

From: "[REDACTED], [REDACTED] ([REDACTED])" <[REDACTED]>
To: "[REDACTED], [REDACTED] ([REDACTED])" <[REDACTED]>, "[REDACTED], [REDACTED] ([REDACTED])" <[REDACTED]>
Cc: "[REDACTED], [REDACTED] ([REDACTED])" <[REDACTED]>, "[REDACTED], [REDACTED] ([REDACTED])" <[REDACTED]>
Subject: RE: RE: updated JE will production
Date: Fri, 17 Jan 2020 20:28:21 +0000

Okay, thanks. let's wait for the additional trust agreements, in that case, and then get a new order for everything.

From: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Sent: Friday, January 17, 2020 1:02 PM
To: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Subject: RE: RE: updated JE will production

We did get a copy of the final signed sharing order, which is attached for convenience. It looks like it ended up being relatively narrow (and more importantly, not prospective, which does make sense), so I think [REDACTED] would need to do a follow-up if we wanted to share these new materials with Civil as well (and presumably we'd draft any such follow-up to similarly include the wills and any trusts referenced therein).

From: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Sent: Friday, January 17, 2020 10:39
To: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Subject: RE: RE: updated JE will production

Okay, thanks. Obviously keep us posted on the prior trusts, and as you note, we'll be happy to review anything they want to send on in writing.

Unrelated, on the sharing order – did the final signed version makes it way to you? Want to see whether it is drafted broadly enough to cover the new material. Thanks

From: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Sent: Thursday, January 16, 2020 6:13 PM
To: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Subject: RE: RE: updated JE will production

On the timeline, I generally agree though it's also conceivably possible that there were other wills / changes and the Trustees just either don't have them or aren't aware – probably unlikely, but it is a long period of no change followed by basically yearly updates so who knows.

On the trusts issue, I have to take some blame – when we requested the wills, the ask from Geoff was specifically for prior wills, so that was our initial ask (and didn't include trusts). When we got the wills today, I responded that we also wanted the trusts, and they were like, why didn't you just ask us for everything together, which I should have just done from the start. So they're going to circle back to their clients, and I don't expect there's likely to be a huge delay, but in addition to calling me today about it I expect they'll send an email to convey their clients' frustration on that issue in particular. So

we'll follow up on timing but did just ask them today so it may be early next week that we get an update, and they're certainly aware they need to get them to us.

They also reiterated their continued interest in meeting with someone at DOJ, whether our office or otherwise, to engage in discussions on forfeiture negotiations, particularly since they view it as an overhang that affects their ability to finalize payments through a Fund process, which they have a hearing about in USVI on Feb. 4. So they'll likely send a letter on that as well, which I'll pass up the chain. No real change there but just FYI.

From: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Sent: Thursday, January 16, 2020 17:37
To: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Subject: RE: RE: updated JE will production

These are very interesting, thanks. As best I can tell, there are no changes to the trust agreement between 2001 and October 2012 – so for the full time period covering the prior investigation and his state prosecution – which is itself somewhat interesting. It looks like Indyke's name first appears around 2004, while Kahn doesn't show up as an executor until 2018.

Also interesting to see that Staley appears to be an executor or backup executor from 2012-18.

I did a quick google search to see if I could find any connection between Ruemmler and Epstein and came up empty. It's an odd choice. Somewhat less odd, although equally notable, is Larry Summers.

Any response yet from the Trustees on when we will get the additional trust agreements (by my count, we need 2001; October 2012; September 2013; November 2014; June 2017; and May 2018)? We should send these on the Brass no later than tomorrow, ideally with an update on when we will get the trust agreements.

Thanks,

From: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Sent: Thursday, January 16, 2020 1:52 PM
To: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Subject: RE: updated JE will production

We received a production from the Trustees today that includes an additional eight prior wills, going back to 2001. In response, we also followed up by asking for the various Trusts referenced in the wills, but wanted to get you these since they're what we asked for in the first instance. Saved here:

[REDACTED]
Assistant U.S. Attorney
Southern District of New York