

[REDACTED]

We specifically seek copies of the following documents that we believe are currently in the possession of the Government:

- 1) Photographs of [REDACTED];
- 2) Videos of [REDACTED];
- 3) Any and all correspondence between Jeffrey Epstein, his agents, employees, medical providers, or attorneys and [REDACTED];
- 4) Any and all records of purchases of gifts or anything of value purchased for or sent to [REDACTED];
- 5) Any and all records of donations made to the Martha Graham Dance Company or Ballet Academy East on behalf of [REDACTED];
- 6) Any and all records showing that a letter or package was sent via U.S. Mail, UPS, FedEx, or by any other means of shipping from Jeffrey Epstein, his agents, or his employees to [REDACTED];
- 7) Any and all records of payments made to medical providers on behalf of [REDACTED];
- 8) Any and all records of payments made to accountants on behalf of [REDACTED];
- 9) Any and all documents including [REDACTED] true name;
- 10) Any and all lists including [REDACTED] true name; and
- 11) Any and all other documentary materials relating in any way to [REDACTED].

Pursuant to the *Touhy* regulations set forth by the Department of Justice, the Deputy or Associate Attorney General assesses the following considerations in determining whether disclosure is warranted:

(a)(1) Whether such disclosure is appropriate under the rules of procedure governing the case or mater in which the demand arose;

(a)(2) Whether disclosure is appropriate under the relevant substantive law of privilege. This request satisfies both of these considerations. As explained previously, the requested non-privileged documentary evidence directly concerns the allegations in [REDACTED] civil case.

Due to the establishment of the Epstein Victim Compensation Program that is currently underway, [REDACTED] seeks this information on an expedited basis in order to properly and completely present her claim for consideration, and if necessary, to continue to proceed by way of formal litigation. The requested information is within the scope of ordinary practice and does not seek disclosure of

information prohibited by statute or regulation. Furthermore, this request does not seek information that is classified or that would reveal the source or identity of any informant. To that effect, [REDACTED] specifically does not request any investigatory records compiled for law enforcement purposes that would interfere with ongoing law enforcement proceedings. [REDACTED] simply requests information in the Government's possession that will assist in the prosecution of her claims and ultimately, aid in her ability to finally obtain the justice that she deserves. To the extent that the requested materials can be made available to [REDACTED] on an expedited basis, it would be greatly appreciated.

Please contact us at your earliest convenience to discuss the identity of [REDACTED] in more detail, at which time we are fully prepared to answer any questions that you may have.

Very truly yours,

EDWARDS POTTINGER LLC



Bradley Edwards
Brittany Henderson