

Congress of the United States

House of Representatives

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

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WASHINGTON, DC 20515-6143

MAJORITY (202) 225-5074
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<https://oversight.house.gov>

March 26, 2026

Mr. Paul Lavery

TRANSMITTED BY CERTIFIED MAIL

Dear Mr. Lavery:

The Committee on Oversight and Government Reform is investigating matters related to Jeffrey Epstein and his co-conspirators, the horrific crimes he committed, and the circumstances that enabled Epstein to continue his abuse. New information provided by Darren Indyke, Epstein's personal attorney, during his deposition before the Committee on March 19, 2026, leads the Committee to believe that you may possess evidence and/or information that will advance our investigation.¹ We request that you cooperate with the Committee's investigation and make yourself available for a transcribed interview with Committee staff, as well as preserve all relevant materials in your possession.

When Palm Beach police raided Epstein's home in 2007, three computers owned by Epstein were conspicuously missing.² In search of these computers, a federal grand jury issued a subpoena to you seeking information about the devices, but it appears no computers were ever produced.³ Despite this, Mr. Indyke confirmed during his deposition that, at some point, private investigators possessed hard drives from Epstein's computers and suggested they were never turned over to law enforcement.⁴

Moreover, the Committee is aware that you were previously employed by Riley Kiraly, a private investigations firm that was retained by Jeffrey Epstein's lawyers in connection with his

¹ *Epstein Hid Computers in Storage Units in Palm Beach County and Beyond*, The Palm Beach Post (Feb. 25, 2026) (online at www.palmbeachpost.com/story/news/crime/2026/02/25/epstein-hid-computers-in-storage-units-in-palm-beach-county-and-beyond/88838961007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epti=z117801p119250l115850c119250e005550v117801d--64--b--64--&gca-ft=177&gca-ds=sophi); Committee on Oversight and Government Reform, Deposition of Darren Indyke (Mar. 19, 2026).

² *Epstein Hid Computers in Storage Units in Palm Beach County and Beyond*, The Palm Beach Post (Feb. 25, 2026) (online at www.palmbeachpost.com/story/news/crime/2026/02/25/epstein-hid-computers-in-storage-units-in-palm-beach-county-and-beyond/88838961007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epti=z117801p119250l115850c119250e005550v117801d--64--b--64--&gca-ft=177&gca-ds=sophi).

³ See *Subpoena to Paul Lavery*, U.S. Department of Justice (June 6, 2007) (EFTA00179244) (online at www.justice.gov/epstein/files/DataSet%209/EFTA00179234.pdf).

⁴ Committee on Oversight and Government Reform, Deposition of Darren Indyke (Mar. 19, 2026).

2007 Florida case.⁵ According to a 2005 memo from private investigator William H. Riley to Epstein's lawyer Roy Black, you removed "items of potential evidentiary value" from Epstein's Palm Beach home at Black's direction, *including three computers*.⁶ The memo also indicates that you turned over this evidence to Mr. Riley, who took custody of the materials and stored them on Epstein's behalf.⁷

Given this background, the Committee requests that you make yourself available for a transcribed interview to provide insight into the contents, removal, storage, and location of the materials removed from Mr. Epstein's Palm Beach home. The Committee also seeks information regarding the reason for the removal of these materials, the potential withholding of these materials from law enforcement, and any other information regarding the activities and crimes of Jeffrey Epstein and any of his co-conspirators. Due to the urgency and gravity of this matter, we ask that you provide a response to the Committee's request by April 9, 2026.

Additionally, this letter serves as a formal notice to preserve and not alter, delete, destroy, or otherwise dispose of any and all documents, communications, materials, and electronically stored information (ESI) that may be relevant to Jeffrey Epstein or the Committee's investigation. Please note that failure to preserve these materials may result in adverse legal consequences, particularly in the event that such materials are later sought pursuant to compulsory process. This preservation obligation applies broadly to materials in your possession, custody, or control, and includes both physical and digital records, including but not limited to:

1. Any hard drives, storage devices, or digital media belonging to or associated with Jeffrey Epstein, including any files stored on such devices;
2. Backups, archived data, and cloud-based storage accounts;
3. Financial records, photographs, videos, and audio recordings;
4. Metadata, logs, and system data reflecting access to or modification of such materials;
5. Communications including, but not limited to, emails, text messages, and messaging application data;

⁵ See *Epstein Hid Computers in Storage Units in Palm Beach County and Beyond*, The Palm Beach Post (Feb. 25, 2026) (online at www.palmbeachpost.com/story/news/crime/2026/02/25/epstein-hid-computers-in-storage-units-in-palm-beach-county-and-beyond/88838961007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epti=z117801p119250l115850c119250e005550v117801d--64--b--64--&gca-ft=177&gca-ds=sophi); *Black Srebnick Kornspan & Stumpf Monthly Billing Summary*, Black Srebnick Kornspan & Stumpf (Dec. 31, 2009) (EFTA01117337-9) (online at www.justice.gov/epstein/files/DataSet%209/EFTA01117337.pdf).

⁶ Memorandum from William Riley to Roy Black, *Jeff Epstein* (Oct. 9, 2005) (EFTA01733753-6) (online at www.justice.gov/epstein/files/DataSet%2010/EFTA01733753.pdf).

⁷ Email from William Riley to Robert D. Critton Jr., U.S. Department of Justice (Aug. 23, 2009) (EFTA00884246-8) (online at www.justice.gov/epstein/files/DataSet%209/EFTA00884246.pdf); Memorandum from William Riley to Roy Black, *Jeff Epstein* (Oct. 9, 2005) (EFTA01733753-6) (online at www.justice.gov/epstein/files/DataSet%2010/EFTA01733753.pdf).

6. Records reflecting the transfer, custody, or handling of the above materials; and
7. Any physical items that were taken from Jeffrey Epstein's home.

The Committee on Oversight and Government Reform is the principal oversight committee of the House of Representatives and has broad authority to investigate "any matter" at "any time" under House Rule X. If you have any questions about this request, including any reasonable accommodations regarding the scope and timing of any voluntary production, please contact Committee Democratic staff at (202) 225-5051. Thank you for your prompt attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Garcia", written over a horizontal line.

Robert Garcia
Ranking Member

cc: The Honorable James Comer, Chairman