

From: [REDACTED] (USANYS)" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Subject: Re: Grand Jury subpoena response
Date: Fri, 01 Nov 2019 22:32:50 +0000

Thanks
Here's wishing you a nice weekend and smooth travels next week.

Sent from my iPhone

> On Nov 1, 2019, at 5:22 PM, [REDACTED] <[REDACTED]> wrote:

>
> Team,

> We wanted to pass along these responses to our subpoenas to the Trustees of the Epstein estate; we received them about an hour ago. The documents are particularly sensitive and very much non-public, including even to the beneficiaries themselves—we believe we're the only people who have these documents other than the Trustees and their counsel, so we're keeping it within the building (and not emailing to law enforcement partners until we're able to directly communicate the importance of ensuring the materials won't be further disseminated). We're familiar with the significant beneficiaries, which include (though in relatively smaller amounts) Maxwell and [REDACTED] but not [REDACTED] or Groff.

>
> We're traveling to Florida for a significant interview on Monday and Tuesday, but can meet next week if that's helpful once people have had a chance to digest.

>
> thanks,
> Alex.

>
>
> From: Weinstein, Marc A. <[REDACTED]>
> Sent: Friday, November 01, 2019 17:15
> To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
> Cc: Tomback, Andrew <[REDACTED]>
> Subject: Grand Jury subpoena response

>
> [REDACTED]:

>
> This responds to the October 18, 2019 grand jury subpoenas to the executors of the estate of Jeffrey Epstein. Each subpoena requests the following:

- >
- > 1. The 1953 Trust agreement and any trust documents referenced or referred to within The 1953 Trust (the "Trust Documents");
 - > 2. Any drafts or notes of the Trust Documents; and
 - > 3. Any communications relating to the Trust Documents.

>
> Attached in response to request 1 are "The 1953 Trust" (dated August 8, 2019), the "Amended and Restated Jeffrey E. Epstein 2019 Trust" (dated February 4, 2019) and the "Jeffrey E. Epstein 2019 Trust" (dated January 18, 2019) (the latter two of which are referenced in the 1953 Trust), bearing bates numbers GJ_00001 through GJ_00102.

>

> As discussed on our call, with respect to requests 2 and 3, we believe that most, if not all, of the communications relating to the formation of the Trust Documents are privileged. In addition, the scope of requests 2 and 3 is quite broad, and the government, rather than the Executors, is in possession and control of some of the potential sources of such information (i.e., Mr. Epstein's computers). We therefore agreed to defer production of any non-privileged documents responsive to those requests and further agreed to revisit what (if anything) the government further sought with respect to requests 2 and 3 until after the government has reviewed the Trust Documents.

>
> Regards,

> Marc

>

>

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