

From: [REDACTED]

To: [REDACTED]

Subject: Re: GM Evidence Review

Date: Thu, 08 Apr 2021 18:18:22 +0000

Importance: Normal

Thank you so much!

Get [Outlook for iOS](#)

From: [REDACTED]

Sent: Thursday, April 8, 2021 2:15:03 PM

To: [REDACTED]

Subject: GM Evidence Review

Hey [REDACTED]

I attached the three spreadsheets showing what is likely to be transported to 500 Pearl. Below is some of the logistical information.

- 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.
 - There are 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.
 - There are 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.
 - 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, the AUSA plans 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:
 - This will be Monday, April 12th.
 - 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.

Thank you for assisting with this!

Feel free to reach out with any questions!

EFTA00038575

Thanks,

[REDACTED]

Special Agent [REDACTED]

FBI New York Field Office

Child Exploitation/Human Trafficking

Desk:

[REDACTED]

[New York Evidence List - Annotated by AUSA.xlsx](#) [Florida Evidence Sub-Item List - Annotated by AUSA.xlsx](#) [Florida Evidence List - Annotated by AUSA.xlsx](#)