

From: "[REDACTED]" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>, "[REDACTED]"
(USANYS)" <[REDACTED]>, "[REDACTED]"
<[REDACTED]>, "[REDACTED]" (USANYS)" <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED]"
<[REDACTED]>, "[REDACTED]"
<[REDACTED]>, "[REDACTED]" <[REDACTED]>

Subject: RE: Epstein search warrant documents

Date: Wed, 04 Mar 2020 21:35:41 +0000

Attachments: EpsteinLoadFilesProgress.xlsx

Here is a listing of what I have already handed over in load files to the US Attorney's Office for taint review. Some points of clarification: There were 9 IDE hard drives found in the Manhattan apartment, they turned out to be 3 copies of 3 drives (9 drives in total) from a July 2007 search on one of his properties. I only processed 3 (as they were all copies). All the loose media from the NY apartment is included. All the Windows machines from the NY apartment are included. Only 2 Macs from NY and 1 from the Island are included.

I will have to more closely coordinate with whoever is loading up Relativity with the remaining Macs as the tool they have to be processed with does not easily re-name the load files.

Spreadsheet is attached.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED] [mailto:[REDACTED]]
Sent: Tuesday, March 03, 2020 12:25 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

I could do Thursday morning, but I think it would be helpful for us to get the accounting in advance of the meeting so we can figure out in advance what (if any) additional steps we need – is that possible?

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, March 03, 2020 09:59
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

Can we do Thursday morning? My network should be back by then and I can give you a good accounting.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] cell
[REDACTED] desk

On Mar 2, 2020 11:15 AM, "[REDACTED]" <[REDACTED]> wrote:
Doing the weekly check in on this – is there a time this week when everyone can meet on this?

thanks,
[REDACTED]

From: [REDACTED]
Sent: Monday, February 24, 2020 17:38
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

[REDACTED]

Totally understand about the network issues—we can relate. I do still think it will be helpful to all sit down together to have an in-person discussion, to make sure everybody is on the same page. Are folks available for that next week? And what I think would be most helpful to facilitate that would be a spreadsheet of each separate device referenced in the two search warrant returns, with columns for whether we've dumped the contents, whether they've been reviewed and/or transferred, what portions were transferred, etc.

Something roughly like the attached, with any other categories you think would be useful – and the info on the attached is mostly hypothetical, obviously, just as examples. That will help us fully understand what's been reviewed, transferred, and received so far, and what remains.

(Also just on the pictures, we do want copies of those as well, please including from the discs and the devices – I think FBI was going to do an initial screen to make sure no CP, and since I think the answer was no, we'll need to get those to be able to review them as well.)

many thanks,
[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Monday, February 24, 2020 09:24
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

[REDACTED]

Sorry for the delayed response. They are tearing out our old network and giving us a new one, they mandated we delete old stuff (about 400 TB worth). Now that they are working on replacing the network, we can do only local work. I should be able to give you an accounting of what is what. I can say, off the top of my head, that all windows based items from the NY search have been handed over as well as all loose media. The CDs from NY only contained pictures, no documents. There are still some Apple items from NY that need to be produced. As far as the Island stuff goes, the 1st item on your spreadsheet, the "kitchen" mac has been produced. Still working on the rest.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] cell
[REDACTED] desk

On Feb 23, 2020 12:21 AM, "[REDACTED]" <[REDACTED]> wrote:
Team,

Following up on the below from last weekend, I'm still not sure how we're addressing this so I thought it would make sense for us to all schedule a (hopefully relatively brief) meeting to all get on the same page? We didn't hear back on which files had previously been provided, but our tech folks did their best to differentiate, and we got access to the materials yesterday and its well over a million documents, and we don't have any idea what we're looking at – i.e., which devices the materials came from, whether it's full or partial results, how many more devices we have coming, etc.

Based on the attached search warrant returns, it looks like from the New York mansion (the PDF) there are approximately 40 devices that would have storage (computers, hard drives, thumb drives, etc.) and that's not even counting at least 60+ CDs. And then from the Virgin Islands (the Excel spreadsheet), at least more than 25 devices, including multiple servers / server racks.

So we gotta know what we've already received, what remains, anticipated schedule, etc, and I know it's a lot of moving pieces on all sides so wanted to loop in everybody at once. The case team will be in California this coming week from Tuesday through Friday, but then I think generally around the first week of March, which will hopefully be plenty of time to schedule a productive meeting.

thanks all,

[REDACTED]

From: [REDACTED]
Sent: Saturday, February 15, 2020 16:30

To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

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

Subject: RE: Epstein search warrant documents

[REDACTED], [REDACTED]

I'm not sure who's the exact right person to ask this, so wanted to get everybody on one email chain about it – I have the hard drive that [REDACTED] dropped off that has new Epstein search warrant materials, but it looks like there are also old materials (that I think we had previously received and uploaded??) on the hard drive, and so I'm not sure what's new.

Just generally, and [REDACTED] and I talked about this last week too, but it's basically impossible for us to keep track of what we're getting, and what has been completed, without some kind of identification or labeling system, along with a list of which devices have been extracted and downloaded.

So for example on the hard drive currently, there are 38 folders labeled "loadFiles" through "37loadFiles" with a modified date of 11/14/19, which I think we may have already previously received – but I'm not sure, because we haven't gotten any info on which folders match up to which devices, etc. And then there's another folder titled "NYC024362" that has a modified date of 1/27/20, so I think that may be the materials we hadn't previously received? That folder by itself has more than 600,000 items.

I don't want to give [REDACTED] anything that we've already previously received and uploaded, and I can't tell from the folder or file names whether everything on the drive is new, or whether just additional materials were saved onto it in addition to what we already have. [REDACTED], are you able to give us some guidance on this? Ultimately what we really need is a spreadsheet of every device, whether it's been dumped (or partially dumped), and then identifying that same info – which device, and what materials from it – are being given to us with each data transfer. Otherwise I think organizationally and for review purposes it will be a total disaster for us.

We're happy to have a meeting on this if that's helpful – and thanks everybody for the assistance.

[REDACTED].

[REDACTED]
Assistant U.S. Attorney
Southern District of New York
[REDACTED]