

From: "[REDACTED]" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Cc: "[REDACTED]. (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

Date: Mon, 15 Mar 2021 20:16:16 +0000

Yep, thanks very much.

From: [REDACTED] <[REDACTED]>
Sent: Monday, March 15, 2021 4:15 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED]. (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

Was just about to email you actually. Can we call you after 5?

On Mar 15, 2021, at 16:05, [REDACTED] <[REDACTED]> wrote:

Hi [REDACTED] and [REDACTED],

Could we get on a quick call to check in about this, please? Defense counsel is asking for an update on timing.

Thanks,

[REDACTED]

From: [REDACTED]
Sent: Friday, March 12, 2021 1:44 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED]. (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

Thanks very much, [REDACTED].

From: [REDACTED] <[REDACTED]>
Sent: Friday, March 12, 2021 1:33 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED]. (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],

I am not in today (and [REDACTED] is still out) but the full team should be back in on Monday to get working on this task list. We will get you answers to these questions as soon as we know.

Thanks,

On Mar 11, 2021, at 20:20, [REDACTED] <[REDACTED]> wrote:

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

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).
- 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?
- 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?

Thanks,

From: [REDACTED]

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

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

Cc: [REDACTED] (NY) (FBI) <[REDACTED]>; [REDACTED] <[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,
[REDACTED]

From: Laura Menninger <lmenninger@hmflaw.com>

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

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

Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP (ceverdell@cohengresser.com) <ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>

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

Counsel –

Please see attached correspondence.

-Laura

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