

**From:** "[REDACTED]"  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] >

**Subject:** Re: e-communications review for Maxwell

**Date:** Thu, 18 Mar 2021 19:11:05 +0000

**Importance:** Normal

---

I can't do Monday. I'm available Tuesday after 12 and all day Wednesday.

---

**From:** [REDACTED] >  
**Sent:** Thursday, March 18, 2021 3:08 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** [EXTERNAL EMAIL] - RE: e-communications review for Maxwell

Works for me too.

---

**From:** [REDACTED] >  
**Sent:** Thursday, March 18, 2021 3:07 PM  
**To:** [REDACTED] >  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** Re: e-communications review for Maxwell

Same here, thanks

On Mar 18, 2021, at 3:03 PM, [REDACTED] > wrote:

Works for me, thanks.

---

**From:** [REDACTED] >  
**Sent:** Thursday, March 18, 2021 3:03 PM  
**To:** [REDACTED] >  
**Cc:** [REDACTED] >; [REDACTED]  
[REDACTED]  
**Subject:** Re: e-communications review for Maxwell

Great, thanks. Let's plan for Monday afternoon. Does 3 on Monday work for everyone?

Sent from my iPhone

On Mar 18, 2021, at 2:58 PM, [REDACTED] > wrote:

I'm generally free all of next week.

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

---

**From:** [REDACTED], [REDACTED] (USANYS) <[REDACTED]>

**Sent:** Thursday, March 18, 2021 12:46 PM

**To:** [REDACTED]  
[REDACTED] >

**Cc:** [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]

[REDACTED] >

**Subject:** RE: e-communications review for Maxwell

Hi [REDACTED] and [REDACTED],

Following up on this, we'd like to schedule a call to discuss the process of collecting these items so that we can begin prepping the materials for production to the defense in the coming weeks. Could you please let us know your availability for a call?

Thanks,

[REDACTED]

---

**From:** [REDACTED] >

**Sent:** Sunday, March 14, 2021 9:51 PM

**To:** [REDACTED] >; [REDACTED] >

**Cc:** [REDACTED] >; [REDACTED] >; [REDACTED],  
[REDACTED] (USANYS) <[REDACTED]>

**Subject:** e-communications review for Maxwell

Hi [REDACTED] and [REDACTED],

[REDACTED]  
[REDACTED] a requirement that the AUSAs review guidance in the Justice Manual regarding e-communications in a federal criminal case. Specifically, we are required to review JM 9-5.004 (available at <https://www.justice.gov/jm/jm-9-5000-issues-related-trials-and-other-court-proceedings>) with you and to discuss our plan to preserve for later review and possible disclosure all substantive e-communications created or received by prosecution team members during the course of an investigation and prosecution, and all e-communications sent to or received from lay witnesses, regardless of content. As I know we have discussed before, we will need you both to preserve any substantive e-communications and all e-communications with witnesses, and we will similarly need your help ensuring that anyone else within the FBI or NYPD who has had communications with witnesses about this case has similarly preserved those communications.

To that end, would you please confirm that you have reviewed JM 5.0004, and let me know a good time for us all to have a call to answer any questions you may have about the policy and to finalize our plan for preserving and reviewing e-communications for Maxwell?

Thanks,

[REDACTED]

[REDACTED] [REDACTED]

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

[REDACTED]

[REDACTED]