

From: "[REDACTED] [REDACTED]@deloitte.com>

To: "Windom, Thomas (USADC)" [REDACTED], "Zusman, Kelly (USANAC)" [REDACTED]
<[REDACTED]@usdoj.gov>

Cc: "[REDACTED] [REDACTED]@deloitte.com>, US Project Coconut [REDACTED]@deloitte.com>

Subject: [EXTERNAL] Project Coconut - Filter Review Meeting Summary

Date: Fri, 27 May 2022 11:16:49 -0400

Importance: Normal

Embedded: [EXT]_FW:

Good morning, Kelly and Thomas.

Thank you both for jumping on an early call this morning to discuss the upcoming Project Coconut Filter Review workflow along with other items! Below is a high-level summary of items discussed during the call; please let me know if any of the below items need to be updated.

1. Filter Review

a. Objective

- i. The Filter Review Team will make Privilege and base-line Relevancy determinations on warrant production documents before documents are reviewed by the Substantive/Investigative Teams
- 1. Documents reviewed by the Filter Team will be sent to the Substantive Team if tagged as;
 - a. *Relevant* and either *Not Privileged* or *Privilege (Can Redact)*
- 2. Documents reviewed by the Filter Team will not be sent to the Substantive Team if tagged as;
 - a. *Unambiguously Not Relevant* (no Privilege determination)
 - b. *Relevant and Privileged (Cannot Redact)*

a. Workflow

- i. Warrant Production documents will be bifurcated into the below two (2) tranches for the Filter Team's review;
 - 1. Documents hitting on Keywords ("Keyword documents")
 - a. Keyword documents will be First Level Reviewed ("1LR") by the Filter Team and Second Level Reviewed ("2LR") by Kelly Z.
 - 2. Documents not hitting on Keywords ("Non Keyword documents")
 - a. Non Keyword documents will be QC'd by Kelly Z.
- ii. Transfer to Substantive Team
 - 1. Upon confirmation from the Filter Team, *Relevant* and *Not Privileged* (or *Privileged Redacted*) documents will be sent to the Substantive Review Team.
 - 2. Documents with a high presumption of privilege that the Filter Team determines should be reviewed by the Substantive Team will be sent to the Court for review and approval before transferring to the Substantive Team.
- iii. **ACTION ITEMS:**
 - 1. Government/DOJ will provide Deloitte with Keyword terms to be used in the Filter Review.
 - 2. Deloitte will review attached email containing the draft Filter Review Protocol and Government's proposed fields/choices to send updated Filter Review coding layout to Government for review.
 - 3. Deloitte will send Kelly recommendations for her Filter 2LR.
 - 4. Deloitte will create a Filter Review tracker in Project Coconut's workspace for the Filter Review documents.

2. Miscellaneous

a. NARA Production

[REDACTED]

- i. The NARA Team will use the Substantive Review coding layout
- ii. **ACTION ITEM:** Government/DOJ to review/update Substantive Review coding layout

b. Additional Data

- i. In approximately four (4) weeks, the government expects to receive devices and iCloud accounts to be loaded to Project Coconut's workspace for review by the Filter and Substantive Teams.

Please let us know if you have any questions or would like any additional information.

I hope you all have a fabulous (much deserved) long weekend!!

Warmest regards,

[REDACTED]

[REDACTED]

Senior Service Delivery Advisor | Risk & Financial Advisory

Deloitte Transactions and Business Analytics LLP

Tel/Direct: [REDACTED] | Mobile: [REDACTED]

[REDACTED] | www.deloitte.com

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v.E.1

[REDACTED]

Project Coconut/Cranberry

Filter Team: May – January 2023

2 Investigations: Special Counsel

- Project Coconut: January 6th Investigations
- Project Cranberry: Mar-a-Lago Document Investigation
- AG Garland appoints Jack Smith as the Special Counsel:
11/18/22



Our Task

- Review information gathered from email accounts and devices for attorney-client privilege and work product information.
- The investigation is still **covert as to most targets**.
- The investigation team presented a **filter protocol** [REDACTED]
[REDACTED] it controls our review.

Covert v. Overt

- For covert targets, we will seek ex parte court review. And because we cannot confer with the privilege-holder's counsel prior to disclosure, **any doubts** about whether information should be disclosed to the trial team must be resolved in favor of the privilege holder.
 - > Court v. hold for PH review
 - > Prioritize
- For overt targets, we will confer with known counsel prior to disclosure to the investigation team.
- The filter protocol affords the PH 7 days to object, or we release the info.
- Rolling production.
- We do not produce anything tagged privileged or unambiguously non-responsive.

Procedures

- Using Relativity, for attorney targets, everything is presumed privileged. Known attorney names are highlighted in purple.
- Known lawyers representing targets and generic attorney/legal search terms are loaded into the database and those terms are all highlights.
- Note: Giuliani uses the email [REDACTED]@gmail.com

Procedures

- Relativity questions: [REDACTED] [@deloitte.com](mailto:[REDACTED]@deloitte.com)
- Our material will not be pre-scoped.
- We are not principally charged with scoping; nevertheless, please mark anything obviously outside the warrant's scope as non-responsive (e.g. REI coupons).
- Anything legal-looking and unrelated to the investigation? Mark it "unambiguously unresponsive," and move on.

Coding: Level 1

Filter Review

- a. **CODE_FILTER – Privilege** (REQUIRED; single-choice)
 - i. Privilege Withhold
 - ii. Privilege Redact
 - iii. Needs Further Review
 - iv. Technical Issue
- b. **CODE_FILTER – Privilege Type** (multi-choice)
 - i. Attorney Client
 - ii. Attorney Work Product
- c. **CODE_FILTER – Responsive** (single-choice)
 - i. Responsive
 - ii. Unambiguously not responsive
 - iii. Needs Further Review
 - iv. News outlets
 - v. Campaign
 - vi. Embedded
- d. **CODE_FILTER – Reviewer Comment** (long-text)

Procedures

- Review of all potentially privileged info and “privilege redact” will be two-layered.
- We’ll decide what goes to the judge, what is delivered to the target’s lawyer, and what is unquestionably not subject to disclosure to the Investigation Team. If need be, we’ll discuss as a group.
- **To protect you and the trial team, any communications from this team to or from the trial team must be via Zusman. If you have questions, please route them through me.**

Documents Reviewed/Tagged

700,000

Team is currently working on 1L/2L for 75,000

Attorney-Client Privilege

- (1) Where legal advice of any kind is sought
 - (2) from a professional legal adviser in his capacity as such,
 - (3) the communications relating to that purpose,
 - (4) made in confidence
 - (5) by the client,
 - (6) are at his instance permanently protected
 - (7) from disclosure by himself or by the legal adviser,
 - (8) unless the protection be waived.*
-
- * Presume that waiver and crime-fraud will be issues we'll submit to the judge.
 - Source: *Eastman v. Thompson*, citing *United States v. Graf*, 610 F.3d 1148, 1156 (9th Cir. 2010).

Work Product

- For documents to be protected work product, they must
 - (1) “be ‘prepared in anticipation of litigation or for trial,’” and
 - (2) “be prepared ‘by or for another party or by or for that other party’s representative.’”
- Note: work product *may* include witness interviews.
- Source: *Eastman v. Thompson*, at 21, citing *In re California Pub. Utils. Comm’n*, 892 F.2d 778, 780-81 (9th Cir. 1989). Note: Judge Carter ruled that 10 emails found in Eastman’s Chapman University account were privileged but subject to the crime-fraud exception.

Important Resource

- **Coconut/Cranberry Filter Team Library:**
 - All search warrants
 - Judicial Opinions (Carter, Howell)
 - Memos (including a summary of all litigation to date); timelines, attorney chart, etc.
 - Briefing
 - Correspondence
 - * Accessible only to Filter Team Members

Experienced Coconut Filter Team Members

- Gavin Bruce, Will MacLaren, Tom Ratcliffe, [REDACTED] (Paralegal) (OR)
- Michael Madigan (CRM)
- D. Brian Simpson (EDPA)
- Keith Liddle (MLARS)
- Laurita Denny, Caren Somerwitz, Marian Glenn (NSD)
- Jessica Akins (SDTX)
- Elyse Stephens (OIG)

New Cranberry/Coconut Filter Team Members

December: Trevor Taniguchi (Maine)

- Early January: Aimee Cooper (EDTX); Matthew McHale (WDPA); Monica Klapper (AZ).
- Mid-January: Nadia Ahmed (NV); Angel Krull (CT); Bryant Watson (UT).
- And now, all of you!

The Importance of this work

- Our goal is to provide as much responsive, non-privileged information to the investigation team as possible, so the Special Counsel can make well-informed decisions about whether anyone should be charged, and if so, what charges are appropriate.
- Thank you for your contribution to this effort.

Coconut/Cranberry Filter Supervisor Contact Info

- [REDACTED]@usdoj.gov
- [REDACTED] (cell); [REDACTED] (desk)

Project Coconut/Cranberry

Filter Team: May 2023

2 Investigations: Special Counsel

- Project Coconut: Attempts to overturn/invalidate the 2020 elections / January 6th Investigation
- Project Cranberry: Mar-a-Lago Document Investigation (filter review complete)
- AG Garland appointed Jack Smith as the Special Counsel: 11/18/22



Our Task

- Review information gathered from email accounts and devices for attorney-client privilege and work product information.
- The investigation is still **covert as to most targets**.
- The investigation team presented a **filter protocol** [REDACTED]
[REDACTED] it controls our review.
- Judge Howell retired and Chief Judge Boasberg has assumed the case.

Filter Team Accomplishments

Over 50 Department of Justice Personnel (DOJ and FBI) have participated in the Filter Team Since June 2022

- First Document Coded: June 17, 2022 (Shoutout to Will McLaren)
- 6 new team members are onboarding currently
- Deloitte Team: 10 Team Members Regularly Support the Filter Team
- Project Coconut and Project Cranberry Combined (as of May 2, 2023)
 - Total Documents Obtained: **15,047,980**
 - Total Documents Coded for Responsiveness: **6,441,968**
 - Total Documents Filed with the Court/Produced to Opposing Counsel: **180,689**
 - Total Documents Released to the Investigative Team: **3,739,437**
 - Total Custodians: **29**
 - Total Accounts & Devices: **94**

Filter Team Accomplishments (continued)

- Project Coconut (as of May 2, 2023)
 - Total Documents Obtained: **13,009,497**
 - Total Documents Coded for Responsiveness: **5,883,461**
 - Total Documents Filed with the Court / Produced to Opposing Counsel: **180,681**
 - Total Documents Released to the Investigative Team: **1,823,475**
 - Total Custodians: **26**
 - Total Accounts (including email, iCloud, and Devices): **85** [one custodian = 39 devices & accounts]
- Project Cranberry
 - Total Documents Obtained: **2,038,483**
 - Total Documents Coded for Responsiveness: **558,507**
 - Total Documents Filed with the Court: **7**
 - Total Documents Released to the Investigative Team: **1,915,962**
 - Total Custodians: **3**
 - Total Accounts (including Email, iCloud, and Devices): **9**

Key Filter Protocol Provisions

- Filter Team members will not be part of (or communicate with) the investigative team, with the exception of the Filter Team Coordinator.
 - All communication to / from the Filter Team must go through the Coordinator.
- No materials shall be disclosed to the investigative team without approval of a filter team attorney.
- *Communications to or from anyone known by the Filter Team to be an attorney will be automatically identified and segregated as Potentially Privileged material.*
- The Investigative Team will neither learn about nor be granted access to any Potentially Privileged material unless the Filter Team seeks review of those materials by, and approval from, the Court, or discloses those materials to and confers with the potential privilege holder.

Review Process

- First Level Review (1L): review all documents and code in Relativity
- Second Level Review (2L): Review of all potentially privileged info and “privilege redact”
- Third Level Review (3L): Decisions about what goes to the judge, what is delivered to the target’s lawyer (when applicable), and what is unquestionably not subject to disclosure to the Investigation Team.
- Drafting Team: Kelly Zusman and Bryant Wilson

To protect you and the trial/investigative team, any communications to or from the trial/investigative team must be via the Filter Team Coordinator, Brian Simpson. If you have questions, please route them through your Team Lead.

Covert v. Overt

- For covert targets, we will seek ex parte court review. And because we cannot confer with the privilege-holder's counsel prior to disclosure, **any doubts** about whether information should be disclosed to the trial team must be resolved in favor of the privilege holder.
 - > Court v. hold for PH review
 - > Prioritize
- For overt targets, we will confer with known counsel prior to disclosure to the investigation team.
- The filter protocol affords the Privilege Holder 7 days to object, or we release the info.
- Rolling production.
- We do not produce anything tagged privileged or unambiguously non-responsive.

The Filter Team: Where we come in

Attorney-Client Privilege

- (1) Where legal advice of any kind is sought
- (2) from a professional legal adviser in his capacity as such,
- (3) the communications relating to that purpose,
- (4) made in confidence
- (5) by the client,
- (6) are at his instance permanently protected
- (7) from disclosure by himself or by the legal adviser,
- (8) unless the protection be waived.*

* Waiver and crime-fraud are issues we continue to submit to the judge.

Source: *Eastman v. Thompson, citing United States v. Graf*, 610 F.3d 1148, 1156 (9th Cir. 2010).

Work Product

For documents to be protected work product, they must

- (1) “be ‘prepared in anticipation of litigation or for trial,’” and
- (2) “be prepared ‘by or for another party or by or for that other party’s representative.’”

- Note: work product *may* include witness interviews.

Source: *Eastman v. Thompson*, at 21, citing *In re California Pub. Utils. Comm’n*, 892 F.2d 778, 780-81 (9th Cir. 1989).

Note: Judge Carter and Judge Howell have found various work product documents and communications that were privileged were subject to the crime-fraud exception.

Crime Fraud Exception

- The doctrine of the crime-fraud “[e]xception comes into play when a privileged relationship is used to further a crime, fraud, or other fundamental misconduct.” *In re Sealed Case* (“*In re Sealed Case (1982)*”), 676 F.2d 793, 807 (D.C. Cir. 1982).
- “Attorney-client communications are not privileged if they ‘are made in furtherance of a crime, fraud, or other misconduct.’” *In re Grand Jury*, 475 F.3d 1299, 1305 (D.C. Cir. 2007) (quoting *In re Sealed Case* (“*In re Sealed Case (1985)*”), 754 F.2d 395, 399 (D.C. Cir. 1985)).
- “To establish the exception . . . the court must consider whether the client ‘made or received the otherwise privileged communication with the intent to further an unlawful or fraudulent act,’ and establish that the client actually ‘carried out the crime or fraud.’” *In re Sealed Case*, 223 F.3d 775, 778 (D.C. Cir. 2000) (quoting *In re Sealed Case* (“*In re Sealed Case (1997)*”), 107 F.3d 46, 49 (D.C. Cir. 1997)).

Coding Highlights: Known Attorneys

Any communication including a known attorney (to/from/cc) is Potentially Privileged *per the Protocol*

- In Relativity, known attorney names are highlighted in purple.
- Generic attorney/legal search terms are loaded into the database and those terms are all highlights.
- Known Attorney List (available in the library)

Coding Highlights (continued)

- Our material will not be pre-scoped.
- We are not principally charged with scoping; nevertheless, please mark anything obviously outside the warrant's scope as unambiguously not responsive (e.g. REI coupons).
- Anything legal-looking and unrelated to the investigation? Mark it "unambiguously not responsive," and move on.

Coding: Level 1

- a. **CODE_FILTER – Responsive** (single-choice)
 - i. Responsive
 - ii. Responsive (Relationship Only)
 - iii. Unambiguously not responsive
 - iv. Needs Further Review
 - v. Technical Issue
- b. **CODE_FILTER – HOT**
 - i. Hot – Not Privileged
 - a. Hot – Potentially Privileged
 - b. Hot - Privileged
- c. **CODE_FILTER – Privilege** (REQUIRED; single-choice)
 - i. Potentially Privileged
 - ii. Privileged (Cannot Redact)
 - iii. Privileged (Can Redact)
 - iv. Not Privileged
 - v. Needs Further Review
 - vi. Hold for Privilege Holder
 - vii. Technical Issue
- d. **CODE_FILTER – Privilege Type** (multi-choice)
 - i. Attorney Client
 - ii. Attorney Work Product
- e. **CODE_FILTER – Document Description**
 - i. Campaign Promotions / Newsletters
 - ii. News Outlets
 - iii. Contact/Calendar
 - iv. Embedded File
 - v. Foreign Language
 - vi. Other (leave comment)
- f. **CODE_FILTER – Reviewer Comment** (narrative)

Important Resources

Coconut Filter Team Library (“Investigation” in Relativity):

- All search warrants
- Judicial Opinions (Carter, Howell, Boasberg)
- Memos (including a summary of all litigation to date); timelines, attorney chart, training materials, etc.
- Briefing
- Correspondence

* Accessible only to Filter Team Members

- Relativity questions: [REDACTED]@deloitte.com and copy Deloitte Project Coconut Filter Team [REDACTED]@deloitte.com
- Substantive / Coding Questions: Your Team Lead

Coconut Filter Team Team Leads

- Jessica Akins (SDTX) [REDACTED] [\[REDACTED\]@usa.doj.gov](mailto:[REDACTED]@usa.doj.gov)
- Laurita Denny (NSD) [REDACTED] [\[REDACTED\]@usdoj.gov](mailto:[REDACTED]@usdoj.gov)
- Michael Madigan (CRM) [REDACTED] [\[REDACTED\]@usdoj.gov](mailto:[REDACTED]@usdoj.gov)
- Caren Somerwitz (NSD) [REDACTED] [\[REDACTED\]@usdoj.gov](mailto:[REDACTED]@usdoj.gov)

Coconut/Cranberry Filter Supervisor Contact Info

Brian Simpson

- [REDACTED] [@usa.doj.gov](mailto:[REDACTED]@usa.doj.gov)

- [REDACTED]

From: "Gaston, Molly (ODAG)" [REDACTED]

To: "Wong, Norman (USAEO)" [REDACTED]

Cc: "Bruck, Andrew (ODAG)" [REDACTED]

Subject: Filter Team Q

Date: Mon, 26 Dec 2022 11:15:49 -0500

Importance: Normal

Attachments: Filter_Team_Memo_2022_1226_11am.docx

Norm,

I hope you are doing well and that you are having a wonderful holiday. Andrew and I have been working on the logistics of expanding the filter team that reviews materials related to the Special Counsel's Office, and wanted to check in with you on a couple questions related to SAUSAs.

Our first question is this—when we discussed the filter team in principle with Jolene, and the fact that these short-term “details” would be non-reimbursable—Jolene thought that we could efficiently accomplish the paperwork necessary with a memo like the attached, simply documenting under Marshall's signature the terms and the list of folks detailed. This has the benefit of cutting down on paperwork, especially for this brief surge-type effort that we need to get stood up by Jan. 3. Would this work for the USAOs providing AUSAs?

Our other question relates to the issue of litigation of any filter issues in D.C. I talked to Bridget Fitzpatrick on Saturday, and she and Matt are fine with the filter team litigating any such issues in D.C. as they have been doing, as long as it is clear that the D.C. USAO is not involved the filter decisions (their concern being that if there are loose ends from the SCO venued in D.C. a few years down the road, they don't want to office to be tainted or recused). Is the attached memo sufficient to allow filter members to file pleadings in D.C., or does there need to be additional paperwork first? We also thought that we could get the filter team up and running through this memo, and then deal with any additional SAUSA paperwork as the need to file in D.C. arises on an attorney-by-attorney basis.

Thanks so much, and sorry to bother you on a holiday weekend!

Molly

Molly Gaston
Associate Deputy Attorney General
Office of the Deputy Attorney General
[REDACTED]

From: "Gaston, Molly (ODAG)" <[REDACTED]@usdoj.gov>

To: "JPC (JSPT)" <[REDACTED]@usdoj.gov>, "Zusman, Kelly (USAOR)" <[REDACTED]@usa.doj.gov>

Subject: RE: Filter Team to Support the SCO.docx

Date: Mon, 02 Jan 2023 11:09:08 -0500

Importance: Normal

All sounds good! Also, Kelly, I'm not sure where you get your logistical/admin support (assignments, batching, all of the Relativity behind-the-scenes work), but if it would be helpful for me to identify a paralegal detailee, let me know and I will look into it.

From: JPC (JSPT) [REDACTED]@usdoj.gov>

Sent: Monday, January 2, 2023 11:04 AM

To: Gaston, Molly (ODAG) <[REDACTED]@usdoj.gov>; Zusman, Kelly (USAOR) <[REDACTED]@usa.doj.gov>

Subject: Filter Team to Support the SCO.docx

Molly/Kelly –

Based on our calls and the information you both provided, I put together a roster of the overall filter team, which is attached. Let me know if you see any issues with it.

Practically speaking, we are going to go from a large surge and solid core team down to 1.5 attorneys on April 3 (including Kelly). Based on Kelly's and my conversation this morning, we will need more support than that after April 3. Kelly and I will assess the need over the course of the month so that we can communicate with ODAG about needs well in advance of April 3. To that end, I am going to put a meeting on the calendar for the three of us in early February to make sure that a needs assessment and request does not run away from us. We can always re-schedule it closer to the time as our individuals schedules become more clear—but I feel like we should just get something on the calendar to make sure we don't have a crisis near April 3.

Molly, thank you so much for putting this together for us!

J.P.

[REDACTED]

From: "Gaston, Molly (ODAG)" <[REDACTED]@usdoj.gov>

To: "JPC (JSPT)" <[REDACTED]@usdoj.gov>, "Zusman, Kelly (USAOR)" <[REDACTED]@usa.doj.gov>

Subject: Filter

Date: Mon, 02 Jan 2023 09:08:34 -0500

Importance: Normal

Attachments: Filter_Team_Memo_2023-01-02.docx

Kelly and J.P.,

Attached is a draft memo regarding the filter team that we will finalize today. Kelly, this includes additions from the Massachusetts USAO; I think you should have all of the other names. It's possible that there will be one last addition today. Please let me know if you have any questions.

Thanks,
Molly

Molly Gaston
Associate Deputy Attorney General
Office of the Deputy Attorney General
[REDACTED]



U.S. Department of Justice

Office of the Deputy Attorney General

Washington, D.C. 20530

January 2, 2023

MEMORANDUM FOR RELEVANT HEADS OF COMPONENTS AND U.S. ATTORNEYS

FROM: Marshall L. Miller
Principal Associate Deputy Attorney General
Office of the Deputy Attorney General

SUBJECT: Temporary Filter Team Assignment

This memorandum confirms that the attorneys listed in Attachment A will be performing a temporary assignment as a member of a filter team related to the work of Special Counsel Jack Smith. Below please find details regarding the assignment.

- Unless otherwise stated, the assigned attorneys are expected to serve as members of the filter team on a full-time basis for 90 days, from January 3, 2023 until April 3, 2023.
- The filter team will operate under the supervision of Kelly Zusman, First Assistant U.S. Attorney (FAUSA) in the District of Oregon. Team members will receive work assignments from FAUSA Zusman or her designees, and FAUSA Zusman will oversee training and advise team members of any applicable ethics, confidentiality, and recordkeeping requirements.
- Throughout the assignment, the filter team members will remain employees of their home component or office, which should continue to maintain records related to their attorneys, including official time, attendance, and leave records; formal performance evaluations; and other personnel matters. The home component or office should coordinate with FAUSA Zusman regarding approvals of leave during the assignment period.
- The assignment is not eligible for reimbursement from the Special Counsel's Office or any other office of the Department of Justice. Filter team members will perform their work from their current duty stations, using the office space, materials, email addresses, phones, and computers currently provided by their home component or office. No travel is expected for this assignment. All filter team members from United States Attorneys' Offices should record their time in the USA-5 system as "national security/domestic terrorism."
- Filter team members will litigate any legal disputes related to their work in the District Court for the District of Columbia, under the supervision of FAUSA Zusman. Team members will not be required to make in-person court appearances in the District Court;

however, team members may be asked to file motions and related court papers and appear remotely for court appearances. For purposes of such litigation, team members will be appointed as Special Assistant United States Attorneys for the United States Attorney's Office for the District of Columbia, working under FAUSA Zusman's supervision. Such appointments—and the further documentation necessary to effectuate them—will be made on as-needed, attorney-by-attorney basis. The United States Attorney for the District of Columbia and his regular Assistant United States Attorneys will not review the filter team's determinations or the underlying documents over which they are made.

ATTACHMENT A

Name	Home Office/Component	Notes (e.g., 50% time)
Ahmed, Nadia	USAO-NV	
Akins, Jessica	USAO-SDTX	Starts end of Jan.
Cooper, Aimee	USAO-EDTX	
Hale, Matthew	USAO-WDPA	
Klapper, Monica	USAO-AZ	
Krull, Monica	USAO-CT	On leave Jan. 14-25.
Marks, Linda	CIV	
Smith, Brandon	CIV	
Muoio, Joe	ATR	
Ortolano, Karima	ATR	
Watson, Bryant	USAO-UT	Starts Jan. 15.
Bennett, Danial	USAO-MA	33% time.
Looney, Chris	USAO-MA	33% time.
Wichers, Christine	USAO-MA	33% time
Birnbaum, Marc	USAO-EDVA	50% time.
Miller, Angela	USAO-EDVA	50% time.
Joines, Adam	USAO-NDOH	
Darcey, Patrick	USAO-MDFL	50% time.
Falzetta, Brenna	USAO-MDFL	50% time.
Thurmond, Sarah	NSD	
Hoffman, Heidi	ENRD	60% time.
Baughman, Natalie	ENRD	60% time.
Perez De La Cruz, Ignacio	TAX	Starts Jan. 5.

From: "Windom, Thomas (USADC)"

To: "JPC (JSPT)"

"Duree, Timothy (CRM)"

Cc:

Subject: RE: Project Coconut- Updated User list

Date: Sun, 01 Jan 2023 12:57:09 -0500

Importance: Normal

Thanks, this looks right
tw

From: @deloitte.com>

Sent: Friday, December 30, 2022 8:57 AM

To: Windom, Thomas (USADC) <@deloitte.com>; JPC (JSPT); Duree, Timothy (CRM) <@deloitte.com>

Cc: @deloitte.com>; deloitte.com>; deloitte.com>

Subject: [EXTERNAL] RE: Project Coconut- Updated User list

Good morning Thomas,

Below please find updated list of all users that either have enabled accounts or we are awaiting their feedback to create their initial account. Please note if the account status has "-", that means that the account may have already been deleted (or never created if a creation date is missing). Finally, "NULL" means that there account is enabled, but the user had not yet logged in prior to when we pulled the report.

Please review and let me know if any of these individuals should no longer have access.

LAST NAME	FIRST NAME	EMAIL	GROUP	Relativity Account Created	RELATIVITY ACCOUNT STATUS	LAST LOGIN DATE
			fbi.gov	12/14/2022	-	-
Ahmed	Nadia		usdoj.gov	12/23/2022	Enabled	NULL
Akerson	Jessica		usdoj.gov	11/1/2022	Enabled	11/1/22 12:39 PM
Akins	Jessica		usdoj.gov	8/1/2022	Enabled	12/11/22 8:13 PM
			fbi.gov		-	-
			fbi.gov	7/14/2022	Enabled	12/14/22 8:47 AM
Ballantine	Jocelyn		usdoj.gov	8/18/2022	Enabled	11/12/22 6:04 PM
Bernazzani	Elisa		fbi.gov		-	-
Bernstein	Gregory		usdoj.gov	9/13/2022	Enabled	12/14/22 11:56 AM
			nara.gov	10/12/2022	Enabled	12/13/22 5:00 PM
Bogle	Christine (Alex)		usdoj.gov	5/9/2022	Enabled	12/13/22 1:38 PM
Bratt	Jay I.		usdoj.gov		-	-
Bruce	Gavin		usdoj.gov	5/26/2022	Enabled	12/12/22 4:57 PM
Burke	Matthew		usdoj.gov	7/26/2022	Enabled	12/14/22 11:40 AM
Burnett	James		usdoj.gov	6/9/2022	Enabled	11/21/22 9:39 AM
			fbi.gov	12/16/2022	Enabled	NULL
			fbi.gov	11/30/2022	Enabled	12/13/22 12:32 PM
Cooper	Aimee		usdoj.gov	12/23/2022	Enabled	NULL
Denny	Laurita		usdoj.gov	7/28/2022	Enabled	12/13/22 9:57 AM
Dohrmann	Mary		usdoj.gov	8/16/2022	Enabled	12/14/22 9:32 AM
Duree	Timothy		usdoj.gov	5/23/2022	-	-
Edelstein	Julie A.		usdoj.gov		-	-
Elling	Daniel		usdoj.gov	5/20/2022	-	-
			fbi.gov	12/23/2022	Enabled	NULL
			fbi.gov	11/16/2022	Enabled	11/17/22 7:24 AM
Freitas	Mary		usdoj.gov	8/31/2022	Enabled	12/13/22 8:54 AM
			fbi.gov	pending	-	-
Garman	Jamie		fbi.gov	5/13/2022	Enabled	12/14/22 11:13 AM
Gegenheimer	Julia		usdoj.gov	9/19/2022	Enabled	12/12/22 3:27 PM
Giardina	Walter		fbi.gov	8/22/2022	Enabled	12/12/22 10:31 AM
Gilbert	Karen		usdoj.gov	12/23/2022	Enabled	NULL
Glenn	Marian		usdoj.gov	8/1/2022	Enabled	12/14/22 9:31 AM
			fbi.gov		-	-
Haray	Jonathan		usdoj.gov	11/8/2022	Enabled	12/13/22 2:51 PM
			fbi.gov	pending	-	-
Higley	Jason		usdoj.gov	4/28/2022	Enabled	12/12/22 5:28 PM
Holley	Benjamin		usdoj.gov	5/26/2022	Enabled	12/12/22 3:00 PM
Hurt	Shannon A.		usdoj.gov	pending	-	-
			fbi.gov		-	-
			fbi.gov		-	-
Klapper	Monica		usdoj.gov	12/23/2022	-	-

Knittel	John
Leach	Matthew
Liddle	Keith
Madigan	Michael
Marzen	Stephen J.
McColman	Karen
McHale	Matthew
McLaren	William
McNamara	Anne P.
Miller	Emily
Nothstein	Peter
Orloff	Stephen
Overstreet	Daniel
Raskin	David A.
Ratcliffe	Thomas
Reynolds	Brett C.
Rody	David
Rohde	Amanda
Simpson	Brian
Small	Adam
Snitselaar	Bryan
Somerwitz	Caren
Stephens	Elyse
Taniguchi	Trevor
Thakur	Michael
Vento	Maria
Watson	Brooke
Windom	Thomas
Zuckerman	Mark
Zusman	Kelly

usdoj.gov	8/31/2022	Enabled	12/8/22 1:12 PM
fbi.gov	11/30/2022	Enabled	12/14/22 12:21 PM
fbi.gov	10/27/2022	Enabled	12/14/22 11:34 AM
usdoj.gov	5/26/2022	Enabled	12/5/22 4:05 PM
fbi.gov	12/6/2022	Enabled	12/14/22 9:40 AM
usdoj.gov	8/19/2022	Enabled	12/13/22 10:37 AM
fbi.gov	pending	-	-
usdoj.gov	7/28/2022	Enabled	12/13/22 10:20 AM
fbi.gov	10/28/2022	Enabled	12/9/22 8:42 AM
fbi.gov	11/30/2022	Enabled	12/14/22 10:44 AM
usdoj.gov		-	-
fbi.gov		-	-
usdoj.gov	12/8/2022	Enabled	NULL
usdoj.gov		-	-
usdoj.gov	6/1/2022	Enabled	12/13/22 5:48 PM
usdoj.gov		-	-
fbi.gov	5/6/2022	Enabled	12/7/22 1:43 PM
fbi.gov	11/18/2022	Enabled	12/1/22 9:47 AM
usdoj.gov	7/27/2022	Enabled	12/11/22 8:02 AM
fbi.gov		-	-
fbi.gov	10/31/2022	Enabled	11/16/22 3:57 PM
usdoj.gov	7/7/2022	Enabled	12/7/22 4:03 AM
usdoj.gov	8/31/2022	Enabled	11/4/22 8:55 AM
uspis.gov	8/8/2022	Enabled	11/25/22 1:05 PM
FBI.GOV	8/22/2022	Enabled	11/2/22 8:46 AM
fbi.gov		-	-
usdoj.gov		-	-
usdoj.gov	8/4/2022	Enabled	12/11/22 3:54 PM
fbi.gov	12/23/2022	Enabled	NULL
usdoj.gov		-	-
fbi.gov	11/30/2022	Enabled	12/14/22 10:46 AM
usdoj.gov	10/5/2022	Enabled	12/13/22 8:20 PM
usdoj.gov	8/18/2022	Enabled	12/14/22 12:21 PM
fbi.gov	8/5/2022	Enabled	12/9/22 10:48 AM
usdoj.gov	7/29/2022	Enabled	12/14/22 11:33 AM
usdoj.gov	10/5/2022	Enabled	12/14/22 12:31 PM
usdoj.gov	11/17/2022	Enabled	12/5/22 9:09 AM
usdoj.gov	7/28/2022	Enabled	12/14/22 12:18 PM
usdoj.gov	6/17/2022	Enabled	12/14/22 11:08 AM
nara.gov	5/3/2022	Enabled	12/9/22 4:26 PM
usdoj.gov	11/23/2022	Enabled	12/14/22 9:16 AM
fbi.gov		-	-
usdoj.gov	12/23/2022	Enabled	NULL
usdoj.gov	9/16/2022	Enabled	12/14/22 11:06 AM
usdoj.gov	9/16/2022	Enabled	12/13/22 10:05 AM
fbi.gov	5/26/2022	Enabled	NULL
usdoj.gov	5/10/2022	Enabled	12/13/22 11:26 PM
usdoj.gov	12/1/2022	Enabled	NULL
usdoj.gov	5/12/2022	Enabled	12/13/22 9:09 AM

Thank you,

Deloitte Transactions and Business Analytics LLP

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From: [REDACTED]

Sent: Thursday, December 29, 2022 11:28 AM

To: Windom, Thomas (USADC) [REDACTED] Cooney, Joseph (USADC) [REDACTED] Duree, Timothy (CRM)

Cc: [REDACTED]@deloitte.com>; [REDACTED]@deloitte.com>; [REDACTED]@deloitte.com>
Subject: RE: Project Coconut- Updated User list

Hello Thomas,

Sure thing, I should be able to get this pulled together by Tuesday as the latest. In the meantime, I'll get the accounts for Kathleen Campbell, Brittany Reed, and Teresa McHenry deactivated.

Thank you,

[REDACTED]
 Deloitte Transactions and Business Analytics LLP
 [REDACTED]
www.deloitte.com

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From: Windom, Thomas (USADC) [REDACTED]@gov>
Sent: Wednesday, December 28, 2022 2:22 PM
To: [REDACTED]@deloitte.com>; Cooney, Joseph (USADC) [REDACTED]@usdoj.gov>; Duree, Timothy (CRM) [REDACTED]@usdoj.gov>
Cc: Lefkovic, Rafael <[REDACTED]@deloitte.com>; Fefelov, Vitaly <[REDACTED]@deloitte.com>; Buell, David <[REDACTED]@deloitte.com>
Subject: [EXT] RE: Project Coconut- Updated User list

Hi TaMira -- when you get a chance (next week maybe?), can you please send an updated version of the below? There are some folks I suspect I'll need you to deactivate. For example, Kathleen Campbell, Brittany Reed, and Teresa McHenry no longer need access. Thanks!
 tw

From: Brown, TaMira [REDACTED]@deloitte.com>
Sent: Monday, November 21, 2022 12:06 PM
To: Windom, Thomas (USADC) [REDACTED]@usa.doj.gov>; Cooney, Joseph (USADC) <[REDACTED]@usa.doj.gov>; Duree, Timothy (CRM) <[REDACTED]@usdoj.gov>
Cc: Lefkovic, Rafael [REDACTED]@deloitte.com>; Fefelov, Vitaly <[REDACTED]@deloitte.com>; Buell, David <[REDACTED]@deloitte.com>
Subject: [EXTERNAL] Project Coconut- Updated User list

Good afternoon Thomas,

Below please find an updated user account list. Please note that blank account status means they have not logged in within the last 4 months and account is either disabled or deleted. A value of "Null" in last login, means that they have not logged into a workspace yet (or system did not capture a login).

Please review and let me know if any of these individuals should no longer have access.

Last	First	Group	RELATIVITY ACCOUNT STATUS	LAST LOGIN DATE
Akerson	Jessica	usdoj.gov	Enabled	11/1/22 12:39 PM
Alexandra Freitas	Mary	usdoj.gov	Enabled	11/2/22 10:00 AM
[REDACTED]	[REDACTED]	fbi.gov	Enabled	11/11/22 10:25 AM
Ballantine	Jocelyn	usdoj.gov	Enabled	11/12/22 6:04 PM
Baset	Ahmed	USDOJ.GOV	-	-
Bernstein	Gregory	usdoj.gov	Enabled	11/9/22 2:38 PM
[REDACTED]	[REDACTED]	nara.gov	Enabled	11/10/22 2:14 PM
Bogle	Christine	usdoj.gov	Enabled	11/14/22 3:04 PM
Burnett	James	usdoj.gov	Enabled	11/2/22 3:02 PM
Campbell	Kathleen	usdoj.gov	Enabled	11/9/22 3:02 PM
[REDACTED]	[REDACTED]	usdoj.gov	Enabled	Null
[REDACTED]	[REDACTED]	usdoj.gov	-	-
Dohrmann	Mary	usdoj.gov	Enabled	11/7/22 2:12 PM
[REDACTED]	[REDACTED]	usdoj.gov	-	-
[REDACTED]	[REDACTED]	fbi.gov	Enabled	Null
[REDACTED]	[REDACTED]	fbi.gov	-	-

[REDACTED]

From: Blaire Toleman <[REDACTED]@fbi.gov>
To: '[REDACTED]sdoj.gov' <[REDACTED]@usdoj.gov>, Jennifer Bacon <[REDACTED]@fbi.gov>
Cc: Jamie Garman <[REDACTED]@fbi.gov>, [REDACTED]@usdoj.gov" <[REDACTED]@usdoj.gov>
Subject: Re: Project Coconut- Updated User list
Date: Fri, 30 Dec 2022 15:33:10 -0500
Importance: Normal

Thanks Thomas. All the folks on the CR15 side are good. We will need to add names once we get the additional three analysts but we will get those to you as soon as we have them.

Happy New Year to all of you!

BT

Respectfully,

SSA Blaire A. Toleman
WFO/NVRA
Public Corruption
Cell: [REDACTED]

From: Windom, Thomas (USADC) <[REDACTED]@usdoj.gov>
Sent: Friday, December 30, 2022 2:56:02 PM
To: Bacon, Jennifer N. (WF) (FBI) <[REDACTED]@fbi.gov>; Toleman, Blaire A. (WF) (FBI) <[REDACTED]@fbi.gov>
Cc: Garman, Jamie Roseannlyn (WF) (FBI) <[REDACTED]@fbi.gov>; Edelstein, Julie (NSD) (JMD) <[REDACTED]@usdoj.gov>
Subject: [EXTERNAL EMAIL] - RE: Project Coconut- Updated User list

Also, please do not circulate this list, as I'm not sure who some of the ppl are.
tw

From: Windom, Thomas (USADC)
Sent: Friday, December 30, 2022 2:41 PM
To: Bacon, Jennifer N. (WF) (FBI) <[REDACTED]@fbi.gov>; Toleman, Blaire A. (WF) (FBI) <[REDACTED]@fbi.gov>
Cc: Garman, Jamie Roseannlyn (WF) (FBI) <[REDACTED]@fbi.gov>; Edelstein, Julie (NSD) <[REDACTED]@usdoj.gov>
Subject: FW: Project Coconut- Updated User list

Please see below and let me know if there are FBI members who no longer are on the case and therefore should have their access to Coconut removed.
tw

From: Brown, TaMira <[REDACTED]@deloitte.com>
Sent: Friday, December 30, 2022 8:57 AM
To: Windom, Thomas (USADC) <[REDACTED]@usa.doj.gov>; JPC (JSPT) <[REDACTED]@usdoj.gov>; Duree, Timothy (CRM) <[REDACTED]@usdoj.gov>
Cc: [REDACTED]@deloitte.com>; [REDACTED]@deloitte.com>; [REDACTED]@deloitte.com>
Subject: [EXTERNAL] RE: Project Coconut- Updated User list

Good morning Thomas,

Below please find updated list of all users that either have enabled accounts or we are awaiting their feedback to create their initial account. Please note if the account status has "-", that means that the account may have already been deleted (or never created if a creation date is missing). Finally, "NULL" means that there account is enabled, but the user had not yet logged in prior to when we pulled the report.

Please review and let me know if any of these individuals should no longer have access.

LAST NAME	FIRST NAME	EMAIL	GROUP	Relativity Account Created	RELATIVITY ACCOUNT STATUS	LAST LOGIN DATE
[REDACTED]	[REDACTED]	[REDACTED]	fbi.gov	12/14/2022	-	-
Ahmed	Nadia	[REDACTED]	usdoj.gov	12/23/2022	Enabled	NULL
Akerson	Jessica	[REDACTED]	usdoj.gov	11/1/2022	Enabled	11/1/22 12:39 PM
Akins	Jessica	[REDACTED]	usdoj.gov	8/1/2022	Enabled	12/11/22 8:13 PM
[REDACTED]	[REDACTED]	[REDACTED]	fbi.gov		-	-
[REDACTED]	[REDACTED]	[REDACTED]	fbi.gov	7/14/2022	Enabled	12/14/22 8:47 AM
Ballantine	Jocelyn	[REDACTED]	usdoj.gov	8/18/2022	Enabled	11/12/22 6:04 PM
[REDACTED]	[REDACTED]	[REDACTED]	fbi.gov		-	-
Bernstein	Gregory	[REDACTED]	usdoj.gov	9/13/2022	Enabled	12/14/22 11:56 AM
[REDACTED]	[REDACTED]	[REDACTED]	nara.gov	10/12/2022	Enabled	12/13/22 5:00 PM
Bogle	Christine (Alex)	[REDACTED]	usdoj.gov	5/9/2022	Enabled	12/13/22 1:38 PM
Bratt	Jay I.	[REDACTED]	usdoj.gov		-	-
Bruce	Gavin	[REDACTED]	usdoj.gov	5/26/2022	Enabled	12/12/22 4:57 PM
Burke	Matthew	[REDACTED]	usdoj.gov	7/26/2022	Enabled	12/14/22 11:40 AM

F-071326-000046

Burnett	James
Cooper	Aimee
Denny	Laurita
Dohrmann	Mary
Duree	Timothy
Edelstein	Julie A.
Elling	Daniel
Freitas	Mary
Garman	Jamie
Gegenheimer	Julia
Giardina	Walter
Gilbert	Karen
Glenn	Marian
Haray	Jonathan
Higley	Jason
Holley	Benjamin
Hurt	Shannon A.
Klapper	Monica
Knittel	John
Leach	Matthew
Liddle	Keith
Madigan	Michael
Marzen	Stephen J.
McColman	Karen
McHale	Matthew
McLaren	William
McNamara	Anne P.
Mehochko	Dan
Miller	Emily
Nothstein	Peter
Orloff	Stephen
Overstreet	Daniel
Raskin	David A.
Ratcliffe	Thomas
Reynolds	Brett C.
Rody	David
Rohde	Amanda
Simpson	Brian
Small	Adam
Snitselaar	Bryan
Somerwitz	Caren
Stephens	Elyse
Taniguchi	Trevor
Thakur	Michael

usdoj.gov	6/9/2022	Enabled	11/21/22 9:39 AM
fbi.gov	12/16/2022	Enabled	NULL
fbi.gov	11/30/2022	Enabled	12/13/22 12:32 PM
usdoj.gov	12/23/2022	Enabled	NULL
usdoj.gov	7/28/2022	Enabled	12/13/22 9:57 AM
usdoj.gov	8/16/2022	Enabled	12/14/22 9:32 AM
usdoj.gov	5/23/2022	-	-
usdoj.gov		-	-
usdoj.gov	5/20/2022	-	-
fbi.gov	12/23/2022	Enabled	NULL
fbi.gov	11/16/2022	Enabled	11/17/22 7:24 AM
usdoj.gov	8/31/2022	Enabled	12/13/22 8:54 AM
fbi.gov	pending	-	-
fbi.gov	5/13/2022	Enabled	12/14/22 11:13 AM
usdoj.gov	9/19/2022	Enabled	12/12/22 3:27 PM
fbi.gov	8/22/2022	Enabled	12/12/22 10:31 AM
usdoj.gov	12/23/2022	Enabled	NULL
usdoj.gov	8/1/2022	Enabled	12/14/22 9:31 AM
fbi.gov		-	-
usdoj.gov	11/8/2022	Enabled	12/13/22 2:51 PM
fbi.gov	pending	-	-
usdoj.gov	4/28/2022	Enabled	12/12/22 5:28 PM
usdoj.gov	5/26/2022	Enabled	12/12/22 3:00 PM
usdoj.gov	pending	-	-
fbi.gov		-	-
fbi.gov		-	-
usdoj.gov	12/23/2022	-	-
usdoj.gov	8/31/2022	Enabled	12/8/22 1:12 PM
fbi.gov	11/30/2022	Enabled	12/14/22 12:21 PM
fbi.gov	10/27/2022	Enabled	12/14/22 11:34 AM
usdoj.gov	5/26/2022	Enabled	12/5/22 4:05 PM
fbi.gov	12/6/2022	Enabled	12/14/22 9:40 AM
usdoj.gov	8/19/2022	Enabled	12/13/22 10:37 AM
fbi.gov	pending	-	-
usdoj.gov	7/28/2022	Enabled	12/13/22 10:20 AM
fbi.gov	10/28/2022	Enabled	12/9/22 8:42 AM
fbi.gov	11/30/2022	Enabled	12/14/22 10:44 AM
usdoj.gov		-	-
fbi.gov		-	-
usdoj.gov	12/8/2022	Enabled	NULL
usdoj.gov		-	-
usdoj.gov	6/1/2022	Enabled	12/13/22 5:48 PM
usdoj.gov		-	-
fbi.gov	5/6/2022	Enabled	12/7/22 1:43 PM
fbi.gov	11/18/2022	Enabled	12/1/22 9:47 AM
usdoj.gov	7/27/2022	Enabled	12/11/22 8:02 AM
fbi.gov		-	-
fbi.gov	10/31/2022	Enabled	11/16/22 3:57 PM
usdoj.gov	7/7/2022	Enabled	12/7/22 4:03 AM
usdoj.gov	8/31/2022	Enabled	11/4/22 8:55 AM
uspis.gov	8/8/2022	Enabled	11/25/22 1:05 PM
FBI.GOV	8/22/2022	Enabled	11/2/22 8:46 AM
fbi.gov		-	-
usdoj.gov		-	-
usdoj.gov	8/4/2022	Enabled	12/11/22 3:54 PM
fbi.gov	12/23/2022	Enabled	NULL
usdoj.gov		-	-
fbi.gov	11/30/2022	Enabled	12/14/22 10:46 AM
usdoj.gov	10/5/2022	Enabled	12/13/22 8:20 PM
usdoj.gov	8/18/2022	Enabled	12/14/22 12:21 PM
fbi.gov	8/5/2022	Enabled	12/9/22 10:48 AM
usdoj.gov	7/29/2022	Enabled	12/14/22 11:33 AM
usdoj.gov	10/5/2022	Enabled	12/14/22 12:31 PM
usdoj.gov	11/17/2022	Enabled	12/5/22 9:09 AM
usdoj.gov	7/28/2022	Enabled	12/14/22 12:18 PM
usdoj.gov	6/17/2022	Enabled	12/14/22 11:08 AM
nara.gov	5/3/2022	Enabled	12/9/22 4:26 PM
usdoj.gov	11/23/2022	Enabled	12/14/22 9:16 AM
fbi.gov		-	-
usdoj.gov	12/23/2022	Enabled	NULL

[REDACTED]		[REDACTED]			
Vento	Maria	[REDACTED]	usdoj.gov	9/16/2022	Enabled 12/14/22 11:06 AM
Watson	Brooke		usdoj.gov	9/16/2022	Enabled 12/13/22 10:05 AM
[REDACTED]	[REDACTED]		fbi.gov	5/26/2022	Enabled NULL
Windom	Thomas		usdoj.gov	5/10/2022	Enabled 12/13/22 11:26 PM
Zuckerman	Mark		usdoj.gov	12/1/2022	Enabled NULL
Zusman	Kelly		usdoj.gov	5/12/2022	Enabled 12/13/22 9:09 AM

Thank you,

[REDACTED]
Deloitte Transactions and Business Analytics LLP
Tel/Direct: [REDACTED]
www.deloitte.com

[REDACTED]

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From: "[REDACTED]" <[REDACTED]@deloitte.com>
To: "MKV (JSPT)" <[REDACTED]@usdoj.gov>, "Zusman, Kelly (USAOR)" <[REDACTED]@usdoj.gov>, "Garman, Jamie Roseannlyn (WF) (FBI)" <[REDACTED]@fbi.gov>, "Higley, Jason (OIG)" <[REDACTED]@usdoj.gov>, "Mehochko, Daniel A. (WF) (FBI)" <[REDACTED]@fbi.gov>, "Bernstein, Gregory (USACAC)" <[REDACTED]@usdoj.gov>, "TPW (JSPT)" <[REDACTED]@usdoj.gov>, "MLD (JSPT)" <[REDACTED]@usdoj.gov>, "MRL (JSPT)" <[REDACTED]@usdoj.gov>, "EBP2 (JSPT)" <[REDACTED]@usdoj.gov>, "Simpson, D. Brian (USAPAM)" <[REDACTED]@usdoj.gov>
Cc: "[REDACTED]" <[REDACTED]@deloitte.com>, "[REDACTED]" <[REDACTED]@deloitte.com>, US Project Cranberry <[REDACTED]@deloitte.com>, US Project Coconut <[REDACTED]@deloitte.com>
Subject: [EXTERNAL] Project Coconut / Cranberry - Proposed Weekly Meeting Agenda for 07.12.2023

Date: Wed, 12 Jul 2023 09:43:13 -0400

Importance: Normal

Attachments: Coconut_-_Filter_Team_Productions_-_Submittals_Log_20230711.xlsx

Good Morning All,

I hope everyone is doing well. We look forward to speaking with you on our 11:00AM (EST) call. Please find below Deloitte's proposed meeting agenda for your review. If you have additional items for discussion please don't hesitate to reach out.

Project Coconut – Meeting Agenda July 12, 2023

I. Relativity Maintenance Schedule

- A. Tentative 1–2-hour outage July 12
- B. No extended outage on weekend of July 15

II. Relativity Users

- C. Account Status

User Types	Workflow / Stream	Total	Accounts Created	Pending	Waiting on Paperwork
USAO/CRM/NSD	Substantive	42	42	0	0
FBI	Substantive	103	103	0	0
USPIS	Substantive	1	1	0	0
NARA	Substantive	2	2	0	0
DOJ OIG	Substantive	12	12	0	0
DOJ OIG	OIG Filter/ Taint	45	45	0	0

*Awaiting executed paperwork from:

III. Substantive Team

- D. Data Intake
 - 1. Coconut
 - a. White House phones – sent list of artifacts to MV
 - 2. Cranberry
 - a. Butler phones –

- i. Pictures – 15 GB file
- ii. All other data hosted & search terms applied

E. Review & Exports

1. Coconut:

- 1. Preparing review summary of DOJ O&A file
- 2. Twitter 2L review – sent to TW
- 3. Exports
 - i. Exported documents released on 7/7; will send overlay for folders
 - ii. Exporting documents release on 7/10

2. Cranberry:

- 1. No activity

IV. Recent Releases from Filter Team to Substantive Team (July 6 -12)

Project	No. Of Custodians	Total Number of Releases	Description

Total Released Documents: 0

V. Filter Team

A. Project Cranberry

- a. Review (1LR/2LR)
 - i. Nauta – 2 Devices – In process
- b. Nauta Opposing Counsel – Production
 - i. Meeting scheduled this afternoon to discuss

B. Project Coconut

- a. Data Intake
 - i. D. Shafer & S. Still – iPhones – Hosted by COB (7/12)
 - ii. SoRelle Phone – Fed-Exed to Deloitte 7/10/23
 - iii. Tarrio MacBook – Estimated Host: 7/13/23
- b. Review
 - i. Active Workflows
 - 1. 1LR/2LR Active (On-Hold – Team in Cranberry)
 - a. Mobile / Physical Devices + Priority Date Range
 - b. Remaining Email Accounts + Priority Date Range
- c. Productions/Court Filings/Releases
 - i. Court Filings
 - 1. 30th Motion – T. Kutti – In progress
 - ii. Releases
 - 1. N/A
 - iii. Production – Submittal Status Log --> **see attached spreadsheet** for full details
- d. Miscellaneous
 - i. Filter Review Status Update
 - 1. Status Report will be provided to Kelly Zusman and Brian Simpson on 07/11 for review and will forward to Mary, Molly, Thomas, and Erin P with Brian's

[REDACTED]
approval

Thank you,

[REDACTED]
Deloitte Transactions and Business Analytics LLP

Tel/Direct: + [REDACTED]

www.deloitte.com

[REDACTED]

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v.E.1

[REDACTED]

From: "[REDACTED]" <[REDACTED]@deloitte.com>
To: "[REDACTED]" <[REDACTED]@deloitte.com>, "MKV (JSPT)" <[REDACTED]@usdoj.gov>, "Zusman, Kelly (USAOR)" <[REDACTED]@usdoj.gov>, "Garman, Jamie Roseannlyn (WF) (FBI)" <[REDACTED]@fbi.gov>, "Higley, Jason (OIG)" <[REDACTED]@usdoj.gov>, "Mehochko, Daniel A. (WF) (FBI)" <[REDACTED]@fbi.gov>, "Bernstein, Gregory (USACAC)" <[REDACTED]@usdoj.gov>, "TPW (JSPT)" <[REDACTED]@usdoj.gov>, "MLD (JSPT)" <[REDACTED]@usdoj.gov>, "MRL (JSPT)" <[REDACTED]@usdoj.gov>, "EBP2 (JSPT)" <[REDACTED]@usdoj.gov>, "Simpson, D. Brian (USAPAM)" <[REDACTED]@usdoj.gov>
Cc: US Project Cranberry <[REDACTED]@deloitte.com>, US Project Coconut <[REDACTED]@deloitte.com>
Subject: [EXTERNAL] RE: Project Coconut / Cranberry - Proposed Weekly Meeting Agenda for 07.19.2023

Date: Wed, 19 Jul 2023 12:59:04 -0400

Importance: Normal

Good Afternoon All,

Please see our notes from today's call below in [blue](#).

Project Coconut – Meeting Agenda July 19, 2023

I. Relativity Maintenance Schedule

A. Upcoming dates

1. Saturday, July 22 (regularly scheduled maintenance)
2. Saturday, August 5 (regularly scheduled maintenance)
3. Saturday, August 19 (regularly scheduled maintenance)
4. Downtime typically starts early in the morning and is typically back online after 6-8 hours

II. Relativity Users

B. Account Status

User Types	Workflow / Stream	Total	Accounts Created	Pending	Waiting on Paperwork
USAO/CRM/NSD	Substantive	42	42	0	0
FBI	Substantive	103	103	0	0
USPIS	Substantive	1	1	0	0
NARA	Substantive	2	2	0	0
DOJ OIG	Substantive	12	12	0	0
DOJ OIG	OIG Filter/ Taint	45	45	0	0

*Awaiting executed paperwork from:

III. Substantive Team

C. Data Intake

1. Anticipated incoming data: [no updates per DOJ](#)
2. WH Phones
 - a. [Previously identified artifacts expected to be hosted in Relativity today](#)
 - b. [Maria will follow-up by EOD with additional artifacts](#)

D. Review & Exports

1. Coconut:

1. Exports

- i. Exported documents released on 7/16
- ii. Preparing 3rd round exports

1. Timeline: as soon as possible

1. Review

- i. O&R breakouts circulated
- 1. Discussed following call how to reconcile against last chart and new tab based on forensic report

2. Cranberry:

1. Batch Review of Nauta phones

- i. Once only a few batches left DOJ will provide another list of items to be batched

2. Filter preparing another release for later this week, ~100k

IV. Recent Releases from Filter Team to Substantive Team (July 12 -18)

Project	No. Of Custodians	Total Number of Releases	Description
Cranberry	1	1	Nauta iPhones

Total Released Documents: 124,950

V. Filter Team

A. Project Cranberry

a. Review (1LR/2LR)

- i. Nauta – 2 Devices – In process

b. Releases

- i. Filter Team will be prepare a second Nauta release for later this week

c. Nauta Opposing Counsel – Production Updates?

B. Project Coconut

a. Data Intake

- i. D. Shafer & S. Still – iPhones – Hosted
- ii. Tarrio MacBook – Hosted
- iii. SoRelle Phone – Hosted by 7/19/23
- iv. TBD: a large extraction from Michael McDonald's phone

b. Review

- i. Active Workflows
- 1. 1LR/2LR Active (On-Hold – Team in Cranberry)
 - a. Mobile / Physical Devices + Priority Date Range
 - b. Remaining Email Accounts + Priority Date Range

c. Productions/Court Filings/Releases

- i. Court Filings
- 1. 30th Motion – T. Kutti – Filing determination under evaluation
- ii. Releases
- 1. D. Shafter (iPhone) – in progress
- 2. S. Still (iPhone) – in progress
- 3. E. Tarrio (MacBook) – in progress

iii. Production – Submittal Status Log --> see attached spreadsheet for full details

d. Miscellaneous

i. Filter Review Status Update

1. Status Report will be provided to Kelly Zusman and Brian Simpson on 07/18 for review and will forward to Mary, Molly, Thomas, and Erin P with Brian's approval

Best,

Deloitte Transactions and Business Analytics LLP

Tel/Direct: +1

@deloitte.com | www.deloitte.com

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From: <tambrown@deloitte.com>

Sent: Wednesday, July 19, 2023 9:50 AM

To: MKV (JSPT @usdoj.gov>; Zusman, Kelly (USAOR @usdoj.gov>; Garman, Jamie Roseannlyn (WF) (FBI @fbi.gov>; Higley, Jason (OIG < @usdoj.gov>; Mehochko, Daniel A. (WF) (FBI @fbi.gov>; Bernstein, Gregory (USACAC @usdoj.gov>; TPW (JSPT < @usdoj.gov>; MLD (JSPT < @usdoj.gov>; MRL (JSPT < @usdoj.gov>; EBP2 (JSPT @usdoj.gov>; Simpson, D. Brian (USAPAM @usdoj.gov>

Cc: US Project Cranberry @deloitte.com>; US Project Coconut @deloitte.com>

Subject: Project Coconut / Cranberry - Proposed Weekly Meeting Agenda for 07.19.2023

Good Morning All,

I hope everyone is doing well. We look forward to speaking with you on our 11:00AM (EST) call. Please find below Deloitte's proposed meeting agenda for your review. If you have additional items for discussion please don't hesitate to reach out.

Project Coconut – Meeting Agenda July 19, 2023

I. Relativity Maintenance Schedule

A. Upcoming dates

1. Saturday, July 22 (regularly scheduled maintenance)
2. Saturday, August 5 (regularly scheduled maintenance)
3. Saturday, August 19 (regularly scheduled maintenance)

II. Relativity Users

A. Account Status

User Types	Workflow / Stream	Total	Accounts Created	Pending	Waiting on Paperwork
USAO/CRM/NSD	Substantive	42	42	0	0
FBI	Substantive	103	103	0	0
USPIS	Substantive	1	1	0	0
NARA	Substantive	2	2	0	0
DOJ OIG	Substantive	12	12	0	0
DOJ OIG	OIG Filter/ Taint	45	45	0	0

*Awaiting executed paperwork from:

III. Substantive Team

A. Data Intake

1. Anticipated incoming data
2. WH Phones

A. Review & Exports

1. Coconut:
 1. Exports
 - i. Exported documents released on 7/16
 - ii. Preparing 3rd round exports
 2. Review
 - i. O&R breakouts circulated
2. Cranberry:
 1. Batch Review of Nauta phones

IV. Recent Releases from Filter Team to Substantive Team (July 12 -18)

Project	No. Of Custodians	Total Number of Releases	Description
Cranberry	1	1	Nauta iPhones

Total Released Documents: 124,950

V. Filter Team

A. Project Cranberry

- a. Review (1LR/2LR)
 - i. Nauta – 2 Devices – In process
- b. Nauta Opposing Counsel – Production Updates?

B. Project Coconut

- a. Data Intake
 - i. D. Shafer & S. Still – iPhones – Hosted
 - ii. Tarrio MacBook – Hosted
 - iii. SoRelle Phone – Hosted by 7/19/23
- b. Review
 - i. Active Workflows
 1. 1LR/2LR Active (On-Hold – Team in Cranberry)
 - a. Mobile / Physical Devices + Priority Date Range

b. Remaining Email Accounts + Priority Date Range

c. Productions/Court Filings/Releases

i. Court Filings

1. 30th Motion – T. Kutti – In progress

ii. Releases

1. D. Shafter (iPhone) – in progress

2. S. Still (iPhone) – in progress

3. E. Tarrio (MacBook) – in progress

iii. Production – Submittal Status Log --> **see attached spreadsheet** for full details

d. Miscellaneous

i. Filter Review Status Update

1. Status Report will be provided to Kelly Zusman and Brian Simpson on 07/18 for review and will forward to Mary, Molly, Thomas, and Erin P with Brian's approval

Thank you,

Deloitte Transactions and Business Analytics LLP

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v.E.1

From: "[REDACTED]" <[REDACTED]@deloitte.com>
To: "[REDACTED]" <[REDACTED]@deloitte.com>, "MKV (JSPT)" <[REDACTED]@usdoj.gov>, "Zusman, Kelly (USAOR)" <[REDACTED]@usdoj.gov>, "Garman, Jamie Roseannlyn (WF) (FBI)" <[REDACTED]@fbi.gov>, "Higley, Jason (OIG)" <[REDACTED]@usdoj.gov>, "Mehochko, Daniel A. (WF) (FBI)" <[REDACTED]@fbi.gov>, "Garman, Jamie Roseannlyn (WF) (FBI)" <[REDACTED]@fbi.gov>, "Higley, Jason (OIG)" <[REDACTED]@usdoj.gov>, "Bernstein, Gregory (USACAC)" <[REDACTED]@usdoj.gov>, "TPW (JSPT)" <[REDACTED]@usdoj.gov>, "MLD (JSPT)" <[REDACTED]@usdoj.gov>, "MRL (JSPT)" <[REDACTED]@usdoj.gov>, "EBP2 (JSPT)" <[REDACTED]@usdoj.gov>, "Simpson, D. Brian (USAPAM)" <[REDACTED]@usdoj.gov>
Cc: "[REDACTED]" <[REDACTED]@deloitte.com>, "[REDACTED]" <[REDACTED]@deloitte.com>, US Project Cranberry <[REDACTED]@deloitte.com>, US Project Coconut <[REDACTED]@deloitte.com>

Subject: [EXTERNAL] RE: Project Coconut / Cranberry - Proposed Weekly Meeting Agenda for 06.21.2023

Date: Wed, 21 Jun 2023 17:41:39 -0400

Importance: Normal

Good Afternoon All,

Please see our notes from today's call below in [blue](#).

Project Coconut – Meeting Agenda June 21, 2023

I. Upcoming Schedule

- i. Raf will circulate a meeting placeholder for Friday afternoon, including Maria, Thomas, Molly, Greg, Mary, and Erin. Brian will not be included pending his discussion with Mary. DOJ will confer to get more information, and then put together realistic plan for the next few weeks.

II. Relativity Maintenance Schedule

A. Scheduled Maintenance: DOJ will be incredibly busy for next 4 weeks, particularly around July 8-9 as DOJ is looking to export all of SW returns, a very large population, by July 8th. Deloitte will give internal team a heads-up and see if we can consolidate the maintenance.

1. June 23-24 (11:00 p.m. – noon)
2. June 26 - July 2 (no scheduled maintenance)
3. July 8-9 (11:00 p.m. – noon)
4. July 15 (possible Saturday morning maintenance)

III. Relativity Users

B. Account Status

User Types	Workflow / Stream	Total	Accounts Created	Pending	Waiting on Paperwork
USAO/CRM/NSD	Substantive	42	42	0	0
FBI	Substantive	103	103	0	0
USPIS	Substantive	1	1	0	0
NARA	Substantive	2	2	0	0
DOJ OIG	Substantive	12	11	1	0
DOJ OIG	OIG Filter/ Taint	45	45	0	0

*Awaiting executed paperwork from:

[REDACTED]

IV. Substantive Team

C. Data Intake (June 14 - 20)

1. Coconut

a. Tarrio phone: Deloitte split into 2 sets for processing

i. Message Data: ~5 mil. messages. Deloitte forensics team is looking into ways to break down data sets for processing. Doug confirmed this data was scoped. Maria will follow-up as needed if data can be further culled.

ii. Non-message Data: currently in processing and should be loaded by EOD today.

b. There are 2 more phones that Deloitte will be receiving from FBI. Maria will follow-up with transfer information, but doesn't believe this data needs to be filtered or scoped. Processed in Axium. Deloitte can't turn those around as quickly as Cellebrite.

1. Cranberry

a. Butler phones - discussion of next steps. Deloitte discussing with Mike and relevant DOJ users.

D. Review/Workflow

1. Coconut:

1. Batch Review Stats (as of 6/20) See attached spreadsheet

2. Open items from June 18th punch list

i. Tech issue documents – possible remediation. Deloitte should have answers in next day or so.

ii. NARA, MLAT, Cellebrite exports

iii. Search Warrant – QC and statistics: Deloitte to flag duplicates and files for review. Deloitte aims to provide analysis (similar to that on CDI side) later today.

iv. Additional phones processed in Axium

3. Exports: Deloitte will work with Josh to assure exports are performed as he has requested.

i. Process & Timeline: DOJ would like to start to produce a few exports a day to Josh so he can start importing into Everlaw.

1. DOJ intends to resolve pending issues by end of week so rolling exports/productions can be begin next week.

2. Will want to pull back in and include the lesser inclusive threads and duplicates.

3. Brian will be discussing with Mary.

ii. DOJ would like to include duplicates of photos from the thumbnails.

iii. Analysis will need to be done of different populations to identify the status of the following: Filter Review, scoping, and documents tagged technical issue or for further review.

iv. O&R Document Export: Even though they are not SWs, some portions will need to be reviewed and exported. Due to size DOJ expects this population to be exported last but, in theory, also by July 8th.

v. Once DOJ confirms litigation documents folder is up to data Maria expects this to be the next population to be exported.

2. Cranberry:

1. Harris Laptop- batch review in progress

V. No Recent Releases from Filter Team to Substantive Team (June 14 – June 20)

VI. Filter Team

A. Project Cranberry

a. Data Intake – Updates? No updates per DOJ.

B. Project Coconut

a. Data Intake

i. Processing / Pending

1. Twitter – Estimated Hosted by 6/22. DOJ reviewing to confirm if public tweets.
2. ON HOLD - R. Giuliani – Remaining 1 device
 - a. Hosted 5/19
 - b. Custodian - M. Santana??
3. SoRelle iPhone will be coming later this or early next week. It is a limited universe that will be pulled from FBI CART via Cellebrite.

a. Review

i. Active Workflows

1. 1LR/2LR Active
 - a. Mobile / Physical Devices + Priority Date Range
 - b. Remaining Email Accounts + Priority Date Range

c. Productions/Court Filings/Releases

i. Court Filings

1. 29th Motion – Various Custodians – Filed 6/15
2. 30th Motion – Eastman iPhone Manual Extraction – In progress

ii. Releases

1. SCO Request – All Filter Court Orders/Opinions – Estimated Release by EOD today (6/21)

iii. Production – Submittal Status Log --> [see attached spreadsheet](#) for full details

d. Miscellaneous

i. Filter Review Status Update

1. Status Report provided to Kelly Zusman and Brian Simpson on 06/20 for review and will forward to Mary, JP, Thomas, and Erin P with Kelly's approval. [Deloitte will include Molly Gaston \(MGG\) and remove JP on these reports going forward.](#)

Best,

Deloitte Transactions and Business Analytics LLP

Tel/Direct: agrayson@deloitte.com | www.deloitte.com

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From: "[REDACTED]" [REDACTED]@deloitte.com>

To: "TPW (JSPT)" [REDACTED]@usdoj.gov>, US Project Coconut [REDACTED]@deloitte.com>

Cc: "GDB (JSPT)" [REDACTED]@usdoj.gov>, "MKV (JSPT)" [REDACTED]@usdoj.gov>, "Garman, Jamie Roseannlyn (WF) (FBI)" [REDACTED]@fbi.gov>

Subject: RE: [EXTERNAL] LW 2023-083 Production 1

Date: Mon, 26 Jun 2023 15:31:36 -0400

Importance: Normal

Good afternoon Thomas,

We'll get this data pulled down.

Thank you,

[REDACTED]
Deloitte Transactions and Business Analytics LLP
Tel/Direct: [REDACTED]
www.deloitte.com

[REDACTED]

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-----Original Message-----

From: TPW (JSPT) <[REDACTED]@usdoj.gov>

Sent: Monday, June 26, 2023 3:29 PM

To: US Project Coconut [REDACTED]@deloitte.com>

Cc: GDB (JSPT) [REDACTED]@usdoj.gov ; MKV (JSPT) [REDACTED]@usdoj.gov ; Garman, Jamie Roseannlyn (WF) (FBI) [REDACTED]@fbi.gov>

Subject: [EXT] FW: [EXTERNAL] LW 2023-083 Production 1

Deloitte – new NARA production for upload.

The password is: [REDACTED]

tw

-----Original Message-----

From: [REDACTED]@nara.gov>

Sent: Tuesday, June 20, 2023 7:34 PM

To: TPW (JSPT) <[REDACTED]@usdoj.gov>

Subject: [EXTERNAL] LW 2023-083 Production 1

[REDACTED]

You have received access to a Serv-U File Share from [REDACTED]. The link to transfer your file(s) will expire on Tuesday, July 4, 2023 12:00 AM.

Need help? See some troubleshooting tips at [REDACTED]

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v.E.1

From: [REDACTED] <[REDACTED]@deloitte.com>

To: "GDB (JSPT)" [REDACTED]@usdoj.gov>, "TPW (JSPT)" <[REDACTED]@usdoj.gov>, "MKV (JSPT)" <[REDACTED]@usdoj.gov>, "TAD (JSPT)" [REDACTED]@usdoj.gov>, "MGG (JSPT)" [REDACTED]@usdoj.gov>, "MLD (JSPT)" [REDACTED]@usdoj.gov>

Cc: US Project Coconut [REDACTED]@deloitte.com>

Subject: [EXTERNAL] Status and Agenda for 4 pm call

Date: Fri, 23 Jun 2023 12:57:03 -0400

Importance: Normal

Hi Maria,

Below is the agenda for today's call and our progress on Sunday's punch list. We look forward to connecting at 4.

Status

1. **Batches** - completed
2. **Statistics on Search Warrant & DOJ O&R documents** – completed
3. **Exports**
 - a. NARA & MLAT – completed
 - b. Cellebrite (on-hold)
4. Tech Issue documents
 - a. Completed – we will address 600+ documents reported under investigation during today's call
5. Butler phones – in progress; working with Josh Ellen & FBI
6. Other phones – please provide contact

Agenda

1. Project Cranberry duplicates
2. Relativity Performance & Maintenance
3. Search Warrant Statistics
4. Review of Search Warrant vs D&O
5. Plans, Timelines

[REDACTED]
Regulatory & Legal Support | Discovery & Data Management
Deloitte Transactions and Business Analytics LLP
30 Rockefeller Plaza, New York, NY, 10112

[REDACTED] [\[REDACTED\]@deloitte.com](mailto:[REDACTED]@deloitte.com) | www.deloitte.com

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[REDACTED]

v.E.1

From: "MKV (JSPT)" <[REDACTED]@usdoj.gov>

To: "[REDACTED] <[REDACTED]@deloitte.com>, US Project Coconut
[REDACTED]@deloitte.com>

Cc: "JPC (JSPT)" <[REDACTED]@usdoj.gov>, "JAE (JSPT)" <[REDACTED]@usdoj.gov>, "EBP2 (JSPT)"
[REDACTED]@usdoj.gov>

Subject: Project Coconut Relativity

Date: Sun, 11 Jun 2023 11:06:42 -0400

Importance: Normal

[REDACTED] and Deloitte Team –

As we have discussed, we now need to address the permission settings on the search warrant returns on the CDI side. Please adjust the settings so that NO ONE on the substantive team (from SCO or FBI) has access to anything for any search warrant return (other than Chamberlain Harris, which still needs to be scoped) that has not been tagged Relevant and exported to us for production.

So substantive team/SCO/FBI only have access to (1) documents marked relevant and exported out; and (2) the Chamberlain Harris email that recently cleared filter. Nothing else from the search warrant returns.

This is the top priority item right now from our end.

Please confirm to this group when this is complete.

Please let us know if you have questions.

Best Regards, Maria

Maria K. Vento | [REDACTED]
United States Department of Justice

From: [REDACTED] <[REDACTED]@nara.gov>
To: "TPW (JSPT)" <[REDACTED]@usdoj.gov>
Cc: "[REDACTED] <[REDACTED]@nara.gov>, Gary Stern <[REDACTED]@nara.gov>
Subject: [EXTERNAL] Re: First response [REDACTED] re SCO
January 6 Investigation ([REDACTED])
Date: Mon, 21 Aug 2023 12:30:24 -0400
Importance: Normal

Thomas:

You'll soon receive an email from me with a link to download these records. The password is: [REDACTED]

Just let us know if you have any questions.

Thank you,
[REDACTED]

On Mon, Aug 21, 2023 at 12:19 PM Gary Stern <garym.stern@nara.gov> wrote:

Thomas:

In response to the June 2, 2023 [REDACTED] for NARA to produce records pursuant to 44 U.S.C 2205(2)(A) of the Presidential Records Act (PRA), and following the requisite notification to the representatives of the former and incumbent Presidents, we have identified the following Presidential records of the Trump administration responsive to the request:

- 54 spreadsheets containing requested custodians' text messages

You will shortly receive an email from my colleague [REDACTED] containing a link to download these records, followed by the password.

Please let us know if you have any questions.

Sincerely,
Gary

Gary M. Stern
General Counsel
National Archives and Records Administration
8601 Adelphi Road
College Park, MD 20740

[REDACTED]
[REDACTED]
[\[REDACTED\]@nara.gov](mailto:[REDACTED]@nara.gov)



On Fri, Jun 2, 2023 at 2:39 PM TPW (JSPT) <[REDACTED]@usdoj.gov> wrote:

Gary

[REDACTED]

Good speaking with you the other week. Please find attached [REDACTED] requiring NARA to produce certain documents. Please call with questions.

Thanks

tw

[REDACTED]
From: "[REDACTED] [REDACTED]@nara.gov>

To: "TPW (JSPT)" <[REDACTED]@usdoj.gov>

Subject: [EXTERNAL] LW 2023-101 Production 1

Date: Mon, 21 Aug 2023 12:30:36 -0400

Importance: Normal

You have received access to a Serv-U File Share from [REDACTED]. The link to transfer your file(s) will expire on Monday, September 4, 2023 12:00 AM.

[REDACTED]

Need help? See some troubleshooting tips at [REDACTED]
[REDACTED]
[REDACTED]

From: "TPW (JSPT)" [REDACTED]@usdoj.gov>

To: "GDB (JSPT)" [REDACTED]@usdoj.gov>, "Garman, Jamie Roseannlyn (WF) (FBI)" [REDACTED]@fbi.gov>

Cc: "MGG (JSPT)" [REDACTED]@usdoj.gov>, "MKV (JSPT)" [REDACTED]@usdoj.gov>, "Mehochko, Daniel A. (WF) (FBI)" <[REDACTED]@fbi.gov>, "RRK (JSPT)" <[REDACTED]@usdoj.gov>

Subject: RE:

Date: Mon, 21 Aug 2023 12:48:29 -0400

Importance: Normal

Embedded: unnamed

For reference, attached is the [REDACTED] email [REDACTED]

tw

From: GDB (JSPT) [REDACTED]@usdoj.gov>

Sent: Monday, August 21, 2023 12:47 PM

To: TPW (JSPT) [REDACTED]@usdoj.gov>; Garman, Jamie Roseannlyn (WF) (FBI) [REDACTED]@fbi.gov>

Cc: MGG (JSPT) [REDACTED]@usdoj.gov>; MKV (JSPT) <[REDACTED]@usdoj.gov>; Mehochko, Daniel A. (WF) (FBI) <[REDACTED]@fbi.gov>; RRK (JSPT) <[REDACTED]@usdoj.gov>

Subject: RE:

I'll save and circulate a link. Stand by. We'll get them to ALS in the next hour if Maria okays.

From: TPW (JSPT) <[REDACTED]@usdoj.gov>

Sent: Monday, August 21, 2023 12:45 PM

To: Garman, Jamie Roseannlyn (WF) (FBI) <[REDACTED]@fbi.gov>

Cc: MGG (JSPT) [REDACTED]@usdoj.gov>; GDB (JSPT) <[REDACTED]@usdoj.gov>; MKV (JSPT) <[REDACTED]@usdoj.gov>; Mehochko, Daniel A. (WF) (FBI) [REDACTED]@fbi.gov>

Subject:

Jamie/Dan – can you please download?

GDB/MKV – I already have downloaded. These should go out in discovery quickly. Do you want me to put them somewhere or wait for FBI transfer?

tw

[REDACTED]

From: "TPW (JSPT)" [REDACTED]@usdoj.gov>
To: Gary Stern [REDACTED]@nara.gov>
Cc: "TPW (JSPT)" <[REDACTED]@usdoj.gov>
Subject: NARA [REDACTED]

Date: Fri, 02 Jun 2023 14:39:01 -0400

Importance: Normal

Attachments: [REDACTED].pdf

Gary –

Good speaking with you the other week. Please find attached [REDACTED] requiring NARA to produce certain documents. Please call with questions.

Thanks
tw

Name	Number 2
Adam Santana	
Alex Gray	
Alison Cheperdak	
Alyssa Farah	
Amy Swonger	
Austin Browning	
Austin Ferrer Piran Basualdo	
Benjamin Williamson	
Bobby Peede	
Brian Jack	
Brian Morgenstern	
Cassidy Hutchinson	
Cassidy Luna/Dumbauld	
Chad Gilmartin	
Chad Mizelle	
Charlton Boyd	
Chase Harrington	
Chris Hodgson	
Chris Liddell	
Dan Scavino	
Derek Lyons	
Devin Petricca	
Donald Trump	
Eliza Thurston	
Elizabeth "Liz" Horning	
Eric Herschmann	
Gabriel Perez	
Garrett Ziegler	
Gregory Jacob	
Hannah Lankford	
Hogan Gidley	
Hope Hicks	
Ivanka Trump	
James Bacon	
Jared Kushner	
Joanna Miller	
John Eisenberg	
John McEntee	
John Ratcliffe	
Judd P. Deere	
Julie Radford	
Kash Patel	
Kathryn "Kate" Lair	
Kathryn "Kate" Todd	
Katie Ricks	

Name	
Katlyn "Kate" Parnitzke/Karnes	
Kayleigh Gilmartin	
Keith Kellog	
Kellyanne Conway	
Kenneth Klukowski	
Lauren Milici (USCG)	
Madison Porter	
Marc Short	
Mark Meadows	
Matt Pottinger	
Max Miller	
Michael Haidet	
Mike Pence	
Mike Purpura	
Miles Johnson	
Molly Michael	
Nick Luna	
Pat Cipollone	
Patrick Philbin	
Paul Teller	
Peter Navarro	
Phil Droege	
Rissa Lundegren	
Robert O'Brien	
Roma Daravi	
Ross Worthington	
Rudy Giuliani	
Russell Vought	
Sarah Matthews	
Scott Toland	
Shealah Craighead	
Spencer Chretien	
Stephen Miller	
Timothy Harleth	
Tony Ornato	
Troup Hemenway	
Vince Haley	
William "Beau" Harrison	
William Bock IV	
William Russell	
Zach Bauer	
Zoraya Hooks	

From: "TPW (JSPT)" <[REDACTED]@usdoj.gov>

To: "MKV (JSPT)" <[REDACTED]@usdoj.gov>, "GDB (JSPT)" <[REDACTED]@usdoj.gov>

Cc: "Garman, Jamie Roseannlyn (WF) (FBI)" <[REDACTED]@fbi.gov>, "MGG (JSPT)" <[REDACTED]@usdoj.gov>, "Mehochko, Daniel A. (WF) (FBI)" <[REDACTED]@fbi.gov>, "RRK (JSPT)" <[REDACTED]@usdoj.gov>

Subject: RE:

Date: Mon, 21 Aug 2023 13:12:55 -0400

Importance: Normal

Single production consisting of 54 excel files with text messages from White House phones
tw

From: MKV (JSPT) <[REDACTED]@usdoj.gov>

Sent: Monday, August 21, 2023 1:12 PM

To: GDB (JSPT) <[REDACTED]@usdoj.gov>

Cc: TPW (JSPT) <[REDACTED]@usdoj.gov>; Garman, Jamie Roseannlyn (WF) (FBI) <[REDACTED]@fbi.gov>; MGG (JSPT) <[REDACTED]@usdoj.gov>; Mehochko, Daniel A. (WF) (FBI) <[REDACTED]@fbi.gov>; RRK (JSPT) <[REDACTED]@usdoj.gov>

Subject: Re:

I'm on my phone so can't look at the links. Am I correct this is all a single production from the National Archives?

On Aug 21, 2023, at 1:06 PM, GDB (JSPT) <[REDACTED]@usdoj.gov> wrote:

RRK -- you can copy to ALS and move to the production and emails to the T-Drive.

1. Source material here: T:\Election Investigation\2. Productions\1. To Be Processed\Government\National Archives
2. FRP for the folder labelled "White House Text Messages": T:\Election Investigation\2. Productions\5. Government\National Archives
3. FRP for content of folder labelled "Emails": T:\Election Investigation\2. Productions\5. Government\National Archives\Emails

Thanks as always. Greg.

From: MKV (JSPT) <[REDACTED]@usdoj.gov>

Sent: Monday, August 21, 2023 12:56 PM

To: GDB (JSPT) <[REDACTED]@usdoj.gov>

Cc: TPW (JSPT) <[REDACTED]@usdoj.gov>; Garman, Jamie Roseannlyn (WF) (FBI) <[REDACTED]@fbi.gov>; MGG (JSPT) <[REDACTED]@usdoj.gov>; Mehochko, Daniel A. (WF) (FBI) <[REDACTED]@fbi.gov>; RRK (JSPT) <[REDACTED]@usdoj.gov>

Subject: Re:

Yes. Let's get to ALS right away for upload to the NARA folder.

[REDACTED]

On Aug 21, 2023, at 12:46 PM, GDB (JSPT) [REDACTED]@usdoj.gov> wrote:

I'll save and circulate a link. Stand by. We'll get them to ALS in the next hour if Maria okays.

From: TPW (JSPT) <[REDACTED]@usdoj.gov>

Sent: Monday, August 21, 2023 12:45 PM

To: Garman, Jamie Roseannlyn (WF) (FBI) <[REDACTED]@fbi.gov>

Cc: MGG (JSPT) <[REDACTED]@usdoj.gov>; GDB (JSPT) <[REDACTED]@usdoj.gov>; MKV (JSPT) <[REDACTED]@usdoj.gov>; Mehochko, Daniel A. (WF) (FBI) [REDACTED]@fbi.gov>

Subject:

Jamie/Dan – can you please download?

GDB/MKV – I already have downloaded. These should go out in discovery quickly. Do you want me to put them somewhere or wait for FBI transfer?

tw

[REDACTED]

From: "KMS (JSPT)" [REDACTED]@usdoj.gov>
To: "MKV (JSPT)" [REDACTED]@usdoj.gov>
Cc: "RRK (JSPT)" [REDACTED]@usdoj.gov>, "MAM2 (JSPT)" [REDACTED]@usdoj.gov>, "KPC (JSPT)" [REDACTED]@usdoj.gov>, "MAZ (JSPT)" [REDACTED]@usdoj.gov>, "JME2 (JSPT)" [REDACTED]@usdoj.gov>, "MPB (JSPT)" [REDACTED]@usdoj.gov>, "SCS (JSPT)" [REDACTED]@usdoj.gov>, "MRL (JSPT)" [REDACTED]@usdoj.gov>, "GDB (JSPT)" [REDACTED]@usdoj.gov>

Subject: RE: NARA Production

Date: Mon, 21 Aug 2023 14:15:29 -0400

Importance: Normal

Ye, they are to TPW transmitting the production.

Thanks,

[REDACTED] Litigation Support
[REDACTED]
Special Counsel's Office

From: MKV (JSPT) <MKV@usdoj.gov>
Sent: Monday, August 21, 2023 2:14 PM
To: KMS (JSPT) [REDACTED]@usdoj.gov>
Cc: RRK (JSPT) [REDACTED]@usdoj.gov>; MAM2 (JSPT) [REDACTED]@usdoj.gov>; KPC (JSPT) [REDACTED]@usdoj.gov>; MAZ (JSPT) [REDACTED]@usdoj.gov>; JME2 (JSPT) [REDACTED]@usdoj.gov>; MPB (JSPT) [REDACTED]@usdoj.gov>; SCS (JSPT) [REDACTED]@usdoj.gov>; MRL (JSPT) [REDACTED]@usdoj.gov>; GDB (JSPT) [REDACTED]@usdoj.gov>
Subject: Re: NARA Production

Thank you. Are the emails with TPW? Ie are they part of the production or transmitting the production?

On Aug 21, 2023, at 2:09 PM, KMS (JSPT) [REDACTED]@usdoj.gov> wrote:

Hi Maria,

These are in the NARA folder in Everlaw bates numbers:

Emails = 101P-N-EMAILS-0000000001 - 101P-N-EMAILS-0000000004
White House Text Messages = 101P-N0000000001 - 101P-N0000000055 (please note 101P-N0000000048 was not provided)

Thanks,

[REDACTED], Litigation Support
[REDACTED]
Special Counsel's Office

From: MKV (JSPT) [REDACTED]@usdoj.gov>
Sent: Monday, August 21, 2023 1:30 PM
To: RRK (JSPT) [REDACTED]@usdoj.gov>
Cc: MAM2 (JSPT) [REDACTED]@usdoj.gov>; KPC (JSPT) [REDACTED]@usdoj.gov>; MAZ (JSPT) [REDACTED]@usdoj.gov>; JME2 (JSPT) [REDACTED]@usdoj.gov>

[REDACTED]
[REDACTED]@usdoj.gov>; KMS (JSPT) [REDACTED]@usdoj.gov>; MPB (JSPT) [REDACTED]@usdoj.gov>; SCS (JSPT) [REDACTED]@usdoj.gov>; MRL (JSPT) <[REDACTED]@usdoj.gov>; GDB (JSPT) <[REDACTED]@usdoj.gov>

Subject: Re: NARA Production

If we could please try to get this in today that would be much appreciated.

On Aug 21, 2023, at 1:22 PM, RRK (JSPT) [REDACTED]@usdoj.gov> wrote:

Hi team –

NARA production has been copied for ALS. Available here: <T:\Election Investigation\9. Other\Litigation Support\Internal Transfers\2023.08.21 NARA>

Please load to the NARA folder in Everlaw.

Thanks,
Rebecca

From: MKV (JSPT) <[REDACTED]@usdoj.gov>
Sent: Monday, August 21, 2023 12:56 PM
To: GDB (JSPT) <[REDACTED]@usdoj.gov>
Cc: TPW (JSPT) [REDACTED]@usdoj.gov>; Garman, Jamie Roseannlyn (WF) (FBI) [REDACTED]@fbi.gov>; MGG (JSPT) [REDACTED]@usdoj.gov>; Mehochko, Daniel A. (WF) (FBI) [REDACTED]@fbi.gov>; RRK (JSPT) [REDACTED]@usdoj.gov>
Subject: Re:

Yes. Let's get to ALS right away for upload to the NARA folder.

On Aug 21, 2023, at 12:46 PM, GDB (JSPT) <[REDACTED]@usdoj.gov> wrote:

I'll save and circulate a link. Stand by. We'll get them to ALS in the next hour if Maria okays.

From: TPW (JSPT) <[REDACTED]@usdoj.gov>
Sent: Monday, August 21, 2023 12:45 PM
To: Garman, Jamie Roseannlyn (WF) (FBI) <[REDACTED]@fbi.gov>
Cc: MGG (JSPT) <[REDACTED]@usdoj.gov>; GDB (JSPT) <[REDACTED]@usdoj.gov>; MKV (JSPT) [REDACTED]@usdoj.gov>; [REDACTED] (WF) (FBI) [REDACTED]@fbi.gov>
Subject:

Jamie/Dan – can you please download?

GDB/MKV – I already have downloaded. These should go out in discovery quickly. Do you want me to put them somewhere or wait for FBI transfer?

tw

[REDACTED]

From: "GDB (JSPT)" [REDACTED]@usdoj.gov>
To: "MKV (JSPT)" [REDACTED]@usdoj.gov>
Cc: "TPW (JSPT)" [REDACTED]@usdoj.gov>, "Garman, Jamie Roseannlyn (WF) (FBI)" [REDACTED]@fbi.gov>, "MGG (JSPT)" <[REDACTED]@usdoj.gov>, "Mehochko, Daniel A. (WF) (FBI)" <[REDACTED]@fbi.gov>, "RRK (JSPT)" [REDACTED]@usdoj.gov>

Subject: RE:

Date: Mon, 21 Aug 2023 13:14:22 -0400

Importance: Normal

Inline-Images: image001.png; image002.png; image003.png

Yup. First two screenshots are the production. Third screenshot is our T-Drive National Archives holdings folder.

2. Productions > 1. To Be Processed > Government > National Archives

Name		Date modified	Type
	 White House Text Messages	8/21/2023 1:03 PM	File folder
	 Emails	8/21/2023 1:03 PM	File folder

1. To Be Processed > Government > National Archives > White House Text Messages

Name	Date modified	Type	Size
 101P-N0000000001	7/18/2023 2:46 PM	Microsoft Excel C...	81 KB
 101P-N0000000002	7/18/2023 2:46 PM	Microsoft Excel C...	110 KB
 101P-N0000000003	7/18/2023 2:46 PM	Microsoft Excel C...	680 KB
 101P-N0000000004	7/18/2023 2:46 PM	Microsoft Excel C...	385 KB
 101P-N0000000005	7/18/2023 2:46 PM	Microsoft Excel C...	28 KB
 101P-N0000000006	7/18/2023 2:46 PM	Microsoft Excel C...	102 KB
 101P-N0000000007	7/18/2023 2:46 PM	Microsoft Excel C...	345 KB
 101P-N0000000008	7/18/2023 2:46 PM	Microsoft Excel C...	78 KB
 101P-N0000000009	7/18/2023 2:46 PM	Microsoft Excel C...	107 KB
 101P-N0000000010	7/18/2023 2:46 PM	Microsoft Excel C...	25 KB
 101P-N0000000011	7/18/2023 2:46 PM	Microsoft Excel C...	902 KB
 101P-N0000000012	7/18/2023 2:46 PM	Microsoft Excel C...	1,145 KB
 101P-N0000000013	7/18/2023 2:46 PM	Microsoft Excel C...	295 KB
 101P-N0000000014	7/18/2023 2:46 PM	Microsoft Excel C...	55 KB
 101P-N0000000015	7/18/2023 2:46 PM	Microsoft Excel C...	109 KB
 101P-N0000000016	7/18/2023 2:46 PM	Microsoft Excel C...	26 KB
 101P-N0000000017	7/18/2023 2:46 PM	Microsoft Excel C...	933 KB
 101P-N0000000018	7/18/2023 2:46 PM	Microsoft Excel C...	2,444 KB
 101P-N0000000019	7/18/2023 2:46 PM	Microsoft Excel C...	705 KB
 101P-N0000000020	7/18/2023 2:46 PM	Microsoft Excel C...	17 KB
 101P-N0000000021	7/18/2023 2:46 PM	Microsoft Excel C...	739 KB
 101P-N0000000022	7/18/2023 2:46 PM	Microsoft Excel C...	106 KB
 101P-N0000000023	7/18/2023 2:46 PM	Microsoft Excel C...	67 KB
 101P-N0000000024	7/18/2023 2:46 PM	Microsoft Excel C...	21 KB
 101P-N0000000025	7/18/2023 2:46 PM	Microsoft Excel C...	373 KB
 101P-N0000000026	7/18/2023 2:46 PM	Microsoft Excel C...	354 KB
 101P-N0000000027	7/18/2023 2:46 PM	Microsoft Excel C...	186 KB
 101P-N0000000028	7/18/2023 2:46 PM	Microsoft Excel C...	51 KB
 101P-N0000000029	7/18/2023 2:46 PM	Microsoft Excel C...	12 KB
 101P-N0000000030	7/18/2023 2:46 PM	Microsoft Excel C...	63 KB
 101P-N0000000031	7/18/2023 2:46 PM	Microsoft Excel C...	1,108 KB
 101P-N0000000032	7/18/2023 2:46 PM	Microsoft Excel C...	172 KB

<< SCO-S (T) > Election Investigation > 2. Productions > 5. Government > National Archives			
	Name	Date modified	Type
	 American Oversight	4/24/2023 11:11 AM	File folder
	 Boxes Review	3/7/2023 2:59 PM	File folder
	 Emails	4/24/2023 11:11 AM	File folder
	 NARA-OIG (Transferred ALS)	8/11/2023 5:07 PM	File folder
	 Photographs	7/19/2023 10:09 AM	File folder
	 Production Emails	7/20/2023 3:52 PM	File folder
	 Productions 1-5	6/21/2023 4:00 PM	File folder
	 Select Committee Production	4/24/2023 11:11 AM	File folder
	 Select Committee Cover Letters	4/24/2023 11:11 AM	File folder

From: MKV (JSPT) [REDACTED]@usdoj.gov>
Sent: Monday, August 21, 2023 1:12 PM
To: GDB (JSPT) [REDACTED]@usdoj.gov>
Cc: TPW (JSPT) [REDACTED]@usdoj.gov>; Garman, Jamie Roseannlyn (WF) (FBI) <[REDACTED]@fbi.gov>; MGG (JSPT) [REDACTED]@usdoj.gov>; Mehochko, Daniel A. (WF) (FBI) <[REDACTED]@fbi.gov>; RRK (JSPT) [REDACTED]@usdoj.gov>
Subject: Re:

I'm on my phone so can't look at the links. Am I correct this is all a single production from the National Archives?

On Aug 21, 2023, at 1:06 PM, GDB (JSPT) [REDACTED]@usdoj.gov> wrote:

RRK -- you can copy to ALS and move to the production and emails to the T-Drive.

1. Source material here: T:\Election Investigation\2. Productions\1. To Be Processed\Government\National Archives
2. FRP for the folder labelled "White House Text Messages": T:\Election Investigation\2. Productions\5. Government\National Archives
3. FRP for content of folder labelled "Emails": T:\Election Investigation\2. Productions\5. Government\National Archives\Emails

Thanks as always. Greg.

From: MKV (JSPT) <[REDACTED]@usdoj.gov>
Sent: Monday, August 21, 2023 12:56 PM
To: GDB (JSPT) [REDACTED]@usdoj.gov>
Cc: TPW (JSPT) [REDACTED]@usdoj.gov>; Garman, Jamie Roseannlyn (WF) (FBI) <[REDACTED]@fbi.gov>; MGG (JSPT) [REDACTED]@usdoj.gov>; Mehochko, Daniel A. (WF) (FBI) <[REDACTED]@fbi.gov>; RRK (JSPT) <[REDACTED]@usdoj.gov>
Subject: Re:

Yes. Let's get to ALS right away for upload to the NARA folder.

On Aug 21, 2023, at 12:46 PM, GDB (JSPT) <[REDACTED]@usdoj.gov> wrote:

I'll save and circulate a link. Stand by. We'll get them to ALS in the next hour if Maria okays.

From: TPW (JSPT) <[REDACTED]@usdoj.gov>

Sent: Monday, August 21, 2023 12:45 PM

To: Garman, Jamie Roseannlyn (WF) (FBI) [REDACTED]@fbi.gov>

Cc: MGG (JSPT) [REDACTED]@usdoj.gov>; GDB (JSPT) [REDACTED]@usdoj.gov>; MKV (JSPT) <[REDACTED]@usdoj.gov>; Mehochko, Daniel A. (WF) (FBI) [REDACTED]@fbi.gov>

Subject:

Jamie/Dan – can you please download?

GDB/MKV – I already have downloaded. These should go out in discovery quickly. Do you want me to put them somewhere or wait for FBI transfer?

tw

[REDACTED]

From: "TPW (JSPT)" <[REDACTED]@usdoj.gov>
To: "TAD (JSPT)" <[REDACTED]@usdoj.gov>, "GDB (JSPT)" <[REDACTED]@usdoj.gov>
Cc: "MGG (JSPT)" [REDACTED]@usdoj.gov>, "Garman, Jamie Roseannlyn (WF) (FBI)" <[REDACTED]@fbi.gov>
Date: Mon, 21 Aug 2023 13:02:37 -0400
Importance: Normal

										I understand you spoke to POTUS and apparently it did not go well. Is it correct, that you are not going to call a special session of the legislature leaving it totally up to the courts??			{contactname=not found, receipientid=1208325, destinationnumber=[REDACTED]}
[REDACTED]	[REDACTED]	1012065	4149	pitc.gov\MRMeadows	not found	1208325	messages-dec-2020_001.xml	[REDACTED]	2020-12-05T21:24:10.830	After being berated again "I told him the courts is fastest way and thatâ€™s how the current process was set up by legislature"	2023-03-01T01:43:18.298640		
[REDACTED]	[REDACTED]	1012066	20446	not found	pitc.gov\MRMeadows	1208326	messages-dec-2020_001.xml	[REDACTED]	2020-12-05T21:45:44.940		2023-03-01T01:49:04.471932		{contactname=pitc.gov\MRMeadows, receipientid=1208326, destinationnumber=[REDACTED]}

From: "TPW (JSPT)" <[REDACTED]@usdoj.gov>

To: "MGG (JSPT)" <[REDACTED]@usdoj.gov>, "JGK (JSPT)" <[REDACTED]@usdoj.gov>, "GDB (JSPT)" <[REDACTED]@usdoj.gov>, "MLD (JSPT)" <[REDACTED]@usdoj.gov>, "AGW (JSPT)" <[REDACTED]@usdoj.gov>, "EBP2 (JSPT)" <[REDACTED]@usdoj.gov>, "MBB (JSPT)" <[REDACTED]@usdoj.gov>, "MKV (JSPT)" <[REDACTED]@usdoj.gov>, "TAD (JSPT)" <[REDACTED]@usdoj.gov>

Cc: "TPW (JSPT)" <[REDACTED]@usdoj.gov>

Subject: RE: Witness menu project

Date: Tue, 05 Sep 2023 23:31:00 -0400

Importance: Normal

Attachments: WH_Text_Messages_Combined_-_8.22.23.xlsx

Team – depending your witness, please be aware of the attached. NARA recently produced to us text messages from a number of White House employees during the relevant time period. FBI then identified in their system the relevant phone numbers of counterparties. Call with questions.

tw

From: TPW (JSPT) <[REDACTED]@usdoj.gov>

Sent: Monday, September 4, 2023 9:09 PM

To: MGG (JSPT) <[REDACTED]@usdoj.gov>; JGK (JSPT) <[REDACTED]@usdoj.gov>; GDB (JSPT) <[REDACTED]@usdoj.gov>; MLD (JSPT) <[REDACTED]@usdoj.gov>; AGW (JSPT) <[REDACTED]@usdoj.gov>; EBP2 (JSPT) <[REDACTED]@usdoj.gov>; MBB (JSPT) <[REDACTED]@usdoj.gov>; MKV (JSPT) <[REDACTED]@usdoj.gov>; TAD (JSPT) <[REDACTED]@usdoj.gov>

Cc: TPW (JSPT) <[REDACTED]@usdoj.gov>

Subject: RE: Witness menu project

Team –

We are about to embark on the Witness Menu project. In our meeting the other day, we suggested that the deadline for entries in the menu spreadsheet would be Wednesday. The deadline is instead going to be Monday, September 11.

So what is the project? It is as follows: attached is an Excel spreadsheet of the vast majority of our witnesses broken up among general categories. Each of you has been assigned certain witnesses. If a witness is assigned to more than one attorney, we would like you to divide the work as you see fit, but feel free to consult with us if you would like help with the division of labor. If you think we have made a glaring error in assigning a witness to you, please let us know. If you think a witness shouldn't be on this list at all, please also let us know that.

The general team breakout is:

- Electors: MLD/MKV/EBP
- State/Federal Election Officials: TAD/GDB
- Other State/Federal Officials: TAD/GDB
- January 6 and Since: JGK/AGW (with assistance from EBP/MLD)
- Campaign/Lawsuits: MBB (with assistance from TAD/MKV/GDB/EBP)
- White House/Miscellaneous: TPW/MGG (with assistance from EBP/GDB/MBB/MKV/MLD/TAD)

Tomorrow, Jack will meet with each team and discuss overall objectives. I'll forward calendar invites shortly. You can expect regular feedback meetings. In general, for each witness, we would like a thorough recitation, in bullet point form, of the following:

- A one-sentence description of who the witness is and why he/she is relevant to the case.

- For our case-in-chief, the points for which we may want to call the witness to testify. If the witness is cited/responsible for information in the indictment, please indicate so and cite the paragraph(s) of the indictment.
- The specific exhibits that we could introduce through the witness.
- The points on which the defense might cross-examine the witness.
- Notes on other witness/evidentiary issues (e.g., absence of a hearsay exception for a piece of desired testimony, an immunity or privilege issue, potential Rule 404b evidence, etc.).

A preliminary example for witness Mark Milley is included in the spreadsheet, but the final spreadsheet will probably be more detailed than this. Please note that for some witnesses, we have pre-filled some information generated by GDB, with help from MBB and TAD. This is meant to assist you and make full use of the excellent work that they already did, but it does not mean that you do not need to conduct a thorough review of the witness's records and decide whether there are additional points to be made or points to be subtracted or moved to a different column.

We understand that this will take some time. For instance, to generate the information above, we know that you will need to review any interview reports/transcripts, grand jury transcripts and exhibits, Select Committee transcripts, etc. Our hope is that doing a thorough job for this step will narrow the number of witnesses for whom we do even more work (outlines, etc.) in the next step. Please feel free to share any questions or concerns, and keep us posted on how things are going and if it appears for any reason that the Sept. 11 deadline is unworkable.

We are incredibly grateful for all of your incredible work.

tw

From: MGG (JSPT) [REDACTED]@usdoj.gov>

Sent: Friday, September 1, 2023 5:40 PM

To: TPW (JSPT) <[REDACTED]@usdoj.gov>; JKG (JSPT) <[REDACTED]@usdoj.gov>; GDB (JSPT) <[REDACTED]@usdoj.gov>; MLD (JSPT) <[REDACTED]@usdoj.gov>; AGW (JSPT) <[REDACTED]@usdoj.gov>; EBP2 (JSPT) <[REDACTED]@usdoj.gov>; MBB (JSPT) <[REDACTED]@usdoj.gov>; MKV (JSPT) <[REDACTED]@usdoj.gov>

Subject: Witness menu project

Team, just a quick note to let you know that TPW and I will not be sending around these assignments until later in the weekend, and the due date will NOT be Wednesday—it'll be later. Instead, we're going to get you the assignments and directions in the next day or two, but then Jack would like to sit down with folks on Tuesday and make sure we're all on the same page before we really roll up our sleeves. Hopefully that means that everybody gets a little bit of rest this holiday weekend. Thank you for everything!

Molly Gaston
[REDACTED]

From: "GDB (JSPT)" [REDACTED]@usdoj.gov>

To: "TPW (JSPT)" [REDACTED]@usdoj.gov>

Subject: FW: NARA Production

Date: Mon, 21 Aug 2023 13:24:18 -0400

Importance: Normal

Done.

From: RRK (JSPT) <[REDACTED]@usdoj.gov>

Sent: Monday, August 21, 2023 1:23 PM

To: MAM2 (JSPT) [REDACTED]@usdoj.gov>; KPC (JSPT) [REDACTED]@usdoj.gov>; MAZ (JSPT) [REDACTED]@usdoj.gov>; JME2 (JSPT) [REDACTED]@usdoj.gov>; KMS (JSPT) [REDACTED]@usdoj.gov>

Cc: MPB (JSPT) <[REDACTED]@usdoj.gov>; SCS (JSPT) <[REDACTED]@usdoj.gov>; MRL (JSPT) [REDACTED]@usdoj.gov>; GDB (JSPT) <[REDACTED]@usdoj.gov>; MKV (JSPT) [REDACTED]@usdoj.gov>

Subject: FW: NARA Production

Hi team –

NARA production has been copied for ALS. Available here: <T:\Election Investigation\9. Other\Litigation Support\Internal Transfers\2023.08.21 NARA>

Please load to the NARA folder in Everlaw.

Thanks,
Rebecca

From: MKV (JSPT) [REDACTED]@usdoj.gov>

Sent: Monday, August 21, 2023 12:56 PM

To: GDB (JSPT) [REDACTED]@usdoj.gov>

Cc: TPW (JSPT) [REDACTED]@usdoj.gov>; Garman, Jamie Roseannlyn (WF) (FBI) [REDACTED]@fbi.gov>; MGG (JSPT) [REDACTED]@usdoj.gov>; Mehochko, Daniel A. (WF) (FBI) <[REDACTED]@fbi.gov>; RRK (JSPT) [REDACTED]@usdoj.gov>

Subject: Re:

Yes. Let's get to ALS right away for upload to the NARA folder.

On Aug 21, 2023, at 12:46 PM, GDB (JSPT) [REDACTED]@usdoj.gov> wrote:

I'll save and circulate a link. Stand by. We'll get them to ALS in the next hour if Maria okays.

From: TPW (JSPT) [REDACTED]@usdoj.gov>

Sent: Monday, August 21, 2023 12:45 PM

To: Garman, Jamie Roseannlyn (WF) (FBI) [REDACTED]@fbi.gov>

Cc: MGG (JSPT) <[REDACTED]@usdoj.gov>; GDB (JSPT) <[REDACTED]@usdoj.gov>; MKV (JSPT) <[REDACTED]@usdoj.gov>; Mehochko, Daniel A. (WF) (FBI) <[REDACTED]@fbi.gov>

Subject:

Jamie/Dan – can you please download?

[REDACTED]

[REDACTED]

GDB/MKV – I already have downloaded. These should go out in discovery quickly. Do you want me to put them somewhere or wait for FBI transfer?

tw

[REDACTED]

[REDACTED]
From: "Simpson, D. Brian (USAPAM)" [REDACTED]

To: "JPC (JSPT)" <[REDACTED]>

Cc: "[REDACTED] (USAOR)" <[REDACTED]>

Subject: Filter Team Roster

Date: Sat, 19 Aug 2023 06:46:34 -0400

Importance: Normal

Attachments: SCO_Filter_Team_(complete).xlsx

J.P.—As requested, here is a spreadsheet that includes the Filter Team roster. I note that [REDACTED] was the only non-attorney member of the team. She is a supervisory paralegal [REDACTED]. Logistically, she handled all our court filings. As you would expect, those from USAO are AUSAs and those from DOJ components are Trial Attorneys.

Please let me know if you need any additional information.

Thanks.

Brian

D. Brian Simpson
U.S. Department of Justice

Mobile: [REDACTED]

[REDACTED]

Special Counsel's Office Filter Team Roster 2022-2023

Name	Office	Email
Simpson, D. Brian	USAPAM	@usa.doj.gov
Zusman, Kelly	USAOR	@usa.doj.gov
Akins, Jessica	USATXS	@usa.doj.gov
Denny, Laurita	NSD	@usdoj.gov
Somerwitz, Caren	NSD	@usdoj.gov
Ahmed, Nadia	USANV	@usa.doj.gov
Aldendifer, Elise	USATXN	@usa.doj.gov
Baughman, Natalie	ENRD	@usdoj.gov
Bennett, Danial	USAMA	@usa.doj.gov
Birnbaum, Marc	USAVAE	@usa.doj.gov
Bornstein, David	USAPR	@usa.doj.gov
		@usa.doj.gov
Bruce, Gavin	USAOR	@usa.doj.gov
Cooper, Aimee	USATXE	@usa.doj.gov
Darcey, Patrick	USAFLM	@usa.doj.gov
Falsetta, Brenna	USAFLM	@usa.doj.gov
Glenn, Marian	NSD	@usdoj.gov
Harris, Stephen	ATR	@usdoj.gov
Himmelhoch, Sarah	ENRD	@usdoj.gov
Hoffman, Heidi K	ENRD	@usdoj.gov
Holley, Benjamin	USACAS	@usa.doj.gov
Joines, Adam	USAOHN	@usa.doj.gov
Klapper, Monica	USAAZ	@usa.doj.gov
Liddle, Keith	CRM	@usdoj.gov
Looney, Christopher	USAMA	@usa.doj.gov
Madigan, Michael	CRM	@usdoj.gov
Marks, Linda	CIV	@usdoj.gov
McHale, Matthew	USAPAW	@usa.doj.gov
McKenzie, Erin	USAKYW	@usa.doj.gov
McLaren, William	USAOR	@usa.doj.gov
Miller, Angela	USAVAE	@usa.doj.gov
Muoio, Joseph	ATR	@usdoj.gov
Ortolano, Karima	ATR	@usdoj.gov
Pearlman, Jeffrey	CRM	@usdoj.gov
Perez De La Cruz, Ignacio	TAX	@usdoj.gov
Ratcliffe, Thomas	USAOR	@usa.doj.gov
Sambat, Albert B	ATR	@usdoj.gov
Shoemaker, Brenda	USAOHS	@usa.doj.gov
Smith, Brandon	CIV	@usdoj.gov
Stephens, Elyse	OIG	@usdoj.gov
Taniguchi, Trevor	USAME	@usa.doj.gov
Thurmond, Sarah	NSD	@usdoj.gov
Walgamuth, Caitlin	USAILN	@usa.doj.gov
Watson, Bryant	USAUT	@usa.doj.gov
Wichers, Christine	USAMA	@usa.doj.gov
Zuckerman, Mark	USANH	@usa.doj.gov

From: "JPC (JSPT)" <[REDACTED]>

To: "JPC (JSPT)" <[REDACTED]>

Subject: FW: Updated SCO-S roster

Date: Mon, 13 Jan 2025 12:02:04 -0500

Importance: Normal

Attachments: SCO-S_Roster_as_of_01-10-2025.xlsx

J.P. Cooney
[REDACTED]

From: SLV (JSPT) <[REDACTED]@usdoj.gov>
Sent: Friday, January 10, 2025 2:09 PM
To: JPC (JSPT) <[REDACTED]@usdoj.gov>
Cc: ACM2 (JSPT) <[REDACTED]>
Subject: Updated SCO-S roster

Hi JP – see attached as requested.

Thanks,
Stephanie

[REDACTED]
Records Officer
Special Counsel's Office - Smith
[REDACTED]

Personnel	SCO ID	Active/Inactive	Team	Position Title	Home Component	Division/District	EOD	Departure Date
Baset, Ahmed M.	AMB (JSPT)	Inactive	Elections	Assistant Special Counsel	US Attorneys	District of Columbia	12/4/2022	8/25/2023
	MPB (JSPT)	Active	Paralegal	Paralegal	Antitrust Division		3/13/2023	1/10/2025
	JHB (JSPT)	Inactive	Paralegal	Paralegal	Antitrust Division		4/3/2023	6/28/2024
Bernstein, Greg D.	GDB (JSPT)	Inactive	Elections	Assistant Special Counsel	US Attorneys	Central District of California	12/4/2022	12/12/2024
Bogle (Tuten), Christine "Alex" A.	CAB (JSPT)	Inactive	Elections	Assistant Special Counsel	National Security Division	Counterterrorism	12/4/2022	8/24/2023
						Counterintelligence and Export		
Bratt, Jay I.	JIB (JSPT)	Active	CDI	Counselor to the Special Counsel	National Security Division	Control	12/4/2022	1/3/2025
Burke, Matthew B.	MBB (JSPT)	Inactive	Elections	Assistant Special Counsel	US Attorneys	District of Columbia	12/4/2022	10/7/2024
Carr, Peter		Active	All	Spokesperson	Public Affairs Office		3/23/2023	1/10/2025
	KPC (JSPT)	Inactive	All	ALS	US Attorneys	District of Maine	5/22/2023	3/15/2024
Cooney, Joseph P. "J.P."	JPC (JSPT)	Active	All	Deputy Special Counsel	US Attorneys	District of Columbia	12/4/2022	1/17/2025
	GDG (JSPT)	Inactive	All	Executive Assistant			1/9/2023	1/20/2023
Dohrmann, Mary L.	MLD (JSPT)	Active	Elections	Assistant Special Counsel	US Attorneys	District of Columbia	12/4/2022	1/10/2025
Dreeben, Michael R.	MRD2 (JSPT)	Active	All	Counselor to the Special Counsel	Non-DOJ		12/11/2023	1/10/2025
					Justice Management	Office of the Chief Information		
	KYD (JSPT)	Inactive	All	Budget Officer	Division	Officer	12/4/2022	6/28/2024
	TRD (JSPT)	Inactive	All	ALS	US Attorneys	Western District of Washington	2/6/2023	6/2/2023
Duree, Timothy "Tad" A.	TAD (JSPT)	Active	Elections	Assistant Special Counsel	Criminal Division	Fraud	12/4/2022	1/10/2025
						Counterintelligence and Export		
Edelstein, Julie A.	JAE (JSPT)	Inactive	CDI	Senior Assistant Special Counsel	National Security Division	Control	12/4/2022	9/21/2024
	JME2 (JSPT)	Active	All	ALS	US Attorneys	North Carolina Western	3/3/2023	1/10/2025
	SmithLegAffairs (JSPT)	Active	All	Legislative Affairs	Civil Division		2/21/2023	1/10/2025
Gaston, Molly G.	MGG (JSPT)	Active	Elections	Senior Assistant Special Counsel	US Attorneys	District of Columbia	4/24/2023	1/10/2025
Gegenheimer, Julia K.	JKG (JSPT)	Active	Elections	Assistant Special Counsel	Civil Rights Division	Criminal	12/4/2022	1/10/2025
Gilbert, Karen E.	KEG (JSPT)	Inactive	CDI	Assistant Special Counsel	US Attorneys	Southern District of Florida	12/19/2022	9/29/2023
	ABG (JSPT)	Inactive	All	Administrative Specialist	FBI	WFO	7/3/2023	8/21/2023
Haray, Jonathan W.	JWH (JSPT)	Inactive	Elections	Assistant Special Counsel	US Attorneys	District of Columbia	12/4/2022	8/25/2023
Harbach, David V.	DVH (JSPT)	Active	CDI	Assistant Special Counsel	Non-DOJ		1/3/2023	1/10/2025
Hulser, Ray N.	RNH (JSPT)	Active	All	Counselor to the Special Counsel	Criminal Division		12/4/2022	1/17/2025

[REDACTED]								
[REDACTED]	SAH (JSPT)	Active	Paralegal	Paralegal	National Security Division		12/4/2022	1/10/2025
[REDACTED]	TRJ (JSPT)	Active	All	TextMap/CaseMap Expert	USANAC		2/6/2023	1/10/2025
[REDACTED]	RRK (JSPT)	Inactive	Paralegal	Paralegal	Antitrust Division	Transportation, Energy, and Agriculture Section	1/12/2023	10/18/2024
[REDACTED]	JHK (JSPT)	Inactive	All	Deputy Executive Officer	Justice Management	Finance Staff	12/4/2022	7/5/2023
[REDACTED]	MRL (JSPT)	Active	Paralegal	Paralegal	US Attorneys	District of Columbia	12/4/2022	1/10/2025
[REDACTED]	MEL (JSPT)	Inactive	All	Administrative Specialist	Justice Management		6/5/2023	6/30/2023
Marlin, Myron L.	MLM (JSPT)	Inactive	All	Spokesperson	Public Affairs Office		12/4/2022	2/17/2023
						Counterintelligence and Export Control		
Marzen, Stephen J.	SJM (JSPT)	Inactive	CDI	Assistant Special Counsel	National Security Division		12/4/2022	3/10/2023
[REDACTED]	ACM2 (JSPT)	Active	All	Executive Officer	Justice Management	Finance Staff	12/4/2022	1/17/2025
[REDACTED]	MAM2 (JSPT)	Inactive	All	ALS	US Attorneys	Utah	6/20/2023	8/30/2024
McNamara, Anne P.	APM2 (JSPT)	Inactive	CDI	Assistant Special Counsel	US Attorneys	District of Columbia	12/4/2022	9/20/2024
[REDACTED]	WGO (JSPT)	Active	All	Administrative Officer	ENRD		6/18/2023	1/17/2025
Pearce, James I.	JIP (JSPT)	Active	All	Assistant Special Counsel	Criminal Division	Appellate	12/19/2022	1/17/2025
Pellettieri, John M.	JMP (JSPT)	Active	All	Assistant Special Counsel	Criminal Division	Appellate	12/4/2022	1/17/2025
[REDACTED]	EXP (JSPT)	Active	Paralegal	Paralegal	Antitrust Division		9/18/2023	1/10/2025
[REDACTED]	PTP (JSPT)	Inactive	All	Administrative Specialist	Justice Management Division	Budget Staff	4/22/2024	9/27/2024
Pulice, Erin B.	EBP2 (JSPT)	Inactive	Elections	Assistant Special Counsel	Non-DOJ		2/27/2023	11/22/2024
Raskin, David A.	DAR (JSPT)	Inactive	CDI	Assistant Special Counsel	US Attorneys	Western District of Missouri	12/19/2022	3/15/2024
						Counterintelligence and Export Control		
Reynolds, Brett C.	BCR (JSPT)	Inactive	CDI	Assistant Special Counsel	National Security Division		12/4/2022	4/5/2024
[REDACTED]	CVR (JSPT)	Active	All	Security Programs Manager	Justice Management Division	SEPS	2/27/2023	1/17/2025
Rody, David M.	DMR (JSPT)	Inactive	Elections	Assistant Special Counsel	Criminal Division		12/4/2022	8/24/2023
[REDACTED]	LES (JSPT)	Inactive	Paralegal	Paralegal	Antitrust Division		9/13/2023	7/19/2024
[REDACTED]	SCS (JSPT)	Inactive	Paralegal	Paralegal	Antitrust Division	Washington Criminal I Section	1/12/2023	5/10/2024
[REDACTED]	FSS (JSPT)	Active	Paralegal	Paralegal	Antitrust Division	Washington Criminal Section	6/3/2024	1/10/2024
Small, Adam L.	ALS (JSPT)	Inactive	Elections	Assistant Special Counsel	National Security Division	Counterterrorism	12/4/2022	8/25/2023
Smith, John L. "Jack"	JLSSC (JSPT)	Active	All	Special Counsel	Non-DOJ		11/18/2022	1/10/2025
[REDACTED]	PNS2 (JSPT)	Active	All	Records Officer	Federal Bureau of Investigation	Information Management Division	12/4/2022	1/17/2025
Stueve, Joshua		Active	All	Spokesperson	Public Affairs Office		2/21/2023	1/10/2025

	KMS (JSPT)	Inactive	All	ALS	US Attorneys	Massachusetts	6/26/2023	3/15/2024
Thakur, Michael E.	MET (JSPT)	Inactive	CDI	Assistant Special Counsel	US Attorneys	Southern District of Florida	12/19/2022	9/14/2024
	EAT (JSPT)	Inactive	All	Executive Assistant	Non-DOJ		2/13/2023	7/28/2023
	SLV (JSPT)	Active	All	Records Officer	Federal Bureau of Investigation	Information Management Division	12/4/2022	1/10/2025
Van Devender, Cecil W.	CWV (JSPT)	Active	All	Assistant Special Counsel	US Attorneys	Middle District of Tennessee	2/13/2023	1/10/2025
Vento, Maria K.	MKV (JSPT)	Inactive	Elections	Assistant Special Counsel	US Attorneys	Middle District of N. Carolina	12/4/2022	5/17/2024
Watson, Brooke C.	BCW (JSPT)	Inactive	Elections	Assistant Special Counsel	US Attorneys	Southern District of Florida	12/4/2022	1/27/2023
Whiting, Alex G.	AGW (JSPT)	Active	Elections	Assistant Special Counsel	Non-DOJ		8/28/2023	1/10/2025
Windom, Thomas P.	TPW (JSPT)	Active	Elections	Senior Assistant Special Counsel	US Attorneys	District of Maryland	12/4/2022	1/10/2025
	MAZ (JSPT)	Inactive	All	ALS	US Attorneys	District of Minnesota	6/5/2023	3/15/2024