

From: "Ruzumna, Daniel (x2034)" <[REDACTED]>

To: [REDACTED]

Cc: "Weiner, Daniel H." <[REDACTED]>, "Weinstein, Marc A." <[REDACTED]>, "McDonnell, Hilary" <[REDACTED]>, "Norris, Tara (x2847)" <[REDACTED]>, "Lau, Sean (x2742)" <[REDACTED]>

Subject: [EXTERNAL EMAIL] - Re: Epstein Estate

Date: Wed, 19 Apr 2023 23:35:24 +0000

Importance: Normal

[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.

Special Agent [REDACTED] Young
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: Young, [REDACTED] (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 Young,

EFTA00039017

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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