

From: "Strauss, Audrey (USANYS)" <[REDACTED]>
To: "[REDACTED] (USANYS)" <[REDACTED]>
Subject: RE: NYLJ
Date: Thu, 14 Nov 2019 16:36:28 +0000

Yes, saw that. thanks

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Thursday, November 14, 2019 11:19 AM
To: Berman, Geoffrey (USANYS) <[REDACTED]>; Strauss, Audrey (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: FW: NYLJ

The Epstein estate's filing seeking permission to hire Ken Feinberg has started to draw press attention.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Thursday, November 14, 2019 11:08 AM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: RE: NYLJ

Also, NYT reporting on a possible victims fund:

Jeffrey Epstein's Estate May Set Up a Program to Pay Accusers

A proposal for a "claims resolution program" was referred to in a court filing by a lawyer for a woman who accused the financier of sexual abuse. Not all the plaintiffs' lawyers are on board.

By [Matthew Goldstein](#)

Nov. 13, 2019

Lawyers for [Jeffrey Epstein's estate](#) are considering setting up a program to resolve claims filed by women who say they were abused by the financier, who [killed himself in August](#) while facing federal sex trafficking charges.

The plan was disclosed in a court filing on Tuesday by a lawyer for one of Mr. Epstein's accusers, who is suing the estate in federal court in Manhattan. The filing said lawyers for Mr. Epstein's estate had informed plaintiffs that they were planning to disclose details of a "claims resolution program" to a court in the United States Virgin Islands, where the [mysteriously wealthy Mr. Epstein](#) had his will filed shortly before his death.

The estate has retained Kenneth R. Feinberg, the noted lawyer who specializes in compensating victims, to set up the program, his team confirmed late Wednesday. His associates [Camille Biros](#) and Jordana Feldman have also been tapped, and Ms. Feldman will carry out the plan once it is set up and if it meets court approval. Ms. Biros has been an architect of programs to provide restitution to victims of the Catholic Church abuse scandal. Ms. Feldman most recently played a critical role in overseeing the administration of the September 11 Victims Compensation Fund.

But the proposal from lawyers for the estate, which is valued at about \$577 million, was facing resistance earlier in the day.

Bradley Edwards, the lawyer for the accuser, said in the court filing that his client “does not believe that the use of any alternative dispute resolution should stay or modify the course of litigation in this matter.”

A lawyer for the estate wrote to one accuser’s lawyer and described the proposed program as “voluntary,” according to emails reviewed by The New York Times. Even so, the accuser’s lawyer, Roberta Kaplan, objected to the plan’s being put together without consulting with the accusers and their lawyers.

“Settlement, after all, is a two-way street,” Ms. Kaplan said in an emailed response, which was also sent to lawyers for other accusers. She said it was “astonishing” that the lawyers for Mr. Epstein’s estate planned to go to court in the Virgin Islands without first discussing the plan.

“In fact, it feels very much like a continuation of his crimes and abuse after his death,” she wrote.

The emails were later included in a public court filing on Wednesday afternoon.

David Brodie, another accuser’s lawyer, said that he was “cautiously optimistic” about the possible resolution program, but that there were many questions about how claims would be handled.

“These women have already endured horrific abuse at the hands of Jeffrey Epstein and have waited many years for justice,” he said. “To turn their personal experiences over to one person selected by Jeffrey Epstein’s estate to make a binding decision (which may not be disputed) could be a process that may exacerbate the victimization of these brave women.”

Bennet Moskowitz, the lawyer hired by Mr. Epstein’s estate to handle lawsuits by the accusers, did not respond to requests for comment on the emails or the proposed resolution program.

The executors of Mr. Epstein’s estate, Darren Indyke and Richard Kahn, also did not respond to a request for comment. Mr. Indyke was Mr. Epstein’s longtime lawyer in New York, and Mr. Kahn was an accountant for some of his companies.

In the weeks since Mr. Epstein’s death, lawsuits against the estate have been piling up.

On Tuesday, three new lawsuits were filed in Manhattan federal court by Mr. Epstein’s accusers, including separate lawsuits filed by two sisters — [REDACTED]

Their lawyer, David Boies, said he anticipated filing lawsuits on behalf of at least one other woman, and called a settlement program “a positive step” toward resolving the claims. “But it is only the first step,” he added.

Until last month, Mr. Boies’s firm represented one of Mr. Epstein’s most outspoken accusers, [REDACTED] in a defamation lawsuit against the former Harvard law professor Alan Dershowitz. A federal judge disqualified [the firm](#), saying its lawyers might have to appear as witnesses in the litigation.

Some accusers are taking advantage of a [new law in New York](#) that allows child victims of sexual abuse to file claims for damages many years later. Many of Mr. Epstein’s accusers said they were abused more than a decade ago.

New York law also permits crime victims to file lawsuits seeking damages within a year of the termination of a criminal case against the defendant. The clock on such claims started on Aug. 29, when federal prosecutors dismissed a sex-trafficking indictment against Mr. Epstein after his [suicide at the Manhattan Correctional Center](#).

If a claims resolution program is formed, it’s possible that dozens of women could seek monetary damages. When Mr. Epstein pleaded guilty in 2008 in Florida state court to a charge of soliciting prostitution from a minor, it was estimated in court filings that he had engaged in sexual activity with at least 30 underage girls.

Last month, representatives from the United States attorney's office in Manhattan met with some of Mr. Epstein's accusers and their lawyers to discuss the status of the investigation since Mr. Epstein's death. Lawyers familiar with the meetings said investigators told the women that they were looking at pursuing charges against [people who may have helped Mr. Epstein](#), and have been lining up potential witnesses.

From: [REDACTED] (USANYS)
Sent: Thursday, November 14, 2019 11:05 AM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
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Subject: NYLJ

Boies Schiller Sues Jeffrey Epstein Estate on Behalf of 3 Sexual Abuse Accusers

The lawsuits, filed in U.S. District Court for the Southern District of New York, include claims for battery and intentional infliction of emotional distress by plaintiffs who said they met Epstein and his companion, Ghislaine Maxwell, between 1995 and 2002.

By [Tom McParland](#) | November 12, 2019 at 03:21 PM

Boies Schiller Flexner attorneys on Tuesday sued the estate of Jeffrey Epstein on behalf of at least three women who said they were sexually abused by the deceased financier after being recruited into his alleged sex-trafficking network in New York.

The lawsuits, filed in U.S. District Court for the Southern District of New York, include claims for battery and intentional infliction of emotional distress by plaintiffs who said they met Epstein and his companion, Ghislaine Maxwell, between 1995 and 2002.

Two of the women, [REDACTED] were the subjects of [New York Times reporting](#) in August, which identified the two sisters as the first to report abusive behavior by Epstein at his Manhattan townhouse. Though the FBI took up an investigation, the Times reported, a widely criticized 2008 plea deal eventually derailed any federal prosecution.

According to ██████████ complaint, Epstein had hired her to purchase art for him, though her job responsibilities soon shifted to “focus on monitoring and keeping records of who entered Epstein’s New York mansion.” She said that Epstein took interest in personal details about her family, and upon hearing that she had a younger sister, arraigned to have ██████████-year-old ██████████ flown to New York.

While there, ██████████ said, Epstein groped ██████████ in a movie theater and eventually flew the girl to his New Mexico ranch, where he assaulted her. In her own lawsuit ██████████ ██████████ said that Maxwell, a British socialite who has been accused of procuring young women and underage girls for Epstein, pressured her to have physical contact with Epstein and that both adults participated in the abuse, under the guise of a massage.

Both of the ██████████ sisters are represented in the litigation by David Boies, Joshua Schiller and Sigrid McCawley of Boies Schiller.

██████████ claimed in her filing that “Maxwell was regularly bringing school-aged girls to the mansion” in New York, and that they were always escorted upstairs. ██████████ who was 26 years old at the time, said she was told that the girls were interviewing for modeling positions with lingerie retailer Victoria’s Secret and was unaware of Epstein’s sex-trafficking conspiracy at the time.

The complaint included a reference to former Harvard law professor Alan Dershowitz, who she said visited the mansion “on a number of occasions” and “would go upstairs at the same time the young girls were there.”

While the filing did not contain any explicit allegations of wrongdoing by Dershowitz, it did signal the latest salvo in an ongoing feud between the professor and Boies Schiller, which has represented Epstein accusers in a range of civil litigation.

Until recently, Boies and McCawley represented ██████████ who claimed that Dershowitz had defamed her through his strong denials of forced sex. Dershowitz has filed counterclaims against ██████████ and last week Boies sued Dershowitz, claiming that he had falsely accused him of extortion.

Dershowitz has repeatedly and forcefully denied allegations that he had sex with anyone in Epstein’s orbit. On Tuesday he said ██████████ account that she had seen him at

Epstein's mansion in 1995 was "categorically" false.

According to Dershowitz, he never visited Epstein's home until after █████ █████ ended her connection to the financier in the summer of 1996. He said the passage would work to undermine her credibility moving forward.

"It just shows that Boies is more interested in going after me" than in helping his own client, Dershowitz said in a brief phone interview.

Boies was not immediately available to comment Tuesday.

A third plaintiff, █████ on Tuesday said that she was recruited by a fellow massage-therapy student in 2002 to interview for a traveling masseuse position with a wealthy couple in New York. After speaking with Epstein employee █████ █████ said she was flown to Manhattan, where she was to be housed at a 66th Street apartment, which housed "many of the models and other young women" Epstein was abusing.

Soon after, █████ said, Epstein sexually assaulted her as she tried to leave the room after he pushed his foot into "her intimate parts" during a foot massage. █████ said she was so traumatized by the encounter that did not finish massage therapy school with the same certification that she initially set out to achieve and returned to Ohio shortly after the alleged assault.

All three lawsuits named Darren Indyke, a longtime attorney for Epstein, and Richard Kahn, who were named executors of Epstein's estate following his apparent suicide in August. Indyke and Kahn are named solely as executors of the estate

While Epstein's death in federal custody terminated the criminal case against him, plaintiffs have sued his estate for civil damages—a process experts have said could take years to complete.

Prosecutors in Manhattan, meanwhile, say they are continuing to investigate whether any of Epstein's associates and employees could have been linked to the conspiracy.

[REDACTED]
Public Affairs
United States Department of Justice
U.S. Attorney's Office | Southern District of New York
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