

From: Bruce Barket <[REDACTED]>
To: "[REDACTED]" ([REDACTED])>
Cc: Aida Leisenring <[REDACTED]>, Tony Ricco <[REDACTED]>, BRUCE KOFFSKY <[REDACTED]>, John Diaz <[REDACTED]> <[REDACTED]>
Subject: Re: Tartaglione Discovery Requests
Date: Sat, 14 Dec 2019 16:36:46 +0000

Thanks.

Bruce Barket
Barket, Epstein, Kearon, Aldea & LoTurco
666 Old Country road
Garden City, NY 11530
[REDACTED]
[REDACTED]
Barket Epstein.com

On Dec 14, 2019, at 11:34 AM, [REDACTED] ([REDACTED]) > wrote:

Yes that's fine.

[REDACTED]
[REDACTED]
[REDACTED]

On Dec 14, 2019, at 11:25, Bruce Barket <[REDACTED]> wrote:

[REDACTED],

I assume we can share our notes from the review of the "attorneys' eyes only" with our resource counsel, David Ruhnke and Tanya Green. Can you confirm that? Thanks.

Bruce Barket
Barket, Epstein, Kearon, Aldea & LoTurco
666 Old Country road
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[REDACTED]
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On Dec 11, 2019, at 7:53 AM, [REDACTED] ([REDACTED]) > wrote:

We are looking into the video request. As you will see in the report, there are some photos that were taken. Friday morning works, after 10. Let us know what time you plan to be here.

[REDACTED]
[REDACTED]
[REDACTED]

On Dec 11, 2019, at 06:00, Bruce Barket <[REDACTED]> wrote:

We appreciate your work in response to our requests.

One item that I think we asked for but you did not address is any video surveillance of the area outside of the cells for the night of July 22nd-23rd. Relatedly, I think we neglected to ask for but we are now requesting, any photographs taken of the Tartaglione/Epstein cell after the July 22nd-23rd incident and any photographs of Epstein and/or of Mr. Tartaglione following the same incident.

As for your offer to review materials at your office, I and Ms. Leisenring would like to view the materials in NYC, later in the day on Thursday; Friday morning; or Monday morning at 9:00 a.m. Let us know if any of those times work for you

Bruce A. Barket, Esq.
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From: [REDACTED] (USANYS) [mailto:[REDACTED]]
Sent: Tuesday, December 10, 2019 10:22 PM
To: Bruce Barket; Aida Leisenring; Tony Ricco; BRUCE KOFFSKY; [REDACTED]; John Diaz;
[REDACTED]
Cc: [REDACTED]
Subject: Tartaglione Discovery Requests

All,

In response to your recent requests for certain information related to the Epstein investigation, we are writing to provide you with the following answers:

1. You requested audio or video of any BOP interviews of Mr. Tartaglione. After speaking with BOP, we have confirmed that no such recordings were made.
2. You requested any documentation regarding the decision to house Mr. Tartaglione and Mr. Epstein together in the same cell in SHU. After speaking with BOP, we have confirmed that no such documentation exists.
3. You asked us to review any After Action Report regarding the July 22/23 incident. After speaking with BOP, we have confirmed that no After Action Report was prepared for this incident.

4. You requested information regarding any BOP investigations into Mr. Tartaglione as a result of the allegations made against him by Mr. Epstein, as reflected in the materials that we previously provided. We are awaiting a response from BOP as to whether such an investigation took place.

5. You asked us to review BOP's interviews with other inmates to determine whether those interviews, to the extent they exist, corroborate information provided by Mr. Tartaglione to BOP about the July 22/23 incident. We are confirming with BOP whether any such interviews took place. Relatedly, we are collecting and reviewing for the same information any inmate interviews conducted by the US Attorney's Office in connection with its Epstein investigation, and will make a disclosure as appropriate.

6. You requested unredacted portions of the materials previously produced from the Epstein investigation file. In response to this request, which we understand to be a request pursuant to Rule 16 and *Brady* for the penalty phase, we have compiled the entire BOP investigative report related to the July 22/23 incident. We will make this document available for your review at the US Attorney's Office, with minimal redactions for (i) the duty assignment roster for the entire MCC, and (ii) certain information in Mr. Epstein's medical records. Your review of the report will be governed by the protective order in this case, and the report is designated Attorney's Eyes Only. Please let us know when you'd like to review the report. If you'd like, we can make the report available at our White Plains office in advance of the conference on December 18 (for planning purposes, the report is 53 pages).

[REDACTED]
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