From: " (USANYS) [Contractor]" <
To: "
Subject: FW: Epstein search warrant documents
Date: Mon, 13 Jul 2020 13:55:05 +0000
Attachments: EpsteinNYEvidence.xlsx
5 (AND (50))
From: (NY) (FBI) < > Sent: Monday, July 13, 2020 9:07 AM
To: (USANYS) [Contractor] <
Subject: RE: Epstein search warrant documents
See attached.
See attached.
NYO CART Coordinator
Senior Forensic Examiner
(office)
(cell)
From: (USANYS) [Contractor] [mailto:
Sent: Monday, July 13, 2020 8:59 AM
To: (NY) (FBI) <>
Subject: RE: Epstein search warrant documents
Hello Maria,
Livet and the board drive and the consequence of the board drive. Board drive Day on the board drive and the board drive are the board drive and the board drive are the board drive.
I just got the hard drive and I have some questions about what is on the hard drive. Do you have a moment to talk?
Thank you.
From: (NY) (FBI) <>
Sent: Wednesday, July 8, 2020 12:42 PM
To: (USANYS) [Contractor] < > Subject: RE: Epstein search warrant documents
Subject No. Epstein Search Warrant documents
Thanks
NY CART Coordinator
Senior Forensic Examiner
desk
ucsk.
On Jul 8, 2020 12:41 PM, " (USANYS) [Contractor]" <
wrote:

Thanks. . (NY) (FBI) < Sent: Wednesday, July 8, 2020 12:38 PM (USANYS) [Contractor] < Subject: RE: Epstein search warrant documents Thats what I hear, they are going to get it to you. NY CART Coordinator Senior Forensic Examiner cell desk On Jul 8, 2020 12:33 PM, " (USANYS) [Contractor]" < wrote: I am assuming you are sending the data to One Saint Andrews correct? From: . (NY) (FBI) < Sent: Wednesday, July 8, 2020 12:31 PM (USANYS) [Contractor] < Subject: RE: Epstein search warrant documents The drive will begin its journey to you in minutes. Reach out when you get it to go over stuff so you aren't looking at it like a dog looking at a tuba. NY CART Coordinator Senior Forensic Examiner cell desk (USANYS) [Contractor]" < On Jul 7, 2020 5:34 PM, " wrote: Hello Our office is not open and I am still working from home. Is it possible to have this data sent to my home? Thank you. . (NY) (FBI) < Sent: Tuesday, July 7, 2020 5:14 PM (USANYS) [Contractor] (USANYS) < . (NY) (FBI) <

As soon as I have the hard drive I will reach out to you.

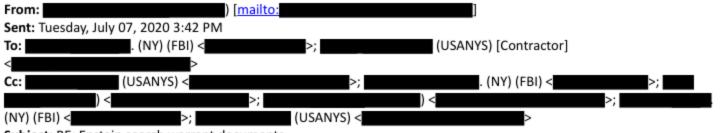


Subject: RE: Epstein search warrant documents

Everything with the exception of a couple of items are ready. I will get you an actual number before I send it over. We can send it over tomorrow. There will be ReadMe files included so it will be easy to see where the items came from. I am a little worried about how the e-mail will present. While looking through on a spot check, the attachments are not connected to the e-mails in the forensic tool. I believe it is a function of the e-mail client they were using to begin with. I know that the attachments are a concern of yours. We may have to massage things a bit to get it right. Now that we are working every day, and everything has been processed, it shouldn't be too big a deal. So far the export is about 350 GB. It copies slowly because it is a ton of pretty small files. You are getting the whole ball of wax, here, Macs, Windows boxes, loose media, etc. There will be a few iPhone and iPad reports, but unsure if I can get you those tomorrow as they very often take a LONG time to copy. Again, lots of small files. If not tomorrow, the next day.

Are you around tomorrow? Reach out to me when you get the production so we can correct any problems we might encounter. Thanks.

NYO CART Coordinator
Senior Forensic Examiner
(office)
(cell)



Subject: RE: Epstein search warrant documents

I understand that some number of the devices are ready to come to us as early as today or tomorrow. Could you please let us know the following information, so we can figure out who the hard drive should go to in the first instance:

- 1. How many total devices are coming to us in this initial production?
 - 1. What are those devices i.e., type of device and which ones, from the spreadsheets you've sent?
- 2. What's the total volume of data coming in this round of production?

Once we know that, I can let the agents know where the drive needs to go in the first instance.

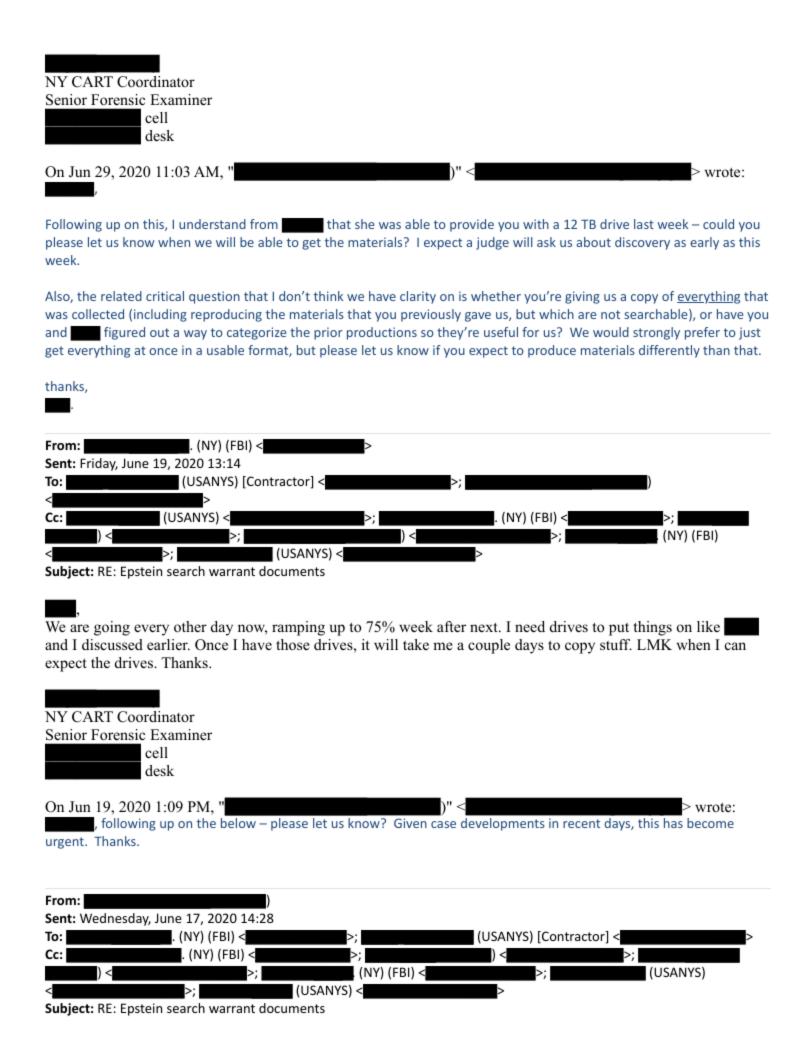
thanks,







I am in the process of exporting the materials (documents, spreadsheets, emails, etc) for your review as per my discussions with ______. Most of the NY stuff is done, just Mac items left. This might take a few days as 1 item in particular has over 500,000 emails. We will be able to provide discovery once Defense Council has provided drives for us to copy items over to. This goes quicker as there is no processing involved. I'll let you know when everything is complete.



Wanted to circle back on this and check in, particularly because we desperately need to get the results from the July and September searches before moving forward with possible additional charges in the case. I know you had mentioned you needed to push back your prior estimate of complete production by early June, by a couple weeks, so wanted to see what the current estimate is? I don't think we've started to get anything yet but please correct me if I'm wrong.

thanks,



Will do.

NY CART Coordinator Senior Forensic Examiner cell desk

On Jun 1, 2020 4:26 PM, " wrote:

Understood, and thanks for letting us know. Let's keep in touch both on timing and also on whether there's a way to identify and categorize what's already been produced, or if we'll need to just get all the raw data at this stage and go from there.



Unfortunately, recent events and our staffing levels have conspired to put a kink in just about everything. If we can't make heads or tails of the stuff I've already produced, we'll do it again. They have told us that our staffing levels will be steadily increasing over the next few weeks, but I'm going to have to push back my estimate by a week or 2. Sorry about that. My next day in the office is Thursday, so I'll be able to see if I can easily identify what I already gave you and marry it to a reliable identifier.

NY CART Coordinator Senior Forensic Examiner cell desk



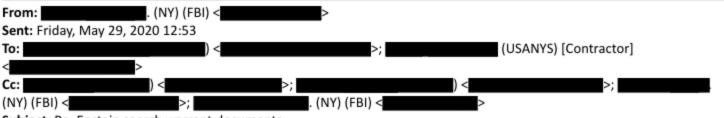
Thanks for this update - we'll take a look and circle back if any questions.

Separately, to follow up on a question from the May 15 email below, the list has just five devices as still pending to be transferred to us, and I think it's right that the plan is to reproduce all the materials so that we can get them in searchable format, but just wanted to confirm? Currently, we aren't able to match any of the prior productions to specific devices – so if we're able to match them up by Bates number now, that might work, but otherwise I think it makes sense for us to get everything. But let us know if any issue with that.

And related to that question, are we still on track to get the full range of data in the next week or so? I don't think we've gotten any updates on that status in the past few weeks, and we're eager to be able to start reviewing.

thanks again,





Subject: Re: Epstein search warrant documents



Updated item descriptions. Just a side note, many thumb drives and SD cards will not have a serial number visible externally, but will report one through our tools. I included those electronically reported serial numbers. Any questions, let me know.





Subject: RE: Epstein search warrant documents



Thanks for this, it's a helpful start. In terms of being able to write our search warrant, one additional piece of information we need is the serial number, or some other specific identifier, ideally for each device but at least for any device that there is more than one of the same thing. So for example, we need to be able to somehow differentiate the following devices —

- The two Dell power edge T310 hard drives (NYC024323 and NYC024324)
- The two Sony Vaio laptop / Fujitsu hdd (NYC024336 and NYC024337)

- the following loose storage devices:
 - Micro SD card (NYC024339)
 - Flash Drive (generic) (NYC024340)
 - o Thumbdrive (Emtec) (NYC024341)
 - o hard drive (loose) (NYC024342)
 - o verbatim thumbdrive (NYC024343)
- The four San Disk cruzer-thumbdrives (NYC024344-47)
- The three Seagate IDE hard drives (NYC024348-50)
- The camera SD card (NYC024351)

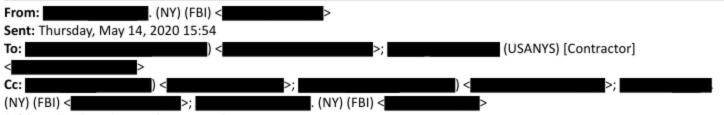
I think the rest of the devices are either specifically distinguishable and/or have an S/N listed. (By comparison, the USVI spreadsheet we have lists an s/n for about 20 of the 25(ish) devices.

The other thing we're looking for is the location in the house (and ideally specific location) for each device, which the USVI list also has – is that info available?

The list also has just five devices as still pending to be transferred to us, and I think it's right that the plan is to reproduce all the materials so that we can get them in searchable format, but just wanted to confirm? Currently, we aren't able to match any of the prior productions to specific devices – so if we're able to match them up by Bates number now, that might work, but otherwise I think it makes sense for us to get everything. But let us know if any issue with that.

thanks very much,





Subject: Re: Epstein search warrant documents



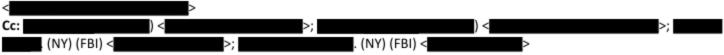
Here is The listing of all the evidence gathered in NY that I have. I added some columns to guide you to the unique numbers CART NY uses fro their evidence. The template wasn't a slam dunk over, so I did what I could to convey the information. If you are confused by anything, please let me know. In the column for approximate size, it is in GB, totaled at the bottom and converted to TB. In the materials contained column, I put what load file group the data was transferred over in (Mac, Windows, Loose Media, IDE, or Blacklight) If there is no entry in that column, that data has yet to be transferred. There are 2 Macs and a DVR you don't have as well as an iPhone and an iPad. IF the descriptions are a bit light, let me know and I'll do what I can to beef them up. I will get you the Island stuff tomorrow.

FBI NY CART Coordinator
Senior Examiner

From: Senior Examiner

Sent: Wednesday, May 13, 2020 12:25 PM

To: (NY) (FBI) < >; (USANYS) [Contractor]



Subject: RE: Epstein search warrant documents



Respectfully, I think there are some miscommunications here — all we have asked is to receive the materials in a format such that we can view them using a system we have access to. We're not able to get web-enabled access through any FBI tool, so we asked for the materials to be transferred in a loadable format so we could put them on Relativity, which both we and the agents can access. We're required to have the files in a format that we can produce them to defense counsel. I've done that in many other cases and it hasn't previously been an issue. My understanding from is that the best way to do it now is just for us (the U.S. Attorney's Office) to get the original files, which our vendor will process—by which I just mean converting into file formats that are loadable onto Relativity. It doesn't really have anything to do with the taint review—we have to have access to the docs in our systems for discovery purposes.

And we were happy to get the materials as they were processed, but when we received the 1.1 million documents earlier this year, they were in a format that wasn't usable for the reasons described in the email I sent on March 9. Again, I understand from that the best way forward is to just get copies of the materials in their original formats, which I understand will be segregated and designated by device. That should work for us! I was just trying to understand the approach, as well as the timeline.

thanks,





Subject: Re: Epstein search warrant documents



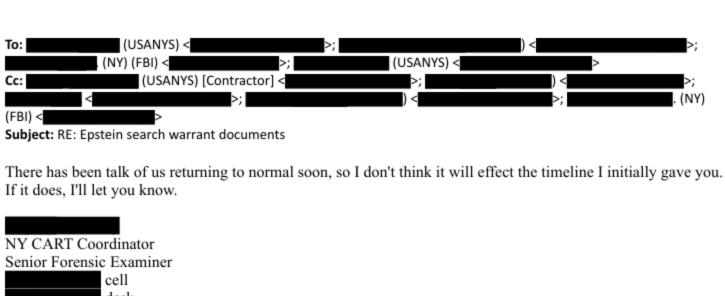
Just to be clear. The US Attorney's Office (or it's contractors) are not "processing" anything. You are taking files that I will be extracting from processed evidence and putting them into an E-Discovery tool (Relativity) to do a taint review.

Relativity is NOT a forensic tool. It is incapable of dealing with many things that are found forensically on a computer like free space, slack space, and system files to name a few. When we started this, and you insisted you do the taint review in Relativity, I warned you that it was adding months worth of work on top of what was already done, and that Relativity was incapable of viewing everything. You insisted we do it this way. So now and I have come up with a way to fit this round peg into this square hole. We will get it done.

Sorry it has taken so long, but we are talking about terabytes worth of data over multiple forms of digital evidence. Phones, tablets, loose media, cameras, DVRs, servers, laptops, and desktop computers. We have gotten past encryption on multiple devices. When we review devices on such large cases, we usually do it piece by piece as things are processed, I was unaware that you didn't want to review as things were processed, that you wanted to do it "all at once", so that added to the delay. Sorry for that. Just a differentiation of methodology I suppose.

and I feel confident that the method we have come up with will be more consistent and preserve the attribution of files to devices and links of e-mails to attachments that the load file generation that I did a while back was lacking. FBI NY CART Coordinator Senior Examiner From: Sent: Tuesday, May 12, 2020 11:33 AM (USANYS) [Contractor] . (NY) (FBI) < Cc: Subject: RE: Epstein search warrant documents Okay, so just to check, you both think that there is not a need to do a test run? You're both comfortable with just basically sending us copies of everything? I don't totally understand why we couldn't have done that eight months ago, but regardless of the passage of time, I want to make sure we understand so we can report to our supervisors. I assume that means that we (at the U.S. Attorney's Office and through contractors) will therefore need to do all the processing ourselves, correct? And thanks again to you both. From: . (NY) (FBI) < Sent: Tuesday, May 12, 2020 11:30 (USANYS) [Contractor] < To: Cc: Subject: RE: Epstein search warrant documents Like said in his earlier email. It will be the raw data and it will be marked so it is easier to attribute it to a particular device. Problem now is how to get the data to since he is teleworking. NY CART Coordinator Senior Forensic Examiner cell desk On May 12, 2020 11:15 AM, " > wrote: I have no doubt you do, but can you please tell us what that plan is? Thanks! From: . (NY) (FBI) < Sent: Tuesday, May 12, 2020 11:11 (USANYS) [Contractor] < To: Subject: RE: Epstein search warrant documents I will use the spreadsheet, no problem. and I ironed out all the details. We've got a good plan moving forward that will meet your needs.





desk

On May 8, 2020 1:58 PM, " Understood, thanks—it will be great to get that list on Thursday. As a refresh, the info we are looking for is in the attached spreadsheet template.

On the returns themselves, do the changes you mentioned mean that the estimate of a month from now for complete transmission of the search warrant returns is no longer likely? If so could you please let us know what the current estimate would be, so we can factor that in? Thanks very much.



Subject: RE: Epstein search warrant documents

Sorry for the delay, they reduced us to 1 day a week, so things have been stretched out by a factor of 5. I will be back in the office on Thursday and will be able to get you the list then as I have to access some of our systems to do so.

Also, please reach out to me at one of the numbers below so we can brain storm. Thanks.

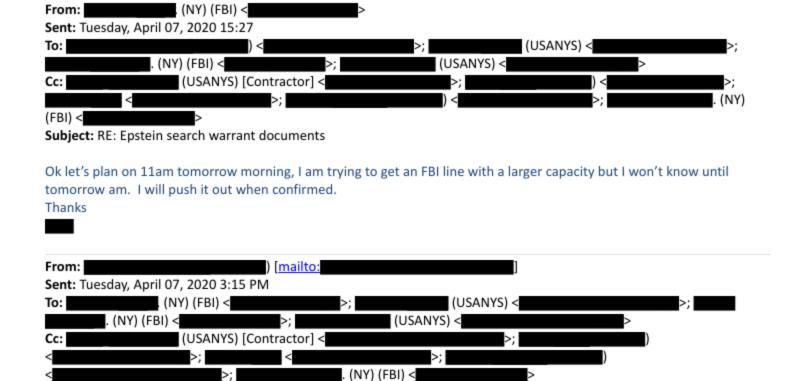
NY CART Coordinator Senior Forensic Examiner cell desk

On May 8, 2020 12:10 PM, " > wrote:

Following up on the below, I think you had said you expected to be able to get us a list of the devices seized from the search warrants at Epstein's residences in New York and the USVI, as well as from his person upon arrest, in about a month (during our conference call a month ago) - so wanted to check if we can still expect that very soon? We're waiting on that list to be able to do an updated search warrant on all of those devices. Please let us know the current timeline and also the current timeline on producing the results from those August and September searches? I think you and



thanks,



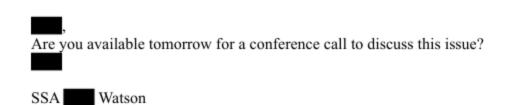
Yes, I can do anytime tomorrow, and can also join anytime tomorrow. So whenever is good on your end.

Also, we can host a conference call, but only up to six lines at a time - so if FBI has larger capacity than that let us know, otherwise I'd propose we do:

- 1) 2) 3) 4) 5) , if either of you wants to join (and if not, one of
- From: . (NY) (FBI) < Sent: Tuesday, April 07, 2020 14:13 To: (USANYS) < (USANYS) < (USANYS) [Contractor] < Cc: (FBI) <

Subject: RE: Epstein search warrant documents

Subject: RE: Epstein search warrant documents





Following up on this from a month ago – I know we're living in a different world than what existed four weeks ago, but are you at all able to assist while working remotely? This has been pending for almost two months and we still don't have a very basic list of each device or item that was seized and searched, or for which of those we've received materials. We're happy to have a call if that would be useful, but as a first step the most basic thing we're looking for is the info in the template spreadsheet we sent earlier (that's also attached).

thanks,

FBI New York



Subject: RE: Epstein search warrant documents

Unfortunately I don't think this is very helpful to us. Did you take a look at the example spreadsheet I sent on 2/24? The excel file you sent has descriptions that don't match up to the items listed in the search warrant returns (that we sent on 2/23), and we don't have the 1B or CART numbers to be able to cross-reference. We also can't tell what you mean by "loose media" without a specific comparison to what was seized, we don't know which items you're referring to as "Windows machines," and we can't tell whether the entirety of any particular item has been transferred, or just partial. For example, it looks like we have gotten very, very few image files, which is surprising.

We have also encountered some very significant problems in trying to review the more than 1 million documents we recently received:

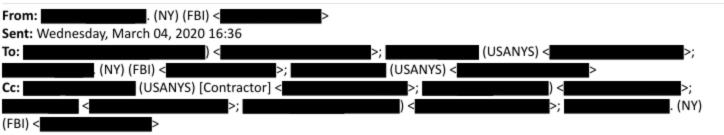
- The data we've received has no way to put any emails and attachments together. So if an email says, "see the attached flight records," for example, we have no way of linking that up with the records themselves. Not only is that a big problem for us in review, it's going to be a huge problem for producing the documents to defense counsel.
- The load file has no link to the native file, so when we load the data to the database, there's no way to have the native files show up in the database. Because many of the files are too large to open in the viewer, it effectively means that there are many files that are completely invisible to us.
- Related, the control numbers in the load file don't match up to the native files. So we have two sets of numbers
 and no way to match up anything—that is, even if we were to try to go hunt down every individual large file in the
 native files, it would be impossible.

So the data that we most recently got, we need to get in a form that addresses those issues, and we likely will need to get a similar reproduction of the data we received a couple months ago. Otherwise we're sifting through more than a million documents without much rhyme or reason.

I've re-attached the spreadsheet we sent last week – I think that's a good place to start in terms of our necessary record-keeping, and we need that info at the very least, as well as anything else you think would be useful. Also attaching the SW returns for reference. And again, we're happy to meet up anytime and hash all this out in person if that's useful.

thanks,





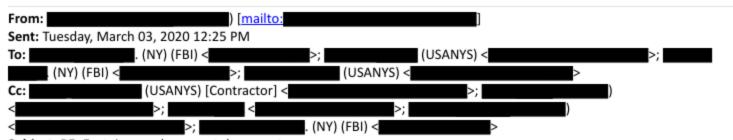
Subject: RE: Epstein search warrant documents

Here is a listing of what I have already handed over in load files to the US Attorney's Office for taint review. Some points of clarification: There were 9 IDE hard drives found in the Manhattan apartment, they turned out to be 3 copies of 3 drives (9 drives in total) from a July 2007 search on one of his properties. I only processed 3 (as they were all copies). All the loose media from the NY apartment is included. All the Windows machines from the NY apartment are included. Only 2 Macs from NY and 1 from the Island are included.

I will have to more closely coordinate with whoever is loading up Relativity with the remaining Macs as the tool they have to be processed with does not easily re-name the load files.

Spreadsheet is attached.

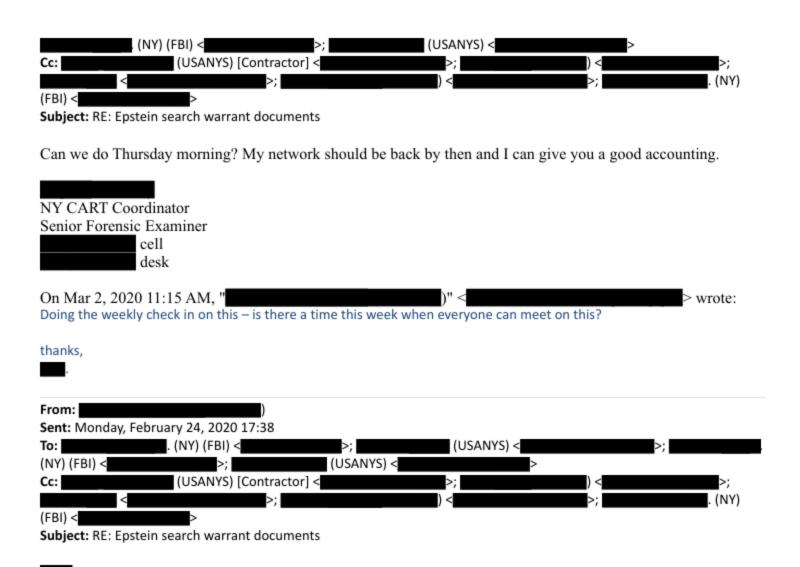
NYO CART Coordinator
Senior Forensic Examiner
(office)



Subject: RE: Epstein search warrant documents

I could do Thursday morning, but I think it would be helpful for us to get the accounting in advance of the meeting so we can figure out in advance what (if any) additional steps we need – is that possible?

From:	. (NY) (FBI) <	>		
Sent: Tuesday, March 0	3, 2020 09:59			
To: US	SANYS) <	>;	>	;

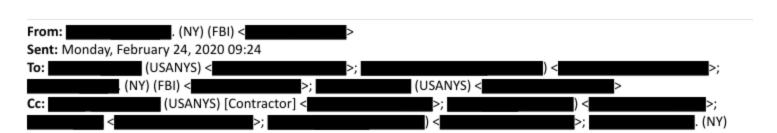


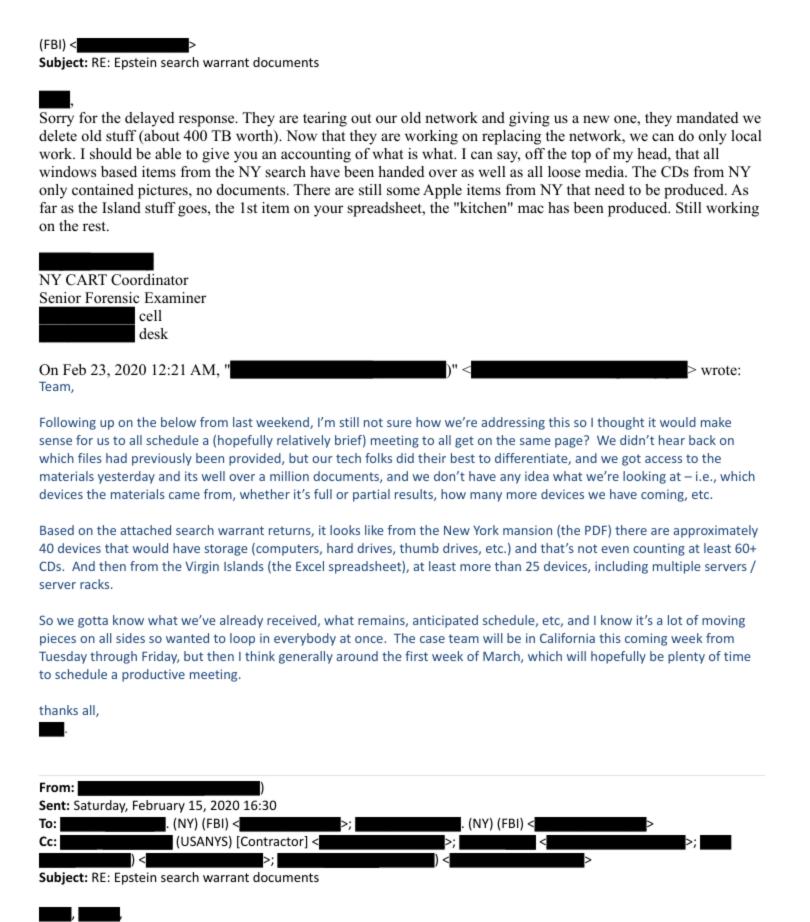
Totally understand about the network issues—we can relate. I do still think it will be helpful to all sit down together to have an in-person discussion, to make sure everybody is on the same page. Are folks available for that next week? And what I think would be most helpful to facilitate that would be a spreadsheet of each separate device referenced in the two search warrant returns, with columns for whether we've dumped the contents, whether they've been reviewed and/or transferred, what portions were transferred, etc.

Something roughly like the attached, with any other categories you think would be useful – and the info on the attached is mostly hypothetical, obviously, just as examples. That will help us fully understand what's been reviewed, transferred, and received so far, and what remains.

(Also just on the pictures, we do want copies of those as well, please including from the discs and the devices – I think FBI was going to do an initial screen to make sure no CP, and since I think the answer was no, we'll need to get those to be able to review them as well.)

many thanks,





I'm not sure who's the exact right person to ask this, so wanted to get everybody on one email chain about it – I have the hard drive that dropped off that has new Epstein search warrant materials, but it looks like there are also old materials (that I think we had previously received and uploaded??) on the hard drive, and so I'm not sure what's new.

Just generally, and and I talked about this last week too, but it's basically impossible for us to keep track of what we're getting, and what has been completed, without some kind of identification or labeling system, along with a list of which devices have been extracted and downloaded.

So for example on the hard drive currently, there are 38 folders labeled "loadFiles" through "37loadFiles" with a modified date of 11/14/19, which I think we may have already previously received – but I'm not sure, because we haven't gotten any info on which folders match up to which devices, etc. And then there's another folder titled "NYC024362" that has a modified date of 1/27/20, so I think that may be the materials we hadn't previously received? That folder by itself has more than 600,000 items.

I don't want to give anything that we've already previously received and uploaded, and I can't tell from the folder or file names whether everything on the drive is new, or whether just additional materials were saved onto it in addition to what we already have. are you able to give us some guidance on this? Ultimately what we really need is a spreadsheet of every device, whether it's been dumped (or partially dumped), and then identifying that same info — which device, and what materials from it — are being given to us with each data transfer. Otherwise I think organizationally and for review purposes it will be a total disaster for us.

We're happy to have a meeting on this if that's helpful – and thanks everybody for the assistance.

Assistant U.S. Attorney Southern District of New York