

Florida Office

Bradley J. Edwards *†
Seth M. Lehrman *†
Brittany N. Henderson *‡
Matthew D. Weissing *†

[REDACTED]

New York Office

J. Stanley Pottinger ‡

† Admitted in California
‡ Admitted in District of Columbia
* Admitted in Florida
‡ Admitted in New York
‡ Board Certified Civil Trial Lawyer

October 15, 2020

VIA E-MAIL AND FEDEX

The Honorable Geoffrey S. Berman
United States Attorney for the
Southern District of New York

[REDACTED]
Assistant United States Attorney
[REDACTED]
[REDACTED]
[REDACTED]

**Re: Request for Tangible and Documentary Evidence (Touhy Request)
Lisa Doe v. Darren K. Indyke, et al., SDNY Case No. 1:19-cv-07773**

Dear Mr. Kochevar:

In follow up to our previous communications, please accept this as our formal written request for documentary and tangible evidence currently in the in the possession, custody, and control of the Department of Justice by way of the Southern District of New York relating to the sexual abuse of one of Jeffrey Epstein's many victims, Lisa Doe.¹ See United States ex rel. *Touhy v. Ragen*, 340 U.S. 462 (1951). We make this written request pursuant to the *Touhy* regulations codified as 28 C.F.R. § 16.21 et seq. Should you find there to be any deficiencies within this request, please notify us and we will do what is necessary to correct any such shortcomings.

[REDACTED]

[REDACTED]

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

- 1) Photographs of Lisa Doe;
- 2) Videos of Lisa Doe;
- 3) Any and all correspondence between Jeffrey Epstein, his agents, employees, medical providers, or attorneys and Lisa Doe;
- 4) Any and all records of purchases of gifts or anything of value purchased for or sent to Lisa Doe;
- 5) Any and all records of donations made to the Martha Graham Dance Company or Ballet Academy East on behalf of Lisa Doe;
- 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 Lisa Doe;
- 7) Any and all records of payments made to medical providers on behalf of Lisa Doe;
- 8) Any and all records of payments made to accountants on behalf of Lisa Doe;
- 9) Any and all documents including Lisa Doe's true name;
- 10) Any and all lists including Lisa Doe's true name; and
- 11) Any and all other documentary materials relating in any way to Lisa Doe.

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 Doe's civil case.

Due to the establishment of the Epstein Victim Compensation Program that is currently underway, Lisa Doe 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, Lisa Doe specifically does not request any investigatory records compiled for law enforcement purposes that would interfere with ongoing law enforcement proceedings. Lisa Doe 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 Lisa Doe on an expedited basis, it would be greatly appreciated.

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

Very truly yours,

EDWARDS POTTINGER LLC

A handwritten signature in black ink, appearing to be 'BEH', written over two lines of text.

Bradley Edwards
Brittany Henderson