



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 13, 2020

By Email and USAfx

Samuel Gregory, Esq.
Law Offices of Samuel Gregory, P.C.

Lloyd Epstein
Epstein & Weil LLC

Re: *United States v. Robert Adams*, No. 20 Cr. 494 (PGG)

Dear Counsel:

This letter provides additional discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure. This letter and the materials identified herein are subject to the protective order entered in this case on October 15, 2020, and have been designated as "Protected Materials" as defined in the order where noted below. Accordingly, the materials and information identified herein shall not be disclosed to any third party except as set forth in the protective order.

Description	Bates Numbers	Classification Pursuant to Protective Order
Materials from Robert Adams interview dated August 16, 2019	SDNY_RA_00000704 – SDNY_RA_00000705	
Robert Adams vehicle workup	SDNY_RA_00000706 – SDNY_RA_00000736	
Collected item logs	SDNY_RA_00000737 -- SDNY_RA_00000745	
Evidence receipts	SDNY_RA_00000746 -- SDNY_RA_00000767 ¹	
BOP records	SDNY_RA_00000770 -- SDNY_RA_00000783	

¹ Please note that the bates range SDNY_RA_00000768 through SDNY_RA_00000769 has been omitted.

Whitestone Motel records	SDNY_RA_00000784 -- SDNY_RA_00000939; SDNY_RA_00001638 -- SDNY_RA_00002533	
MCC records	SDNY_RA_00000940 -- SDNY_RA_00001313	
MCC surveillance footage	SDNY_RA_00001314 -- SDNY_RA_00001322	
Metrocard records	SDNY_RA_00001323 -- SDNY_RA_00001332	
Photographs	SDNY_RA_00001333 -- SDNY_RA_00001343	
Search warrant for historical cellsite data for the cellphone number [REDACTED], dated November 5, 2019	SDNY_RA_00001344 -- SDNY_RA_00001359	
T-Mobile records for the phone number [REDACTED] responsive to a search warrant dated November 5, 2019 (19 Mag. 10436)	SDNY_RA_00001360 -- SDNY_RA_00001365	
Sprint records for the phone number [REDACTED] responsive to a search warrant dated August 19, 2019 (19 Mag. 7762)	SDNY_RA_00001366 -- SDNY_RA_00001371	
Verizon records for the phone number [REDACTED] responsive to a search warrant dated August 21, 2019 (19 Mag. 7836)	SDNY_RA_00001372 -- SDNY_RA_00001395	
Magic Auto Sales for an account in the name of Robert Adams	SDNY_RA_00001396 -- SDNY_RA_00001403	
Transunion records for an account in the name of Robert Adams	SDNY_RA_00001404 -- SDNY_RA_00001416	
Law enforcement searches	SDNY_RA_00001417	
Responsive materials from Robert Adams' cellphone	SDNY_RA_00001418 -- SDNY_RA_00001511	
Responsive materials from Visitor-1's phone	SDNY_RA_00001512 -- SDNY_RA_00001637	

The Government has now produced to you relevant portions of the MCC's visitors logbook. Should you wish to physically inspect the logbook, we can arrange for you to do so at the FBI's offices at 26 Federal Plaza. Similarly, we have produced to you relevant portions of the MCC's video surveillance footage from July 5, 2019. Should you wish you receive additional footage from that day, please provide us with a 32 gigabyte disc.

In addition, we wish to advise you of the following:

On or about August 16, 2019, in connection with an investigation into the circumstances of the death of Jeffrey Epstein, a paralegal at the U.S. Attorney's Office spoke to the defendant by

telephone. On that call, the defendant stated, in sum and substance, the following: he was working on August 16 to 8 p.m. or 10 p.m.; his days off were Monday and Tuesday; his schedule on weekends was varied, and on August 17 and August 18 he was working from 8 a.m. to 12 a.m.; and on the next Wednesday he would be working from 12 p.m. to 8 p.m. The defendant also stated, in sum and substance, that the number for the control room at the MCC was [REDACTED] and that his cellphone number was [REDACTED].

On or about September 28, 2020, after he was arrested and released from FBI custody, and as the FBI special agents were walking the defendant out of the courthouse, they discussed what was open to get something to eat. The defendant stated he wanted to go to the food cart located outside of 60 Centre Street, New York, New York. When the FBI special agents and the defendant approached the corner of Pearl Street and Centre Street, the defendant stated that the food cart was not there. One of the FBI special agents stated that he was going to go to the deli/pizzeria at the corner of Duane Street and Lafayette Street. The defendant stated that the special agents should try Luna Pizzeria located near the MCC. The defendant further stated that there was a girl who worked at Luna Pizzeria who was “easy on the eyes.”

The Government interviewed Visitor-1, who is represented by counsel, on or about August 14, 2019, August 22, 2019, September 12, 2019, and February 12, 2020.² Among other things, Visitor-1 has stated the following, in substance and in part:

- The defendant told Visitor-1 that the defendant threw away the contraband that Visitor-1 brought to the MCC on or about July 5, 2019.
- The defendant told Visitor-1 not to bring drugs to the MCC anymore. Visitor-1 was afraid that the defendant would get Visitor-1 in trouble if she did, and as a result, did not bring drugs during subsequent visits when she believed the defendant was working.
- On a subsequent visit to the MCC, the defendant told Visitor-1, in substance and in part, that Visitor-1 was having a “dry month,” which Visitor-1 understood to mean that Visitor-1 was not making money because Visitor-1 was not bringing any contraband into the MCC.
- In a text message dated on or about July 26, 2019, which has been produced in discovery, Visitor-1 wrote, in substance and in part, that “the fed was there he blowing mines.” Visitor-1 has told the Government, in substance and in part, that Visitor-1 was trying to convey that the defendant prevented Visitor-1 from visiting Inmate-1 and was describing a sense of frustration.
- In a text message dated July 26, 2019, which has been produced in discovery, Visitor-1 wrote, in substance and in part, “I’m headed home I bagged one of the feds he said he

² The Government intends to disclose the names of the witnesses referenced herein in advance of trial along with other *Giglio* and Jencks Act materials. The Government is available to discuss a schedule for those disclosures at your convenience.

might give me money.” Visitor-1 has told the Government, in substance and in part, that she used the term “bagged” as slang for getting the defendant’s telephone number, and denied that “bagged” meant to have sexual intercourse with someone; that Visitor-1 was attempting to act as if obtaining the defendant’s phone number was Visitor-1’s choice; and that she planned to obtain money from the defendant, as she frequently tried to obtain money from men with whom she was having sexual relations.

- On one occasion when Visitor-1 attempted to visit Inmate-1 following the July 5, 2019 incident, the defendant told Visitor-1 that Visitor-1 could not see Inmate-1 because something was going on inside the MCC. Visitor-1 learned from another MCC visitor that visiting was stopped because there was a fight among inmates. However, Visitor-1 suspected that the defendant may have intentionally prevented Visitor-1 from seeing Inmate-1. Visitor-1 believed that the defendant fabricated a reason to prevent Visitor-1 from visiting Inmate-1 because she believed that the defendant was romantically interested in her.
- Visitor-1 told an individual who provided contraband for Visitor-1 to bring to the MCC (“Individual-1”), that a MCC correctional officer did not facilitate Visitor-1’s efforts to smuggle contraband into the MCC.

On or about August 21, 2019, the Government interviewed an inmate at the MCC (“Inmate-2”), who is represented by counsel. Among other things, Inmate-2 stated, in sum and substance, the following: an inmate known as “Lucky” went to the visiting floor to get contraband, and after the defendant intercepted that contraband, he told “Lucky” that he was going to flush it down a toilet.

On or about September 13, 2019, the Government interviewed an inmate at the MCC (“Inmate-3”), who is represented by counsel. Among other things, Inmate-3 stated, in sum and substance, the following: Inmate-3 never heard about the defendant being involved in smuggling contraband.

On or about September 27, 2019, the Government interviewed a former MCC inmate (“Inmate-4”). Among other things, Inmate-4 stated, in substance and in part, the following: everybody at the MCC respected the defendant; that Inmate-4 was unaware of any issues with the defendant or issues with the defendant being too friendly with visiting wives or girlfriends; and the defendant was very friendly with the visitors and inmates at the MCC.

On or about October 16, 2019, the Government interviewed a MCC Correctional Officer (“CO-1”). Among other things, CO-1 stated, in substance and in part, the following: CO-1 did not believe that the defendant would let any inmates or visitors slide or do favors for them; CO-1 never experienced a situation where an inmate or visitor was causing trouble and the defendant told CO-1 to let it go; that the defendant did his strip searches of inmates out in the open, unlike other dirty correctional officers who did their searches while looking over their shoulder to see who was coming; and that the defendant did not try to chat up or flirt with women who visited the MCC.

