

From: "[REDACTED]" >
To: "[REDACTED]" >, "[REDACTED]" >
[REDACTED] >
Cc: "[REDACTED]" >

Subject: RE: Notification -- Appointment of Counsel

Date: Tue, 27 Apr 2021 02:03:09 +0000

Importance: Normal

Actually, mind holding off please? The agent and I still need to add our signatures, and I need to add the first page.

From: [REDACTED] >
Sent: Monday, April 26, 2021 8:24 PM
To: [REDACTED] >; [REDACTED] >
[REDACTED] >
Cc: [REDACTED] >; [REDACTED] >
Subject: FW: Notification -- Appointment of Counsel

[REDACTED]
Can you please add this to next NTW production?

Thanks,
[REDACTED]

From: Megan Benett <[REDACTED]>
Sent: Wednesday, April 14, 2021 5:43 PM
To: [REDACTED] >
Cc: [REDACTED] >; Lisa Ranieri <[REDACTED]>; [REDACTED] >
[REDACTED] >; Lisa Ranieri <[REDACTED]>
Subject: RE: Notification -- Appointment of Counsel

Apologies for the delay – signature pages are attached. Anthony and I were both remote in locations without printers for some time but here you go. Thanks. Megan

From: [REDACTED] >
Sent: Thursday, April 8, 2021 1:45 AM
To: Megan Benett <[REDACTED]>
Cc: [REDACTED] >; Lisa Ranieri <[REDACTED]>; [REDACTED] >
<[REDACTED]>
Subject: RE: Notification -- Appointment of Counsel

Hi Megan,

Would you be able to please send us a copy of the executed proffer agreement with your and your client's signatures? We're going through our records and noticed we're missing that document.

Thanks,
[REDACTED]

From: [REDACTED]
Sent: Wednesday, January 27, 2021 1:26 PM
To: Megan Benett <[REDACTED]>
Cc: [REDACTED]; Lisa Ranieri <[REDACTED]>; [REDACTED]
>
Subject: RE: Notification -- Appointment of Counsel

Hi Megan,

Attached please find a copy of the proffer agreement and VTC addendum for today's interview with [REDACTED].

Thanks,
[REDACTED]

From: [REDACTED]
Sent: Tuesday, January 26, 2021 1:24 PM
To: Megan Benett <[REDACTED]>
Cc: [REDACTED]; Lisa Ranieri <[REDACTED]>; [REDACTED]
>
Subject: RE: Notification -- Appointment of Counsel

I'm happy to have you try to forward the invitation to [REDACTED] yourself. If that doesn't work, then I can send a separate invitation directly to [REDACTED].

Best,
[REDACTED]

From: Megan Benett <[REDACTED]>
Sent: Tuesday, January 26, 2021 9:31 AM
To: [REDACTED]
Cc: [REDACTED]; Lisa Ranieri <[REDACTED]>; [REDACTED]
>
Subject: Re: Notification -- Appointment of Counsel

Thanks, Maureen. Can I forward the details of the call in the invite to [REDACTED]? If it has to come directly from you, let me know and I'll get you his email later today. Talk tomorrow. Megan

Sent from my iPhone

On Jan 25, 2021, at 12:21 PM, [REDACTED] > wrote:

Hi Megan,

How about we plan for 5:30pm on Wednesday 1/27? I'll send out a calendar invitation with the WebEx VTC details. Would you please let me know to what email address I should send [REDACTED] invitation?

As I believe [REDACTED] mentioned to you when you previously spoke on the phone, we can confirm that [REDACTED] is not a target of the investigation. We are seeking to interview [REDACTED] because we believe we may wish to call [REDACTED] to testify as a potentially trial witness. If you would like to have a discussion about what category [REDACTED] falls into under the USAM, I'd be happy to have a call to talk about our thinking on that matter.

You are correct that we are open to taking steps that would allow [REDACTED] to testify without needing to invoke his privilege against self-incrimination. In that vein, we are open to the possibility of something like a non-prosecution agreement or immunity. As you noted, though, we cannot promise any such resolution at this time, and any such resolution would have to be approved by our supervisors after [REDACTED] has been fully debriefed. To help [REDACTED] feel comfortable speaking with us, we are happy to proceed under our office's standard proffer agreement.

Please feel free to call my cell at 347-344-8771 if you would like to discuss or have any other questions.

Best,

[REDACTED]

[REDACTED]
Assistant United States Attorney
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10002
[REDACTED]
[REDACTED]

From: Megan Benett <[REDACTED]>

Sent: Friday, January 22, 2021 7:00 PM

To: [REDACTED]

Cc: Lisa Ranieri <[REDACTED]>; [REDACTED]; [REDACTED]
[REDACTED]

Subject: RE: Notification -- Appointment of Counsel

Hi all –

[REDACTED] is working until 5 pm ET every day next week. Could we do it on an evening next week? I'm available for an interview at 5:30 pm ET or later any day next week.

Also, could you confirm that [REDACTED] is not a target of the investigation and let me know whether you think he falls within the definition of a subject? Last, I believe we discussed the possibility of pursuing a non-pros if your team found [REDACTED] credible and helpful – that is important for [REDACTED] to know before committing to the interview, so please let me know your office's position on working toward that (though I know you cannot commit to entering into the agreement, can you tell me whether you are open to pursuing it following an interview(s)?)

Thanks
Megan

From: [REDACTED]

Sent: Friday, January 22, 2021 9:05 AM

To: Megan Benett <[REDACTED]>

Cc: Lisa Ranieri <[REDACTED]>; [REDACTED]; [REDACTED]
[REDACTED] <[REDACTED]>

Subject: RE: Notification -- Appointment of Counsel

Hi Megan,

No worries at all, and thanks for reaching out to [REDACTED]. The number I have is: [REDACTED].

Thanks,

[REDACTED]

From: Megan Benett <[REDACTED]>

Sent: Friday, January 22, 2021 11:25 AM

To: [REDACTED]; Megan Benett <[REDACTED]>

Cc: Lisa Ranieri <[REDACTED]>; [REDACTED]; [REDACTED]
[REDACTED]

Subject: RE: Notification -- Appointment of Counsel

Hi all –

My apologies for not following up. I will get you a few dates / times in the next week or so asap – but have to confess that [REDACTED] phone number is sitting on a pad in my office and I'm actually out of state. I know your agents have his contact info. If you (or they) could forward his number to me today I'll try to get back to you later this afternoon.

Thanks and happy new year

Megan

From: [REDACTED]

Sent: Thursday, January 21, 2021 10:06 AM

To: Megan Benett <[REDACTED]>

Cc: Lisa Ranieri <[REDACTED]>; [REDACTED]; [REDACTED]
[REDACTED] <[REDACTED]>

Subject: RE: Notification -- Appointment of Counsel

Hi Megan,

I'm following up on this in case this got lost in the mix – could you please let us know what dates and times might work for you and your client for an interview by videoconference?

Thanks very much, and hope you're doing well--

[REDACTED]

From: [REDACTED]

Sent: Tuesday, December 15, 2020 3:57 PM

To: Megan Benett <[REDACTED]>

Cc: Lisa Ranieri <[REDACTED]>; [REDACTED]; [REDACTED]
[REDACTED]

Subject: RE: Notification -- Appointment of Counsel

Hi Megan,

Thanks for following up. When we last spoke, we discussed a potential interview in mid-January, and you were going to confirm with your client before we firmed up dates. If that timing works for you, could you please let us know what dates are convenient for you and your client for an interview by video conference?

Thanks very much,

[REDACTED]

From: Megan Benett <[REDACTED]>

Sent: Tuesday, December 15, 2020 3:34 PM

To: [REDACTED]

Cc: Lisa Ranieri <[REDACTED]>
Subject: RE: Notification -- Appointment of Counsel

Hi [REDACTED] –

Did we set a date for the call with [REDACTED] and the agents etc.? I don't have it in my calendar and want to make sure the day / time are blocked. Please reply all so that my assistant Lisa (cc'ed here) knows the plans, as well.

Thanks
Megan

From: [REDACTED]
Sent: Friday, December 4, 2020 1:58 PM
To: Megan Benett <[REDACTED]>
Subject: RE: Notification -- Appointment of Counsel

That works well—thanks, and talk you then.

From: Megan Benett <[REDACTED]>
Sent: Friday, December 4, 2020 1:21 PM
To: [REDACTED]
Subject: RE: Notification -- Appointment of Counsel

Yes – we got it done just under the wire late on Wed. Can we talk on Monday? I should be in my office all morning and early afternoon – [REDACTED]. Thanks. Megan

From: [REDACTED]
Sent: Friday, December 04, 2020 11:26 AM
To: Megan Benett <[REDACTED]>
Subject: Re: Notification -- Appointment of Counsel

Hi Megan,

Did the appointment of counsel go forward?

Thanks,

[REDACTED]

Sent from my iPhone

On Dec 2, 2020, at 9:54 AM, Megan Benett <[REDACTED]> wrote:

Do you have contact info for the witness so I can at least get the financial affidavit completed? Let me know and thanks.
Megan

From: [REDACTED]
Sent: Tuesday, December 01, 2020 2:58 PM
To: [REDACTED]
Cc: Megan Benett <[REDACTED]>; [REDACTED]; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: Notification -- Appointment of Counsel

FORM FOR NOTIFICATION OF **NEW PRESENTMENTS
TO THE ARRAIGNMENTS UNIT**

Instructions: Use this form for all notifications to Mag Court of New Presentments (new arrests, extraditions, or surrenders).

If applicable:

- **Attach Complaint/Indictment/VOSR specs to this email**
- **Attach [Conflict of Interest Form](#)**

DO NOT use this form to schedule other events in Mag Court.

For Arraignments for Previously Presented Defendants, Pleas, Detention Hearings, Substitution of Counsel Hearings, Deferred Prosecution Hearings, and Curcio Hearings, send an email to arraignment@nysd.uscourts.gov

AUSA NAME:	[REDACTED]	PHONE NO:	[REDACTED]
		CELL:	

Type of Case: [Choose one]	<input type="checkbox"/> New Arrest <input type="checkbox"/> Voluntary Surrender <input type="checkbox"/> Safe Keep <input type="checkbox"/> VOSR <input checked="" type="checkbox"/> Appointment of Counsel (witness)		
Docket No.:	N/A		
If Indicted:	USDJ:	Referred to Mag Court for Arraignment:	
Charge(s)/ VOSR Specs:			
** attach complaint/ indictment / VOSR specs to this email **			

WITNESS		D Counsel [FD/CJA/Retained?]	D Counsel Name	Contact Info
1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2				
3				
4				
5				
<i>If Applicable, List of Conflicted D Counsel:</i> [e.g., same or related case; CW's counsel]		Federal Defenders		
** If FD is conflicted, attach Conflict of Interest Form **				
Interpreter Required? No			<i>If Yes, Language:</i>	
Location/ETA of Defendant(s): The witness is located out of state.			Other Remarks:	

[REDACTED]
 Assistant United States Attorney
 Southern District of New York
 One Saint Andrew's Plaza
 New York, NY 10007
 [REDACTED]