

MARTIN G. WEINBERG, P.C.
ATTORNEY AT LAW

[REDACTED]
BOSTON, MASSACHUSETTS 02116

EMAIL ADDRESSES:

[REDACTED]

FAX [REDACTED]

NIGHT EMERGENCY:
[REDACTED]

August 1, 2019

By Electronic Mail

[REDACTED]
Assistant United States Attorneys
U.S. Attorney's Office for the
Southern District of New York
[REDACTED]
New York, New York 10007

Re: United States v. Jeffrey Epstein, No. 19-cr-00490
Supplement to Defendant's First Request for Discovery

Dear [REDACTED]:

We write to supplement our first request for discovery that was electronically mailed to you on July 26, 2019 that sought the preservation and production of documents relating to the NPA and issues arising from the NPA. We wanted to particularize certain requests that were applicable to the United States Attorney's Office (hereinafter "USAO") for Southern District of Florida and the FBI Office that were working with them as follows:

To request that AUSA [REDACTED] who was the lead prosecutor investigating Mr. Epstein in 2006-8 produce or in the alternative agree to preserve any and all documents, communications whether emails from any and all email accounts from which she was sending or receiving relevant emails, texts, letters, papers, voice messages, tapes or any other information that:

1. Relate to any investigation and any interviews conducted by the USAO for the Southern District of Florida and/or the USAO for the Southern District of New York and FBI agents from either or both offices in 2008 in and around New York City, including, but not limited to an interview of a [REDACTED] and/or communications with [REDACTED], any other potential witness, [REDACTED] and any other

representative of any USAO for the Southern District of New York between January 1 – June 30, 2008. This request includes any communications prior to or during AUSA [REDACTED] March 2008 trip to New York and any communications that resulted from the trip.

2. Relate to her communications with her victim witnesses either directly or through their counsel wherein she discussed their right to confer with a USAO other than the Southern District of Florida.
3. Relate to any communications with the USAO for the Southern District of New York or FBI agents working with them at any time from 2007-2019.
4. Relate to the providing of any investigatory information or evidence to the USAO for the Southern District of New York or FBI agents working with them at any time from 2007-2019.

Very truly yours,

Reid Weingarten
Michael Miller
Steptoe & Johnson LLP
[REDACTED]
New York, NY 10036

Martin G. Weinberg
Martin G. Weinberg, P.C.
[REDACTED]
Boston, MA 02116