



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 13, 2020

BY USAfx

Jason E. Foy
Foy & Sepowitz LLC



Re: *United States v. Tova Noel* No. 19 Cr. 830

Dear Counsel:

This letter provides additional discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure. This letter and the materials identified herein are subject to the protective order entered in this case on December 16, 2019, and have been designated as "Protected Materials" as defined in the order where noted below. Accordingly, the materials and information identified herein shall not be disclosed to any third party or referenced publicly except as set forth in the protective order.

Description	Bates Numbers	Classification Pursuant to Protective Order
Emails from MCC employee email accounts ¹	SDNY_00008724 – SDNY_00013257	Confidential
FBI interview and investigation memoranda	SDNY_00013258 – SDNY_00013324	Confidential
Records of evidence seizures and submissions	SDNY_00013325 – SDNY_00013424	Confidential

¹ The Bureau of Prisons ("BOP") provided to the Government the contents of 24 email accounts used by MCC employees, including an account used by each of the defendants. The list of email custodians is available upon request. In total, the Government was provided with approximately 45,000 emails and attachments within those accounts, which appear to have been copied on or around August 19, 2019. In a prior discovery production, the Government produced the entirety of the account used by your client to you. Through the manual review of emails in some (but not all) of the accounts, as well as the use of keyword searches across all accounts, the Government has identified the documents that it is producing now. The Government used the keywords "Epstein," "suicide," "institutional count," "rounds," "30 minute," and "count slip." While we believe the remaining materials are not discoverable under Rule 16, if you believe additional searches should be run, please let us know and we will consider your request.

