

From: '[REDACTED]' <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Subject: RE: Jeffrey Epstein/Ghislaine Maxwell/FOIA
Date: Wed, 10 Mar 2021 23:23:55 +0000

You can send a round-robin to the Civ Div. In addition to Radar, I did an Epstein search in caseview and here are another couple civ div matters that I think you're familiar with:
NYT v BOP, 2020V00220
Epstein victim Touhy requests, 2019V01791

FYI, FOIA litigation can be brought in the home district of the requester, or in DDC.

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, March 10, 2021 5:45 PM
To: [REDACTED]; [REDACTED]
Cc: [REDACTED] <[REDACTED]>; [REDACTED] [REDACTED] [REDACTED] <[REDACTED]>
Subject: RE: Jeffrey Epstein/Ghislaine Maxwell/FOIA

Ok thanks, that's helpful to know. How would we go about determining whether the civil division litigated any cases based on FOIA requests to other components?

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, March 10, 2021 5:44 PM
To: [REDACTED] <[REDACTED]>; [REDACTED]
Cc: [REDACTED] <[REDACTED]>; [REDACTED] [REDACTED] <[REDACTED]>
Subject: RE: Jeffrey Epstein/Ghislaine Maxwell/FOIA

Oh, sorry: our FOIA Tracking Database is designed to cover FOIA requests that are directed to our Office; it does not track FOIA requests to, e.g., the FBI, that end up in litigation in the SDNY and that our Civ Div defends.

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, March 10, 2021 5:40 PM
To: [REDACTED] <[REDACTED]>; [REDACTED]
Cc: [REDACTED] <[REDACTED]>; [REDACTED] [REDACTED] <[REDACTED]>
Subject: RE: Jeffrey Epstein/Ghislaine Maxwell/FOIA

Thanks, [REDACTED] [REDACTED] could you please check your records and let us know if there are any other cases? From [REDACTED]'s list, it seems like at least one case is missing (there is a civil case involving a FOIA request from Radar Online).

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, March 10, 2021 5:23 PM
To: [REDACTED] <[REDACTED]>; [REDACTED]
Cc: [REDACTED] <[REDACTED]>; [REDACTED] [REDACTED] <[REDACTED]>
Subject: RE: Jeffrey Epstein/Ghislaine Maxwell/FOIA

As we just discussed:
Here is what we have in our FOIA tracking database regarding Epstein FOIAs.
And also attached is the letter in PPI about discovery vs FOIA (see p. 8)

From: [REDACTED] <[REDACTED]>

Sent: Wednesday, March 10, 2021 5:20 PM

To: [REDACTED]

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: Jeffrey Epstein/Ghislaine Maxwell/FOIA

Hi [REDACTED]

Hope you're doing well. [REDACTED] and [REDACTED] and I are trying to assemble a list of every FOIA request our office has ever received (at any point) relating to Jeffrey Epstein and/or Ghislaine Maxwell. [REDACTED] suggested that you'd be the best point of contact to help us figure this out. Could you please send us the following information:

- A list of all FOIA requests our office has received;
- For each case, whether a production was made in response to the request; and
- Who the AUSA point of contact for the request is.

That would be a big help. Please let us know if you need any information from us to run the search.

Thanks very much,

[REDACTED]

[REDACTED]

Assistant United States Attorney
Southern District of New York

[REDACTED]
New York, NY 10007
[REDACTED]