty work-product
Suppl. Box 3 P-013892 Through P-013893	Email, Gerald Lefcourt to Marie Villafana, Lilly Ann Sanchez, Roy Black, re: Jeffrey Epstein	[Not considered privileged. Will be produced to opposing counsel upon lifting of stay]
Suppl. Box 3 P-013894 Thru P-013898	E-mail, Marie Villafana to Matthew Menchel, July 13, 2007, 3:14 p.m., RE: Epstein, with e-mail from Menchel (July 5, 2007, 3:30 p.m.), Villafana to Menchel (July 4, 2007, 5:16 p.m.), and Sloman to Villafana (July 3, 2007, 1:47 p.m.), attached	Atty work-product atty-client privilege
Suppl. Box 3 P-013899	E-mail, Marie Villafana to Jeff Sloman, Matthew Menchel, Andrew Lourie, Karen Atkinson, and Shawn Ball, July 3, 2007, 6:26 a.m., RE: Epstein	Atty work-product
Suppl. Box 3 P-013900 Thru P-013901	E-mail, Marie Villafana to Matthew Menchel, June 21, 2007, 3:24 p.m., RE: Meeting Next Week, with e-mails from Menchel to Villafana (June 21, 2007, 2:58 p.m.), and Villafana to Menchel (June 21, 2007, 1:37 p.m.), attached	Atty work-product
Suppl. Box 3 P-013902	E-mail, Marie Villafana to Matthew Menchel, Jeff Sloman, Andrew Lourie, and Karen Atkinson, June 18, 2007, 5:04 p.m., RE: Epstein	Atty work-product
Suppl. Box 3 P-013903 Thru P-013904	E-mail, Andrew Lourie to Marie Villafana, May 24, 2007, 9:25 a.m., FW: Jeffrey Epstein, with e-mail from Gerald Lefcourt to Andrew Lourie (May 23, 2007, 5:00 p.m.), Andrew Lourie to Gerald Lefcourt (May 22, 2007, 6:32 p.m.), and Gerald Lefcourt to Andrew Lourie Marie Villafana, and Lilly Ann Sanchez (May 22, 2007, 2:05 p.m.), attached	Atty work-product
Suppl. Box 3 P-013905	E-mail, Andrew Lourie to Matthew Menchel, Jeff Sloman, and Marie Villafana, May 22, 2007, 3:11 p.m., FW: Jeffrey Epstein, with e-mail from Lefcourt to Lourie, Villafana, and Lilly Ann Sanchez (May 22, 2007, 2:05 p.m.), attached	Atty work-product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013906	E-mail Menchel to Villafana and Lourie, May 14, 2007, 10:52 a.m., RE: Operation Leap Year, with e-mail from Villafana to Lourie and Menchel (May 14, 2007, 10:38 a.m.), attached	Atty work-product
Suppl. Box 3 P-013907 Through P-013908	Inadvertently marked as privileged, will be produced	
Suppl. Box 3 P-013909 Thru P-013911	Memorandum, Lisa Howard, Assistant Counsel, U.S. Department of Justice, Office of Professional Responsibility (OPR), to Ruth Plagenhoef, Acting Associate Counsel, OPR, undated, Subject: Recommendation	Deliberative Process Privilege; atty work-product
Suppl. Box 3 P-013912 Thru P-013914	Memorandum, Lisa Howard, Assistant Counsel, OPR, to Ruth Plagenhoef, Acting Associate Counsel, OPR, Subject: Recommendation, with handwritten note dated 5/4/11	Deliberative Process Privilege, atty work-product
Suppl. Box 3 P-013915 Thru P-013918	Memorandum, Lisa Howard, Assistant Counsel, OPR, to Ruth Plagenhoef, Acting Associate Counsel, OPR, Subject: Recommendation, with two post-it notes attached with handwritten attorney notations, and handwritten notations, underlines, and circled text throughout the body of the two page memorandum	Deliberative Process Privilege; atty work-product
Suppl. Box 3 P-013919 Thru P-013921	Draft letter, marked "Confidential", from Robin C. Ashton, Counsel, Office of Professional Responsibility to Wifredo A. Ferrer, United States Attorney, with handwritten corrections, strikethroughs, and added text	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013922 Thru P-013924	Draft Letter, marked "Confidential", from Robin C. Ashton, to Wifredo A. Ferrer, with handwritten corrections	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013925 Thru P-013927	Draft Letter, from Robin C. Ashton to Professor Paul G. Cassell, with handwritten correction	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013928 Thru P-013930	Draft Letter, from Robin C. Ashton to Professor Paul G. Cassell, with handwritten corrections	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013931 Thru P-013933	Draft Letter, from Robin C. Ashton to Professor Paul G. Cassell, with handwritten corrections, circled text, strikethroughs, and additional text	Deliberative Process Privilege Attorney Work Product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013934 Thru P-013936	Draft Letter, marked "Confidential," from Robin C. Ashton to Wifredo A. Ferrer, with handwritten corrections	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013937 Thru P-013939	Draft Letter, Robin C. Ashton to Professor Paul G. Cassell, with handwritten corrections	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013940 Thru P-013942	Draft Letter, marked "Confidential: To Be Opened by Addressee Only," Robin C. Ashton to Wifredo A. Ferrer, with handwritten corrections	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013943	E-mail, Ruth Plagenhoef to Lisa Howard, May 5, 2011, 11:19 a.m., RE: Re-write of Epstein letters for your review, with e-mail from Lisa Howard to Ruth Plagenhoef (May 5, 2011, 11:08 a.m.), and Plagenhoef to Howard (May 5, 2011, 11:10 a.m.), and Howard to Plagenhoef (May 5, 2011, 10:41 a.m.), attached	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013944	E-mail, Plagenhoef to Howard, May 5, 2011, 11:17 a.m., RE: Re-write of Epstein letters for your review, with e-mail from Howard to Plagenhoef (May 5, 2011, 11:08 a.m.), Plagenhoef to Howard (May 5, 2011, 11:01 a.m.), and Howard to Plagenhoef (May 5, 2011, 10:41), attached	Deliberative Process Privilege
Suppl. Box 3 P-013945	E-mail, Plagenhoef to Howard, May 4, 2011, 5:01 p.m., RE: draft letters in Epstein matter, with e-mail from Howard to Plagenhoef (May 4, 2011, 4:57 p.m.), attached	Deliberative Process Privilege
Suppl. Box 3 P-013946	E-mail, Plagenhoef to Robin C. Ashton, May 4, 2011, 4:08 p.m., RE: FYI on the Florida matter	Law Enforcement investigatory record, atty work product; deliberative process privilege
Suppl. Box 3 P-013947	E-mail, Paul Cassell to Plagenhoef, May 3, 2011, 12:23 p.m., RE: OPR Inquiry – request for information, with post-it note attached with handwritten attorney notes on telephone call between Plagenhoef and Howard with Dexter Lee and Marie Villafana	atty work product; law enforcement investigatory record
Suppl. Box 3 P-013948 Thru P-013951	E-mail, Plagenhoef to Howard and Robin C. Ashton, May 3, 2011, 12:30 p.m., FW: OPR Inquiry – request for information, with attached e-mails. Handwritten attorney notes on margin	atty work-product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013952 Thru P-013953	E-mail, Dexter Lee to Ruth Plagenhoef, March 16, 2011, 10:52 a.m., RE: Referral of Cassell Request for Investigation, with e-mail from Paul Cassell to Dexter Lee and Marie Villafana (March 15, 2011, 7:21 p.m.), attached	atty work-product; atty-client privilege
Suppl. Box 3 P-013954 Thru P-013955	E-mail, Plagenhoef to Neil Hurley, OPR, December 16, 2010, 10:59 a.m., FW: OPR Referral – Allegation of Misconduct – U.S. Attorney’s Office, S.D.Fla., with e-mail from Dexter Lee to Plagenhoef (December 16, 2010, 10:22 a.m.), attached. Handwritten attorney notations.	atty work-product, atty-client privilege
Suppl. Box 3 P-013956 Thru P-013846	Fourteen (14) pages of handwritten attorney notes on case, telephone interviews with DOJ attorneys	atty work-product

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