

Michael C. Miller
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August 20, 2019

Via Electronic Mail

[REDACTED], Esq.
[REDACTED], Esq.
[REDACTED], Esq.

United States Attorney's Office, Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007

Re: *United States v. Jeffrey Epstein*, 19-CRIM-00490 (S.D.N.Y.)

Dear [REDACTED]

We represent Jeffrey Epstein, Reg No. 76318-054, who was previously incarcerated at the Metropolitan Correction Center in New York, New York (the "MCC") while awaiting trial on federal charges in the above-captioned case. We have been authorized by his estate to write pursuant to 28 C.F.R. §§ 16.21-16.26 to request documents and records from the U.S. Department of Justice related to Mr. Epstein.

Specifically, we are seeking: any (1) protocols relating to the response to/investigation of inmate deaths within the MCC; (2) video recordings of all entrances and exits to the MCC; (3) entry and exit logs for the MCC; (4) video recordings of the hallways of the floor on which Mr. Epstein's cell was located; and (5) logs related to the guards on duty at the MCC (collectively, the "Requested Evidence"). The applicable time period for the requests is from 7:00 am on Friday, August 9, 2019 until 8:00 am on Saturday, August 10, 2019. As required by the regulations, we set forth below a summary of the relevance of the Requested Evidence.

Mr. Epstein died in federal custody in his cell at the MCC. We are troubled by the circumstances of his death and by reports of irregularities at the facility. According to a statement issued by the Federal Bureau of Prisons:

On Saturday, August 10, 2019, at approximately 6:30 a.m., inmate Jeffrey Edward Epstein was found unresponsive in his cell in the Special Housing Unit from an apparent suicide at the Metropolitan Correctional Center (MCC) in New York, New York. Life-saving measures were initiated immediately by responding staff. Staff requested emergency medical services (EMS) and life-saving efforts continued. Mr. Epstein was transported by EMS to a local hospital for treatment of life-threatening injuries, and subsequently pronounced dead by hospital staff. The FBI is investigating the incident.

In a separate statement, Attorney General William P. Barr indicated that "Mr. Epstein's death raises serious questions that must be answered." On August 12, Mr. Barr further stated, "We are now learning of serious irregularities at this facility that are deeply concerning and that demand a thorough investigation."

Moreover, there was initial uncertainty about the cause and manner of Mr. Epstein's death. The New York City Office of Chief Medical Examiner ("OCME") declined to immediately release a determination, citing the need for "further information." Days later, the OCME announced that it had reached a conclusion following a "careful review of all investigative information."

We intend to conduct our own investigation into the circumstances of Mr. Epstein's death. In order to do so, we ask that the Requested Evidence be made available to counsel.

Please let us know if you would like to discuss this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael C. Miller".

Michael C. Miller
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