

From: "[REDACTED]" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Cc: "[REDACTED]. (NY) (FBI)" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Subject: RE: Maxwell Discovery
Date: Wed, 22 Jul 2020 03:18:41 +0000

Thanks very much. Will circulate an invite.

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, July 21, 2020 9:51 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED]. (NY) (FBI) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Re: Maxwell Discovery

[REDACTED] Tuesday at 4:30 sounds good.

[REDACTED] well chat tomorrow.

On Jul 21, 2020, at 21:11, [REDACTED] <[REDACTED]> wrote:

Thanks very much, [REDACTED]. Let's shoot for Tuesday afternoon to give [REDACTED] a day to get back up and running after she returns to the office. Would a call at 4:30pm that day work for everyone?

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, July 21, 2020 5:39 PM
To: [REDACTED] <[REDACTED]>; [REDACTED]. (NY) (FBI) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Re: Maxwell Discovery

Hey guys,

I apologize as today is my first day back in the office after my vacation. As for next week my schedule is mostly wide open but I cannot speak for [REDACTED]. As far as I know we do not have anything out of the ordinary scheduled outside of the office. Lets try to aim for an afternoon phone call on Monday or Tuesday if possible.

I will get working on those discovery requests in the meantime. Some of those files are going to be quite large and likely need to be burned to a DVD or thumb drive. Is anyone in the office this week that I could drop that off to once its completed?

[REDACTED]

Detective [REDACTED]
NYPD / FBI
Child Exploitation Human Trafficking Task Force

Office: [REDACTED]
Cell: [REDACTED]
Fax: [REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, July 21, 2020 4:20 PM
To: [REDACTED]. (NY) (FBI) <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Maxwell Discovery

Hi,

Following up on this, would you guys please let us know when would work for a call next week? And would you be able to send any of the preliminary discovery I listed below, please?

Thanks,

[REDACTED]

From: [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]