

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

Subject: FW: Epstein search warrant documents

Date: Mon, 18 May 2020 14:29:50 +0000

[REDACTED] – would one of you be able to please send me a spreadsheet for the electronic devices seized from the New York residence with locations/seizure information, like the one you sent me for the USVI search? Thanks!

From: [REDACTED] <[REDACTED]>
Sent: Friday, May 15, 2020 7:57 PM
To: [REDACTED]; [REDACTED]
<[REDACTED]>
Cc: [REDACTED]; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

[REDACTED],
I can get you better identifiers Monday. I'll be in then. [REDACTED] and [REDACTED] have access to better documentation to the search, as in location of findings. I don't have that. Will get you the outstanding stuff as soon as I get the drives to put it on.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] cell
[REDACTED] desk

On May 15, 2020 4:12 PM, "[REDACTED]" <[REDACTED]> wrote:
[REDACTED],

Thanks for this, it's a helpful start. In terms of being able to write our search warrant, one additional piece of information we need is the serial number, or some other specific identifier, ideally for each device but at least for any device that there is more than one of the same thing. So for example, we need to be able to somehow differentiate the following devices –

- The two Dell power edge T310 hard drives (NYC024323 and NYC024324)
- The two Sony Vaio laptop / Fujitsu hdd (NYC024336 and NYC024337)
- the following loose storage devices:
 - o Micro SD card (NYC024339)
 - o Flash Drive (generic) (NYC024340)
 - o Thumbdrive (Emtec) (NYC024341)
 - o hard drive (loose) (NYC024342)
 - o verbatim thumbdrive (NYC024343)
- The four San Disk cruze-thumbdrives (NYC024344-47)
- The three Seagate IDE hard drives (NYC024348-50)
- The camera SD card (NYC024351)

I think the rest of the devices are either specifically distinguishable and/or have an S/N listed. (By comparison, the USVI spreadsheet we have lists an s/n for about 20 of the 25(ish) devices.

The other thing we're looking for is the location in the house (and ideally specific location) for each device, which the USVI list also has – is that info available?

The list also has just five devices as still pending to be transferred to us, and I think it's right that the plan is to reproduce all the materials so that we can get them in searchable format, but just wanted to confirm? Currently, we aren't able to match any of the prior productions to specific devices – so if we're able to match them up by Bates number now, that might work, but otherwise I think it makes sense for us to get everything. But let us know if any issue with that.

thanks very much,

[REDACTED]

From: [REDACTED] >

Sent: Thursday, May 14, 2020 15:54

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

[REDACTED] >

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

Subject: Re: Epstein search warrant documents

[REDACTED]

Here is The listing of all the evidence gathered in NY that I have. I added some columns to guide you to the unique numbers CART NY uses for their evidence. The template wasn't a slam dunk over, so I did what I could to convey the information. If you are confused by anything, please let me know. In the column for approximate size, it is in GB, totaled at the bottom and converted to TB. In the materials contained column, I put what load file group the data was transferred over in (Mac, Windows, Loose Media, IDE, or Blacklight) If there is no entry in that column, that data has yet to be transferred. There are 2 Macs and a DVR you don't have as well as an iPhone and an iPad. IF the descriptions are a bit light, let me know and I'll do what I can to beef them up. I will get you the Island stuff tomorrow.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED] <[REDACTED]>

Sent: Wednesday, May 13, 2020 12:25 PM

To: [REDACTED] >; [REDACTED]

[REDACTED] >

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

Subject: RE: Epstein search warrant documents

[REDACTED]

Respectfully, I think there are some miscommunications here – all we have asked is to receive the materials in a format such that we can view them using a system we have access to. We're not able to get web-enabled access through any FBI tool, so we asked for the materials to be transferred in a loadable format so we could put them on Relativity, which both

we and the agents can access. We're required to have the files in a format that we can produce them to defense counsel. I've done that in many other cases and it hasn't previously been an issue. My understanding from [REDACTED] is that the best way to do it now is just for us (the U.S. Attorney's Office) to get the original files, which our vendor will process—by which I just mean converting into file formats that are loadable onto Relativity. It doesn't really have anything to do with the taint review—we have to have access to the docs in our systems for discovery purposes.

And we were happy to get the materials as they were processed, but when we received the 1.1 million documents earlier this year, they were in a format that wasn't usable for the reasons described in the email I sent on March 9. Again, I understand from [REDACTED] that the best way forward is to just get copies of the materials in their original formats, which I understand will be segregated and designated by device. That should work for us! I was just trying to understand the approach, as well as the timeline.

thanks,

[REDACTED]

From: [REDACTED] >

Sent: Tuesday, May 12, 2020 13:03

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

[REDACTED] >

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

[REDACTED] >; [REDACTED] >

Subject: Re: Epstein search warrant documents

[REDACTED]

Just to be clear. The US Attorney's Office (or it's contractors) are not "processing" anything. You are taking files that I will be extracting from processed evidence and putting them into an E-Discovery tool (Relativity) to do a taint review.

Relativity is NOT a forensic tool. It is incapable of dealing with many things that are found forensically on a computer like free space, slack space, and system files to name a few. When we started this, and you insisted you do the taint review in Relativity, I warned you that it was adding months worth of work on top of what was already done, and that Relativity was incapable of viewing everything. You insisted we do it this way. So now [REDACTED] and I have come up with a way to fit this round peg into this square hole. We will get it done.

Sorry it has taken so long, but we are talking about terabytes worth of data over multiple forms of digital evidence. Phones, tablets, loose media, cameras, DVRs, servers, laptops, and desktop computers. We have gotten past encryption on multiple devices. When we review devices on such large cases, we usually do it piece by piece as things are processed, I was unaware that you didn't want to review as things were processed, that you wanted to do it "all at once", so that added to the delay. Sorry for that. Just a differentiation of methodology I suppose.

[REDACTED] and I feel confident that the method we have come up with will be more consistent and preserve the attribution of files to devices and links of e-mails to attachments that the load file generation that I did a while back was lacking.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, May 12, 2020 11:33 AM
To: [REDACTED]; [REDACTED]
[REDACTED]
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

Okay, so just to check, you both think that there is not a need to do a test run? You're both comfortable with just basically sending us copies of everything? I don't totally understand why we couldn't have done that eight months ago, but regardless of the passage of time, I want to make sure we understand so we can report to our supervisors. I assume that means that we (at the U.S. Attorney's Office and through contractors) will therefore need to do all the processing ourselves, correct? And thanks again to you both.

From: [REDACTED]
Sent: Tuesday, May 12, 2020 11:30
To: [REDACTED]; [REDACTED]
[REDACTED]
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

Like [REDACTED] said in his earlier email. It will be the raw data and it will be marked so it is easier to attribute it to a particular device. Problem now is how to get the data to [REDACTED] since he is teleworking.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] cell
[REDACTED] desk

On May 12, 2020 11:15 AM, "[REDACTED]" <[REDACTED]> wrote:
I have no doubt you do, but can you please tell us what that plan is? Thanks!

From: [REDACTED]
Sent: Tuesday, May 12, 2020 11:11
To: [REDACTED]; [REDACTED]
[REDACTED]
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

I will use the spreadsheet, no problem. [REDACTED] and I ironed out all the details. We've got a good plan moving forward that will meet your needs.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] cell
[REDACTED] desk

On May 12, 2020 10:34 AM, "[REDACTED]" <[REDACTED]> wrote:
[REDACTED], it would be very helpful for us if you could please use the attached spreadsheet in transmitting that info so we make sure we get all the info we need. I think you had previously sent us a list of certain information that unfortunately wasn't helpful for us, so we want to make sure we're all on the same page.

In terms of data transfer, [REDACTED] are you just sending a literal copy of all the raw data, and we'll process and upload it on our end? I ask to make sure we don't lose any searchability – when FBI sent versions before, it had already been processed. I think what we talked about on the phone a month ago was getting, for example, data from one device to make sure it transfers correctly, before sending over literally everything – is that still the plan?

thanks,
[REDACTED].

From: [REDACTED] >
Sent: Tuesday, May 12, 2020 10:27
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] >
Subject: RE: Epstein search warrant documents

Hello [REDACTED],

Me and [REDACTED] just finished our phone call regarding the data. [REDACTED] will put together a list of the all of the data and where the data was collected. I will work to send some hard drives to [REDACTED] so he can begin to copy the data and send it to us. I will need to figure out a way to get the data off of the hard drives.

Please let us know if there are any questions.

Thank you.

[REDACTED].

From: [REDACTED] <[REDACTED]>
Sent: Friday, May 8, 2020 2:15 PM
To: [REDACTED] >; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
[REDACTED] >; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] >; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] >; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

Okay thanks – please do let us know if at any point that changes, otherwise we'll look forward to being able to review the returns in early June. Thanks again.

From: [REDACTED] >
Sent: Friday, May 08, 2020 14:14
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED] >; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] >; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] >; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

There has been talk of us returning to normal soon, so I don't think it will effect the timeline I initially gave you. If it does, I'll let you know.

cell
desk

On May 8, 2020 1:58 PM, "[REDACTED]" <[REDACTED]> wrote:
Understood, thanks—it will be great to get that list on Thursday. As a refresh, the info we are looking for is in the attached spreadsheet template.

On the returns themselves, do the changes you mentioned mean that the estimate of a month from now for complete transmission of the search warrant returns is no longer likely? If so could you please let us know what the current estimate would be, so we can factor that in? Thanks very much.

From: [REDACTED] <[REDACTED]>
Sent: Friday, May 08, 2020 13:50
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

Sorry for the delay, they reduced us to 1 day a week, so things have been stretched out by a factor of 5. I will be back in the office on Thursday and will be able to get you the list then as I have to access some of our systems to do so.

Also, [REDACTED], please reach out to me at one of the numbers below so we can brain storm. Thanks.

cell
desk

On May 8, 2020 12:10 PM, "[REDACTED]" <[REDACTED]> wrote:
[REDACTED],

Following up on the below, I think you had said you expected to be able to get us a list of the devices seized from the search warrants at Epstein's residences in New York and the USVI, as well as from his person upon arrest, in about a month (during our conference call a month ago) – so wanted to check if we can still expect that very soon? We're waiting on that list to be able to do an updated search warrant on all of those devices. Please let us know the current timeline – and also the current timeline on producing the results from those August and September searches? I think you and [REDACTED] were going to coordinate on that, and you had mentioned you expected we'd have it a couple months from our call, which would be about a month from now. Wanted to make sure we're still on track.

thanks,
[REDACTED].

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, April 07, 2020 15:27
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>;

[REDACTED]; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED]; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

Ok let's plan on 11am tomorrow morning, I am trying to get an FBI line with a larger capacity but I won't know until tomorrow am. I will push it out when confirmed.

Thanks

[REDACTED]

From: [REDACTED] [mailto:[REDACTED]]
Sent: Tuesday, April 07, 2020 3:15 PM
To: [REDACTED]; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
[REDACTED]; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED]; [REDACTED]
<[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

Yes, I can do anytime tomorrow, and [REDACTED] can also join anytime tomorrow. So whenever is good on your end.

Also, we can host a conference call, but only up to six lines at a time – so if FBI has larger capacity than that let us know, otherwise I'd propose we do:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: Tuesday, April 07, 2020 14:13
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED]; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

[REDACTED],
Are you available tomorrow for a conference call to discuss this issue?

[REDACTED]

[REDACTED]
[REDACTED]

On Apr 7, 2020 1:55 PM, "[REDACTED]" <[REDACTED]> wrote:

[REDACTED]

thanks,
[REDACTED]

Unfortunately I don't think this is very helpful to us. Did you take a look at the example spreadsheet I sent on 2/24? The excel file you sent has descriptions that don't match up to the items listed in the search warrant returns (that we sent on 2/23), and we don't have the 1B or CART numbers to be able to cross-reference. We also can't tell what you mean by "loose media" without a specific comparison to what was seized, we don't know which items you're referring to as "Windows machines," and we can't tell whether the entirety of any particular item has been transferred, or just partial. For example, it looks like we have gotten very, very few image files, which is surprising.

- The data we've received has no way to put any emails and attachments together. So if an email says, "see the attached flight records," for example, we have no way of linking that up with the records themselves. Not only is that a big problem for us in review, it's going to be a huge problem for producing the documents to defense counsel.
- The load file has no link to the native file, so when we load the data to the database, there's no way to have the native files show up in the database. Because many of the files are too large to open in the viewer, it effectively means that there are many files that are completely invisible to us.
- Related, the control numbers in the load file don't match up to the native files. So we have two sets of numbers and no way to match up anything—that is, even if we were to try to go hunt down every individual large file in the native files, it would be impossible.

I've re-attached the spreadsheet we sent last week – I think that's a good place to start in terms of our necessary record-keeping, and we need that info at the very least, as well as anything else you think would be useful. Also attaching the SW returns for reference. And again, we're happy to meet up anytime and hash all this out in person if that's useful.

thanks,
[REDACTED]

From: [REDACTED] >
Sent: Wednesday, March 04, 2020 16:36
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

Here is a listing of what I have already handed over in load files to the US Attorney's Office for taint review. Some points of clarification: There were 9 IDE hard drives found in the Manhattan apartment, they turned out to be 3 copies of 3 drives (9 drives in total) from a July 2007 search on one of his properties. I only processed 3 (as they were all copies). All the loose media from the NY apartment is included. All the Windows machines from the NY apartment are included. Only 2 Macs from NY and 1 from the Island are included.

I will have to more closely coordinate with whoever is loading up Relativity with the remaining Macs as the tool they have to be processed with does not easily re-name the load files.

Spreadsheet is attached.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] (office)
[REDACTED] (cell)

From: [REDACTED] [mailto:[REDACTED]]
Sent: Tuesday, March 03, 2020 12:25 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

I could do Thursday morning, but I think it would be helpful for us to get the accounting in advance of the meeting so we can figure out in advance what (if any) additional steps we need – is that possible?

From: [REDACTED] >
Sent: Tuesday, March 03, 2020 09:59
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

Can we do Thursday morning? My network should be back by then and I can give you a good accounting.

[REDACTED]
[REDACTED]
[REDACTED]

cell
desk

On Mar 2, 2020 11:15 AM, "[REDACTED]" <[REDACTED]> wrote:
Doing the weekly check in on this – is there a time this week when everyone can meet on this?

thanks,
[REDACTED].

From: [REDACTED]
Sent: Monday, February 24, 2020 17:38

To: [REDACTED]; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
[REDACTED]; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED]; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

[REDACTED],

Totally understand about the network issues—we can relate. I do still think it will be helpful to all sit down together to have an in-person discussion, to make sure everybody is on the same page. Are folks available for that next week? And what I think would be most helpful to facilitate that would be a spreadsheet of each separate device referenced in the two search warrant returns, with columns for whether we've dumped the contents, whether they've been reviewed and/or transferred, what portions were transferred, etc.

Something roughly like the attached, with any other categories you think would be useful – and the info on the attached is mostly hypothetical, obviously, just as examples. That will help us fully understand what's been reviewed, transferred, and received so far, and what remains.

(Also just on the pictures, we do want copies of those as well, please including from the discs and the devices – I think FBI was going to do an initial screen to make sure no CP, and since I think the answer was no, we'll need to get those to be able to review them as well.)

many thanks,
[REDACTED].

From: [REDACTED]
Sent: Monday, February 24, 2020 09:24
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED]; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED]; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: RE: Epstein search warrant documents

[REDACTED],

Sorry for the delayed response. They are tearing out our old network and giving us a new one, they mandated we delete old stuff (about 400 TB worth). Now that they are working on replacing the network, we can do only local work. I should be able to give you an accounting of what is what. I can say, off the top of my head, that all windows based items from the NY search have been handed over as well as all loose media. The CDs from NY only contained pictures, no documents. There are still some Apple items from NY that need to be produced. As far as the Island stuff goes, the 1st item on your spreadsheet, the "kitchen" mac has been produced. Still working on the rest.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] cell
[REDACTED] desk

On Feb 23, 2020 12:21 AM, "[REDACTED]" <[REDACTED]> wrote:
Team,

Following up on the below from last weekend, I'm still not sure how we're addressing this so I thought it would make sense for us to all schedule a (hopefully relatively brief) meeting to all get on the same page? We didn't hear back on which files had previously been provided, but our tech folks did their best to differentiate, and we got access to the materials yesterday and its well over a million documents, and we don't have any idea what we're looking at – i.e., which devices the materials came from, whether it's full or partial results, how many more devices we have coming, etc.

Based on the attached search warrant returns, it looks like from the New York mansion (the PDF) there are approximately 40 devices that would have storage (computers, hard drives, thumb drives, etc.) and that's not even counting at least 60+ CDs. And then from the Virgin Islands (the Excel spreadsheet), at least more than 25 devices, including multiple servers / server racks.

So we gotta know what we've already received, what remains, anticipated schedule, etc, and I know it's a lot of moving pieces on all sides so wanted to loop in everybody at once. The case team will be in California this coming week from Tuesday through Friday, but then I think generally around the first week of March, which will hopefully be plenty of time to schedule a productive meeting.

thanks all,

[REDACTED]

From: [REDACTED]

Sent: Saturday, February 15, 2020 16:30

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

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

Subject: RE: Epstein search warrant documents

[REDACTED], [REDACTED]

I'm not sure who's the exact right person to ask this, so wanted to get everybody on one email chain about it – I have the hard drive that [REDACTED] dropped off that has new Epstein search warrant materials, but it looks like there are also old materials (that I think we had previously received and uploaded??) on the hard drive, and so I'm not sure what's new.

Just generally, and [REDACTED] and I talked about this last week too, but it's basically impossible for us to keep track of what we're getting, and what has been completed, without some kind of identification or labeling system, along with a list of which devices have been extracted and downloaded.

So for example on the hard drive currently, there are 38 folders labeled "loadFiles" through "37loadFiles" with a modified date of 11/14/19, which I think we may have already previously received – but I'm not sure, because we haven't gotten any info on which folders match up to which devices, etc. And then there's another folder titled "NYC024362" that has a modified date of 1/27/20, so I think that may be the materials we hadn't previously received? That folder by itself has more than 600,000 items.

I don't want to give [REDACTED] anything that we've already previously received and uploaded, and I can't tell from the folder or file names whether everything on the drive is new, or whether just additional materials were saved onto it in addition to what we already have. [REDACTED], are you able to give us some guidance on this? Ultimately what we really need is a spreadsheet of every device, whether it's been dumped (or partially dumped), and then identifying that same info – which device, and what materials from it – are being given to us with each data transfer. Otherwise I think organizationally and for review purposes it will be a total disaster for us.

We're happy to have a meeting on this if that's helpful – and thanks everybody for the assistance.

[REDACTED]

[REDACTED]
Assistant U.S. Attorney
Southern District of New York
[REDACTED]