

United States District Court  
SOUTHERN DISTRICT OF NEW YORK

TO: Michael Kearins

GREETINGS:

WE COMMAND YOU that all and singular business and excuses being laid aside, you appear and attend before the GRAND JURY of the people of the United States for the Southern District of New York, at the United States Courthouse, 40 Foley Square, Room 220, in the Borough of Manhattan, City of New York, New York, in the Southern District of New York, at the following date, time and place:

Appearance Date: August 26, 2019 Appearance Time: 10:00 a.m.

to testify and give evidence in regard to an alleged violation of :

18 U.S.C. §§ 371, 1001, 1519

and not to depart the Grand Jury without leave thereof, or of the United States Attorney, and that you bring with you and produce at the above time and place the following:

**Personal appearance is required unless excused by the U.S. Attorney's Office for the Southern District of New York. Please see the attached riders.**

Failure to attend and produce any items hereby demanded will constitute contempt of court and will subject you to civil sanctions and criminal penalties, in addition to other penalties of the Law.

DATED: New York, New York  
August 20, 2019

*Geoffrey S. Berman*

GEOFFREY S. BERMAN  
*United States Attorney for the  
Southern District of New York*

[Redacted]  
Assistant United States Attorneys  
One St. Andrew's Plaza  
New York, New York 10007  
Telephone: [Redacted]  
Email: [Redacted]



**RIDER**

(Grand Jury Subpoena to Michael Kearins, dated August 20, 2019)

**Advice of Rights**

1. You may refuse to answer any question if a truthful answer to the question would tend to incriminate you.
2. Anything that you do say may be used against you by the grand jury or in a subsequent legal proceeding.
3. If you have a lawyer, the grand jury will permit you a reasonable opportunity to step outside the grand jury room to consult with your lawyer if you so desire.
4. If you would like a lawyer but do not have funds to retain one, you may make an application to the United States Magistrate Judge who will decide whether to appoint a lawyer to represent you.

**Instructions and Definitions:**

1. This subpoena calls for the production of categories of documents, records, correspondence, other written material (including electronically stored material), and physical items, as specified below, in your possession, custody or control.
2. This subpoena covers all responsive documents wherever they may be found, including on computers, email accounts, iCloud accounts, servers, cellphones, and other personal electronic devices, whether in the United States or any foreign jurisdiction.
3. This subpoena does not call for the production of any documents protected by a valid claim of privilege, although any responsive document over which privilege is being asserted must be preserved. Any documents withheld on grounds of privilege must be specifically identified on a privilege log with descriptions sufficient to identify their dates, authors, recipients, and general subject matter.

**Materials to be Produced:**

1. All materials relating to Jeffrey Epstein including, but not limited to, any text messages, emails, social media messages or posts, documents, or notes.
2. All materials related to any destruction of records at the Metropolitan Correctional Center after the August 10, 2019 death of Jeffrey Epstein, including, but not limited to, any text messages, emails, social media messages or posts, documents, or notes.