

From: [REDACTED]
To: [REDACTED]
Subject: RE: Epstein OIG/FBI--Document Preservation
Date: Wed, 14 Aug 2019 20:35:46 +0000

Belatedly, thanks.

From: [REDACTED]
Sent: Tuesday, August 13, 2019 12:12 PM
To: [REDACTED]
Subject: RE: Epstein OIG/FBI--Document Preservation

[REDACTED]

Attached please find my completed form. The USAO number for the portion of the case that I worked on is 2018R01618. Throughout my participation in this case, I have, as a practice, saved all Epstein-related emails that I received in my email archive in a folder entitled "Epstein". Any emails that I sent regarding the case would be in the sent items folder in my email. I have not sent or received any substantive text messages regarding the case (any texts with other team members are purely logistical—e.g., setting up a time to meet or for a call).

Please let me know if you need anything else.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: Monday, August 12, 2019 5:13 PM

[REDACTED]

Subject: RE: Epstein OIG/FBI--Document Preservation

Dear all,

As [REDACTED] explained, we are instituting a formal litigation hold in connection with Mr. Epstein's death at MCC. You have been identified as having done work on or supervised the Epstein matter, and thus as possibly having responsive records. Please note and preserve whatever you have about Mr. Epstein, not limited to his death and to the earlier reported incident in which he suffered physical injuries. In addition, to the extent possible, please avoid altering any relevant records. If you need to use existing documents, please save what you're working off of as a new document so that the version that now exists remains preserved and available.

I attach a formal litigation hold notice, which as required is on an EOUSA-provided form. Please review the notice, fill out the form to indicate whether and where you have responsive records, and sign and return it to me. In particular, be sure to let me know by USAO number if possible what records and share directories we have that are likely to include relevant information.

I prefer scanned and emailed return of the forms, but you can also use interoffice mail if you prefer.

Please let me know if you think other USAO personnel may have relevant documents or evidence.

And please let me know if you have questions or want to discuss.

Finally, I am copying [REDACTED] to inform him of the new litigation hold, and to ask him to ensure that all responsive information on our electronic record systems is preserved, including by suspending the routine maintenance email deletions for recipients of this email.

Many thanks,

[REDACTED]

Deputy Chief, Civil Division, and Litigation Hold Coordinator
U.S. Attorney's Office, S.D.N.Y.

[REDACTED]
New York, NY 10007
[REDACTED]

From: [REDACTED]
Sent: Monday, August 12, 2019 4:46 PM

[REDACTED]

Subject: RE: Epstein OIG/FBI--Document Preservation

FYI, as a result of a preservation request Epstein's lawyers have made on behalf of the family, which indicates a potential wrongful death case, you will shortly be receiving a formal litigation hold request from [REDACTED] our litigation hold coordinator.

From: [REDACTED]
Sent: Monday, August 12, 2019 11:43 AM

[REDACTED]

[REDACTED]

Subject: FW: Epstein OIG/FBI--Document Preservation

All – Please see below and follow [REDACTED] instructions. Additionally, if you believe there are others at SDNY to whom this email should be sent, please let me know immediately.

Thanks,
[REDACTED]

From: [REDACTED]
Sent: Monday, August 12, 2019 11:35 AM

[REDACTED]

Subject: Epstein OIG/FBI--Document Preservation

Please forward this to everyone who might have any documents relating to the Epstein suicide, and cc me:

Please make sure to preserve any documents you may have relating to Epstein's conditions of confinement.

- Your emails will be adequately preserved, for present purposes, by the regular three-year backup. But let me know if you have any or not.
- If you have any hard-copy notes, please scan them and send them to me. If you have none, let me know that too.
- Most particularly, please check to see if you have texted anything pertinent. If so let me know, one way or the other. If you do have anything, we'll figure out how to preserve that.

[REDACTED]
Associate U.S. Attorney
United States Attorney's Office
Southern District of New York
[REDACTED]
New York, NY 10007
[REDACTED]