



VIRGIN ISLANDS DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

April 2, 2020

By U.S. Mail

By U.S. Mail and Email: FOIAOJP@usdoj.gov

Dear [REDACTED]

The Government of the United States Virgin Islands ("GVI") submits this *Touhy* request to the Office of Justice Program Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering and Tracking ("SMART"). This request relates to the matter currently pending in the Superior Court of the Virgin Islands, Case No. ST-2020-CV-14, filed by the GVI against the Estate of Jeffrey E. Epstein. The complaint details numerous violations of the Virgin Islands' Criminally Influenced and Corrupt Organizations Act ("CICO"), based on violations of the laws against human trafficking, child abuse, and sexual abuse committed by Jeffrey Epstein and the other named defendants in the Virgin Islands (the "Acts").

The Acts underlying this request involve the international travel of registered sex offender Jeffrey E. Epstein. Upon information and belief, as a registered sex offender, Epstein was required to, at a minimum, alert SMART, in accordance with the Sex Offender Registration and Notification Act ("SORNA"), of any international travel twenty-one days in advance. By this request, the GVI specifically seeks all information related to every occasion Jeffrey E. Epstein traveled outside of the United States from the date of his registration as a sex offender in June 2008 until August 2019.

For each date identified, please provide all information related to his international travel, including the destination of the international travel, as well as any other information provided to or provided by SMART in accordance with SORNA. This request includes any and all information provided to or obtained from the following agencies in conjunction with the operation of SMART and SORNA: the U.S. Marshals Service National Sex Offender Targeting Center; INTERPOL-Washington for foreign country notification; the Federal Bureau of Investigation; and the Department of Homeland Security's Angel Watch Center. Additionally, the GVI requests any and all documentation related to the above via the Correspondence Tracking System and/or obtained by or retained in the Program Accountability Library.

This information is not otherwise reasonably procurable by exercise of due diligence. The Government of the United States Virgin Islands is unable to properly execute its case without production SMART's records, and the failure to obtain such inspection may unreasonably delay effective prosecution of the pending case. This request is narrowly tailored, and made with a good faith reason to believe the information will directly advance issues at the heart of the litigation. The GVI is willing to pay for the costs of producing any documents responsive to its request. Our request does not include anything that would be precluded by any act under United States law.

Sincerely,

A large black rectangular redaction box covering the signature of the sender.

Chief, Civil Division,
Virgin Islands Department of Justice