

From: "McDonnell, Hilary" <[REDACTED]>

To: [REDACTED]

Cc: "Wang, Wilson" <[REDACTED]>

Subject: [EXTERNAL EMAIL] - RE: Epstein Estate

Date: Thu, 18 May 2023 15:15:48 +0000

Importance: Normal

[REDACTED]

I hope you are well. We have completed our review of videos from the Epstein Estate and flagged some additional videos that could be potential CSAM. I know that you are visiting Patterson Belknap next Tuesday. Are you available to come Hughes Hubbard's office again next Wednesday or Thursday?

Thanks very much,
Hilary

Hilary McDonnell | Associate
She/Her

Hughes Hubbard & Reed LLP

One Battery Park Plaza, 15th floor | New York | NY 10004-1482

Office [REDACTED] | Cell [REDACTED]

[REDACTED] | bio

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From: [REDACTED]

Sent: Thursday, April 20, 2023 4:09 PM

To: McDonnell, Hilary <[REDACTED]>

Cc: Weiner, Daniel H. <[REDACTED]>; Weinstein, Marc A. <[REDACTED]>

Subject: RE: Epstein Estate

CAUTION: This email was sent by someone outside of the Firm.

Hilary,

It was nice speaking with you as well. My partner, Detective [REDACTED] [REDACTED] will be joining me.

We will see you on Monday.

Thanks,

[REDACTED]

Special Agent [REDACTED] [REDACTED]

FBI New York Field Office

Child Exploitation/Human Trafficking

EFTA00038997

Desk: [REDACTED]

From: McDonnell, Hilary <[REDACTED]>
Sent: Thursday, April 20, 2023 3:51 PM
To: [REDACTED], [REDACTED] Nicole (NY) (FBI) <[REDACTED]>
Cc: Weiner, Daniel H. <[REDACTED]>; Weinstein, Marc A. <[REDACTED]>
Subject: [EXTERNAL EMAIL] - RE: Epstein Estate

Hi [REDACTED],

It was nice speaking with you today. This email confirms our meeting on Monday, April 24 at 4:00 PM at Hughes Hubbard. Our address is One Battery Park Plaza, New York, NY 10004.

Please let me know if anyone else will be joining you, so I can give their names to reception.

Best,
Hilary

Hilary McDonnell | Associate
She/Her

Hughes Hubbard & Reed LLP

One Battery Park Plaza, 15th floor | New York | NY 10004-1482
Office [REDACTED] | Cell [REDACTED]

[REDACTED] | [bio](#)

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From: [REDACTED]>
Sent: Wednesday, April 19, 2023 7:42 PM
To: Ruzumna, Daniel (x2034) <[REDACTED]>
Cc: Weiner, Daniel H. <[REDACTED]>; Weinstein, Marc A.
<[REDACTED]>; McDonnell, Hilary <[REDACTED]>; Norris, Tara (x2847) <[REDACTED]>; Lau, Sean (x2742) <[REDACTED]>
Subject: Re: Epstein Estate

CAUTION: This email was sent by someone outside of the Firm.

Yes that works for me.

Special Agent [REDACTED] [REDACTED]
FBI New York Field Office
Child Exploitation/Human Trafficking

From: Ruzumna, Daniel (x2034) <[REDACTED]>
Sent: Wednesday, April 19, 2023 7:35:24 PM
To: [REDACTED], [REDACTED] Nicole (NY) (FBI) <[REDACTED]>
Cc: Weiner, Daniel H. <[REDACTED]>; Weinstein, Marc A.
<[REDACTED]>; McDonnell, Hilary <[REDACTED]>; Norris, Tara

EFTA00038998

(x2847) <[REDACTED]>; Lau, Sean (x2742) <[REDACTED]>
Subject: [EXTERNAL EMAIL] - Re: Epstein Estate

[REDACTED], are you free for a call at 3:00 p.m. tomorrow (Thursday)?

Sent from my iPad

On Apr 19, 2023, at 3:46 PM, [REDACTED] > wrote:

Caution: External Email!

Mr. Ruzumna,

Thank you for reaching out regarding the potential discovery of CSAM. I have some questions and I'd like to chat by phone to discuss in further detail about next steps. Could you let me know a time that would work for you? I'm available the rest of today and pretty open tomorrow. My cell, [REDACTED], is the best way to reach me.

Thanks and I look forward to speaking with you.
[REDACTED]

Special Agent [REDACTED]
FBI New York Field Office
Child Exploitation/Human Trafficking
Desk: [REDACTED]

From: Ruzumna, Daniel (x2034) <[REDACTED]>
Sent: Wednesday, April 19, 2023 3:22 PM
To: [REDACTED], [REDACTED] Nicole (NY) (FBI) <[REDACTED]>
Cc: Weiner, Daniel H. <[REDACTED]>; Weinstein, Marc A.
<[REDACTED]>; McDonnell, Hilary <[REDACTED]>; Norris, Tara (x2847) <[REDACTED]>; Lau, Sean (x2742) <[REDACTED]>
Subject: [EXTERNAL EMAIL] - Epstein Estate

Dear Special Agent [REDACTED],

As you have apparently heard from AUSA [REDACTED], we represent one of the two co-executors of the Estate of Jeffrey Epstein. Hughes Hubbard & Reed represents the other. Recently, we have been responding to requests/demands for documents in connection with a settlement that the Estate entered into with the Government of the U.S. Virgin Islands and in response to subpoenas issued in litigations pending before the U.S. District Court for the Southern District of New York. The Estate is not a party to the SDNY litigation.

As part of the Estate's document production obligations, we are reviewing approximately 1,100 videos that were pulled from Epstein's emails and other files. Because of the potential existence of child pornography in those videos, we worked out a protocol with the parties to whom we owed document production obligations, and that protocol gave our reviewers protection and comfort in undertaking the review. The protocol was

submitted to the SDNY Court (Judge Jed Rakoff), who signed the “Order regarding Review of Videomaterials.” (Attached).

During the review yesterday, our co-counsel at Hughes Hubbard came across a video that may contain child pornography. Apparently the relevant video was shared with Epstein by an individual who was convicted of a child pornography-type offense and it depicted one or two topless women. In an abundance of caution, we halted the review and reached out to [REDACTED]. Co-counsel at Hughes Hubbard (Dan Weiner and Hilary McDonnell) can correct any misstatements in my description of the review since I heard the account secondhand.

We would appreciate any guidance that you may have. We have been careful not to download videos to the respective law firms' servers, but the videos were processed (without review) by a document collection vendor.

Thanks and we look forward to hearing from you.

Best,
Daniel Ruzumna
Daniel S. Ruzumna
Patterson Belknap Webb & Tyler LLP
1133 Avenue of the Americas
New York, New York 10036
Phone: [REDACTED]
Fax: [REDACTED]

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