

From: [REDACTED]
To: [REDACTED]
Subject: Re: JE estate meeting
Date: Sat, 21 Dec 2019 00:52:36 +0000

:)

Sent from my iPhone

On Dec 20, 2019, at 19:43, [REDACTED] wrote:

Ah, sorry, just saw this.

On Dec 20, 2019, at 5:22 PM, [REDACTED] wrote:

[REDACTED] I'm sorry – my colleagues remind me that this is inaccurate, defense counsel returned and/or destroyed discovery materials, pursuant to the protective order, following Epstein's suicide. So they won't be able to provide discovery materials. However, I believe they should separately have copies of the search warrant inventories which were of course provided separate from the protective order; if they don't, please let us know, and again we'll continue to try to figure out what if any obligations / restrictions we are subject to on the copies of inventory records that we have. Apologies for the confusion.

[REDACTED]

From: [REDACTED]
Sent: Friday, December 20, 2019 17:17
To: [REDACTED]
Cc: [REDACTED]

Subject: RE: JE estate meeting

[REDACTED]

We're not yet exactly sure what our ability is to provide to the Trustees what is effectively discovery in a now-defunct criminal case against Epstein himself; that said, I can convey that we did produce to defense counsel detailed search warrant returns in connection with the New York property. Perhaps you would be able to obtain those from Epstein's criminal defense counsel? In particular I believe what you're looking for would be especially at USAO_4381-4445, but potentially also USAO_2662-4380 (though I note that a handful of those pages were marked as Confidential under a protective order, as set forth in the discovery letter sent to counsel on July 31, 2019). We will also review the status of the search warrant return with respect to the island property (and we have not searched the New Mexico property), and I hope this is useful in the interim.

Separately, I've conveyed your request for a meeting to discuss the possibility of resolving the Government's potential forfeiture claims, and I haven't yet gotten a response to relay but will let you know as soon as I do (and will also provide these dates in connection with your request).

thanks,

[REDACTED]

From: [REDACTED]
Sent: Thursday, December 19, 2019 19:09
To: [REDACTED]
Cc: [REDACTED]
Subject: JE estate meeting

[REDACTED]

To follow up on our call, can you please send us the search warrant returns/inventories and, if possible, any additional detail regarding the items that were seized in the two searches of the New York property and the search of the New Mexico property.

With respect to a next meeting with you and the Chief of the Criminal Division and, of course, any other colleagues you wish to attend, the following dates in early January would be good for us:

January 3, 6 (before 2:00), 7, 8 (1:00 or later), 9 (after 11:00), or 10

Happy and Healthy New Year from Andy and me.

[REDACTED]

[REDACTED] Partner
Co-Chair, White Collar Defense

[REDACTED]
[REDACTED] New York, NY 10004-1482

Office [REDACTED] Cell [REDACTED] Fax [REDACTED]
[REDACTED]

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