

From: "██████████)" <██████████>
To: "██████████>
Subject: Fwd: Epstein search warrant documents
Date: Tue, 12 May 2020 17:13:56 +0000

Could you please give me a call when you have a moment? Not an emergency but when you have a chance. I'm at █████. Thanks.

Sent from my iPhone

Begin forwarded message:

From: "██████████>
Date: May 12, 2020 at 13:02:53 EDT
To: "██████████)" <██████████>, "██████████>
Cc: "██████████)" <██████████>, "██████████)" <██████████>, "██████████>
Subject: Re: Epstein search warrant documents

██████████
Just to be clear. The US Attorney's Office (or it's contractors) are not "processing" anything. You are taking files that I will be extracting from processed evidence and putting them into an E-Discovery tool (Relativity) to do a taint review.

Relativity is NOT a forensic tool. It is incapable of dealing with many things that are found forensically on a computer like free space, slack space, and system files to name a few. When we started this, and you insisted you do the taint review in Relativity, I warned you that it was adding months worth of work on top of what was already done, and that Relativity was incapable of viewing everything. You insisted we do it this way. So now █████ and I have come up with a way to fit this round peg into this square hole. We will get it done.

Sorry it has taken so long, but we are talking about terabytes worth of data over multiple forms of digital evidence. Phones, tablets, loose media, cameras, DVRs, servers, laptops, and desktop computers. We have gotten past encryption on multiple devices. When we review devices on such large cases, we usually do it piece by piece as things are processed, I was unaware that you didn't want to review as things were processed, that you wanted to do it "all at once", so that added to the delay. Sorry for that. Just a differentiation of methodology I suppose.

██████████ and I feel confident that the method we have come up with will be more consistent and preserve the attribution of files to devices and links of e-mails to attachments that the load file generation that I did a while back was lacking.

██████████
██████████
██████████
██████████

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, May 12, 2020 11:33 AM
To: [REDACTED]>; [REDACTED]
<[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

Okay, so just to check, you both think that there is not a need to do a test run? You're both comfortable with just basically sending us copies of everything? I don't totally understand why we couldn't have done that eight months ago, but regardless of the passage of time, I want to make sure we understand so we can report to our supervisors. I assume that means that we (at the U.S. Attorney's Office and through contractors) will therefore need to do all the processing ourselves, correct? And thanks again to you both.

From: [REDACTED] >
Sent: Tuesday, May 12, 2020 11:30
To: [REDACTED] >; [REDACTED]
<[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

Like [REDACTED] said in his earlier email. It will be the raw data and it will be marked so it is easier to attribute it to a particular device. Problem now is how to get the data to [REDACTED] since he is teleworking.

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

On May 12, 2020 11:15 AM, "[REDACTED]" <[REDACTED]> wrote:
I have no doubt you do, but can you please tell us what that plan is? Thanks!

From: [REDACTED] >
Sent: Tuesday, May 12, 2020 11:11
To: [REDACTED] >; [REDACTED]
<[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

I will use the spreadsheet, no problem. [REDACTED] and I ironed out all the details. We've got a good plan moving forward that will meet your needs.

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

On May 12, 2020 10:34 AM, "[REDACTED]" <[REDACTED]> wrote:
[REDACTED], it would be very helpful for us if you could please use the attached spreadsheet in transmitting that info so we make sure we get all the info we need. I think you had previously sent us a list of certain information that unfortunately

wasn't helpful for us, so we want to make sure we're all on the same page.

In terms of data transfer, [REDACTED] are you just sending a literal copy of all the raw data, and we'll process and upload it on our end? I ask to make sure we don't lose any searchability – when FBI sent versions before, it had already been processed. I think what we talked about on the phone a month ago was getting, for example, data from one device to make sure it transfers correctly, before sending over literally everything – is that still the plan?

thanks,

[REDACTED]

From: [REDACTED] >

Sent: Tuesday, May 12, 2020 10:27

To: [REDACTED] <[REDACTED]>

Cc: [REDACTED] >

Subject: RE: Epstein search warrant documents

Hello [REDACTED],

Me and [REDACTED] just finished our phone call regarding the data. [REDACTED] will put together a list of the all of the data and where the data was collected. I will work to send some hard drives to [REDACTED] so he can begin to copy the data and send it to us. I will need to figure out a way to get the data off of the hard drives.

Please let us know if there are any questions.

Thank you.

[REDACTED].

From: [REDACTED] <[REDACTED]>

Sent: Friday, May 8, 2020 2:15 PM

To: [REDACTED] >; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] >; [REDACTED] (USANYS) <[REDACTED]>

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

Subject: RE: Epstein search warrant documents

Okay thanks – please do let us know if at any point that changes, otherwise we'll look forward to being able to review the returns in early June. Thanks again.

From: [REDACTED] >

Sent: Friday, May 08, 2020 14:14

To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] >; [REDACTED] (USANYS) <[REDACTED]>

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

Subject: RE: Epstein search warrant documents

There has been talk of us returning to normal soon, so I don't think it will effect the timeline I initially gave you. If it does, I'll let you know.

[REDACTED]
cell
desk

On May 8, 2020 1:58 PM, "████████")" <████████> wrote:
Understood, thanks—it will be great to get that list on Thursday. As a refresh, the info we are looking for is in the attached spreadsheet template.

On the returns themselves, do the changes you mentioned mean that the estimate of a month from now for complete transmission of the search warrant returns is no longer likely? If so could you please let us know what the current estimate would be, so we can factor that in? Thanks very much.

From: █████>
Sent: Friday, May 08, 2020 13:50
To: █████ (USANYS) <████████>; █████) <████████>;
████████ >; █████ (USANYS) <████████>
Cc: █████ >; █████) <████████>;
████████ <████████>; █████) <████████>; █████
Subject: RE: Epstein search warrant documents

Sorry for the delay, they reduced us to 1 day a week, so things have been stretched out by a factor of 5. I will be back in the office on Thursday and will be able to get you the list then as I have to access some of our systems to do so.

Also, █████, please reach out to me at one of the numbers below so we can brain storm. Thanks.

[REDACTED]
cell
desk

On May 8, 2020 12:10 PM, "████████")" <████████> wrote:
████████

Following up on the below, I think you had said you expected to be able to get us a list of the devices seized from the search warrants at Epstein's residences in New York and the USVI, as well as from his person upon arrest, in about a month (during our conference call a month ago) – so wanted to check if we can still expect that very soon? We're waiting on that list to be able to do an updated search warrant on all of those devices. Please let us know the current timeline – and also the current timeline on producing the results from those August and September searches? I think you and █████ were going to coordinate on that, and you had mentioned you expected we'd have it a couple months from our call, which would be about a month from now. Wanted to make sure we're still on track.

thanks,

████████

From: █████>
Sent: Tuesday, April 07, 2020 15:27

EFTA00025485

To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>;
[REDACTED] >; [REDACTED] (USANYS) <[REDACTED]>;
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED]
Subject: RE: Epstein search warrant documents

Ok let's plan on 11am tomorrow morning, I am trying to get an FBI line with a larger capacity but I won't know until tomorrow am. I will push it out when confirmed.

Thanks

From: [REDACTED] [mailto:[REDACTED]]
Sent: Tuesday, April 07, 2020 3:15 PM
To: [REDACTED] >; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
[REDACTED] >; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] >; [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] >
Subject: RE: Epstein search warrant documents

Yes, I can do anytime tomorrow, and [REDACTED] [REDACTED] can also join anytime tomorrow. So whenever is good on your end.

Also, we can host a conference call, but only up to six lines at a time – so if FBI has larger capacity than that let us know, otherwise I'd propose we do:

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

From: [REDACTED] >
Sent: Tuesday, April 07, 2020 14:13
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] >; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] >; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] >; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED]
Subject: RE: Epstein search warrant documents

[REDACTED],
Are you available tomorrow for a conference call to discuss this issue?

On Apr 7, 2020 1:55 PM, "[REDACTED]" <[REDACTED]> wrote:

Following up on this from a month ago – I know we’re living in a different world than what existed four weeks ago, but are you at all able to assist while working remotely? This has been pending for almost two months and we still don’t have a very basic list of each device or item that was seized and searched, or for which of those we’ve received materials. We’re happy to have a call if that would be useful, but as a first step the most basic thing we’re looking for is the info in the template spreadsheet we sent earlier (that’s also attached).

thanks,
[REDACTED]

From: [REDACTED])

Sent: Monday, March 09, 2020 12:00

To: [REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]

[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

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

[REDACTED]>

Subject: RE: Epstein search warrant documents

[REDACTED]

Unfortunately I don’t think this is very helpful to us. Did you take a look at the example spreadsheet I sent on 2/24? The excel file you sent has descriptions that don’t match up to the items listed in the search warrant returns (that we sent on 2/23), and we don’t have the 1B or CART numbers to be able to cross-reference. We also can’t tell what you mean by “loose media” without a specific comparison to what was seized, we don’t know which items you’re referring to as “Windows machines,” and we can’t tell whether the entirety of any particular item has been transferred, or just partial. For example, it looks like we have gotten very, very few image files, which is surprising.

We have also encountered some very significant problems in trying to review the more than 1 million documents we recently received:

- The data we’ve received has no way to put any emails and attachments together. So if an email says, “see the attached flight records,” for example, we have no way of linking that up with the records themselves. Not only is that a big problem for us in review, it’s going to be a huge problem for producing the documents to defense counsel.
- The load file has no link to the native file, so when we load the data to the database, there’s no way to have the native files show up in the database. Because many of the files are too large to open in the viewer, it effectively means that there are many files that are completely invisible to us.
- Related, the control numbers in the load file don’t match up to the native files. So we have two sets of numbers and no way to match up anything—that is, even if we were to try to go hunt down every individual large file in the native files, it would be impossible.

So the data that we most recently got, we need to get in a form that addresses those issues, and we likely will need to get a similar reproduction of the data we received a couple months ago. Otherwise we’re sifting through more than a million documents without much rhyme or reason.

I’ve re-attached the spreadsheet we sent last week – I think that’s a good place to start in terms of our necessary record-keeping, and we need that info at the very least, as well as anything else you think would be useful. Also attaching the SW returns for reference. And again, we’re happy to meet up anytime and hash all this out in person if that’s useful.

thanks,
[REDACTED]

From: [REDACTED] >
Sent: Wednesday, March 04, 2020 16:36
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>;
[REDACTED] >; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] >; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;
Subject: RE: Epstein search warrant documents

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] (office)
[REDACTED]
[REDACTED] (cell)

From: [REDACTED] [mailto:[REDACTED]]
Sent: Tuesday, March 03, 2020 12:25 PM
To: [REDACTED] >; [REDACTED] (USANYS) <[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] >
Sent: Tuesday, March 03, 2020 09:59
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED] >; [REDACTED] (USANYS) <[REDACTED]>
Cc: [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, "████████")" <████████> wrote:
Doing the weekly check in on this – is there a time this week when everyone can meet on this?

thanks,
████████

From: ██████████)

Sent: Monday, February 24, 2020 17:38

To: █████████>; █████████ (USANYS) <████████>; █████████
████████>; █████████ (USANYS) <████████>

Cc: █████████>; █████████) <████████>; █████████>;
████████ <████████>; █████████) <████████>; █████████>

Subject: RE: Epstein search warrant documents

████████
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,
████████

From: █████████>

Sent: Monday, February 24, 2020 09:24

To: █████████ (USANYS) <████████>; █████████) <████████>;
████████>; █████████ (USANYS) <████████>

Cc: █████████>; █████████) <████████>; █████████>;
████████ <████████>; █████████) <████████>; █████████>

Subject: RE: Epstein search warrant documents

████████

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]
cell
desk

On Feb 23, 2020 12:21 AM, "████████")" <████████> 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: █████
Sent: Saturday, February 15, 2020 16:30
To: █████>; █████>
Cc: █████>; █████<████████>; █████
████████<████████>; █████<████████>
Subject: RE: Epstein search warrant documents

[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 █████ 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 █████ 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.

Assistant U.S. Attorney
Southern District of New York