

From: "[REDACTED]" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>
Subject: RE: discovery review ([REDACTED])
Date: Sun, 02 Aug 2020 23:51:14 +0000

Great, thanks. Sending now.

From: [REDACTED] <[REDACTED]>
Sent: Sunday, August 2, 2020 2:48 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>
Subject: Re: discovery review ([REDACTED])

This is good with me— thanks! Very glad we are all set to get everything to [REDACTED].

Sent from my iPhone

On Aug 2, 2020, at 2:33 PM, [REDACTED] <[REDACTED]> wrote:

Sure, that's fine. As far as I could tell, those files only contain Epstein info, but nothing sensitive like his SSN. Fine to mark confidential though.

On Aug 2, 2020, at 2:18 PM, [REDACTED] <[REDACTED]> wrote:

My only thought is that we probably should mark the Google responses for Epstein (the 2019-01-15 folder) and the Oath Holdings files as Confidential due to other third-party info, no? Other than that, no other questions from me, thanks.

From: [REDACTED] <[REDACTED]>
Sent: Sunday, August 02, 2020 14:01
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: discovery review ([REDACTED])

Notes below—happy to discuss if there are any issues before I send to [REDACTED]

Arrest Materials – Fine to produce all without marking confidential

Pen Register Orders and Applications – Fine to produce all without marking confidential

Travel & Immigration Records – Fine to produce all without marking confidential

Search Warrants & Applications:

- Mark all applications CONFIDENTIAL

- Fine to produce all of the warrants as is, EXCEPT 9/12/19 19 mag 8579 and 6/26/19 both need to be marked CONFIDENTIAL because they both identify [REDACTED] as a co-conspirator by name

Notes for remaining subpoena return folders in the "TO BE PRODUCED" file:

- Experian
 - [REDACTED] Folder
 - Remove subpoena and rider from pdf entitled Experian 8-27-19 Prod Re [REDACTED] (so we should only be producing the last 3 pages of this pdf, which include the declaration of custodian and report). Please also mark this pdf CONFIDENTIAL
 - Maxwell Folder
 - Remove subpoena and rider from pdf entitled Experian 8-28-19 Prod – G Maxwell (no need to mark confidential because these are GM's info)
 - [REDACTED] Folder
 - Remove subpoena and rider from pdf entitled 9-11-19 Prod - [REDACTED]. Please also mark this pdf CONFIDENTIAL
 - [REDACTED] Folder
 - Remove subpoena and rider from pdf. Please also mark this pdf CONFIDENTIAL
- Fifth Third Bank
 - Please unzip all documents, remove any password protection, and mark the entire contents of this folder CONFIDENTIAL
 - In the pdf entitled Fifth Third Bank 10-17-19 Transmittal Ltr, please remove the subpoena and billing info (pages 3-8)
 - Please do not produce the pdf entitled Fifth Third Bank 10-22-19 Transmittal Ltr
- FirstBank Puerto Rico
 - Please mark all CONFIDENTIAL and produce (these include SSNS, DOBs, and other PII throughout hundreds, of pages of records for JE's various entities. The PII includes people other than JE, which is why I think we should just mark it CONFIDENTIAL).
- Gold Coast Federal Credit
 - In the Subpoena to Gold Coast pdf, please remove the first 3 pages (the subpoena and rider) and just leave the completed custodian declaration
 - Please mark the remaining pdfs CONFIDENTIAL
- Google
 - No issues
- Granite Reality
 - Please convert all emails to pdfs (please note several of the emails have attachments, including additional emails within them—please make sure those attachments are also saved as pdfs and produced. Additionally, some of the attached emails have attachments to them—please also make sure those are saved separately and produced)
 - Please convert the jpgs to pdfs
 - Please mark all as CONFIDENTIAL (these include PII for the seller)
- Instagram
 - No issues
- Interlochen
 - Please delete the cover letter and just produce the custodian declarations in the Interlochen cover letter & custodian declarations pdf

- For INT 000001 – INT 000293, please remove the “HIGHLY CONFIDENTIAL” marking on each page and change the marking to CONFIDENTIAL (these documents include references to at least one student who Epstein sponsored, and would also tend to identify Minor Victim-1)
- For INT 000294 – INT 000631, please remove the “HIGHLY CONFIDENTIAL” marking on each page and change the marking to CONFIDENTIAL (these pages include the names of minor students)
- JPMorgan Chase
 - Do not produce the SAR information folder
 - ██████ First Production folder
 - do not produce the ResponseLetter pdf or the Subpoena pdf
 - please remove the cover letter and subpoena from the pdf entitled SB1066502-F1_SCD_1 (pages 1, and 3-5)
 - otherwise please mark everything else CONFIDENTIAL and produce it
 - first production folder
 - please remove the SDNY Letter pdf
 - produce JPM-SDNY-00000002 as is (only reflects GM accounts)
 - mark JPM-SDNY-00000001 & 3 as CONFIDENTIAL
 - Maxwell Production folder, please remove the cover letter from the pdf entitled SB1062192-F1_SCD_1 (should just be the first page)
 - ██████ Production folder, please remove the cover letter from the pdf (should just be the first page), and please mark as CONFIDENTIAL
 - ██████ Second Production folder, please remove the transmittal email, and please mark the rest as CONFIDENTIAL
 - Second production folder, please remove the SDNY letter, and please mark the rest as CONFIDENTIAL
 - Third production folder, please remove the SDNY letter, and please mark the rest as CONFIDENTIAL
 - Fourth production, SARs folder – do not produce (consists exclusively of SARs)
 - Fifth production folder, please remove the SDNY letter, and please mark the rest as CONFIDENTIAL
 - Sixth production folder, please remove the SDNY letter, and please mark the rest as CONFIDENTIAL
- MCC
 - This email chain between myself and MCC legal contains a negative response to a subpoena request for JE’s emails and calls. I’m fine producing, just need to convert the email into a pdf for production.
- Microsoft
 - Do not produce the pdf entitled 2018-12-31 Subpoena to Microsoft
 - Fine to produce the excel spreadsheet
- MoneyGram
 - Maxwell folder – confirm txt file is blank (if so, no need to produce), otherwise no issues
 - ██████ folder – please convert txt file to pdf and mark everything, except the reference guide, CONFIDENTIAL. What is the Thumbs file? Please check with IT. I suspect it is empty and does not need to be produced, but please confirm.
 - ██████ folder – please convert txt file to pdf and mark everything, except the reference guide, CONFIDENTIAL.
- NYS DOS – Division of Corporations
 - Please remove the cover letter and subpoena from the pdf (pages 1-4)
 - Otherwise no issues
- Oath Holdings
 - No need to produce the original zip, as it’s a dupe of the unzipped documents
 - Otherwise no issues

- PayPal
 - Please mark everything in the Epstein Production folder confidential, as it includes the names and PII of individuals who received payments from Epstein
 - Fine to produce the No Records document for Maxwell
 - Please mark everything in the [REDACTED] Production folder confidential

- Professional Childrens School
 - Do not produce the cover letter to AUSA [REDACTED]
 - Produce the remaining documents, but please mark all of them CONFIDENTIAL