EXHIBIT A

PRIVILEGE LOG – WITH VICTIMS' OBJECTIONS

PRIVILEGE LOG – WITH VICTIMS' OBJECTIONS

Key to Objections (linking to Victims' Motion to Compel Production of Docments that Are Not Privileged)

<u>Objection</u>	<u>Abbreviation</u>
General Objections	
Inadequate Privilege Log	Inadequate Log
Failure to Prove Factual Underpinnings of Privilege Claim	No Factual Underpinnings
Waiver of Confidentiality	Waiver
Government's Fiduciary Duty to Crime Victims Bars Privilege	Fiduciary Duty
Communications Facilitating Crime-Fraud-Misconduct Not Covered	Crime-Fraud-Misconduct
Factual Materials Not Covered	Factual Materials
Documents Not Prepared in Anticipation of CVRA Litigation	Not in Anticipation of Litigation
Attorney Client Objections -	
Ordinary Governmental Communications Not Covered	Ordinary Government Communication
Attorney-Client Relationship Not Established	No Attorney-Client Relationship
Deliberative Process Objections -	
Privilege Not Properly Invoked	Improper Invocation
Final Decision Exempted from Privilege	Final Decision
Qualified Privilege Overridden By the Victims' Need for the Documents	Overriding Need
Investigative Privilege -	
Privilege Not Properly Invoked	Improper Invocation
Qualified Privilege Overridden By the Victims' Need for the Documents	Overriding Need
Work Product Doctrine	Claima Assinat Paltis Processor
No Work Product Doctrine in the Context of a Claim Against Public Prosecutors	Claims Against Public Prosecutor
Qualified Privilege Overridden By the Victims' Need for the Documents Work Production Privilege Does No. Apply When the Atternay's Conduct is at Issue	Overriding Need Attorney Conduct at Issue
Work Production Privilege Does No Apply When the Attorney's Conduct is at Issue $Rule\ 6(e)$	Attorney Conduct at Issue
Court-Authorized Disclosure Not Covered Under Rule 6(e)(3)(E)	Court Authorized Under 6(e)(3)(E)
The Court Has Inherent Power to Release Grand Jury Materials	Court Inherent Power to Release
Victims Have Properly Petitioned for the Release of Grand Jury	Proper Victim's Petition
The CVRA Gives the Court Authority to Release Grand Jury Materials	CVRA-authorized release

Grand Jury Materials Can Be Severed from Other Materials

The Privacy Rights of Other Victims

Government Redaction Can Resolve Privacy Concerns

No Assertion of Privacy Rights by Other Victims

Privacy Act

The Privacy Act Does Not Apply to Court-Compelled Disclosures for Discovery

Material Severable

Redaction

No Assertion by Victims

Court-Compelled Disclosure

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	File folder entitled "CORR RE GJ	6(e)	Inadequate Log; No Factual Underpinnings;
P-000001	SUBPOENAS" containing correspondence	Work Product	Fiduciary Duty; Not in Anticipation of
thru	related to various grand jury subpoenas and		Litigation; Claims Against Public Prosecutor;
P-000039	attorney (Villafaña) handwritten notes		Overriding Need; Attorney Conduct at Issue;
			Factual Materials; Court Authorized Under
			6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Overriding Need
Box #1	Operation Leap Year Grand Jury Log	6(e)	Inadequate Log; No Factual Underpinnings;
P-000040	containing subpoenas OLY-01 through	Work Product	Fiduciary Duty; Factual Materials; Not in
thru	OLY-81, correspondence and research	Contains documents	Anticipation of Litigation; Improper
P-000549	related to enforcement of same, documents	subject to investigative	Invocation; Overriding Need; Claims Against
	produced in response to some subpoenas;	privilege	Public Prosecutor; Attorney Conduct at Issue;
	and attorney (Villafaña) handwritten notes	Also contains documents	Factual Materials; Court Authorized Under
		subject to privacy rights of	6(e)(3)(E); Court Inherent Power to Release;
		victims who are not	Proper Victim's Petition; CVRA-authorized
		parties to this litigation	release; Material Severable; Redaction; No
			Assertion by Victims; Overriding Need

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	File folder entitled "Ritz Compact Flash	6(e)	Inadequate Log; No Factual Underpinnings;
P-000550	SW" containing copies of a sealed search	Contains information	Fiduciary Duty; Factual Materials; Not in
thru	warrant application, warrant, and	subject to investigative	Anticipation of Litigation; Improper
P-000621	supporting documents	privilege	Invocation; Overriding Need; Factual
		Also contains information	Materials; Court Authorized Under 6(e)(3)(E);
		subject to privacy rights of	Court Inherent Power to Release; Proper
		victims who are not	Victim's Petition; CVRA-authorized release;
		parties to this litigation	Material Severable; Redaction; No Assertion
			by Victims
Box #1	File folder entitled "PNY Technologies	6(e)	Inadequate Log; No Factual Underpinnings;
P-000622	Compact Flash SW" containing copies of a	Contains information	Fiduciary Duty; Factual Materials; Not in
thru	sealed search warrant application, warrant,	subject to investigative	Anticipation of Litigation; Improper
P-000693	and supporting documents	privilege	Invocation; Overriding Need; Factual
		Also contains information	Materials; Court Authorized Under 6(e)(3)(E);
		subject to privacy rights of	Court Inherent Power to Release; Proper
		victims who are not	Victim's Petition; CVRA-authorized release;
		parties to this litigation	Material Severable; Redaction; No Assertion
			by Victims
Box #1	File folder entitled "JE Corporations"	Work Product	Inadequate Log; No Factual Underpinnings;
P-000694	containing attorney research on Epstein-	Contains information	Fiduciary Duty; Not in Anticipation of
thru	owned corporations and prior litigation	subject to investigative	Litigation; Improper Invocation; Overriding
P-000781		privilege	Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue; Overriding Need
Box #1	File folder entitled "Capital One"	6(e)	Inadequate Log; No Factual Underpinnings;
P-000782	containing subpoena and correspondence		Fiduciary Duty; Factual Materials; Court
thru			Authorized Under 6(e)(3)(E); Court Inherent
P-000803			Power to Release; Proper Victim's Petition;
			CVRA-authorized release; Material Severable

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	File folder entitled "DTG	6(e)	Inadequate Log; No Factual Underpinnings;
P-000804	Operations/Dollar Rent-a-Car" containing	Contains documents and	Fiduciary Duty; Factual Materials; Not in
thru	subpoena and responsive documents	information subject to	Anticipation of Litigation; Improper
P-000854		investigative privilege	Invocation; Overriding Need; Factual
		Also contains documents	Materials; Court Authorized Under 6(e)(3)(E);
		and information subject to	Court Inherent Power to Release; Proper
		privacy rights of victims	Victim's Petition; CVRA-authorized release;
		who are not parties to this	Material Severable; Redaction; No Assertion
		litigation	by Victims
Box #1	File folder entitled "JP Morgan Chase"	6(e)	Inadequate Log; No Factual Underpinnings;
P-000855	containing subpoena, correspondence, and	Contains documents and	Fiduciary Duty; Not in Anticipation of
thru	responsive documents	information subject to	Litigation; Improper Invocation; Overriding
P-000937		investigative privilege	Need; Factual Materials; Court Authorized
			Under 6(e)(3)(E); Court Inherent Power to
			Release; Proper Victim's Petition; CVRA-
			authorized release; Material Severable
Box #1	File folder entitled "Washington Mutual"	6(e)	Inadequate Log; No Factual Underpinnings;
P-000938	containing subpoena, correspondence, and	Contains documents and	Fiduciary Duty; Not in Anticipation of
thru	responsive documents	information subject to	Litigation; Improper Invocation; Overriding
P-000947		investigative privilege	Need; Factual Materials; Court Authorized
			Under 6(e)(3)(E); Court Inherent Power to
			Release; Proper Victim's Petition; CVRA-
			authorized release; Material Severable
Box #1	File folder entitled "Computer Search &"	Work Product	Inadequate Log; No Factual Underpinnings;
P-000948	containing legal research on computer	Attorney-Client	Fiduciary Duty; Factual Materials; Not in
thru	search and handwritten notes on indictment	Contains information	Anticipation of Litigation; Ordinary
P-000982	preparation	subject to investigative	Government Communication; No Attorney-
		privilege. Also contains	Client Relationship; Improper Invocation;
		information subject to	Overriding Need; Claims Against Public
		privacy rights of victims	Prosecutor; Attorney Conduct at Issue;
		who are not parties to this	Redaction; No Assertion by Victims
		litigation	

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	File folder entitled "Attorney Notes from	Work product	Inadequate Log; No Factual Underpinnings;
P-000983	Document Review" containing typed and	6(e)	Fiduciary Duty; Factual Materials; Not in
thru	handwritten attorney (Villafaña) notes,	Contains information	Anticipation of Litigation; Improper
P-001007	target letters, correspondence re grand jury	subject to investigative	Invocation; Overriding Need; Claims Against
	subpoena	privilege. Also contains	Public Prosecutor; Attorney Conduct at Issue;
		information subject to	Factual Materials; Court Authorized Under
		privacy rights of victims	6(e)(3)(E); Court Inherent Power to Release;
		who are not parties to this	Proper Victim's Petition; CVRA-authorized
		litigation	release; Material Severable; Redaction; No
			Assertion by Victims
Box #1	File folder entitled "Notes from Fed Ex	Work Product	Inadequate Log; No Factual Underpinnings;
P-001008	Records" containing handwritten and typed	6(e)	Fiduciary Duty; Factual Materials; Not in
thru	attorney (Villafaña) notes and screen shots	Contains information	Anticipation of Litigation; Improper
P-001056	of FedEx subpoena response electronic file	subject to investigative	Invocation; Overriding Need; Claims Against
		privilege. Also contains	Public Prosecutor; Attorney Conduct at Issue;
		information subject to	Factual Materials; Court Authorized Under
		privacy rights of victims	6(e)(3)(E); Court Inherent Power to Release;
		who are not parties to this	Proper Victim's Petition; CVRA-authorized
		litigation	release; Material Severable; Redaction; No
			Assertion by Victims
Box #1	File folder entitled "Colonial Bank	6(e)	Inadequate Log; No Factual Underpinnings;
P-001057	Records" containing records received in	Contains information	Fiduciary Duty; Not in Anticipation of
thru	response to grand jury subpoena	subject to investigative	Litigation; Improper Invocation; Overriding
P-001959		privilege	Need; Factual Materials; Court Authorized
			Under 6(e)(3)(E); Court Inherent Power to
			Release; Proper Victim's Petition; CVRA-
			authorized release; Material Severable

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	File folder entitled "OLY Grand Jury Log	6(e)	Inadequate Log; No Factual Underpinnings;
P-001960	Vol 2: OLY-51 THROUGH" containing	Contains information	Fiduciary Duty; Factual Materials; Not in
Thru	subpoenas numbered OLY-51 through	subject to investigative	Anticipation of Litigation; Improper
P-002089	OLY-81 with related correspondence	privilege. Also contains	Invocation; Overriding Need; Factual
		information subject to	Materials; Court Authorized Under 6(e)(3)(E);
		privacy rights of victims	Court Inherent Power to Release; Proper
		who are not parties to this	Victim's Petition; CVRA-authorized release;
		litigation	Material Severable; Redaction; No Assertion
			by Victims
Box #1	File folder entitled "Epstein Corporate	6(e)	Inadequate Log; No Factual Underpinnings;
P-002090	Records: OLY-51, OLY-52, OLY-53,	Contains information and	Fiduciary Duty; Not in Anticipation of
Thru	OLY-54" containing subpoenas, records	documents subject to	Litigation; Improper Invocation; Overriding
P-002169	received in response to subpoenas, and	investigative privilege	Need; Factual Materials; Court Authorized
	related correspondence		Under 6(e)(3)(E); Court Inherent Power to
			Release; Proper Victim's Petition; CVRA-
			authorized release; Material Severable
Box #1	File folder entitled "Colonial Bank"	6(e)	Inadequate Log; No Factual Underpinnings;
P-002170	containing subpoenas, correspondence	Contains information and	Fiduciary Duty; Not in Anticipation of
Thru	related to subpoenas, records received in	documents subject to	Litigation; Improper Invocation; Overriding
P-002246	response to subpoenas	investigative privilege	Need; Factual Materials; Court Authorized
			Under 6(e)(3)(E); Court Inherent Power to
			Release; Proper Victim's Petition; CVRA-
D #1	Elle felden andded WIEGE 0 H		authorized release; Material Severable
Box #1	File folder entitled "JEGE & Hyperion	6(e)	Inadequate Log; No Factual Underpinnings;
P-002247	from Goldberger OLY-46 & OLY-47"	Contains information and	Fiduciary Duty; Not in Anticipation of
Thru	containing documents received in response	documents subject to	Litigation; Improper Invocation; Overriding
P-002265	to subpoenas	investigative privilege	Need; Factual Materials; Court Authorized
			Under 6(e)(3)(E); Court Inherent Power to
			Release; Proper Victim's Petition; CVRA-
			authorized release; Material Severable

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	Indictment preparation binder containing:	Work product	Inadequate Log; No Factual Underpinnings;
P-002266	Grand jury subpoena log, evidence/activity	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	summary chart, witness/victim names and	Contains information and	Anticipation of Litigation; Improper
P-002386	contact list, attorney (Villafaña)	documents subject to	Invocation; Overriding Need; Claims Against
	handwritten notes, 302s, portions of state	investigative privilege.	Public Prosecutor; Attorney Conduct at Issue;
	investigative file, attorney (Villafaña)	Also contains information	Factual Materials; Court Authorized Under
	typed notes, of individuals listed as	and documents subject to	6(e)(3)(E); Court Inherent Power to Release;
	"Additional victims"	privacy rights of victims	Proper Victim's Petition; CVRA-authorized
		who are not parties to this	release; Material Severable
		litigation	
Box #1	Indictment preparation binder containing:	Work product	Inadequate Log; No Factual Underpinnings;
P-002387	Grand jury subpoena log, evidence/activity	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	summary chart, witness/victim names and	Contains information and	Anticipation of Litigation; Improper
P-002769	contact list, attorney (Villafaña)	documents subject to	Invocation; Overriding Need; Claims Against
	handwritten notes, 302s, portions of state	investigative privilege.	Public Prosecutor; Attorney Conduct at Issue;
	investigative file, attorney (Villafaña)	Also contains information	Factual Materials; Court Authorized Under
	typed notes, relevant pieces of grand jury	and documents subject to	6(e)(3)(E); Court Inherent Power to Release;
	materials, telephone records/flight records	privacy rights of victims	Proper Victim's Petition; CVRA-authorized
	analysis charts, victim/witness	who are not parties to this	release; Material Severable; Redaction; No
	photographs, DAVID records, NCICs, and	litigation	Assertion by Victims
	related materials for persons identified as		
	Jane Does #15, 16, 17, 18, 19, Past		
	Employees, Misc. Witnesses		

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	Indictment preparation binder containing:	Work product	Inadequate Log; No Factual Underpinnings;
P-002770	witness/victim list with identifying	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	information, sexual activity summary,	Contains information and	Anticipation of Litigation; Improper
P-003211	telephone call summary chart, attorney	documents subject to	Invocation; Overriding Need; Claims Against
	(Villafaña) handwritten notes, 302s,	investigative privilege.	Public Prosecutor; Attorney Conduct at Issue;
	portions of state investigative file, attorney	Also contains information	Redaction; No Assertion by Victims
	(Villafaña) typed notes, relevant pieces of	and documents subject to	
	grand jury materials, telephone	privacy rights of victims	
	records/flight records analysis charts,	who are not parties to this	
	victim/witness photographs, DAVID	litigation	
	records, NCICs, and related materials for		
	persons identified as Jane Does #1, 2, 3, 4,		
	5, 6, 7, 8		
Box #1	Indictment preparation binder containing	Work product	Inadequate Log; No Factual Underpinnings;
P-003212	meta-analysis charts of	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	telephone/flight/grand jury information for	Contains information and	Anticipation of Litigation; Improper
P-003545	a number of victim/witnesses, Nadia	documents subject to	Invocation; Overriding Need; Claims Against
	Marcinkova, and Adriana Mucinska	investigative privilege.	Public Prosecutor; Attorney Conduct at Issue;
		Also contains information	Factual Materials; Court Authorized Under
		and documents subject to	6(e)(3)(E); Court Inherent Power to Release;
		privacy rights of victims	Proper Victim's Petition; CVRA-authorized
		who are not parties to this	release; Material Severable; Redaction; No
		litigation	Assertion by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	FBI Reports of March 2008 interviews of	Work product	Inadequate Log; No Factual Underpinnings;
P-003546	additional witness/victim located in New	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	York	Contains information and	Anticipation of Litigation; Improper
P-003552		documents subject to	Invocation; Overriding Need; Claims Against
		investigative privilege.	Public Prosecutor; Attorney Conduct at Issue;
		Also contains information	Factual Materials; Court Authorized Under
		and documents subject to	6(e)(3)(E); Court Inherent Power to Release;
		privacy rights of victims	Proper Victim's Petition; CVRA-authorized
		who are not parties to this	release; Material Severable; Redaction; No
		litigation	Assertion by Victims
Box #1	Printout of filenames from Federal Express	Work product	Inadequate Log; No Factual Underpinnings;
P-003553	subpoena response with Attorney notations	6(e)	Fiduciary Duty; Not in Anticipation of
Thru			Litigation; Claims Against Public Prosecutor;
P-003555B			Overriding Need; Attorney Conduct at Issue;
			Factual Materials; Court Authorized Under
			6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable
Box #1	Document entitled "Identified Numbers"	Work product	Inadequate Log; No Factual Underpinnings;
P-003556	with accompanying handwritten attorney	6(e)	Fiduciary Duty; Not in Anticipation of
Thru	list compiled from grand jury materials and	Contains information	Litigation; Improper Invocation; Overriding
P-003562	attorney analysis of records	subject to investigative	Need; Claims Against Public Prosecutor;
		privilege	Attorney Conduct at Issue; Factual Materials;
			Court Authorized Under 6(e)(3)(E); Court
			Inherent Power to Release; Proper Victim's
			Petition; CVRA-authorized release; Material
			Severable

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	Folder entitled "Flight Manifests"	6(e)	Inadequate Log; No Factual Underpinnings;
P-003563	containing manifests received pursuant to	Contains information and	Fiduciary Duty; Not in Anticipation of
Thru	grand jury subpoena	documents subject to	Litigation; Improper Invocation; Overriding
P-003629		investigative privilege	Need; Factual Materials; Court Authorized
			Under 6(e)(3)(E); Court Inherent Power to
			Release; Proper Victim's Petition; CVRA-
			authorized release; Material Severable
Box #1	File folder entitled "Recent Attorney	Work product	Inadequate Log; No Factual Underpinnings;
P-003630	Notes" containing handwritten attorney	6(e)	Fiduciary Duty; Not in Anticipation of
Thru	(Villafaña) notes regarding document	Investigative privilege	Litigation; Improper Invocation; Overriding
P-003633	review and case strategy	Deliberative process	Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue; Factual Materials;
			Court Authorized Under 6(e)(3)(E); Court
			Inherent Power to Release; Proper Victim's Petition; CVRA-authorized release; Material
			Severable
Box #1	File folder bearing victim name containing	Work product	Inadequate Log; No Factual Underpinnings;
P-003634	FBI interview report from May 2008,	Attorney-client privilege	Fiduciary Duty; Factual Materials; Not in
Thru	telephone activity report with attorney	6(e)	Anticipation of Litigation; Ordinary
P-003646	(Villafanaña) handwritten notes, related	Investigative privilege	Government Communication; No Attorney-
	grand jury material	Also contains information	Client Relationship; Improper Invocation;
		and documents subject to	Overriding Need; Claims Against Public
		privacy rights of victims	Prosecutor; Attorney Conduct at Issue; Factual
		who are not parties to this	Materials; Court Authorized Under 6(e)(3)(E);
		litigation	Court Inherent Power to Release; Proper
			Victim's Petition; CVRA-authorized release;
			Material Severable; Redaction; No Assertion
			by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	File folder entitled "Summary of Sexual	Work product	Inadequate Log; No Factual Underpinnings;
P-003647	Activity" containing chart bearing	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	handwritten title "Sexual Activity –	Investigative privilege	Anticipation of Litigation; Improper
P-003651	Summary" with meta-analysis of	Deliberative process	Invocation; Overriding Need; Claims Against
	information, sorted by name of each	Also contains information	Public Prosecutor; Attorney Conduct at Issue;
	victim/witness, including name and	and documents subject to	Factual Materials; Court Authorized Under
	identifying information of each victim/witness	privacy rights of victims who are not parties to this	6(e)(3)(E); Court Inherent Power to Release; Proper Victim's Petition; CVRA-authorized
	Victini/ withess	litigation	release; Material Severable; Redaction; No
		ntigation	Assertion by Victims
			Assortion by Victims
Box #1	File folder entitled "Victim Civil Suits"	Not privileged.	N/A
P-003652	The folder entitled whethir envir suits	Produced to counsel for	1011
Thru		Petitioners	
P-003663			
Box #1	File folder entitled "Research re JE	Work product	Inadequate Log; No Factual Underpinnings;
P-003664	Websites" containing attorney research		Fiduciary Duty; Not in Anticipation of
Thru			Litigation; Claims Against Public Prosecutor;
P-003678			Overriding Need; Attorney Conduct at Issue
Box #1	File folder entitled "Serene Cano (N.Y.	Work product	Inadequate Log; No Factual Underpinnings;
P-003679	AUSA)" containing attorney (Villafaña)		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-003680		***	Overriding Need; Attorney Conduct at Issue
Box #1	File folder entitled "Dr. Anna Salter"	Work product	Inadequate Log; No Factual Underpinnings;
P-003681	containing attorney (Villafaña) memo to	Investigative privilege	Fiduciary Duty; Not in Anticipation of
Thru	expert witness and handwritten attorney		Litigation; Improper Invocation; Overriding
P-003687	notes		Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	File folder entitled "I[] G[] Interview"	Work product	Inadequate Log; No Factual Underpinnings;
P-003688	containing attorney handwritten notes of	Investigative privilege	Fiduciary Duty; Factual Materials; Not in
Thru	interview, and attorney handwritten notes	Also contains information	Anticipation of Litigation; Improper
P-003693	regarding potential charges	subject to privacy rights of	Invocation; Overriding Need; Claims Against
		victims who are not	Public Prosecutor; Attorney Conduct at Issue;
		parties to this litigation	Redaction; No Assertion by Victims
Box #1	File folder entitled "Research re Travel for	Work product	Inadequate Log; No Factual Underpinnings;
P-003694	Prostitution" containing attorney	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	(Villafaña) handwritten notes regarding	Investigative privilege	Anticipation of Litigation; Improper
P-003711	grand jury presentation, chart entitled	Also contains information	Invocation; Overriding Need; Claims Against
	"Brought to Epstein's House" with	and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
	handwritten notes, Message Pad meta-	privacy rights of victims	Factual Materials; Court Authorized Under
	analysis chart, summary of evidence	who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
	related to one victim/witness, and relevant	litigation	Proper Victim's Petition; CVRA-authorized
	grand jury information		release; Material Severable; Redaction; No
			Assertion by Victims
Box #1	Empty file folder bearing name of	Investigative privilege	N/A
P-003712	victim/witness	Also contains information	
		subject to privacy rights of	
		victim who is not a party	
		to this litigation	
Box #1	File folder entitled "T[] M[]" containing	6(e)	Inadequate Log; No Factual Underpinnings;
P-003713	grand jury subpoenas, motion and order to	Documents under seal	Fiduciary Duty; Factual Materials; Court
Thru	compel testimony, and correspondence	pursuant to court order	Authorized Under 6(e)(3)(E); Court Inherent
P-003746	regarding same		Power to Release; Proper Victim's Petition;
			CVRA-authorized release; Material Severable
Box #1	File folder entitled "Adriana Ross"	6(e)	Inadequate Log; No Factual Underpinnings;
P-003747	containing subpoena and correspondence		Fiduciary Duty; Factual Materials; Court
Thru	regarding same		Authorized Under 6(e)(3)(E); Court Inherent
P-003751			Power to Release; Proper Victim's Petition;
			CVRA-authorized release; Material Severable

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	File folder entitled "PBPD Investigative	6(e)	Inadequate Log; No Factual Underpinnings;
P-003752	File" obtained via subpoena	Investigative privilege	Fiduciary Duty; Factual Materials; Not in
Thru		Also contains information	Anticipation of Litigation; Improper
P-004295		and documents subject to	Invocation; Overriding Need; Factual
		privacy rights of victims	Materials; Court Authorized Under 6(e)(3)(E);
		who are not parties to this	Court Inherent Power to Release; Proper
		litigation	Victim's Petition; CVRA-authorized release;
			Material Severable; Redaction; No Assertion
			by Victims
Box #1	File folder bearing name of victim/witness	Work product	Inadequate Log; No Factual Underpinnings;
P-004296	containing meta-analysis chart showing	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	telephone calls, travel, and grand jury	Investigative privilege	Anticipation of Litigation; Improper
P-004350	materials relevant to possible charges	Also contains information	Invocation; Overriding Need; Claims Against
		and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
		privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #1	File folder entitled "Daniel Gonzalez	Work product	Inadequate Log; No Factual Underpinnings;
P-004351	Documents 53909-004" containing		Fiduciary Duty; Not in Anticipation of
Thru	attorney research related to bias issue		Litigation; Claims Against Public Prosecutor;
P-004381			Overriding Need; Attorney Conduct at Issue
Box #1	File Folder entitled "FEDEX" containing	6(e)	Inadequate Log; No Factual Underpinnings;
P-004382	documents obtained via subpoena	Investigative privilege	Fiduciary Duty; Not in Anticipation of
Thru			Litigation; Improper Invocation; Overriding
P-004478			Need; Factual Materials; Court Authorized
			Under 6(e)(3)(E); Court Inherent Power to
			Release; Proper Victim's Petition; CVRA-
			authorized release; Material Severable

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	File Folder entitled "State of Delaware	6(e)	Inadequate Log No Factual Underpinnings;
P-004479	Records" containing documents obtained	Investigative privilege	Fiduciary Duty; Not in Anticipation of
Thru	in preparation for indictment	Work product	Litigation; Improper Invocation; Overriding
P-004551			Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue; Factual Materials;
			Court Authorized Under 6(e)(3)(E); Court
			Inherent Power to Release; Proper Victim's
			Petition; CVRA-authorized release; Material
D #1			Severable
Box #1	File folder entitled "Jet Blue Records"	6(e)	Inadequate Log; No Factual Underpinnings;
P-004552 Thru	containing documents obtained via	Work product	Fiduciary Duty; Factual Materials; Not in Anticipation of Litigation; Improper
P-004555	subpoena	Investigative privilege Also contains information	Anticipation of Litigation; Improper Invocation; Overriding Need; Claims Against
r-004333		and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
		privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #1	File folder entitled "FL EMPLOYMENT	Investigative privilege	Inadequate Log; No Factual Underpinnings;
P-004556	RECORDS" containing FDLE records on	Work product	Fiduciary Duty; Not in Anticipation of
Thru	targets and witnesses obtained at attorney	-	Litigation; Improper Invocation; Overriding
P-004560	request		Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue
Box #1	Filed folder entitled "JANUSZ	Work product	Inadequate Log; No Factual Underpinnings;
P-004561	BANASIAK" containing attorney	Investigative privilege	Fiduciary Duty; Not in Anticipation of
Thru	(Villafaña) handwritten notes of interview		Litigation; Improper Invocation; Overriding
P-004565			Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	File folder entitled "JANUSZ BANASIAK	6(e)	Inadequate Log; No Factual Underpinnings;
P-004566	RECORDS 23-0001 THROUGH 23-"	Work product	Fiduciary Duty; Factual Materials; Not in
Thru	containing documents obtained via	Investigative privilege	Anticipation of Litigation; Improper
P-004716	subpoena	Also contains information	Invocation; Overriding Need; Claims Against
		and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
		privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #1	File folder entitled "IGOR ZINOVIEV"	Work product	Inadequate Log; No Factual Underpinnings;
P-004717	containing attorney research regarding	Investigative privilege	Fiduciary Duty; Not in Anticipation of
Thru	witness		Litigation; Improper Invocation; Overriding
P-004722			Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue
Box #1	File folder entitled "BEAR STEARNS	Work Product	Inadequate Log; No Factual Underpinnings;
P-004723	RESEARCH" containing attorney research	Investigative privilege	Fiduciary Duty; Not in Anticipation of
Thru	regarding potential witness and subpoena		Litigation; Improper Invocation; Overriding
P-004725	recipient		Need; Claims Against Public Prosecutor;
D #1	Til Call did to the AMERICA	W 1 D 1	Attorney Conduct at Issue
Box #1	File folder entitled "LAWSUITS	Work Product	Inadequate Log; No Factual Underpinnings;
P-004726	INVOLVING EPSTEIN CORP'S"	Investigative privilege	Fiduciary Duty; Not in Anticipation of
Thru	containing attorney research regarding		Litigation; Improper Invocation; Overriding
P-004819	Epstein's past personal and business		Need; Claims Against Public Prosecutor;
Box #1	litigative practices Filed folder entitled "SEC RECORDS"	Work Product	Attorney Conduct at Issue
P-004820		Investigative privilege	Inadequate Log; No Factual Underpinnings;
Thru	containing attorney research regarding Epstein financial relationships	mvesugauve privilege	Fiduciary Duty; Not in Anticipation of Litigation; Improper Invocation; Overriding
P-004959	Epstem maneral relationships		Need; Claims Against Public Prosecutor;
r-004939			Attorney Conduct at Issue
			Attorney Conduct at Issue

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	File folder entitled "Message Pads"	Work Product	Inadequate Log; No Factual Underpinnings;
P-004960	containing selected items from evidence	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	obtained via subpoena	Investigative privilege	Anticipation of Litigation; Improper
P-005059		Also contains information	Invocation; Overriding Need; Claims Against
		and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
		privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #1	File folder bearing name of victim/witness	Work Product	Inadequate Log; No Factual Underpinnings;
P-005060	containing correspondence with counsel	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	for victim/witness, attorney witness outline	Investigative privilege	Anticipation of Litigation; Improper
P-005081	with attorney handwritten notes, attorney	Also contains information	Invocation; Overriding Need; Claims Against
	handwritten notes regarding witness	and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
	reports and case preparation	privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #1	File folder entitled "New York Trip"	Work product	Inadequate Log; No Factual Underpinnings;
P-005082	containing attorney notes re witness	Investigative privilege	Fiduciary Duty; Not in Anticipation of
Thru	interview		Litigation; Improper Invocation; Overriding
P-005083			Need; Claims Against Public Prosecutor;
	D 005004 1 D 005107		Attorney Conduct at Issue
	P-005084 thru P-005107 are non		N/A
	responsive documents and have been		
	removed		

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	File folder entitled "ANNA SALTER"	Work product	Inadequate Log; Fiduciary Duty; Factual
P-005108	containing attorney research on select	Investigative privilege	Materials; Not in Anticipation of Litigation;
Thru	expert, use of experts at trials in child		Improper Invocation; Overriding Need; Claims
P-005193	exploitation cases, and additional research		Against Public Prosecutor; Attorney Conduct
	materials on offenders and victims		at Issue
Box #1	File folder entitled "Extra Copies"	Work product	Inadequate Log; No Factual Underpinnings;
P-005194	containing meta-analysis chart and 302's of	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	victim/witnesses used in preparing	Investigative privilege	Anticipation of Litigation; Improper
P-005300	indictment package	Also contains information	Invocation; Overriding Need; Claims Against
		and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
		privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #1	File folder entitled "JUAN ALESSI	6(e)	Inadequate Log; No Factual Underpinnings;
P-005301	STATEMENT" containing transcript	Investigative privilege	Fiduciary Duty; Not in Anticipation of
Thru	obtained via subpoena		Litigation; Improper Invocation; Overriding
P-005331			Need; Factual Materials; Court Authorized
			Under 6(e)(3)(E); Court Inherent Power to
			Release; Proper Victim's Petition; CVRA-
			authorized release; Material Severable
Box #1	File folder entitled "KEN LANNING"	Work product	Inadequate Log; No Factual Underpinnings;
P-005332	containing attorney research on select	Investigative privilege	Fiduciary Duty; Not in Anticipation of
Thru	expert, including attorney handwritten		Litigation; Improper Invocation; Overriding
P-005341	notes		Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	File folder entitled "Info re Planes"	6(e)	Inadequate Log; No Factual Underpinnings;
P-005342	containing correspondence regarding	Investigative privilege	Fiduciary Duty; Improper Invocation;
Thru	subpoenas and documents received in		Overriding Need; Factual Materials; Court
P-005387	response to subpoenas		Authorized Under 6(e)(3)(E); Court Inherent
			Power to Release; Proper Victim's Petition;
			CVRA-authorized release; Material Severable
Box #1	File folder entitled "Police Reports & PC	Work product	Inadequate Log; No Factual Underpinnings;
P-005388	Affidavit" containing portions of police	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	reports with attorney notes, related phone	Investigative privilege	Anticipation of Litigation; Improper
P-005442	records, a list entitled "Victims" with	Also contains information	Invocation; Overriding Need; Claims Against
	identifying information and attorney	and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
	handwritten notes, photographs and	privacy rights of victims	Factual Materials; Court Authorized Under
	DAVID information, and additional	who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
	attorney research regarding Epstein sexual	litigation	Proper Victim's Petition; CVRA-authorized
	activity		release; Material Severable; Redaction; No Assertion by Victims
Box #1	File folder entitled "[Victim name]	6(e)	Inadequate Log; No Factual Underpinnings;
P-005443	Transcript of Interview & GJ Transcript"	Investigative privilege	Fiduciary Duty; Factual Materials; Not in
Thru	Transcript of interview & GJ Transcript	Also contains information	Anticipation of Litigation; Improper
P-005496		and documents subject to	Invocation; Overriding Need; Factual
1 003470		privacy rights of victims	Materials; Court Authorized Under 6(e)(3)(E);
		who are not parties to this	Court Inherent Power to Release; Proper
		litigation	Victim's Petition; CVRA-authorized release;
		11118411011	Material Severable; Redaction; No Assertion
			by Victims
Box #1	File folder entitled "Bear Stearns Subpoena	6(e)	Inadequate Log; No Factual Underpinnings;
P-005497	Resp." containing material received in	Investigative privilege	Fiduciary Duty; Not in Anticipation of
Thru	response to subpoena		Litigation; Improper Invocation; Overriding
P-005556	_		Need; Factual Materials; Court Authorized
			Under 6(e)(3)(E); Court Inherent Power to
			Release; Proper Victim's Petition; CVRA-
			authorized release; Material Severable

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #1	U.S. Attorney's Office Criminal Case File	Work product	Inadequate Log; No Factual Underpinnings;
P-005557	Jacket containing file opening documents,	Deliberative process	Fiduciary Duty; Not in Anticipation of
Thru	expert witness payment documents		Litigation; Improper Invocation; Overriding
P-005576			Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue
Box #1	U.S. Attorney's Office Asset Forfeiture	Work product	Inadequate Log; No Factual Underpinnings;
P-005578	Case File Jacket containing file opening	Deliberative process	Fiduciary Duty; Not in Anticipation of
Thru	and file closing documents		Litigation; Improper Invocation; Overriding
P-005583			Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue
Box #1	File folder entitled "6001 Immunity	6(e)	Inadequate Log; No Factual Underpinnings;
P-005584	Request" containing internal memoranda	Work product and	Fiduciary Duty; Not in Anticipation of
Thru	seeking witness immunity and	deliberative process (as to	Litigation; Improper Invocation; Overriding
P-005606	correspondence with counsel for witness	internal memoranda)	Need; Claims Against Public Prosecutor;
	regarding same	Investigative privilege	Attorney Conduct at Issue; Factual Materials;
		Also contains information	Court Authorized Under 6(e)(3)(E); Court
		and documents subject to	Inherent Power to Release; Proper Victim's
		privacy rights of victims	Petition; CVRA-authorized release; Material
		who are not parties to this	Severable; Redaction; No Assertion by
		litigation	Victims
Box #2	File folder entitled "MASTER PHONE	Work product	Inadequate Log; No Factual Underpinnings;
P-005607	RECORDS" containing meta-analysis of	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	all phone, travel, and grand jury data for all	Investigative privilege	Anticipation of Litigation; Improper
P-005914	victim/witnesses for indictment preparation	Also contains information	Invocation; Overriding Need; Claims Against
		and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
		privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder bearing name of victim/witness	Work product	Inadequate Log; No Factual Underpinnings;
P-005915	containing meta-analysis of all phone,	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	travel, and grand jury data related to that	Investigative privilege	Anticipation of Litigation; Improper
P-005977	victim/witness for indictment preparation	Also contains information	Invocation; Overriding Need; Claims Against
		and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
		privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #2	File folder bearing name of victim/witness	Work product	Inadequate Log; No Factual Underpinnings;
P-005978	containing meta-analysis of all phone,	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	travel, and grand jury data related to that	Investigative privilege	Anticipation of Litigation; Improper
P-006050	victim/witness for indictment preparation	Also contains information	Invocation; Overriding Need; Claims Against
		and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
		privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #2	File folder bearing name of victim/witness	Work product	Inadequate Log; No Factual Underpinnings;
P-006051	containing meta-analysis of all phone,	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	travel, and grand jury data related to that	Investigative privilege	Anticipation of Litigation; Improper
P-006065	victim/witness for indictment preparation	Also contains information	Invocation; Overriding Need; Claims Against
		and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
		privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "JANE DOE #4"	Work product	Inadequate Log; No Factual Underpinnings;
P-006066	containing meta-analysis of all phone,	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	travel, and grand jury data related to that	Investigative privilege	Anticipation of Litigation; Improper
P-006220	victim/witness for indictment preparation	Also contains information	Invocation; Overriding Need; Claims Against
		and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
		privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #2	File folder entitled ""JANE DOE #12"	Work product	Inadequate Log; No Factual Underpinnings;
P-006221	containing meta-analysis of all phone,	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	travel, and grand jury data related to that	Investigative privilege	Anticipation of Litigation; Improper
P-006222	victim/witness for indictment preparation	Also contains information	Invocation; Overriding Need; Claims Against
		and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
		privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
7 112			Assertion by Victims
Box #2	File folder entitled "CORRECTED	Work product	Inadequate Log; No Factual Underpinnings;
P-006223	PHONE RECORDS 5/31/07" containing	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	meta-analysis of all phone, travel, and	Investigative privilege	Anticipation of Litigation; Improper
P-006522	grand jury data related to all	Also contains information	Invocation; Overriding Need; Claims Against
	victims/witnesses for indictment	and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
	preparation	privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "[Victim Name] Phone	Work product	Inadequate Log; No Factual Underpinnings;
P-006523	Records" containing telephone records	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	received in response to subpoena	Investigative privilege	Anticipation of Litigation; Improper
P-006802		Also contains information	Invocation; Overriding Need; Claims Against
		and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
		privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #2	File folder entitled "Lists of Identified	Work product	Inadequate Log; No Factual Underpinnings;
P-006803	Phone Numbers" containing charts of	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	information culled from grand jury	Investigative privilege	Anticipation of Litigation; Improper
P-006860	materials, interviews, and other	Also contains information	Invocation; Overriding Need; Claims Against
	investigation, with attorney handwritten	and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
	notes, and information to issue follow-up	privacy rights of victims	Factual Materials; Court Authorized Under
	grand jury subpoena	who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
D #2	Ell. 6-11	W/ - vl- v- v- d+	Assertion by Victims
Box #2	File folder entitled "EPSTEIN/KELLEN	Work product	Inadequate Log; No Factual Underpinnings;
P-006861 Thru	CELL PHONE RECORDS" containing documents received via subpoena with	6(e)	Fiduciary Duty; Factual Materials; Not in Anticipation of Litigation; Improper
P-007785	attorney handwritten notes and	Investigative privilege Also contains information	Anticipation of Litigation; Improper Invocation; Overriding Need; Claims Against
F-007763	highlighting	and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
	ingingining	privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
		miguion	release; Material Severable; Redaction; No
			Assertion by Victims
			Assertion by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	Folder entitled "OLY GRAND JURY	Work product	Inadequate Log; No Factual Underpinnings;
P-007786	LOG: OLY-01 THROUGH OLY-50"	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	containing subpoenas, correspondence	Investigative privilege	Anticipation of Litigation; Improper
P-008120	regarding same, 6(e) letters, attorney	Also contains information	Invocation; Overriding Need; Claims Against
	handwritten notes regarding records	and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
	received in response to subpoenas	privacy rights of victims	Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #2	Handwritten flight logs received in	6(e)	Inadequate Log; No Factual Underpinnings;
P-008121	response to subpoena	Investigative privilege	Fiduciary Duty; Not in Anticipation of
Thru			Litigation; Improper Invocation; Overriding
P-008139			Need; Factual Materials; Court Authorized
			Under 6(e)(3)(E); Court Inherent Power to
			Release; Proper Victim's Petition; CVRA-
D #/2		***	authorized release; Material Severable
Box #2	Grand jury presentation folder containing	Work product	Inadequate Log; No Factual Underpinnings;
P-008140	attorney handwritten notes, typed outline	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	with additional handwritten notes,	Investigative privilege	Anticipation of Litigation; Improper
P-008298	complete indictment package dated	Also contains information	Invocation; Overriding Need; Claims Against
	2/19/2008, victim list with identifying	and documents subject to	Public Prosecutor; Attorney Conduct at Issue;
	information, photographs, and summary of	privacy rights of victims	Factual Materials; Court Authorized Under
	activity	who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		litigation	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "FINAL		
P-008299	AGREEMENTS" containing subfolder		N/A
Thru	entitled "Agrmts Filed in State Court" (P-		
P-008363	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	File folder entitled "Lacerda Immunity	6(e)	Inadequate Log; No Factual Underpinnings;
P-008364	Request" containing internal memoranda,	Work Product	Fiduciary Duty; Not in Anticipation of
Thru	Justice Department documentation, and	Deliberative Process	Litigation; Improper Invocation; Overriding
P-008382	subpoena regarding immunity request	Investigative privilege	Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue; Factual Materials;
			Court Authorized Under 6(e)(3)(E); Court
			Inherent Power to Release; Proper Victim's
			Petition; CVRA-authorized release; Material
			Severable

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder containing March 18, 2008	Work product	Inadequate Log; No Factual Underpinnings;
P-008383	grand jury presentation materials, including	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	"Operation Leap Year Revised Indictment	Investigative privilege	Anticipation of Litigation; Improper
P-008516	Summary Chart (by victim)," grand jury	Deliberative process	Invocation; Overriding Need; Claims Against
	materials, draft indictments, victim	Also contains information	Public Prosecutor; Attorney Conduct at Issue;
	reference list, grand jury subpoena log	and documents subject to	Factual Materials; Court Authorized Under
		privacy rights of victims	6(e)(3)(E); Court Inherent Power to Release;
		who are not parties to this	Proper Victim's Petition; CVRA-authorized
		litigation	release; Material Severable; Redaction; No Assertion by Victims
Box #2	6/25/2007 Letter from Gerald Lefcourt to		
P-008517	Jeffrey Sloman and Andrew Lourie		
Thru	[pursuant to Court's Order, not being		N/A
P-008535	withheld as privileged – will be produced		
	to opposing counsel upon lift of stay by 11 th Circuit]		
Box #2	Handwritten attorney notes to prepare for	Work product	Inadequate Log; No Factual Underpinnings;
P-008536	interview of Jane Doe #2	Investigative Privilege	Fiduciary Duty; Factual Materials; Not in
Thru		Contains information	Anticipation of Litigation; Improper
P-008542		subject to privacy rights of	Invocation; Overriding Need; Claims Against
		victims who are not	Public Prosecutor; Attorney Conduct at Issue;
		parties to this suit	Redaction; No Assertion by Victims
Box #2	Handwritten attorney notes regarding May	Work product	Inadequate Log; No Factual Underpinnings;
P-008543	8, 2007 grand jury presentation	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru		Investigative privilege	Anticipation of Litigation; Improper
P-008549		Contains information	Invocation; Overriding Need; Claims Against
		subject to privacy rights of	Public Prosecutor; Attorney Conduct at Issue;
		victims who are not	Factual Materials; Court Authorized Under
		parties to this suit	6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "Most Recent	Work product	Inadequate Log; No Factual Underpinnings;
P-008550	Indictment & Good Cases" containing draft	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	indictment and legal research	Investigative privilege	Anticipation of Litigation; Improper
P-008615		Deliberative process	Invocation; Overriding Need; Claims Against
		Contains information	Public Prosecutor; Attorney Conduct at Issue;
		subject to privacy rights of	Factual Materials; Court Authorized Under
		victims who are not	6(e)(3)(E); Court Inherent Power to Release;
		parties to this suit	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #2	File folder entitled "FBI Summary Charts"	Work product	Inadequate Log; No Factual Underpinnings;
P-008616	containing chart prepared at direction of	Attorney-Client Privilege	Fiduciary Duty; Factual Materials; Not in
Thru	AUSA, containing victim names,	6(e)	Anticipation of Litigation; Ordinary
P-008686	identifying information, summary of	Investigative privilege	Government Communication; No Attorney-
	activity, and other information relevant to	Contains information	Client Relationship; Improper Invocation;
	indictment	subject to privacy rights of	Overriding Need; Claims Against Public
		victims who are not	Prosecutor; Attorney Conduct at Issue; Factual
		parties to this suit	Materials; Court Authorized Under 6(e)(3)(E);
			Court Inherent Power to Release; Proper
			Victim's Petition; CVRA-authorized release;
			Material Severable ; Redaction; No Assertion
D #2	F'1 C 11 ('4 1 657' (' 1/I	337 1 1 4	by Victims
Box #2	File folder entitled "[Victim name]/Jane	Work product	Inadequate Log; No Factual Underpinnings;
P-008687	Doe #4" containing phone records and	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru P-008776	meta-analysis of all phone, travel, and grand jury data related to that	Investigative privilege Contains information and	Anticipation of Litigation; Improper
P-008//6			Invocation; Overriding Need; Claims Against
	victim/witness for indictment preparation	documents subject to privacy rights of victims	Public Prosecutor; Attorney Conduct at Issue; Factual Materials; Court Authorized Under
		who are not parties to this	6(e)(3)(E); Court Inherent Power to Release;
		suit	Proper Victim's Petition; CVRA-authorized
		Suit	release; Material Severable; Redaction; No
			Assertion by Victims
			Assertion by victilis

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "[Victim name]/Jane	Work product	Inadequate Log; No Factual Underpinnings;
P-008777	Doe #5" containing handwritten notes and	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	meta-analysis of all phone, travel, and	Investigative privilege	Anticipation of Litigation; Improper
P-008808	grand jury data related to that	Contains information	Invocation; Overriding Need; Claims Against
	victim/witness for indictment preparation	subject to privacy rights of	Public Prosecutor; Attorney Conduct at Issue;
		victims who are not	Factual Materials; Court Authorized Under
		parties to this suit	6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No Assertion by Victims
Box #2	File folder entitled "[Victim name]/Jane	Work product	Inadequate Log; No Factual Underpinnings;
P-008809	Doe #6" containing meta-analysis of all	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	phone, travel, and grand jury data related to	Investigative privilege	Anticipation of Litigation; Improper
P-008847	that victim/witness for indictment	Contains information	Invocation; Overriding Need; Claims Against
	preparation	subject to privacy rights of	Public Prosecutor; Attorney Conduct at Issue;
		victims who are not	Factual Materials; Court Authorized Under
		parties to this suit	6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
7 110			Assertion by Victims
Box #2	File folder entitled "[Victim name]/Jane	Work product	Inadequate Log; No Factual Underpinnings;
P-008848	Doe #7" containing meta-analysis of all	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	phone, travel, and grand jury data related to	Investigative privilege	Anticipation of Litigation; Improper
P-008862	that victim/witness for indictment	Contains information	Invocation; Overriding Need; Claims Against
	preparation	subject to privacy rights of victims who are not	Public Prosecutor; Attorney Conduct at Issue;
			Factual Materials; Court Authorized Under
		parties to this suit	6(e)(3)(E); Court Inherent Power to Release; Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "[Victim name]/Jane	Work product	Inadequate Log; No Factual Underpinnings;
P-008863	Doe #8" containing meta-analysis of all	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	phone, travel, and grand jury data related to	Investigative privilege	Anticipation of Litigation; Improper
P-008890	that victim/witness for indictment	Contains information	Invocation; Overriding Need; Claims Against
	preparation	subject to privacy rights of	Public Prosecutor; Attorney Conduct at Issue;
		victims who are not	Factual Materials; Court Authorized Under
		parties to this suit	6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
D #/2			Assertion by Victims
Box #2	File folder entitled "Certified Copy of State		
P-008891	Case" containing certified copy of Epstein		N/A
Thru	state criminal cases and change of plea		N/A
P-009103	transcript [not being withheld as privileged		
Box #2	- copy provided to opposing counsel]	W/ - vl- v- v- d4	In decree I are No Fraction I I decree in the
P-009104	File folder entitled "Meeting Timeline"	Work product	Inadequate Log; No Factual Underpinnings;
P-009104 Thru	containing Villafaña typed notes	Deliberative process	Fiduciary Duty; Crime-Fraud-Misconduct; Not
P-009111	summarizing meetings with opposing		in Anticipation of Litigation; Improper Invocation; Overriding Need; Claims Against
F-009111	counsel prepared at request of R. Alexander Acosta, with handwritten		Public Prosecutor; Attorney Conduct at Issue
	correction and typed guideline estimate		rubile Floseculoi, Attorney Conduct at Issue
Box #2	11/26/2008 Email from Roy Black to A.		
P-009112	Marie Villafaña and Karen Atkinson re		N/A
Thru	Jeffrey Epstein (work release)		1 1/1 1
P-009113	[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	Victims' Objections
Box #2	7/3/2008 Email from A. Marie Villafaña to		
P-009114	Col. M. Gauger at PBSO re Epstein work		N/A
Thru	release with attachment [not being		
P-009115	withheld as privileged – produced to		
	opposing counsel]		
Box #2	12/6/2007 Letter from Jeffrey Sloman to		
P-009116	Jay P. Lefkowitz re Jeffrey Epstein (victim		N/A
Thru	notification) [pursuant to Court's Order,		
P-009125	not being withheld as privileged – will be		
	produced to opposing counsel upon lift of		
D #/2	stay by 11 th Circuit])	*** 1 1 .	
Box #2	File folder entitled "[Victim name]/Jane	Work product	Inadequate Log; No Factual Underpinnings;
P-009126	Doe #9" containing meta-analysis of all	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru P-009134	phone, travel, and grand jury data related to that victim/witness for indictment	Investigative privilege Contains information	Anticipation of Litigation; Improper
P-009134			Invocation; Overriding Need; Claims Against
	preparation	subject to privacy rights of victims who are not	Public Prosecutor; Attorney Conduct at Issue; Factual Materials; Court Authorized Under
		parties to this suit	6(e)(3)(E); Court Inherent Power to Release;
		parties to this suit	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #2	File folder entitled "[Victim name]/Jane	Work product	Inadequate Log; No Factual Underpinnings;
P-009135	Doe #13" containing meta-analysis of all	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	phone, travel, and grand jury data related to	Investigative privilege	Anticipation of Litigation; Improper
P-009141	that victim/witness for indictment	Contains information	Invocation; Overriding Need; Claims Against
	preparation	subject to privacy rights of	Public Prosecutor; Attorney Conduct at Issue;
		victims who are not	Factual Materials; Court Authorized Under
		parties to this suit	6(e)(3)(E); Court Inherent Power to Release;
		_	Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "[Victim name]/Jane	Work product	Inadequate Log; No Factual Underpinnings;
P-009141A	Doe #12" containing meta-analysis of all	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	phone, travel, and grand jury data related to	Investigative privilege	Anticipation of Litigation; Improper
P-009141C	that victim/witness for indictment	Contains information	Invocation; Overriding Need; Claims Against
	preparation	subject to privacy rights of	Public Prosecutor; Attorney Conduct at Issue;
		victims who are not	Factual Materials; Court Authorized Under
		parties to this suit	6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #2	File folder entitled "Adriana 'Mucinka'	Work product	Inadequate Log; No Factual Underpinnings;
P-009142	Ross" containing meta-analysis of all	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	phone, travel, and grand jury data related to	Investigative privilege	Anticipation of Litigation; Improper
P-009152	that individual for indictment preparation	Contains information	Invocation; Overriding Need; Claims Against
		subject to privacy rights of	Public Prosecutor; Attorney Conduct at Issue;
		victims who are not	Factual Materials; Court Authorized Under
		parties to this suit	6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #2	File folder entitled "Nadia Marcinkova"	Work product	Inadequate Log; No Factual Underpinnings;
P-009153	containing meta-analysis of all phone,	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	travel, and grand jury data related to that	Investigative privilege	Anticipation of Litigation; Improper
P-009156	individual for indictment preparation	Contains information	Invocation; Overriding Need; Claims Against
		subject to privacy rights of	Public Prosecutor; Attorney Conduct at Issue;
		victims who are not	Factual Materials; Court Authorized Under
		parties to this suit	6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "[Victim name]/Jane	Work product	Inadequate Log; No Factual Underpinnings;
P-009157	Doe #1" containing meta-analysis of all	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	phone, travel, and grand jury data related to	Investigative privilege	Anticipation of Litigation; Improper
P-009208	that victim/witness for indictment	Contains information	Invocation; Overriding Need; Claims Against
	preparation	subject to privacy rights of	Public Prosecutor; Attorney Conduct at Issue;
		victims who are not	Factual Materials; Court Authorized Under
		parties to this suit	6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No Assertion by Victims
Box #2	File folder entitled "[Victim name]/Jane	Work product	Inadequate Log; No Factual Underpinnings;
P-009209	Doe #2" containing meta-analysis of all	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	phone, travel, and grand jury data related to	Investigative privilege	Anticipation of Litigation; Improper
P-009213	that victim/witness for indictment	Contains information	Invocation; Overriding Need; Claims Against
	preparation	subject to privacy rights of	Public Prosecutor; Attorney Conduct at Issue;
		victims who are not	Factual Materials; Court Authorized Under
		parties to this suit	6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #2	File folder entitled "[Victim name]/Jane	Work product	Inadequate Log; No Factual Underpinnings;
P-009214	Doe #3" containing meta-analysis of all	6(e)	Fiduciary Duty; Factual Materials; Not in
Thru	phone, travel, and grand jury data related to	Investigative privilege	Anticipation of Litigation; Improper
P-009271	that victim/witness for indictment	Contains information	Invocation; Overriding Need; Claims Against
	preparation	subject to privacy rights of	Public Prosecutor; Attorney Conduct at Issue;
		victims who are not	Factual Materials; Court Authorized Under
		parties to this suit	6(e)(3)(E); Court Inherent Power to Release; Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
			Assertion by victilis

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "Purpose of Travel	Work product	Inadequate Log; No Factual Underpinnings;
P-009272	Cases" containing attorney research and		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-009354			Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "Interstate Commerce	Work product	Inadequate Log; No Factual Underpinnings;
P-009355	Cases" containing attorney research and		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-009403			Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "Attorney Conflict	Work product	Inadequate Log; No Factual Underpinnings;
P-009404	Research" containing attorney research and		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-009536			Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "Mann Act/Travel to	Work product	Inadequate Log; No Factual Underpinnings;
P-009537	Have Sex w/Minor" containing attorney		Fiduciary Duty; Not in Anticipation of
Thru	research and handwritten notes		Litigation; Claims Against Public Prosecutor;
P-009574			Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "Travel Act" containing	Work Product	Inadequate Log; No Factual Underpinnings;
P-009575	attorney research and handwritten notes		Fiduciary Duty; Not in Anticipation of
Thru			Litigation; Claims Against Public Prosecutor;
P-009603			Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "Florida	Work Product	Inadequate Log; No Factual Underpinnings;
P-009604	Prostitution/Lewdness Statutes" containing		Fiduciary Duty; Not in Anticipation of
Thru	attorney research and handwritten notes		Litigation; Claims Against Public Prosecutor;
P-009711			Overriding Need; Attorney Conduct at Issue
Box #2	Booklet entitled "Attorney General		
P-009712	Guidelines for Victim and Witness		N/A
Thru	Assistance" [not being withheld as		
P-009819	privileged – produced to opposing counsel]		
Box #2	File folder entitled "Corporate Liability	Work Product	Inadequate Log; No Factual Underpinnings;
P-009820	Rsrch" containing attorney research and		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-009965			Overriding Need; Attorney Conduct at Issue

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "Research re	Work Product	Inadequate Log; No Factual Underpinnings;
P-009966	Knowledge of Age Unnecessary"	6(e)	Fiduciary Duty; Not in Anticipation of
Thru	containing attorney research and		Litigation; Claims Against Public Prosecutor;
P-010096	handwritten notes and copy of grand jury		Overriding Need; Attorney Conduct at Issue;
	subpoena		Factual Materials; Court Authorized Under
			6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable
Box #2	File folder entitled "Money Laundering"	Work Product	Inadequate Log; No Factual Underpinnings;
P-010097	containing attorney research and		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-010276			Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "1960 &	Work Product	Inadequate Log; No Factual Underpinnings;
P-010277	Aiding/Abetting" containing attorney		Fiduciary Duty; Not in Anticipation of
Thru	research and handwritten notes		Litigation; Claims Against Public Prosecutor;
P-010394	FIL 6.11	***	Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "18 USC § 2255 Cases"	Work Product	Inadequate Log; No Factual Underpinnings;
P-010395	containing attorney research and		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-010488		W 1 D 1	Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "Research re Overt Acts	Work Product	Inadequate Log; No Factual Underpinnings;
P-010489	& Witness Testimony" containing attorney		Fiduciary Duty; Not in Anticipation of
Thru	research and handwritten notes		Litigation; Claims Against Public Prosecutor;
P-010509	File Calden and the GF-1111 22	W- d- Do- d4	Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "Extradition"	Work Product	Inadequate Log; No Factual Underpinnings;
P-010510	containing attorney research and		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-010525			Overriding Need; Attorney Conduct at Issue

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "Rsrch re Crime	Work Product	Inadequate Log; No Factual Underpinnings;
P-010526	Victims Rights" containing attorney	Deliberative Process	Fiduciary Duty; Crime-Fraud-Misconduct;
Thru	research, handwritten notes, draft victim		Crime-Fraud-Misconduct; Factual Materials;
P-010641	notification letter, and draft		Not in Anticipation of Litigation; Improper
	correspondence to Jay Lefkowitz		Invocation; Overriding Need; Claims Against
	(Also contains a November 28, 2007 letter		Public Prosecutor; Attorney Conduct at Issue
	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)		
Box #2	File folder entitled "Immunity" containing	Work Product	Inadequate Log; No Factual Underpinnings;
P-010642	attorney research on granting immunity to		Fiduciary Duty; Not in Anticipation of
Thru	witnesses		Litigation; Claims Against Public Prosecutor;
P-01650			Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "Research re G.J.	Work Product	Inadequate Log; No Factual Underpinnings;
P-010651	Transcript" containing attorney research	6(e)	Fiduciary Duty; Not in Anticipation of
Thru	and draft pleadings re compelling	Deliberative process	Litigation; Improper Invocation; Overriding
P-010659	production of grand jury transcript with		Need; Claims Against Public Prosecutor;
	subpoena		Attorney Conduct at Issue; Factual Materials;
			Court Authorized Under 6(e)(3)(E); Court
			Inherent Power to Release; Proper Victim's
			Petition; CVRA-authorized release; Material
			Severable

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "Research re GJ	Work Product	Inadequate Log; No Factual Underpinnings;
P-010660	Transcript" containing grand jury	6(e)	Fiduciary Duty; Not in Anticipation of
Thru	subpoena, 6(e) letters, attorney research		Litigation; Claims Against Public Prosecutor;
P-010757	and correspondence related to subpoena		Overriding Need; Attorney Conduct at Issue;
			Factual Materials; Court Authorized Under
			6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable
Box #2	File folder entitled "Original Proposed	Work Product	Inadequate Log; No Factual Underpinnings;
P-010758	Ind." containing draft indictment	6(e)	Fiduciary Duty; Not in Anticipation of
Thru		Deliberative process	Litigation; Improper Invocation; Overriding
P-010793			Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue; Factual Materials;
			Court Authorized Under 6(e)(3)(E); Court
			Inherent Power to Release; Proper Victim's
			Petition; CVRA-authorized release; Material Severable
Box #2	File folder entitled "Epstein" containing	Work Product	Inadequate Log; No Factual Underpinnings;
P-010794	sample indictments and attorney research	work I foduct	Fiduciary Duty; Not in Anticipation of
Thru	re potential charges with attorney notes		Litigation; Claims Against Public Prosecutor;
P-010829	re potential charges with attorney notes		Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "1591 & Money	Work Product	Inadequate Log; No Factual Underpinnings;
P-010830	Laundering" containing attorney research	,, oil I loude	Fiduciary Duty; Not in Anticipation of
Thru	and handwritten notes		Litigation; Claims Against Public Prosecutor;
P-010853			Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "18 USC 2425"	Work Product	Inadequate Log; No Factual Underpinnings;
P-010854	containing attorney research and		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-010876			Overriding Need; Attorney Conduct at Issue

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "Knowledge of Age"	Work Product	Inadequate Log; No Factual Underpinnings;
P-010877	containing attorney research and		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-010920			Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "2423(b)	Work Product	Inadequate Log; No Factual Underpinnings;
P-010921	Constitutionality and Purpose of Travel"		Fiduciary Duty; Not in Anticipation of
Thru	containing attorney research and		Litigation; Claims Against Public Prosecutor;
P-011049	handwritten notes		Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "Mistake not a	Work Product	Inadequate Log; No Factual Underpinnings;
P-011050	Defense" containing attorney research and		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-011212			Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "Research re	Work Product	Inadequate Log; No Factual Underpinnings;
P-011213	'Pandering'" containing attorney research		Fiduciary Duty; Not in Anticipation of
Thru	and handwritten notes		Litigation; Claims Against Public Prosecutor;
P-011237			Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "Research re Grand	Work Product	Inadequate Log; No Factual Underpinnings;
P-011238	Jury Instructions" containing attorney	6(e)	Fiduciary Duty; Not in Anticipation of
Thru	research and handwritten notes		Litigation; Claims Against Public Prosecutor;
P-011319			Overriding Need; Attorney Conduct at Issue;
			Factual Materials; Court Authorized Under
			6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable
Box #2	File folder entitled "Telephone = Facility	Work Product	Inadequate Log; No Factual Underpinnings;
P-011320	of Commerce" containing attorney		Fiduciary Duty; Not in Anticipation of
Thru	research and handwritten notes		Litigation; Claims Against Public Prosecutor;
P-011361			Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "Def of Prostitution"	Work Product	Inadequate Log; No Factual Underpinnings;
P-011362	containing attorney research and		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-011374			Overriding Need; Attorney Conduct at Issue

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #2	File folder entitled "Relevant Florida	Work Product	Inadequate Log; No Factual Underpinnings;
P-011375	Statutes" containing attorney research and		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-011456			Overriding Need; Attorney Conduct at Issue
Box #2	File folder entitled "Unit of Prosecution	Work Product	Inadequate Log; No Factual Underpinnings;
P-011457	Research" containing attorney research and		Fiduciary Duty; Not in Anticipation of
Thru	handwritten notes		Litigation; Claims Against Public Prosecutor;
P-011626			Overriding Need; Attorney Conduct at Issue
Box #3	File folder entitled "Attorney Notes"	Work Product	Inadequate Log; No Factual Underpinnings;
P-011627	containing attorney handwritten and typed		Fiduciary Duty; Not in Anticipation of
Thru	notes		Litigation; Claims Against Public Prosecutor;
P-011662			Overriding Need; Attorney Conduct at Issue
Box #3	File folder entitled "Drafts" containing	6(e)	Inadequate Log; No Factual Underpinnings;
P-011663	draft indictments with attorney handwritten	Work Product	Fiduciary Duty; Factual Materials; Not in
Thru	notes, draft internal memoranda, relevant	Deliberative Process	Anticipation of Litigation; Improper
P-011698 and	witness interview reports and grand jury	Investigative Privilege	Invocation; Overriding Need; Claims Against
P-012189 thru	material and attorney handwritten notes	Contains information	Public Prosecutor; Attorney Conduct at Issue;
P-012361		subject to privacy rights of	Factual Materials; Court Authorized Under
(gap was		victims who are not	6(e)(3)(E); Court Inherent Power to Release;
scanning		parties to this	Proper Victim's Petition; CVRA-authorized
error)			release; Material Severable; Redaction; No
			Assertion by Victims
Box #3	File folder entitled "6/9/09 Signed	6(e)	Inadequate Log; No Factual Underpinnings;
P-011699	Indictment" containing signed indictment	Work product	Fiduciary Duty; Not in Anticipation of
Thru	package dated 6/9/2009 with corrections	Deliberative process	Litigation; Improper Invocation; Overriding
P-011777			Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue; Factual Materials;
			Court Authorized Under 6(e)(3)(E); Court
			Inherent Power to Release; Proper Victim's
			Petition; CVRA-authorized release; Material
			Severable

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #3	File folder entitled "6/12/09 Victim Notif.	Work product	Inadequate Log; No Factual Underpinnings;
P-011778	Log" containing chart with victim contact		Fiduciary Duty; Crime-Fraud-Misconduct;
Thru	information and attorney notes regarding		Factual Materials; Not in Anticipation of
P-011788	dates and type of contacts		Litigation; Claims Against Public Prosecutor;
			Overriding Need; Attorney Conduct at Issue
Box #3	File folder entitled "Breach Memo"	Work product	Inadequate Log; No Factual Underpinnings;
P-011789	containing memorandum analyzing breach	Deliberative process	Fiduciary Duty; Not in Anticipation of
Thru	of Non-Prosecution Agreement with		Litigation; Improper Invocation; Overriding
P-011879	attachments		Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue; Factual Materials
Box #3	File folder entitled "Overt Act Lists"	Work product	Inadequate Log; No Factual Underpinnings;
P-011880	containing handwritten notes cross-	Attorney-client privilege	Fiduciary Duty; Factual Materials; Not in
Thru	checking all overt acts alleged in draft	Deliberative process	Anticipation of Litigation; Ordinary
P-011922	indictment by victim and typed overt act	6(e)	Government Communication; No Attorney-
	summary charts for indictment preparation		Client Relationship; Improper Invocation;
			Overriding Need; Claims Against Public
			Prosecutor; Attorney Conduct at Issue; Factual
			Materials; Court Authorized Under 6(e)(3)(E);
			Court Inherent Power to Release; Proper
			Victim's Petition; CVRA-authorized release;
			Material Severable

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #3	Folder entitled "Responses to Arguments	Work product	No Factual Underpinnings; Fiduciary Duty;
P-011923	from JE Counsel" containing:	Deliberative process	Crime-Fraud-Misconduct; Crime-Fraud-
Thru	■ 7/13/2007 letter from Lilly Ann	6(e)	Misconduct; Not in Anticipation of Litigation;
P-011966	Sanchez to Andrew Lourie with handwritten attorney (Lourie)	Attorney-Client Privilege	Ordinary Government Communication; No Attorney-Client Relationship; Improper
	notes;		Invocation; Overriding Need; Claims Against
	■ 6/25/2007 letter from Gerald		Public Prosecutor; Attorney Conduct at Issue;
	Lefcourt to Jeffrey Sloman, Matt		Factual Materials; Court Authorized Under
	Menchal, Andrew Lourie, and		6(e)(3)(E); Court Inherent Power to Release;
	Marie Villafaña with handwritten		Proper Victim's Petition; CVRA-authorized
	attorney (Villafaña) notes;		release; Material Severable
	■ 6/25/2007 email from Andrew		
	Lourie to Matt Menchel and Marie		
	Villafaña entitled "Thoughts on		
	Lefcourt's letter"		
	Handwritten and typed attorney (Villafaña)		
	notes regarding main themes raised by		
	Epstein counsel		
Box #3	Composition book entitled "Operation	Work product	Inadequate Log; No Factual Underpinnings;
P-011967	Leap Year" containing attorney	Investigative privilege	Fiduciary Duty; Factual Materials; Not in
Thru	handwritten notes regarding investigation	6(e)	Anticipation of Litigation; Improper
P-012016	and case strategy	Contains information	Invocation; Overriding Need; Claims Against
		subject to privacy rights of	Public Prosecutor; Attorney Conduct at Issue;
		victims who are not	Factual Materials; Court Authorized Under
		parties to this litigation	6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #3	Motion of Jeffrey Epstein to Intervene and	6(e)	Inadequate Log; No Factual Underpinnings;
P-012017	to Quash Grand Jury Subpoenas and		Fiduciary Duty; Factual Materials; Court
Thru	Incorporated Memorandum of Law		Authorized Under 6(e)(3)(E); Court Inherent
P-012055			Power to Release; Proper Victim's Petition;
			CVRA-authorized release; Material Severable
Box #3	Affidavit of Roy Black, Esq. in Support of	6(e)	Inadequate Log; No Factual Underpinnings;
P-012056	Motion of Jeffrey Epstein to Intervene and		Fiduciary Duty; Factual Materials; Court
Thru	to Quash Grand Jury Subpoenas		Authorized Under 6(e)(3)(E); Court Inherent
P-012088			Power to Release; Proper Victim's Petition;
			CVRA-authorized release; Material Severable
Box #3	United States' Response to Motion of	6(e)	Inadequate Log; No Factual Underpinnings;
P-012089	Jeffrey Epstein to Intervene and to Quash		Fiduciary Duty; Factual Materials; Court
Thru	Grand Jury Subpoenas and Cross-Motion		Authorized Under 6(e)(3)(E); Court Inherent
P-012129	to Compel		Power to Release; Proper Victim's Petition;
			CVRA-authorized release; Material Severable
Box #3	Declaration of Joseph Recarey	6(e)	Inadequate Log; No Factual Underpinnings;
P-012130			Fiduciary Duty
Thru			
P-012150			
Box #3	Ex Parte Declaration Number One in	6(e)	Inadequate Log; No Factual Underpinnings;
P-012151	Support of United States' Response to	Investigative Privilege	Fiduciary Duty; Factual Materials; Not in
Thru	Motion to Quash Subpoenas	Also contains information	Anticipation of Litigation; Improper
P-012167		subject to privacy rights of	Invocation; Overriding Need; Factual
		victims who are not	Materials; Court Authorized Under 6(e)(3)(E);
		parties to this litigation	Court Inherent Power to Release; Proper
			Victim's Petition; CVRA-authorized release;
			Material Severable; Redaction; No Assertion
			by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #3	Ex Parte Declaration Number Two in	6(e)	Inadequate Log; No Factual Underpinnings;
P-012168	Support of United States' Response to	Investigative Privilege	Fiduciary Duty; Not in Anticipation of
Thru	Motion to Quash Subpoenas		Litigation; Improper Invocation; Overriding
P-012170			Need; Factual Materials; Court Authorized
			Under 6(e)(3)(E); Court Inherent Power to
			Release; Proper Victim's Petition; CVRA-
			authorized release; Material Severable
Box #3	Supplement to Ex Parte Declaration	6(e)	Inadequate Log; No Factual Underpinnings;
P-012171	Number One in Support of United States'	Investigative Privilege	Fiduciary Duty; Factual Materials; Not in
Thru	Response to Motion to Quash Subpoenas	Also contains information	Anticipation of Litigation; Improper
P-012173		subject to privacy rights of	Invocation; Overriding Need; Factual
		victims who are not	Materials; Court Authorized Under 6(e)(3)(E);
		parties to this litigation	Court Inherent Power to Release; Proper
			Victim's Petition; CVRA-authorized release;
			Material Severable; Redaction; No Assertion
			by Victims
Box #3	Draft of September 2009 letter from Marie	Work Product	Inadequate Log; No Factual Underpinnings;
P-012174	Villafaña to Roy Black regarding breach of	Attorney-Client Privilege	Fiduciary Duty; Not in Anticipation of
Thru	Non Prosecution Agreement with	Deliberative Process	Litigation; Ordinary Government
P-012176	handwritten attorney (Villafaña) notes		Communication; No Attorney-Client
			Relationship; Improper Invocation; Overriding
			Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue
Box #3	Undated handwritten attorney (Villafaña)	Work Product	Inadequate Log; No Factual Underpinnings;
P-012177	notes regarding negotiations and	Attorney-Client Privilege	Fiduciary Duty; Not in Anticipation of
Thru	allegations	Deliberative Process	Litigation; Ordinary Government
P-012178			Communication; No Attorney-Client
			Relationship; Improper Invocation; Overriding
			Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #3	File Folder entitled "FBI G.J. Log"	6(e)	Inadequate Log; No Factual Underpinnings;
P-012179	containing copy of FBI grand jury	Work Product	Fiduciary Duty; Factual Materials; Not in
Thru	subpoena log with attorney (Villafaña)	Investigative Privilege	Anticipation of Litigation; Improper
P-012188	handwritten notes	Also contains information	Invocation; Overriding Need; Claims Against
		subject to privacy rights of	Public Prosecutor; Attorney Conduct at Issue;
		victims who are not	Factual Materials; Court Authorized Under
		parties to this litigation	6(e)(3)(E); Court Inherent Power to Release;
			Proper Victim's Petition; CVRA-authorized
			release; Material Severable; Redaction; No
			Assertion by Victims
Box #3	File folder entitled "Key Documents"	6(e)	Inadequate Log; No Factual Underpinnings;
P-012362	containing correspondence between AUSA	Work Product	Fiduciary Duty; Factual Materials; Not in
Thru	and case agent regarding indictment prep	Attorney-Client privilege	Anticipation of Litigation; Ordinary
P-012451	questions, victim identification	Investigative Privilege	Government Communication; No Attorney-
	information, corrections to draft	Also contains information	Client Relationship; Improper Invocation;
	indictment, indictment preparation	subject to privacy rights of	Overriding Need; Claims Against Public
	timeline, key grand jury material	victims who are not	Prosecutor; Attorney Conduct at Issue; Factual
		parties to this litigation	Materials; Court Authorized Under 6(e)(3)(E);
			Court Inherent Power to Release; Proper
			Victim's Petition; CVRA-authorized release;
			Material Severable; Redaction; No Assertion
D #2	T:1. C-11(1.1 (67)(1 T)	W- d- Do- d- d	by Victims
Box #3	File folder entitled "Victim List"	Work Product	Inadequate Log; No Factual Underpinnings;
P-012451	containing list of victims with dates of	Investigative Privilege	Fiduciary Duty; Factual Materials; Not in
Thru	birth and age information	Also contains information	Anticipation of Litigation; Improper
P-012452		subject to privacy rights of	Invocation; Overriding Need; Claims Against
		victims who are not	Public Prosecutor; Attorney Conduct at Issue;
		parties to this litigation	Redaction; No Assertion by Victims

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #3	Complete indictment package marked	Work-product	Inadequate Log; No Factual Underpinnings;
P-012453	"Originals 12/12/07"	Deliberative process	Fiduciary Duty; Factual Materials; Not in
Thru		6(e)	Anticipation of Litigation; Improper
P-012623		Also contains documents	Invocation; Overriding Need; Factual
		subject to investigative	Materials; Court Authorized Under 6(e)(3)(E);
		privilege	Court Inherent Power to Release; Proper
		Also contains documents	Victim's Petition; CVRA-authorized release;
		subject to privacy rights of	Material Severable; Redaction; No Assertion
		victims who are not	by Victims
		parties to this litigation	
Box #3	Folder entitled "(Victims) Additional	Investigative Privilege	Inadequate Log; No Factual Underpinnings;
P-012624	302's" containing reports of interviews	Also contains documents	Fiduciary Duty; Factual Materials; Not in
Thru	conducted in June 2007, October 2007, and	subject to privacy rights of	Anticipation of Litigation; Improper
P-012653	March 2008.	victims who are not	Invocation; Overriding Need; Redaction; No
		parties to this litigation	Assertion by Victims
Box #3	3-ring binder entitled "Child Molesters: A	Work-product	Inadequate Log; No Factual Underpinnings;
P-012654	Behavioral Analysis" with attorney		Fiduciary Duty; Overriding Need
Thru	(Villafaña) handwritten notes		
P-012864			
Box #3	Indictment preparation binder containing:	Work Product	Inadequate Log; No Factual Underpinnings;
P-012865	witness/victim list with identifying	Deliberative Process	Fiduciary Duty; Factual Materials; Not in
Thru	information, sexual activity summary,	6(e)	Anticipation of Litigation; Improper
P-013226	telephone call summary chart, attorney	Also contains documents	Invocation; Overriding Need; Claims Against
	(Villafaña) handwritten notes, 302s,	subject to investigative	Public Prosecutor; Attorney Conduct at Issue;
	portions of state investigative file, attorney	privilege	Factual Materials; Court Authorized Under
	(Villafaña) typed notes, relevant pieces of	Also contains documents	6(e)(3)(E); Court Inherent Power to Release;
	grand jury materials, telephone	subject to privacy rights of	Proper Victim's Petition; CVRA-authorized
	records/flight records analysis charts,	victims who are not	release; Material Severable; Redaction; No
	victim/witness photographs, DAVID	parties to this litigation	Assertion by Victims
	records, NCICs, and related materials for		
	persons identified as Jane Does #9, 10, 11,		
	12, 13, 14		

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #3	April 23, 2008 Memo from Jeffrey Sloman	Privacy Act	Inadequate Log; No Factual Underpinnings;
P-013227	to Office of Professional Responsibility re		Fiduciary Duty; Crime-Fraud-Misconduct;
	Self Reporting, Corrected Version of the		Factual Materials; Court Compelled
	previously submitted April 21, 2008 Letter		Disclosure; Waiver
	to OPR		
Box #3	April 21, 2008 Letter from Jeffrey Sloman	Privacy Act	Inadequate Log; No Factual Underpinnings;
P-013226	to Office of Professional Responsibility re		Fiduciary Duty; Court Compelled Disclosure;
Thru	Self Reporting		Factual Materials; Waiver
P-013230			
Box #3	April 22, 2008 Letter from A. Marie	Privacy Act	Inadequate Log; No Factual Underpinnings;
P-013231	Villafaña to Office of Professional		Factual Materials; Fiduciary Duty; Court
Thru	Responsibility re Self-Report of Allegation		Compelled Disclosure; Waiver
P-013239	of Conflict of Interest		
Box #3	April 21, 2008 Letter from Jeffrey Sloman	Privacy Act	Inadequate Log; No Factual Underpinnings;
P-013240	to Office of Professional Responsibility re		Fiduciary Duty; Court Compelled Disclosure;
Thru	Self Reporting with attachments		Factual Materials; Waiver
P-013247			
Box #3	Emails between Richard Sudder, Assistant	Attorney-Client Privilege	No Factual Underpinnings; Fiduciary Duty;
P-013248	General Counsel, Executive Office for		Ordinary Government Communication; No
Thru	United States Attorneys, and Benjamin		Attorney-Client Relationship; Waiver
P-013251	Greenberg, First Assistant U.S. Attorney,		
	Southern District of Florida, regarding		
	Formal Notice of Office-wide Recusal of		
	Southern District of Florida dated August		
D #/2	24 and August 29, 2011	A. CIL D. I	N. D. allia de Bial de
Box #3	Emails between Richard Sudder, Assistant	Attorney-Client Privilege	No Factual Underpinnings; Fiduciary Duty;
P-013252	General Counsel, Executive Office for		Ordinary Government Communication; No
Thru	United States Attorneys, and Benjamin		Attorney-Client Relationship; Waiver
P-013253	Greenberg, First Assistant U.S. Attorney,		
	Southern District of Florida, regarding		
	Recusal matter, dated July 28, August 3,		
	and August 24, 2011		

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #3	Emails between Richard Sudder, Assistant	Attorney-Client Privilege	No Factual Underpinnings; Fiduciary Duty;
P-013254	General Counsel, Executive Office for		Ordinary Government Communication; No
Thru	United States Attorneys, and Benjamin		Attorney-Client Relationship; Waiver
P-013257	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		
Box #3	Emails between Richard Sudder, Assistant	Attorney-Client Privilege	No Factual Underpinnings; Fiduciary Duty;
P-013258	General Counsel, Executive Office for		Ordinary Government Communication; No
Thru	United States Attorneys, and Benjamin		Attorney-Client Relationship; Waiver
P-013259	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		
Box #3	and August 3, 2011 Email from Richard Sudder, Assistant	Attomay Client Drivilage	No Ecotual Undominaines, Eidusiany Duty
P-013260	General Counsel, Executive Office for	Attorney-Client Privilege	No Factual Underpinnings; Fiduciary Duty; Ordinary Government Communication; No
Thru	United States Attorneys, to Wifredo Ferrer		Attorney-Client Relationship; Waiver
P-013262	(U.S. Attorney, SDFL), Robert O'Neill		Attorney-Chefit Relationship, warver
1-013202	(U.S. Attorney, MDFL), Robert o Rein		
	Greenberg, (FAUSA, SDFL), and Lee		
	Bentley (FAUSA, MDFL) 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), Michelle Tapken (USAEO),		
	James Read (USAEO)		

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Box #3	Emails between Richard Sudder, Assistant	Attorney-Client Privilege	No Factual Underpinnings; Fiduciary Duty;
P-013263	General Counsel, Executive Office for	Deliberative Process	Not in Anticipation of Litigation; Ordinary
Thru	United States Attorneys, and Benjamin	Work Product	Government Communication; No Attorney-
P-013271	Greenberg, First Assistant U.S. Attorney,		Client Relationship; Improper Invocation;
	Southern District of Florida, regarding		Overriding Need; Claims Against Public
	recusal of Southern District of Florida,		Prosecutor; Attorney Conduct at Issue; Waiver
	dated July 29, 2011, with attached		
	memorandum from A. Marie Villafaña to		
	Benjamin Greenberg summarizing Jeffrey		
	Epstein Investigation		
Box #3	Emails between Peter Mason, Executive	Attorney-Client Privilege	No Factual Underpinnings; Fiduciary Duty;
P-013272	Office for United States Attorneys, and		Ordinary Government Communication; No
Thru	Dexter Lee, Southern District of Florida,		Attorney-Client Relationship; Factual
P-013278	seeking advice regarding office-wide		Materials; Waiver
	recusal, dated December 16 and 17, 2010,		
	with attached letter from Paul Cassell to		
	Wifredo A. Ferrer, dated December 10,		
a 1 5 40	2010		
Suppl. Box #3	8/15/08 Emails between A. Acosta and	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-013279	A. Marie Villafaña, R. Senior, D. Lee	Work Product	Fiduciary Duty; Crime-Fraud-Misconduct;
Thru	and K. Atkinson re proposed		Crime-Fraud-Misconduct; Not in Anticipation
P-013280	correspondence to Jay Lefkowitz		of Litigation; Ordinary Government
			Communication; No Attorney-Client
			Relationship; Claims Against Public
			Prosecutor; Overriding Need; Attorney
G 1 D #2		Att Cit t D : II	Conduct at Issue; Waiver
Suppl. Box #3	Handwritten note re Epstein investigation	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
		Work Product	Fiduciary Duty; Factual Materials; Not in
		Investigative privilege Also contains information	Anticipation of Litigation; Ordinary
			Government Communication; No Attorney-
		subject to privacy rights of victims who are not	Client Relationship; Improper Invocation;
		vicums who are not	Overriding Need; Claims Against Public

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
P-013281		parties to this litigation	Prosecutor; Attorney Conduct at Issue; Redaction; No Assertion by Victims
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	No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Crime-Fraud- Misconduct; Crime-Fraud-Misconduct; Factual Materials; Not in Anticipation of Litigation; Ordinary Government Communication; No Attorney-Client Relationship; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue; Waiver
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 e victim notification	Attorney-Client Privilege Work Product Deliberative Process	No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Factual Materials; Not in Anticipation of Litigation; Ordinary Government Communication; No Attorney- Client Relationship; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue; Waiver
Suppl. Box #3 P-013285 Thru P-013289	File folder entitled "8/5/08 AMCV email 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	No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Crime-Fraud- Misconduct; Not in Anticipation of Litigation; Ordinary Government Communication; No Attorney-Client Relationship; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Suppl. Box #3	File folder entitled "8/14/08 E-mail from	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-013290	Lefk to AMCV" containing (undated)	Work Product	Fiduciary Duty; Crime-Fraud-Misconduct; Not
Thru	emails from A. Marie Villafaña to R.		in Anticipation of Litigation; Ordinary
P-013292	Senior, J. Sloman, A. Acosta, K.		Government Communication; No Attorney-
	Atkinson, D. Lee re draft response to		Client Relationship; Claims Against Public
	8/14/08 email from J. Lefkowitz		Prosecutor; Overriding Need; Attorney
	regarding "the December 2007 proposal"		Conduct at Issue
Suppl. Box #3	File folder entitled "8/15/08 AMCV e-	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-013293	mail re Agrmt" containing 8/15/08 e-	Work Product	Fiduciary Duty; Crime-Fraud-Misconduct;
Thru	mails from A. Marie Villafaña to A.	Deliberative Process	Factual Materials; Not in Anticipation of
P-013299	Acosta, J. Sloman, R. Senior, K.		Litigation; Ordinary Government
	Atkinson, D. Lee re follow up on		Communication; No Attorney-Client
	Agreement and from A. Acosta to Ann		Relationship; Improper Invocation; Overriding
	Marie Villafana on issue of Special		Need; Claims Against Public Prosecutor;
	Master with attached 8/15/08 emails from		Attorney Conduct at Issue; Waiver
	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		
Cumpl Dow #2		Attomacy Client Duivile as	Inadaguata Lag. No Factual Underninnings
Suppl. Box #3 P-013300	File folder entitled "8/18/08 Lefkowitz Ltr to AMCV" containing A. Marie	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Not
P-013300 Thru	\mathcal{E}		
THITU	Villafaña's handwritten draft notes for		in Anticipation of Litigation; Ordinary

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
P-0133303	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	Work Product	Government Communication; No Attorney- Client Relationship; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue; Waiver
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Not in Anticipation of Litigation; Ordinary Government Communication; No Attorney- Client Relationship
Suppl. Box #3	File folder entitled "9/17/07 Villafaña	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-013326 Thru	Lefkowitz containing 9/17/07 e-mail from A. Marie Villafaña to R. Garcia, A. Lourie	Work Product	Fiduciary Duty; Not in Anticipation of Litigation; Ordinary Government
P-013329	and from R. Garcia to A. Marie Villafaña		Communication; No Attorney-Client
1 01002	concerning status of plea negotiations		Relationship; Claims Against Public
			Prosecutor; Overriding Need; Attorney
			Conduct at Issue
Suppl. Box #3	File folder entitled "11/8/07 Lefkowitz	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-013330	Sloman" containing 11/8/07 letter from	Work Product	Fiduciary Duty; Not in Anticipation of
Thru	J. Lefkowitz re issues arising during		Litigation; Ordinary Government
P-013333	pendency of matter with attorney handwritten notes		Communication; No Attorney-Client Relationship; Claims Against Public
	nandwritten notes		Prosecutor; Overriding Need; Attorney
			Conduct at Issue
Suppl. Box #3	File folder entitled "11/13/07 Sloman to	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-013334	Lefkowitz (was this sent?)" containing	·	Fiduciary Duty; Not in Anticipation of
Thru	draft 11/13/07 letter from J. Sloman		Litigation; Ordinary Government

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
P-013337	responding to J. Lefkowitz's letter	Work Product	Communication; No Attorney-Client
			Relationship; Claims Against Public
			Prosecutor; Overriding Need; Attorney
			Conduct at Issue
Suppl. Box #3	File folder entitled "12/6/07 Sloman to	[Not considered	N/A
P-013338	Lefkowitz" containing 12/5/07 faxed letter	privileged. Will be	
Thru	w/ cover sheet from K. Starr and J.	produced to opposing	
013341	Lefkowitz to A. Acosta	counsel upon lifting of	
Suppl. Box #3	File folder entitled "12/05/07 Starr to	stay] Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-013342	Acosta" containing drafts of 11/30/07	Work Product	Fiduciary Duty; Crime-Fraud-Misconduct;
Thru	letters from A. Acosta to K. Starr and	Deliberative Process	Factual Materials; Not in Anticipation of
P-013350	from J. Sloman to J. Lefkowitz re	Denociative 1 locess	Litigation; Ordinary Government
1 013350	performance and victim notification with		Communication; No Attorney-Client
	handwritten notes and edits by A. Marie		Relationship; Improper Invocation; Overriding
	Villafaña		Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue
Suppl. Box #3	File folder entitled "12/21/07 Lefkowitz	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-13351	Acosta" containing handwritten notes by	Work Product	Fiduciary Duty; Crime-Fraud-Misconduct; Not
Thru	A. Marie Villafaña, 12/21/07 letter		in Anticipation of Litigation; Ordinary
P-013361	from J. Lefkowitz to A. Acosta re		Government Communication; No Attorney-
	performance of NPA and appeal to		Client Relationship; Claims Against Public
	Washington with attorney handwritten		Prosecutor; Overriding Need; Factual
	notes		Materials; Attorney Conduct at Issue
Suppl. Box #3	File folder labeled "12/26/07 Lefkowitz	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-013362	to Acosta" containing 2 copies of draft	Work Product	Fiduciary Duty; Crime-Fraud-Misconduct; Not
Thru	letter from A. Acosta to J. Lefkowitz	Deliberative Process	in Anticipation of Litigation; Ordinary
P-013366	(with 12/28/07 fax header)		Given Polyticachine Learner Learner Learner
			Client Relationship; Improper Invocation;
			Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue
Suppl Dov #2	File folder labeled "Droft ltn from	Attornovy Client Driviless	, ,
Suppl. Box #3	File folder labeled "Draft ltr from	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
P-013367	Sloman to Lefkowitz re termination"	Work Product	Fiduciary Duty; Not in Anticipation of
Thru	containing draft letter dated "April,		Litigation; Ordinary Government
P-013372	2008" from J. Sloman to J. Lefkowitz		Communication; No Attorney-Client
	concerning the compliance with the		Relationship; Claims Against Public
	Agreement		Prosecutor; Overriding Need; Attorney Conduct at Issue
Suppl. Box #3	File folder labeled "6/3/08 Sloman	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-013373	Submission to the DAG" containing	Deliberative Process	Fiduciary Duty; Not in Anticipation of
Thru	6/3/08 letter from J. Sloman to Mark	Work Product	Litigation; Ordinary Government
P-013503	Filip, Office of the DAG, cc'd to R.	Investigative privilege	Communication; No Attorney-Client
	Senior, A. Marie Villafaña, K. Atkinson,		Relationship; Improper Invocation; Overriding
	re Jeffrey Epstein, detailing events		Need; Claims Against Public Prosecutor;
	concerning the Agreement and thereafter and with relevant attachments		Overriding Need; Attorney Conduct at Issue; Waiver
Suppl. Box #3	File folder labeled "Mtg w/ Ken Starr,	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-013504	RAA, JS, Drew" containing handwritten	Work Product	Fiduciary Duty; Not in Anticipation of
Thru	notes by A. Marie Villafaña	Work Froduct	Litigation; Ordinary Government
P-013507			Communication; No Attorney-Client
			Relationship; Claims Against Public
			Prosecutor; Overriding Need; Attorney
			Conduct at Issue; Waiver
Suppl. Box #3	File folder labeled "Internal Corr."	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-013508	containing 11/28/07 e-mails from J.	Work Product	Fiduciary Duty; Crime-Fraud-Misconduct;
Thru	Sloman to A. Marie Villafaña re		Factual Materials; Not in Anticipation of
P-013514	responding to 11/28/07 e-mail from J.		Litigation; Ordinary Government
	Lefkowitz to J. Sloman regarding victim		Communication; No Attorney-Client
	notification with attachments		Relationship; Claims Against Public Prosecutor; Overriding Need; Attorney
			Conduct at Issue; Factual Materials; Waiver
Suppl. Box #3	Draft 11/30/07 letter from A. Acosta to	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-013515	K. Starr cc'd to J. Sloman and A. Marie	Work Product	Fiduciary Duty; Crime-Fraud-Misconduct; Not
Thru	Villafaña re compliance with Agreement		in Anticipation of Litigation; Ordinary

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
P-013525	and internal emails from J. Sloman, A. Acosta, and A. Lourie re items to address in letter	Deliberative Process	Government Communication; No Attorney- Client Relationship; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue; Waiver; Factual Materials
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Not in Anticipation of Litigation; Ordinary Government Communication; No Attorney-Client Relationship; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue; Factual Materials
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Factual Materials; Not in Anticipation of Litigation; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
Suppl. Box #3 P-013531	Typed note addressed to "Dear David" re response to grand jury subpoena	6(e) Investigative privilege	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Not in Anticipation of Litigation; Improper Invocation; Overriding Need; Factual Materials; Court Authorized Under 6(e)(3)(E); Court Inherent Power to Release; Proper Victim's Petition; CVRA-authorized release; Material Severable
Suppl. Box #3 P-013538 Thru	File folder labeled "Notes Re Post- Agreement Communications" containing	Work Product	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Not in Anticipation of Litigation; Improper Invocation; Overriding

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
P-013553	handwritten notes by A. Marie Villafaña	Deliberative Process	Need; Claims Against Public Prosecutor; Attorney Conduct at Issue; Factual Materials
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 yillafaña 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 R. Garcia, A. Lourie re negotiation strategy; ■ 9/14/07 e-mail from A. Marie Villafaña to 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	Attorney-Client Privilege Work Product Deliberative Process Investigative Privilege	No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Not in Anticipation of Litigation; Ordinary Government Communication; No Attorney-Client Relationship; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue; Waiver; Final Decision

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Bates Range	Description	Privilege(s) Asserted	Victims' Objections
	■ 9/11/07 e-mail from A. Marie	<u> </u>	
	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;		
	■ 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		
	ivianc viniarana ie charging strategy		

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
	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. MarieVillafaña re non-prosecution agree 9/11/07 e-mail from J. Sloman to A. MarieVillafaña re non-prosecution agree 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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Not in Anticipation of Litigation; Improper Invocation; Overriding Need; Factual Materials; Court Authorized Under 6(e)(3)(E); Court Inherent Power to Release; Proper Victim's Petition; CVRA-authorized release; Material Severable
Suppl. Box #3 P-013616	File folder entitled "Atty Notes re Revised Indictment" containing	Attorney-Client Privilege Deliberative Process	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Factual Materials; Not in

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Thru P-013621	handwritten notes by A. Marie Villafaña	Work Product Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation	Anticipation of Litigation; Ordinary Government Communication; No Attorney- Client Relationship; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue
Suppl. Box #3 P-013622 Thru P-013643	File folder entitled "Research Re Possible Misdemeanors" containing attorney research	Work product	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Not in Anticipation of Litigation; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Factual Materials; Not in Anticipation of Litigation; Ordinary Government Communication; No Attorney-Client Relationship; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue; Waiver
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Not in Anticipation of Litigation; Ordinary Government Communication; No Attorney-Client Relationship; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue
Suppl. Box #3 P-0013747	File folder entitled "Draft Non- Prosecution Agreements" containing	Attorney-Client Privilege Work Product	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Not in Anticipation of

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Thru	several draft non- prosecution agreements	Deliberative Process	Litigation; Ordinary Government
P-013810	some with handwritten notes by A. Marie		Communication; No Attorney-Client
	Villafaña; plea sheet State Circuit Court;		Relationship; Improper Invocation; Overriding
	copies of draft Information; draft plea		Need; Claims Against Public Prosecutor;
	proffer; draft motion and order to seal;		Attorney Conduct at Issue; Factual Materials
	draft penalty sheet; draft plea agreement		
Suppl. Box 3	File folder entitled "Information Packet	Attorney-Client Privilege	Inadequate Log; No Factual Underpinnings;
P-013811	Drafts" containing several drafts of	Work Product	Fiduciary Duty; Not in Anticipation of
Thru	Informations, and complete draft	Deliberative Process	Litigation; Ordinary Government
P-013833	Information packet		Communication; No Attorney-Client
			Relationship; Improper Invocation; Overriding
			Need; Claims Against Public Prosecutor;
1 1 2 2 2			Attorney Conduct at Issue
Suppl. Box 3 P-	Two pages of filed document, D.E. 62,	Atty work-product	Inadequate Log; No Factual Underpinnings;
013834	page 2 of 54 and page 6 of 54,		Fiduciary Duty; Claims Against Public
Through P-	containing handwritten attorney notes		Prosecutor; Overriding Need; Attorney
013835	D1 D 1 D 1 M A C1	A 44 1 1 4	Conduct at Issue
Suppl. Box 3 P-013836	Palm Beach Daily News Article,	Atty work-product	Inadequate Log; No Factual Underpinnings;
Thru	"Attorneys want Jeffrey Epstein Agreement Thrown Out," with		Fiduciary Duty; Claims Against Public Prosecutor; Overriding Need; Attorney
P-013837	attorney's notes written on margin		Prosecutor; Overriding Need; Attorney Conduct at Issue
Suppl. Box 3	Letter from Paul Cassell to Wifredo A.	Atty work-product	Inadequate Log; No Factual Underpinnings;
P-013838	Ferrer, December 10, 2010, Subject:	Atty work-product	Fiduciary Duty; Claims Against Public
Thru	Request for Investigation of Jeffrey Epstein		Prosecutor; Overriding Need; Attorney
P-013841	Prosecution, with underlines, written notes,		Conduct at Issue
1 013041	and comments by DOJ attorney		Conduct at 19940
Suppl. Box 3	Email from Dexterr Lee to Ruth	Atty work-product	Inadequate Log; No Factual Underpinnings;
P-013842	Plagenhoef (OPR), February 25, 2011,	Atty-client privilege	Fiduciary Duty; Crime-Fraud-Misconduct;
	4:31 p.m., Re: request for OPR	, r8	Factual Materials; Ordinary Government
	Investigation – Jeffrey Epstein Non-		Communication; No Attorney-Client
	Prosecution Agreement		Relationship; Claims Against Public
			Prosecutor; Overriding Need; Attorney

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
			Conduct at Issue
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Ordinary Government Communication; No Attorney-Client Relationship; Waiver; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue Waiver
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	No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Crime-Fraud- Misconduct; Waiver; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	No Factual Underpinnings; Fiduciary Duty; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
Suppl. Box 3	E-mail, Marie Villafana to Jeff Sloman	Atty work-product	Inadequate Log; No Factual Underpinnings;

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
P-013855	and Andrew Lourie, September 10, 2007, 5:24 p.m., RE: FBI	Atty-client privilege	Fiduciary Duty; Ordinary Government; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue Communication; No Attorney-Client Relationship
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	No Factual Underpinnings; Fiduciary Duty; Ordinary Government Communication; No Attorney-Client Relationship; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	No Factual Underpinnings; Fiduciary Duty; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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]	N/A
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Ordinary Government Communication; No Attorney-Client Relationship; Waiver; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Waiver; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
Suppl. Box 3 P-013867 Thru	E-mail, Marie Villafana to Matthew Menchel, June 21, 2007, 3:24 p.m., RE: Meeting Next Week, with e-mails from	Atty work-product	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Waiver; Claims Against Public Prosecutor;

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
P-013868	Menchel to Villafana (June 21, 2007, 2:58		Overriding Need; Attorney Conduct at Issue
	p.m.), and Villafana to Menchel (June 21, 2007, 1:37 p.m.), attached		
Suppl. Box 3	E-mail, Marie Villafana to Matthew	Atty work-product	Inadequate Log; No Factual Underpinnings;
P-013869	Menchel, Jeff Sloman, Andrew Lourie, and		Fiduciary Duty; Crime-Fraud-Misconduct;
	Karen Atkinson, June 18, 2007, 5:04 p.m.,		Waiver; Claims Against Public Prosecutor;
	RE: Epstein		Overriding Need; Attorney Conduct at Issue
Suppl. Box 3 P-013870	E-mail, Andrew Lourie to Marie	Atty work-product	Inadequate Log; No Factual Underpinnings;
Thru	Villafana, May 24, 2007, 9:25 a.m., FW: Jeffrey Epstein, with e-mail from Gerald		Fiduciary Duty; Claims Against Public Prosecutor; Overriding Need; Attorney
P-013871	Lefcourt to Andrew Lourie (May 23,		Conduct at Issue
1 013071	2007, 5:00 p.m.), Andrew Lourie to		Conduct at 15500
	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		
Suppl. Box 3	E-mail, Andrew Lourie to Matthew	Atty work-product	Inadequate Log; No Factual Underpinnings;
P-013872	Menchel, Jeff Sloman, and Marie		Fiduciary Duty; Crime-Fraud-Misconduct; Waiver; Claims Against Public Prosecutor;
	Villafana, May 22, 2007, 3:11 p.m., FW: Jeffrey Epstein, with e-mail from		Overriding Need; Attorney Conduct at Issue
	Lefcourt to Lourie, Villafana, and Lilly		Overriding reed, Attorney Conduct at issue
	Ann Sanchez (May 22, 2007, 2:05 p.m.),		
	attached		
Suppl. Box 3	E-mail Menchel to Villafana and Lourie,	Atty work-product	Inadequate Log; No Factual Underpinnings;
P-013873	May 14, 2007, 10:52 a.m., RE:		Fiduciary Duty; Crime-Fraud-Misconduct;
	Operation Leap Year, with e-mail from		Waiver; Claims Against Public Prosecutor;
	Villafana to Lourie and Menchel (May		Overriding Need; Attorney Conduct at Issue
Cumpl Day	14, 2007, 10:38 a.m.), attached		N/A
Suppl. Box 3 P-	Inadvertently marked as privileged, will be produced		IN/A
013874	be produced		
013874			

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
Through			
P-013875			
Suppl. Box 3	E-mail, Villafana to Lourie, Garcia, and	Atty work-product	Inadequate Log; No Factual Underpinnings;
P-013876	Atkinson, September 19, 2007, 4:33 p.m.,		Fiduciary Duty; Waiver; Claims Against
Thru	RE: Draft Plea Agreement, with e-mail		Public Prosecutor; Overriding Need; Attorney
P-013877	from Lefkowitz to Villafana (September		Conduct at Issue
	19, 2007, 3:44 p.m.), and Lefkowitz to Villafana (September 19, 2007, 3:35 p.m.)		
	attached		
Suppl. Box 3	E-mail, Lourie to Villafana, September 19,	Atty work-product	Inadequate Log; No Factual Underpinnings;
P-013878	2007, 4:21 p.m., RE: Epstein, with e-mails	Titty work product	Fiduciary Duty; Claims Against Public
Thru	from Villafana to Lourie and Garcia		Prosecutor; Overriding Need; Attorney
P-013879	(September 19, 2007, 4:13 p.m.),		Conduct at Issue
	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		
G 1.D 2	(September 19, 2007, 2:31 p.m.), attached		N. F. J. W. J. J. J. B. J. J. B. J. J. B. J. J. B. J.
Suppl. Box 3	E-mail, Villafana to Lourie, Garcia, and	Atty work-product	No Factual Underpinnings; Fiduciary Duty;
P-013880	Atkinson, September 18, 2007, 11:43		Waiver; Claims Against Public Prosecutor;
Thru P-013882	a.m., RE: Draft Agreements?, with e-mails from Villafana to Lourie, Garcia and		Overriding Need; Attorney Conduct at Issue
F-013004	Atkinson (September 18, 2007, 11:18a.m.),		
	Atkinson (September 16, 2007, 11.16d.III.),		

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
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	No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Waiver; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Waiver; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Waiver; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Ordinary Government Communication; No Attorney-Client Relationship; Waiver; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Ordinary Government Communication; No Attorney-Client Relationship; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
Suppl. Box 3	Email, Gerald Lefcourt to Marie Villafana, Lilly Ann Sanchez, Roy	[Not considered privileged. Will be	N/A

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
P-013892	Black, re: Jeffrey Epstein	produced to opposing	
Through		counsel upon lifting of	
P-013893		stay]	
Suppl. Box 3	E-mail, Marie Villafana to Matthew	Atty work-product	Inadequate Log; No Factual Underpinnings;
P-013894	Menchel, July 13, 2007, 3:14 p.m., RE:	atty-client privilege	Fiduciary Duty; Crime-Fraud-Misconduct;
Thru	Epstein, with e- mail from Menchel (July		Ordinary Government Communication; No
P-013898	5, 2007, 3:30 p.m.), Villafana to Menchel (July 4, 2007, 5:16 p.m.), and		Attorney-Client Relationship; Claims Against Public Prosecutor; Overriding Need; Attorney
	Sloman to Villafana (July 3, 2007, 1:47		Conduct at Issue
	p.m.), attached		Conduct at Issue
Suppl. Box 3	E-mail, Marie Villafana to Jeff Sloman,	Atty work-product	Inadequate Log; No Factual Underpinnings;
P-013899	Matthew Menchel, Andrew Lourie,	They work product	Fiduciary Duty; Crime-Fraud-Misconduct;
	Karen Atkinson, and Shawn Ball, July 3,		Waiver; Claims Against Public Prosecutor;
	2007, 6:26 a.m., RE: Epstein		Overriding Need; Attorney Conduct at Issue
Suppl. Box 3	E-mail, Marie Villafana to Matthew	Atty work-product	Inadequate Log; No Factual Underpinnings;
P-013900	Menchel, June 21, 2007, 3:24 p.m., RE:		Fiduciary Duty; Crime-Fraud-Misconduct;
Thru	Meeting Next Week, with e-mails from		Claims Against Public Prosecutor; Overriding
P-013901	Menchel to Villafana (June 21, 2007, 2:58		Need; Attorney Conduct at Issue
	p.m.), and Villafana to Menchel (June 21,		
G 1 D 2	2007, 1:37 p.m.), attached		
Suppl. Box 3	E-mail, Marie Villafana to Matthew	Atty work-product	Inadequate Log; No Factual Underpinnings;
P-013902	Menchel, Jeff Sloman, Andrew Lourie, and		Fiduciary Duty; Crime-Fraud-Misconduct;
	Karen Atkinson, June 18, 2007, 5:04 p.m.,		Waiver; Claims Against Public Prosecutor;
Suppl. Box 3	RE: Epstein E-mail, Andrew Lourie to Marie	Atty work-product	Overriding Need; Attorney Conduct at Issue Inadequate Log; No Factual Underpinnings;
P-013903	Villafana, May 24, 2007, 9:25 a.m., FW:	Ally Work-product	Fiduciary Duty; Waiver; Claims Against
Thru	Jeffrey Epstein, with e-mail from Gerald		Public Prosecutor; Overriding Need; Attorney
P-013904	Lefcourt to Andrew Lourie (May 23,		Conduct at Issue
	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		

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
	Sanchez (May 22, 2007, 2:05 p.m.), attached		
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
Suppl. Box 3 P- 013907 Through P-013908	Inadvertently marked as privileged, will be produced		N/A
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Factual Materials; Improper Invocation; Final Decision; Waiver; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Factual Materials; Improper Invocation; Waiver; Final Decision; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
Suppl. Box 3	Memorandum, Lisa Howard, Assistant	Deliberative Process	Inadequate Log; No Factual Underpinnings;

	Counsel, OPR, to Ruth Plagenhoef,		
Thru /	- · · · · · · · · · · · · · · · · · · ·	Privilege; atty work-	Fiduciary Duty; Crime-Fraud-Misconduct;
	Acting Associate Counsel, OPR, Subject:	product	Factual Materials; Improper Invocation;
	Recommendation, with two post-it notes		Waiver; Final Decision; Claims Against Public
	attached with handwritten attorney		Prosecutor; Overriding Need; Attorney
	notations, and handwritten notations,		Conduct at Issue
	underlines, and circled text throughout		
	the body of the two page memorandum	D 11 / D	
	Draft letter, marked "Confidential", from Robin C. Ashton, Counsel, Office of	Deliberative Process	Inadequate Log; No Factual Underpinnings;
	Professional Responsibility to Wifredo A.	Privilege Attorney Work Product	Fiduciary Duty; Not in Anticipation of Litigation; Improper Invocation; Overriding
P-013921	Ferrer, United States Attorney, with	Attorney Work Floduct	Need; Claims Against Public Prosecutor;
	handwritten corrections, strikethroughs,		Attorney Conduct at Issue; Waiver; Final
	and added text		Decision
	Draft Letter, marked "Confidential", from	Deliberative Process	Inadequate Log; No Factual Underpinnings;
1.1	Robin C. Ashton, to Wifredo A. Ferrer,	Privilege	Fiduciary Duty; Not in Anticipation of
	with handwritten corrections	Attorney Work Product	Litigation; Improper Invocation; Overriding
P-013924		,	Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue
Suppl. Box 3	Draft Letter, from Robin C. Ashton to	Deliberative Process	Inadequate Log; No Factual Underpinnings;
	Professor Paul G. Cassell, with	Privilege	Fiduciary Duty; Not in Anticipation of
	handwritten correction	Attorney Work Product	Litigation; Improper Invocation; Overriding
P-013927			Need; Claims Against Public Prosecutor;
			Attorney Conduct at Issue
* *	Draft Letter, from Robin C. Ashton to	Deliberative Process	Inadequate Log; No Factual Underpinnings;
	Professor Paul G. Cassell, with	Privilege	Fiduciary Duty; Not in Anticipation of
	handwritten corrections	Attorney Work Product	Litigation; Improper Invocation; Overriding
P-013930			Need; Claims Against Public Prosecutor;
Suppl. Box 3 I	Draft Letter, from Robin C. Ashton to	Deliberative Process	Attorney Conduct at Issue Inadequate Log; No Factual Underpinnings;
	Professor Paul G. Cassell, with	Privilege	Fiduciary Duty; Not in Anticipation of
	handwritten corrections, circled text,	Attorney Work Product	Litigation; Improper Invocation; Overriding
P-013933	nandwitten corrections, effected text,	1 Morney Work I found	Need; Claims Against Public Prosecutor;

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
	strikethroughs, and additional text		Attorney Conduct at Issue
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Not in Anticipation of Litigation; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Not in Anticipation of Litigation; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue; Waiver
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	Inadequate Log; No Factual Underpinnings; Fiduciary Duty; Not in Anticipation of Litigation; Improper Invocation; Crime-Fraud- Misconduct; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue; Waiver; Final Decision; Factual Materials
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	No Factual Underpinnings; Fiduciary Duty; Not in Anticipation of Litigation; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue; Final Decision; Waiver
Suppl. Box 3 P-013944	E-mail, Plagenhoef to Howard, May 5, 2011, 11:17 a.m., RE: Re-write of Epstein letter your review, with e-mail from Howard to Plagenhoef (May 5, 2011, 11:08)	Deliberative Process Privilege	No Factual Underpinnings; Fiduciary Duty; Improper Invocation; Overriding Need; Final Decision; Waiver

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
	Plagenhoef to Howard (May 5, 2011, 11:01 a.m.), and Howard to Plagenhoef (May 5, 2011, 10:41), attached		
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	No Factual Underpinnings; Fiduciary Duty; Improper Invocation; Overriding Need
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	No Factual Underpinnings; Fiduciary Duty; Not in Anticipation of Litigation; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue; Final Decision; Waiver
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 investigatiory record	No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Factual Materials; Not in Anticipation of Litigation; Improper Invocation; Overriding Need; Claims Against Public Prosecutor; Attorney Conduct at Issue; Factual Materials; Final Decision
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	No Factual Underpinnings; Fiduciary Duty; Crime-Fraud-Misconduct; Factual Materials; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
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	No Factual Underpinnings; Fiduciary Duty; Ordinary Government Communication; No Attorney-Client Relationship; Claims Against Public Prosecutor; Overriding Need; Attorney Conduct at Issue
Suppl. Box 3	E-mail, Plagenhoef to Neil Hurley, OPR,	atty work-product, atty-	Inadequate Log; No Factual Underpinnings;

Bates Range	Description	Privilege(s) Asserted	Victims' Objections
P-013954	December 16, 2010, 10:59 a.m., FW: OPR	client privilege	Fiduciary Duty; Crime-Fraud-Misconduct;
Thru	Referral – Allegation of Misconduct –		Factual Materials; Ordinary Government
P-013955	U.S. Attorney's Office, S.D.Fla., with e-		Communication; No Attorney-Client
	mail from Dexter Lee to Plagenhoef		Relationship; Waiver; Claims Against Public
	(December 16, 2010, 10:22 a.m.),		Prosecutor; Overriding Need; Attorney
	attached. Handwritten attorney notations.		Conduct at Issue
Suppl. Box 3	Fourteen (14) pages of handwritten	atty work-product	Inadequate Log; No Factual Underpinnings;
P-013956	attorney notes on case, telephone		Fiduciary Duty; Material Severable; Crime-
Thru	interviews with DOJ attorneys		Fraud-Misconduct; Factual Materials; Claims
P-013846			Against Public Prosecutor; Overriding Need;
			Attorney Conduct At Issue.