

From: "[REDACTED]" <[REDACTED]>

To: "[REDACTED]" <[REDACTED]>

Subject: RE: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

Date: Mon, 15 Mar 2021 23:14:14 +0000

Inline-Images: image001.jpg

[REDACTED] notes from call with [REDACTED] in red below.

From: [REDACTED]

Sent: Thursday, March 11, 2021 8:20 PM

To: [REDACTED] (NYPD)' <[REDACTED]>

Cc: [REDACTED] N. (NY) (FBI) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

Subject: RE: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

[REDACTED]

Following up on this, we had a call with defense counsel, who asked a number of questions I couldn't answer. Would you please let me know the answers to the below?

For the nude/partially nude highly confidential images:

- How many highly confidential images are there in total, including both from the discs and from the devices?

From the devices approximately 2,100 images/videos (celebrite is on there)

From the discs you previously reviewed them all (3,459), please let us know if you want us to provide to you.

Small number of nude images from hard copy FBI Florida file

- What is the format of these images? Are they all going to be viewable as thumbnails on the computer, or does each image have to be opened individually?

Should be viewable as thumbnails

- For the images extracted from iPhone and iPads, will the FBI please be sure to include Celebrite so the defense can open those files?

Yes

- What, if any, metadata will be included with the highly confidential files? Will the metadata include information clarifying which device each image was extracted from?

Images that were carved or deleted will not have data, or files that did not have any data to them, will have date that they were saved to the folder

Images that were recovered with metadata, should be viewable

Images are separated by folder to indicate which device each came from

- Would it be possible to provide the defense with more than one laptop to review these images on? They will have their whole team of lawyers, the defendant, and investigators reviewing these, so they asked if it would be possible to have multiple laptops instead of all crowding around one.

Only one drive from devices. Cannot make duplicates because considered obscene material.

For the physical evidence:

- Does the FBI have a list of all physical items in its custody for this case? The defense is eager to have such a list and does not seem to care if it is in the same excel spreadsheet format we previously provided. (My recollection from other cases is that the FBI can usually generate a list of all 1B items, so if that's possible, we'd be grateful for that).

Will send 1B list from Florida case and NY case

Will email which 1B items are not stored at the vault in the Bronx

- How soon can defense counsel go to the vault to see the physical evidence? Would they be able to do so on Friday of next week?

FBI needs to be told the date 2 weeks in advance in order to pull all items from the entire case.

2 people at a time in the FBI warehouse; or if want more people, need an extra week for transport, can bring a digital camera

Need to know how many people?

8am-5pm

- If the defense wants to review the contents of VHS tapes, cassette tapes, and CDs, would the FBI be able to provide a space with the appropriate players for them to view the contents of that media?

Will take time for us to track down all of the players, so working on that now, will have the meeting at 26 Fed

Thanks,

From: [REDACTED]

Sent: Tuesday, March 9, 2021 3:33 PM

To: [REDACTED] (NYPD) <[REDACTED]>

Cc: [REDACTED] N. (NY) (FBI) <[REDACTED]>; [REDACTED] N. (NY) (FBI) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

Subject: FW: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

Hi [REDACTED],

Thanks very much for chatting this afternoon. To recap:

- By tomorrow: Please check to see whether it would be possible to prepare all of the "HIGHLY CONFIDENTIAL" nude/partially nude images and videos from the search of Epstein's devices for Maxwell and her counsel to review at 500 Pearl by next Wednesday or Thursday. If that is not feasible, please let me know how much time you need to prepare those materials for review.
- Please confirm that the only categories of "HIGHLY CONFIDENTIAL" nude/partially nude images in our custody that have not been produced to the defense are (1) the images seized from Epstein's NY and USVI residences, which were already loaded onto a laptop and brought by the FBI to the MDC for Maxwell to review, and (2) the images and videos seized from Epstein's devices.
- Attached is the inventory you all provided us detailing the physical evidence items from the FBI-Florida investigation. Please confirm that no items from the Florida case are missing from this index.
- Please provide us with a similar inventory of all physical evidence items in FBI-NY custody gathered during our investigation.
- Please work with [REDACTED] to figure out the logistics of how to allow defense counsel and (where possible) Maxwell at 500 Pearl Street to review the physical items in the FBI's custody.

Thanks,

From: Laura Menninger <[REDACTED]>

Sent: Monday, March 8, 2021 2:03 PM

To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

Cc: Jeff Pagliuca <[REDACTED]>; Christian R Everdell - Cohen & Gresser LLP ([REDACTED]) <[REDACTED]>; 'BOBBI C STERNHEIM' <[REDACTED]>

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Counsel –

Please see attached correspondence.

-Laura



Laura A. Menninger
Haddon, Morgan and Foreman, P.C.



www.hmflaw.com

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