

LAW OFFICE



AND ASSOCIATES

October 15, 2008

Dexter Lee, AUSA  
United States Attorney's Office  
99 N.E. 4th Street  
Miami, Florida 33132

Re: Jane Doe # and Jane Doe #2 v. United States of America  
Case No.: 08-80736-CIV-MARRA/JOHNSON

Dear Mr. Lee:

I am writing to inquire about whether Mr. Epstein has violated his Non-Prosecution Agreement with the Government.

As you know, the Government has repeatedly described the Non-Prosecution Agreement as guaranteeing to the victims of Epstein's sexual abuse at least \$150,000 in civil damages. The Government has made these representations in reliance on a current provision in the U.S. Code – 18 U.S.C. § 2255(a) – which provides for an automatic amount of damages of at least \$150,000. At the time that the Non-Prosecution Agreement was drafted and signed, that was the law that was in effect.

In Epstein's latest filing in federal court, however, he takes the position that the pre-2006 Amendments version of the law applies. *See* Defendant Epstein's Motion to Dismiss, for More Definite Statement and To Strike Directed to Plaintiff Jane Doe's Complaint at 9, *Jane Doe v. Jeffrey Epstein*, No. 08-CIV-80893-Marra/Johnson (discussing § 2255 and stating that the "applicable version of the statute" is "pre-2006 Amendments"). The 2006 Amendments altered § 2255(a), by increasing the presumed minimum damages from \$50,000 to \$150,000. *See* Pub. L. 109-248, Title VII, § 707(b), (c), July 27, 2006, 120 Stat. 650.

In light of Epstein's latest filing, I write to ask several questions:

- (1) Would you stipulate that you told me several times that Epstein had agreed to pay at least \$150,000 to the identified victims of his abuse?
- (2) Did Epstein in fact agree to pay damages to the identified victims of his abuse at least \$150,000?
- (3) Did the Government tell victims, either directly or through counsel, that Epstein had agreed to pay his victims at least \$150,000?

2028 HARRISON STREET, SUITE 202, HOLLYWOOD, FLORIDA 33020

OFFICE: 954-414-8033/305-935-2011  
FAX: 954-924-1530/305-935-4227  
BE@BRADEDWARDSLAW.COM

Dexter Lee, AUSA  
United States Attorney's Office  
October 15, 2008  
Page Two

(4) Is Epstein in compliance with his Non-Prosecution Agreement with the Government when he is now taking the legal position, through his attorneys, that he only has to pay the victims \$50,000 damages under § 2255?

Thank you for any clarification you can provide on these questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad Edwards', with a stylized flourish at the end.

BE/sg

Brad Edwards

cc: Ann Marie C. Villafaña, AUSA  
United States Attorney's Office  
500 South Australian Avenue  
West Palm Beach, Florida 33401

---

2028 HARRISON STREET, SUITE 202, HOLLYWOOD, FLORIDA 33020

OFFICE: 954-414-8033/305-935-2011  
FAX: 954-924-1530/305-935-4227  
BE@BRADEDWARDSLAW.COM