

EXHIBIT 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 9:08-cv-80736-KAM

JANE DOE NO. 1 and JANE DOE NO. 2,

Petitioners,

vs.

UNITED STATES OF AMERICA,

Respondent.

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**VICTIMS FIRST AMENDED PETITION FOR ENFORCEMENT
OF THE CRIME VICTIMS' RIGHTS ACT**

COME NOW Jane Doe No. 1 and Jane Doe 2, to file this first amended petition for enforcement of rights under the Crime Victims' Rights Act (CVRA), 18 U.S.C. § 3771.

1. Petitioners Jane Doe No. 1, Jane Doe No. 2, Jane Doe, No. 3, and Jane Doe No. 4 (hereinafter collectively referred to as "the petitioners"), now adults, were as minor girls the victims of federal sex crimes committed by Jeffrey Epstein (hereinafter "Defendant") and by other co-conspirators between about 1998 and 2006. These crimes included sex trafficking of children (in violation of 18 U.S.C. § 1591), use of a means of interstate commerce entice a minor to commit prostitution (in violation of 18 U.S.C. § 2422), travel with intent to engage in illicit sexual conduct (in violation of 18 U.S.C. § 2423), wire fraud (in violation of 18 U.S.C. § 1343), and conspiracy to commit such crimes (in violation of 18 U.S.C. § 371). The Defendant and others committed these crimes within the jurisdiction of the Southern District of Florida in Palm Beach County,

Florida, as well as in other jurisdictions inside and outside the United States. The Defendant and his co-conspirators committed similar crimes against dozens of other victims.

2. Upon information and belief, in and around 2005 to 2007, the Defendant and others were the subject of a federal criminal investigation conducted by the United States Attorney's Office for the Southern District of Florida (hereafter "the U.S. Attorney's Office") for crimes committed against the petitioners and other similarly situated victims. In around September 2007, the Defendant and the U.S. Attorney's Office entered a non-prosecution agreement ("NPA"), under which the Defendant and other potential co-conspirators would not be prosecuted for their federal crimes against petitioners and other similarly-situated victims, in exchange for the Defendant's guilty plea to two state offenses, including solicitation of a minor for prostitution. On June 30, 2008, in the Circuit Court for Palm Beach, the Defendant entered his guilty plea to the State offenses and, pursuant to the previous agreement, was sentenced to 18 months in jail.

3. Upon information and belief, around and after September 2007, the Defendant and the U.S. Attorney's Office conspired together to make the NPA confidential and thereafter conceal its existence from the petitioners and other similarly situated victims for as long as possible. This conspiracy was designed to prevent the outcry that would have resulted from awareness by the petitioners, other victims, and members of the public that a wealthy, politically-connected defendant was receiving only a short county jail sentence for hundreds of federal sex crimes committed against minor girls. Among the means used by the conspiracy to conceal the existence of the non-prosecution agreement were false statements directed by the Office that the case was "still under investigation"

and the Office was considering whether to file charges, when in fact the Office had already entered into the NPA.

4. Under the Crime Victims Rights Act (CVRA), 18 U.S.C. § 3771, when the investigation had focused on the Defendant – and at all times thereafter – the petitioners and other similarly-situated crime victims had the rights (among others) to notice of their rights under the CVRA, to reasonably confer with the prosecutors, to notice of court hearings involving them, and to be treated with fairness.

5. By cooperating together to conceal the NPA's existence until after it has become fully effective – and by taking other improper steps to prevent the investigation and prosecution of the Defendant and his co-conspirators – the U.S. Attorney's Office and the Defendant denied and continues to deny petitioners and other similarly-situated victims their rights (among others) to reasonably confer with prosecutors about the NPA and other aspects of the case, to notice that the June 30, 2008, hearing related to crimes committed against them, to restitution, and to be treated with fairness.

WHEREFORE, the petitioners respectfully request this Court grant them appropriate remedies to fully enforce their rights, including (1) a declaration that the NPA is illegal and was entered into in violation of their rights, (2) a declaration that if after consultation with the victims the U.S. Attorney's Office determines that prosecution of Epstein and of others is appropriate then prosecution is permitted, (3) a declaration that the Office shall reasonably confer with the petitioners and other similarly-situated victims about whether to prosecute Epstein and his co-conspirators, (4) a release of all information surrounding the circumstances of the Office's initial decision not to pursue

criminal prosecution, and (5) all other appropriate remedies that the Court deems just and proper.

The petitioners request appropriate discovery and an evidentiary hearing to prove their allegations and secure the relief requested above.

DATED: February 6, 2015

Respectfully Submitted,

/s/ Bradley J. Edwards

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CERTIFICATE OF SERVICE

I certify that the foregoing document was served on February 6, 2015, on the following using the Court's CM/ECF system:

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