



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
[REDACTED]

April 14, 2021

BY USAfx

Jason E. Foy
Foy & Seplowitz LLC
105 Main Street
Hackensack, NJ 07601

Re: *United States v. Tova Noel No. 19 Cr. 830*

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 December 16, 2019, 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 or referenced publicly except as set forth in the protective order.

Description	Bates Numbers	Classification Pursuant to Protective Order
Arrest documentation and signed warrants	SDNY_00017773 – SDNY_00017775	Confidential
Documents from the MCC including quarters, maps, and rosters	SDNY_00017776 – SDNY_00017782	Confidential
FBI import forms	SDNY_00017783 – SDNY_00017822	Confidential
FBI Laboratory examination requests	SDNY_00017823 – SDNY_00017825	Confidential
FBI process reports	SDNY_00017826 – SDNY_00017991	Confidential
Witness statements	SDNY_00017992 – SDNY_00018024	Confidential
Anonymized index	SDNY_00018025	Attorney's Eyes Only

Additionally, the Government is producing the following materials only to your client:

Description	Bates Numbers	Classification Pursuant to Protective Order
US Marshals Service Intake and Personal History	SDNY_TN_00020912 – SDNY_TN_00020924	

Finally, while we do not agree these materials are required to be produced pursuant to Rule 16, based on your prior request for information, the Government is providing the following information from the Bureau of Prisons (“BOP”):

- Since approximately January 1, 2019, in BOP matters that resulted in sustained administrative charges of falsification with regard to log entries, the following disciplinary actions were taken: 2 letters of reprimand; 50 suspensions; 1 demotion; 3 terminations; and 6 resignations/retirements prior to discipline.
- The BOP has records of the following inmate deaths over the last ten years at the MCC and MDC:

Inmate Name	Register Num	DOD	Institution	Death Location	Cause of Death
Tony McClam	79490-054	9/24/2020	MCC	Housing Unit	Cardiac
Kenneth Houck	06743-015	5/19/2020	MDC	Special Housing Unit	Hanging
Eric Manson	01558-112	10/23/2019	MCC	Community Hospital	Drug Overdose
Jeffrey Epstein	76318-054	8/10/2019	MCC	Community Hospital	Hanging
Oscar Reynoso	60240-019	10/23/2015	MDC	Community Hospital	Hanging
Fang Xin He	79018-053	7/19/2012	MDC	Mental Health Unit	Hanging

The foregoing information is subject to the protective order. Please contact us with any questions.

Very truly yours,

AUDREY STRAUSS
United States Attorney for the
Southern District of New York

By: /s/

Assistant United States Attorneys