

From: [REDACTED]

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: GM -- search warrant returns

Date: Tue, 20 Oct 2020 21:34:24 +0000

Inline-Images: image001.jpg

Yes, my view is that these would be responsive to 2, 3, 4, 5, and 6. And [REDACTED] confirmed that these have been de-duped.

I'm going to go through and do a few more spot checks to try to weed out any more false hits. My hope is that we can clarify the empty attachments with [REDACTED] tomorrow and then ask [REDACTED] to start bates stamping the remaining responsive documents for production tomorrow.

Please let me know if you'd like to discuss anything else in the meantime.

From: [REDACTED]

Sent: Tuesday, October 20, 2020 4:51 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: GM -- search warrant returns

Thanks, this is helpful. It seems like the [REDACTED] and jeevacation hits (which had two of the highest hit rates in the STR) would be responsive to #6 (and possibly #2, 3, 4, or 5) – is that right? And have these documents been de-duped?

1. Evidence concerning the identity or location of the owner(s) or user(s) of the Subject Devices.
2. Evidence concerning the identity or location of co-conspirators of JEFFREY EPSTEIN, including [REDACTED] and GHISLAINE MAXWELL.
3. Evidence concerning communications to, from, by, and/or among co-conspirators of JEFFREY EPSTEIN, including [REDACTED] and GHISLAINE MAXWELL.
4. Any documents or communications with or regarding victims or potential victims of the Subject Offenses.
5. Documents or records reflecting payments to victims and/or co-conspirators including but not limited to bank and financial records, spreadsheets, ledgers, account listings, check and wire records, and documents reflecting cash withdrawals.
6. Documents or records reflecting travel plans or arrangements for victims or potential victims of the Subject Offenses, or co-conspirators in those Subject Offenses, including

Given that the warrant authorizes seizing data from a more than 20-year period, and given the extent to which Epstein traveled, having this many responsive documents does not seem crazy to me. Particularly if you've already tried to weed out the spam, and spot-checked the responsive documents for each search term to make sure it wasn't pulling in false hits.

From: [REDACTED]

Sent: Tuesday, October 20, 2020 3:58 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: GM -- search warrant returns

Sure, the warrant is attached.

From: [REDACTED]

Sent: Tuesday, October 20, 2020 3:52 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: GM -- search warrant returns

Thanks [REDACTED] Let's see what [REDACTED] says about the attachments. Do you mind sending the rider for the warrant that we would be seizing these materials pursuant to?

From [REDACTED]

Sent: Tuesday, October 20, 2020 2:12 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: GM -- search warrant returns

Update from [REDACTED]

There are 128,175 email attachments attached to emails with search term hits that are empty files. [REDACTED] review of the emails to which these empty files attached suggests that the FBI only provided us with partial files for these emails.

Unclear whether those partial files are all that the FBI was able to extract from the devices, or whether the FBI left out parts of these files when producing them to us. I have asked [REDACTED] for a call tomorrow morning to discuss.

In the meantime, that still leaves us with a very large number of documents hitting on the search terms. Here is a breakdown of the file types:

- 1,087,903 are emails (majority featuring Epstein as sender or recipient)
- 323,179 are email attachments (128,175 of which are empty files as discussed above)
- The remaining 36,619 are a mix of non-email files with no association with emails, such as Word, PDF, PowerPoint, and Excel files.

From: [REDACTED]

Sent: Tuesday, October 20, 2020 8:26 AM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: GM -- search warrant returns

I tend to agree that if we really do have hundreds of thousands of emails between Epstein and [REDACTED] talking about the logistics of travel or meetings with women, we have a good faith basis to tag those as responsive. To the extent defense counsel (or we) want(s) to run search terms within those hundreds of thousands of emails focused on particular names or time periods, they are free to do so, and we may well want to do so.

Also agree on drilling down on the attachment issue. Sorry for the issue with [REDACTED] which is really annoying. Please let us know what you learn from him when he's back tomorrow.

From: [REDACTED]

Sent: Tuesday, October 20, 2020 8:14 AM

To: [REDACTED]

Cc: [REDACTED]

Subject: Re: GM -- search warrant returns

I can ask [REDACTED] about the attachments. [REDACTED] is out today, so I cannot ask CART until tomorrow.

On Oct 20, 2020, at 7:28 AM, [REDACTED] wrote:

Thanks [REDACTED] Those certainly do sound like they would be responsive. But I can imagine improperly extracted attachments being something the defense will certainly complain about- can we go back to CART or [REDACTED] to ask them to figure out what happened and whether there is a way to fix it, or we just have to live with that (for instance, maybe the attachments were deleted or partially overwritten).

On Oct 19, 2020, at 11:47 PM, [REDACTED] wrote:

Following up on this, I've done a spot check of a couple hundred of these hits, and the vast majority are emails with Epstein as a sender or recipient. A small number were spam emails, though I did not see any repeat emails from spam senders. The majority were emails discussing logistics, such as travel, phone calls, and meetings, including the travel

plans of individuals with female names. Most of these logistics emails are with [REDACTED]. There are also emails about paying for school for people with female names, renovations to Epstein's properties, Epstein's finances, and miscellaneous emails about people with female names (e.g., discussing the physical appearance of various females, Epstein asking to have a threesome, modelling photos).

One thing I noticed is that most of the attachments to emails did not appear to have been successfully extracted. Most were just blank pages when I clicked through them. So one way to narrow the responsive category would be just to take the documents with hits and not the entire family of documents along with them.

From: [REDACTED]
Sent: Monday, October 19, 2020 10:37 PM

To: [REDACTED]
Cc: [REDACTED]

Subject: RE: GM -- search warrant returns

I'm struggling to think of a way to limit [REDACTED] or "jeevaction" more because:

- [REDACTED] last name. Because she was Epstein's primary secretary who handled the travel logistics for Epstein, his employees, and the victims who traveled. So it makes sense that her last name has so many hits. Those will include essentially all of the day-to-day communications regarding Epstein's schedule and travel.
- The term "jeevaction" is the phrase Epstein used for the majority of his email addresses (e.g., jeevaction@gmail.com, jeevaction@yahoo.com, etc.). So it's unsurprising that this phrase is the highest hit. I suspect that number reflects the majority of Epstein's emails. We ran that search term because we do not know all of the email addresses Epstein used, and we suspected that there were more domains with "jeevaction" email accounts than we knew about.

We've already run search terms to cut out spam, though we can certainly try to find more.

From: [REDACTED]
Sent: Monday, October 19, 2020 9:21 PM

To: [REDACTED]
Cc: [REDACTED]

Subject: RE: GM -- search warrant returns

Thanks, this is a helpful start. I would recommend we think about how we can perhaps narrow or focus our search terms a bit, perhaps through combinations/connectors or other means, particularly for common names/words that are likely to generate a significant number of hits. For example, "David" turns up nearly 40,000 hits, and "flight" or "flights" turns up over 100,000 just to pick a few.

Also, curious as to why [REDACTED] turns up 450,000 hits and "jeevaction" (which I'm not familiar with but assume you all are?) turns up 750,000. Those two alone seem to account for the overwhelming majority of documents we've identified, so if there's a way to focus those two in particular, that might be a big help.

One thing you might want to do is just review a couple hundred random hits, if you haven't already, to get a bit of a flavor for what we're turning up, as that may help inform our efforts to focus the search. I think we may also have the technology to weed out spam and potentially duplicates, if we haven't already, but defer to others with more experience in those areas....

From: [REDACTED]
Sent: Monday, October 19, 2020 8:51 PM

To: [REDACTED]
Cc: [REDACTED]

Subject: RE: GM -- search warrant returns

The STR report is attached, in case that's useful.

From: [REDACTED]
Sent: Monday, October 19, 2020 8:44 PM

To: [REDACTED]
Cc: [REDACTED]

Subject: RE: GM -- search warrant returns

Thanks, [REDACTED] Taking these one by one:

- We designated certain email accounts responsive, per our discussion, at that yielded 90,000 emails. The balance of the 1.4 million emails/documents comes from search terms.
- The database contains all kinds of documents—word, PDF, and excel. I haven't seen any texts, and it's mainly the kinds of things you'd expect to be saved on someone's computer.
- I don't have numbers by search term, but will check on that and circle back. We sent a list of terms to [REDACTED] and asked him to execute, so I'm not sure about the breakdown.
- Yes, Maxwell is a search term and her email account has been designated responsive.

From: [REDACTED]

Sent: Monday, October 19, 2020 8:37 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: GM -- search warrant returns

Thanks, [REDACTED] Couple of follow up questions on this, and happy to set up a call if that's easier.

First, am I understanding correctly that we ran all of our search terms and came up with 90,000 responsive emails and 1.31 million other responsive documents? Or is the 90,000 figure just [REDACTED] email account?

Second, and related, with respect to the non-email documents, whatever their volume, do you have a sense of what kinds of documents we're talking about? Word documents, texts, excel spreadsheets, some combination thereof?

Third, do you know how many documents hit on each term? If we came up with 1 million hits on the names of the victims, that's one thing, but if we came up with a million hits on the word "flight" or "passenger" we might want to think about whether to narrow the terms a bit.

Also, I presume we ran Maxwell's name as one of the co-conspirators and ran any email account of hers we identified as one of the email accounts?

As noted, happy to jump on a call tomorrow if that's easier.

Thanks,

[REDACTED]

From: [REDACTED]

Sent: Monday, October 19, 2020 8:14 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: GM -- search warrant returns

[REDACTED]

We've run our responsiveness search terms for the search warrant returns, and they yield a total of 1.4 million documents. As a breakdown, 90,000 of those items are emails we designated responsive by account (for example, [REDACTED]). The remaining documents are hits on our search terms, which included the first and last names of every victim and suspected co-conspirators, as well as specific keywords (e.g., passenger, flight). The total database is 1.6 million documents.

1.4 million documents is obviously a substantial portion of the 1.6 million document database. Given our prior discussions, our understanding is that the office is okay with us designating all of these documents responsive, but please let us know if you'd like us to take a different approach.

Thanks,

[REDACTED]

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

[REDACTED]