

**SONDEE**  
**RACINE & DOREN**<sub>PLC</sub>  
A T T O R N E Y S

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May 13, 2021

[REDACTED]  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, NY 10007

Re: Interlochen Center for the Arts – Grand Jury Subpoena dated March 26, 2021

Dear [REDACTED]:

As you know, I represent Interlochen Center for the Arts (“Interlochen”). Enclosed please find executed custodian certifications along with a document production on behalf of Interlochen in response to the subpoena duces tecum that was served by your office on the custodian of records for Interlochen. The enclosed flash drive includes those responsive documents with a bates range of INT000001 through INT000096.

Consistent with our prior communications, Interlochen is committed to cooperating fully with your office.

The submission of this letter and the materials enclosed herewith is without prejudice to, and with full reservation of, all privileges, rights, and protections. Interlochen requests that this letter and the materials attached hereto be treated as exempt from disclosure, under the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), and as confidential pursuant to 28 C.F.R. § 16.8.

We submit these materials to you with the understanding that your office’s request for this information is relevant and material to a valid law enforcement purpose. We further submit these materials to you with the understanding that they will remain confidential unless and until they are made public by the Court.

Finally, we submit these materials to you with the understanding that, in the event that any privileged or work-product protected documents are produced, inadvertent or otherwise, your office will promptly destroy each copy of any such document that is in the possession, custody, or control of the United States. *See, e.g.*, Fed. R. Civ. P. 26(b)(5)(B).

[REDACTED]  
Assistant United States Attorney  
Page 2  
May 13, 2021

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

SONDEE RACINE & DOREN, PLC



Jeffrey L. Jocks

JLJ: jm  
Enclosure