

From: "[REDACTED]" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Subject: RE: Maxwell Discovery
Date: Tue, 21 Jul 2020 19:40:11 +0000

Nope.

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, July 21, 2020 3:29 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Maxwell Discovery

Any response?

From: [REDACTED] <[REDACTED]>
Sent: Thursday, July 16, 2020 3:41 PM
To: [REDACTED] (NY) (FBI) <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Maxwell Discovery

[REDACTED],

Would you two be available for a call the week of July 27th to discuss discovery for Maxwell, please? [REDACTED] and I will need to make sure we have the entirety of any FBI or NYPD file related to the Epstein investigation, so that we can review those files for any disclosures that need to be made to Maxwell. We'd like to discuss when you're both in the office.

In the meantime, would you be able to provide us with the below materials so we can prepare some initial discovery productions to Maxwell, please? My hope is that the below materials should be fairly straightforward to gather and provide to us, but please let me know if any of these items would take more than a couple weeks to send to us.

- All 302s from all FBI searches, including all searches of Epstein's NY residence, and all searches of Epstein's USVI residence
- All photographs from all FBI searches, including all searches of Epstein's NY residence, and all searches of Epstein's USVI residence
- All search warrant returns
- All CART paperwork regarding the extraction of data from all devices seized during the investigation
- All 302s and photographs from Maxwell's arrest
- All phone records gathered regarding Maxwell, including subscriber information and any other information obtained through administrative subpoena, toll records, pen data, historical cell site records, GPS data, and triggerfish data
- All 302s regarding the extraction of data from any seized devices and the review of images (both digital and hard copy) seized during the investigation, including from Epstein's properties. Relatedly, we will need to provide a list or other form of inventory to defense counsel informing them how many images were seized and where they can be reviewed (we can discuss this further on our call).

Please feel free to give me a call if you have any questions or would like to discuss.

Thanks very much,

[REDACTED]

[REDACTED]

Assistant United States Attorney
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007

[REDACTED]

[REDACTED]