From: "[redacted], [redacted] (USANYS)" <[redacted]>
To: "[redacted], [redacted] (USANYS)" <[redacted]>
Cc: "[redacted])" <[redacted]>, "[redacted] (USANYS)" <[redacted]>, "[redacted])" <[redacted]>, "[redacted] (USANYS)" <[redacted]>, "[redacted], [redacted] (USANYS)" <[redacted]>
Subject: RE: Jeffrey Epstein-Related Touhy Requests
Date: Sat, 17 Oct 2020 21:40:23 +0000
Attachments: 2020-10-15_[redacted]Touhy_Request.pdf; 2020-10-15_[redacted]_Touhy_Request.pdf; 2020-10-15_[redacted]_Touhy_Request.pdf; 2020-10-14_[redacted]_Touhy_Request.pdf; 2020-10-15_[redacted]_Touhy_Request.pdf; 2020-10-15_[redacted]_Touhy_Request.pdf

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All,

FYI, this week, [redacted] sent us six Epstein-related Touhy requests (attached) under pseudonyms. The Crim team does not know who these victims are. I am going to write back to [redacted] stating that we cannot process these under pseudonyms, and he should re-submit with names. I assume he will ask to call me and tell me the names over the phone. I am going to tell him that we cannot accept that and need complete Touhy requests with names, in writing. Please let me know if you have any concerns with this approach.

Thanks,
[redacted]

From: [redacted], [redacted] (USANYS) <[redacted]>
Sent: Wednesday, September 9, 2020 3:56 PM
To: [redacted], [redacted] (USANYS) <[redacted]>
Cc: [redacted]) <[redacted]>; [redacted] (USANYS) <[redacted]>; [redacted]) <[redacted]>; [redacted] (USANYS) <[redacted]>; [redacted], [redacted] (USANYS) <[redacted]>
Subject: RE: Jeffrey Epstein-Related Touhy Requests

This string is a mile long so I'm going to truncate it.

I think at this point we need to ask [redacted] to make a formal *Touhy* request, with specifics of what he wants, in connection with what proceeding, and naming names, so that we can know exactly what he wants and evaluate it.

Criminals, anything in particular you would like [redacted] *Touhy* request to address? You will have to consider (i) whether disclosing anything under the *Touhy* request would have an impact on your case; (ii) whether it would have any impact on any of your witnesses (e.g., sharing info with a wit as affecting the wit's credibility; sharing info with the wit for the wit's civil case as a disclosable benefit); and (iii) keep in mind that responding to the request is likely to involve a great deal of your time.

-[redacted]