

From: [REDACTED]
To: [REDACTED]
Subject: RE: Maxwell physical evidence review
Date: Wed, 07 Apr 2021 14:46:54 +0000

Of course!

From: [REDACTED]
Sent: Wednesday, April 7, 2021 10:46 AM
To: [REDACTED]
Subject: RE: Maxwell physical evidence review

Thank you so much! I actually am going to need to ask for some coverage, particularly on Thursday when I have a doctor's appointment in the afternoon. I'm planning to reach out to you and [REDACTED] to try to work out some shifts if that's ok.

From: [REDACTED]
Sent: Wednesday, April 7, 2021 10:45 AM
To: [REDACTED]
Subject: RE: Maxwell physical evidence review

Hi [REDACTED],

This sounds like a lot of AUSA time just meeting agents and sitting with the defense lawyers next week. I doubt I'm in a good position to field defense questions about the evidence, but to the extent I can help with any of this, just let me know!

From: [REDACTED]
Sent: Wednesday, April 7, 2021 12:33 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: Maxwell physical evidence review

Hi [REDACTED],

As promised, below please find the plan for the upcoming evidence review for the Maxwell case:

- Maxwell and her defense team will all be present in the proffer room area on the 5th floor of the 500 Pearl Street courthouse for the primary review. This review will begin on April 13, 2021 and will continue every day thereafter until the review is complete. The logistics for this review are as follows:
 - The Marshals will produce Maxwell to 500 Pearl Street each morning by approximately 9:30am. Defense counsel are expected to arrive each morning at approximately 9:30am. We will need at least one FBI agent with a handcuff key who is responsible for pulling Maxwell from the Marshal cellblock and monitoring her (the same way an agent would monitor any proffering inmate at 500 Pearl) throughout the day. Please note that an agent will likely need to escort Maxwell to the bathroom during the day as well.
 - I have reserved three proffer rooms for this review: The largest will be where the FBI can put the evidence for review. The second largest will be where the defense can meet privately, without any of the evidence items, to confer among themselves. The smallest will be a break area available for any agents and/or AUSAs who are not currently monitoring the evidence review or maintaining custody of Maxwell.

- I've attached three annotated spreadsheets of the evidence in this case. Each day, the FBI will need to plan to produce all of the evidence with the notation "500 Pearl" in the column entitled "Plan for Review by Defense" in each of the three attached spreadsheets. Please let me know what time the FBI plans to arrive at 500 Pearl each morning so that I (or another AUSA if necessary) can meet the agents and let them into the proffer room area.
 - Additionally, each day, the FBI will need to plan to bring the following to 500 Pearl: (1) a secure laptop; (2) the hard drive containing the highly confidential images from the CDs that were previously provided for review at the MDC; (3) the hard drive containing the highly confidential images from Epstein's devices that the defense has not yet reviewed; and (4) the 7 hard copy highly confidential images that the defense has not yet reviewed. The agent bringing these should please plan to arrive by 9:30am.
 - At least one agent and at least one AUSA should plan to be in the room whenever the defense is reviewing the evidence. The AUSA will field any questions from the defense.
 - At the end of each review day, I plan to ask the defense to identify any items that do not need to be brought back to 500 Pearl the next day, which will hopefully make each subsequent review day less burdensome for the FBI.
- Three members of the defense team plan to travel to the Bronx warehouse to review evidence that the FBI is not producing to 500 Pearl Street. The logistics for that review are as follows:
 - I do not yet have a date for this review, but I will let you know as soon as I have one confirmed with the defense.
 - For this review, the defense team will be looking to review all evidence with the notation "Bronx Warehouse" in the column entitled "Plan for Review by Defense" in each of the three attached spreadsheets.
 - At least one agent and at least one AUSA will be present to monitor the review. The AUSA will field any questions from the defense.
 - The defense team will bring a camera to photograph certain of the items to be reviewed.

I'd be very grateful if you would please let me know the names and contact information of the agents who will be handling (1) the delivery of the physical evidence to 500 Pearl; (2) the delivery of the highly confidential materials to 500 Pearl; (3) pulling and monitoring Maxwell while at 500 Pearl; and (4) the evidence review at the Bronx warehouse. Please feel free to give everyone who will be working on this project my contact information, including my cellphone number ([REDACTED]) and encourage them to call me with any questions at all.

Thank you so much for all of your efforts in coordinating this. And a huge thank you to everyone at the FBI who is pitching in on this project as well. We are so grateful to you all.

[REDACTED]

[REDACTED]

Assistant United States Attorney
Southern District of New York

[REDACTED]