

**From:** "[REDACTED]" <[REDACTED]>  
**To:** "Stoddart, Allison" <Allison.Stoddart@wilmerhale.com>  
**Cc:** "Sahni, Anjan" <Anjan.Sahni@wilmerhale.com>, "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)  
**Date:** Mon, 22 Nov 2021 15:44:03 +0000

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Hi Allison,

In addition to the records we've been discussing, we'd also like to request account ownership documents for account # Q78859008. I'm available for a call today if it would be helpful to discuss that before our meeting this evening.

Thanks,

Alison

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**From:** Stoddart, Allison <Allison.Stoddart@wilmerhale.com>  
**Sent:** Saturday, November 20, 2021 4:53 PM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** Sahni, Anjan <Anjan.Sahni@wilmerhale.com>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Thanks, Alison. I'll send an invite with dial-in for 2pm tomorrow, but let me know if that doesn't work.

Allison

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Saturday, November 20, 2021 12:00 PM  
**To:** Stoddart, Allison <Allison.Stoddart@wilmerhale.com>  
**Cc:** Sahni, Anjan <Anjan.Sahni@wilmerhale.com>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

**EXTERNAL SENDER**

Hi Allison,

Thanks very much for following up on this. I'm free for a call at any point after 12 p.m. tomorrow.

Thanks,

Alison

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**From:** Stoddart, Allison <Allison.Stoddart@wilmerhale.com>  
**Sent:** Saturday, November 20, 2021 11:48 AM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** Sahni, Anjan <Anjan.Sahni@wilmerhale.com>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]

[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Hi Alison,

Apologies for the email over the weekend. We were wondering if you have time for a quick call tomorrow to follow up on our Wednesday meeting. Let us know if there are some times that might work.

Thanks,  
Allison

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Friday, November 19, 2021 5:33 PM  
**To:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>  
**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

**EXTERNAL SENDER**

Hi Allison,

Thanks very much. Let me look into it, and I'll let you know if Zoom is an issue, but otherwise let's plan for that.

Best,

Allison

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**From:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>  
**Sent:** Friday, November 19, 2021 11:51 AM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Allison,

Monday at 6pm works for us for our next meeting with Pat. To avoid Webex issues, it would be great if we could use Zoom. If that works for you, we can use the following Zoom meeting ID:

Meeting ID: 3127323168 or ryankusmin

I'll send an invite to hold the time, but please let me know if that doesn't work.

Thanks,

Allison

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Wednesday, November 17, 2021 8:17 AM  
**To:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>

Cc: Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
Subject: RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

**EXTERNAL SENDER**

Thanks, yes. Let's plan to meet at 7. I'm heading to court now and will circulate a webex invitation later today. Thanks very much.

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**From:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>  
**Sent:** Wednesday, November 17, 2021 8:15 AM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Alison –

Does tonight still work for a call with Pat? I know you're tied up during the day, but he is available from 6-9pm tonight.

Thanks,  
Allison

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**From:** Stoddart, Allison  
**Sent:** Monday, November 15, 2021 6:20 PM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Thanks, Alison. Pat has been traveling, but returning tomorrow. I'll pass your schedule along, and I expect to get back to you tomorrow with some possible times.

Thanks,  
Allison

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Monday, November 15, 2021 6:16 PM  
**To:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>  
**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

**EXTERNAL SENDER**

Hi Allison,

I wanted to follow up on scheduling, since this week is a bit tight and I know everyone is busy. I'm available from 7 p.m. onwards tomorrow evening, Wednesday, or Thursday. I'm also available this weekend, if that's easier. Apologies for

proposing evening/weekend times, but jury selection this week makes scheduling a little difficult. I'm also free on Monday from 12-4 if it's not possible to meet sooner.

Thanks,

Allison

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**From:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>

**Sent:** Wednesday, November 10, 2021 8:35 PM

**To:** [REDACTED] <[REDACTED]>

**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Hi Allison,

Apologies for not responding sooner. I am still trying to confirm timing, but looking at next week, not tomorrow.

Thanks,

Allison

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**From:** [REDACTED] <[REDACTED]>

**Sent:** Wednesday, November 10, 2021 7:48 PM

**To:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>

**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

**EXTERNAL SENDER**

Hi Allison,

Just checking in on timing, in case we're meeting tomorrow. If not, no worries, next week is fine.

Thanks,

Allison

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**From:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>

**Sent:** Tuesday, November 9, 2021 8:43 PM

**To:** [REDACTED] <[REDACTED]>

**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Thanks, Allison. I'll check and get back to you.

Allison

---

**From:** [REDACTED] <[REDACTED]>

**Sent:** Tuesday, November 9, 2021 8:07 PM

**To:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>

Cc: Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
Subject: Re: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

**EXTERNAL SENDER**

Are there times on Thursday afternoon or evening that would work? I can move a few things around if he is available. Otherwise, I'm available anytime next week in the the morning from 7:30-8:30, or in the evening from 5:30 p.m. onwards, or anytime on the weekend. Thanks very much for your help arranging the meeting.

On Nov 9, 2021, at 7:23 PM, Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)> wrote:

Thanks, Alison. Pat is traveling on Friday and Monday unfortunately. I know jury selection is scheduled to be underway next week, but if tomorrow doesn't work, would there be times next week that might?

Thanks,  
Allison

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Tuesday, November 9, 2021 6:32 PM  
**To:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>  
**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

**EXTERNAL SENDER**

Hi Allison,

Thanks very much. We'll be in court most of the day for a hearing tomorrow, but is there a time on Friday that would work?

Thanks,

Alison

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**From:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>  
**Sent:** Tuesday, November 9, 2021 3:50 PM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Hi Alison,

When we last spoke, we discussed setting up a call with your team and Pat McHugh. Would tomorrow afternoon work for that call?

Thanks very much,

Allison

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Wednesday, October 27, 2021 9:02 AM  
**To:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>  
**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

**EXTERNAL SENDER**

Hi Allison,

Thanks— would 3 p.m. work for a call today?

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**From:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>  
**Sent:** Wednesday, October 27, 2021 7:48 AM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Hi Alison,

We wanted to provide an update on the trial witness topic. Do you have any time this afternoon or tomorrow for a brief call?

Thanks,  
Allison

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**From:** Stoddart, Allison  
**Sent:** Monday, October 18, 2021 9:05 PM  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Great. Thanks, Alison. Appreciate it.

Allison

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Monday, October 18, 2021 8:58 PM  
**To:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>  
**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

**EXTERNAL SENDER**

Hi Allison,

Thanks, that's not a problem. I'm attaching a broadly worded subpoena to the bank, but please let me know if you'd like me to direct this more specifically to a particular entity or officer.

Thanks,

Alison

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**From:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>

**Sent:** Monday, October 18, 2021 8:57 AM

**To:** [REDACTED] <[REDACTED]>

**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

**Subject:** RE: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

Alison, Maurene, Lara,

Following up on our last discussion, JPMorgan is working on identifying a witness for trial. Are you able to provide JPMorgan with a trial appearance subpoena?

Thanks very much,

Alison

**Allison Stoddart | WilmerHale**

7 World Trade Center

250 Greenwich Street

New York, NY 10007 USA

+1 212 295 6401 (t)

[allison.stoddart@wilmerhale.com](mailto:allison.stoddart@wilmerhale.com)

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**From:** [REDACTED] <[REDACTED]>

**Sent:** Friday, October 8, 2021 12:15 PM

**To:** Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>

**Cc:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

**Subject:** Re: [EXTERNAL] RE: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

**EXTERNAL SENDER**

Hi Allison,

I'm traveling for work for much of next week, but I'm available for a call anytime on Monday, or at 9 a.m. on Tuesday. I'm also available for a call this afternoon anytime from 4 pm onwards if that's easier.

Thanks.

On Oct 8, 2021, at 11:18 AM, Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)> wrote:

Thanks, Alison. Could we find some time early next week to discuss? Are there certain windows that would work on your end?

Thanks,  
Allison

**Allison Stoddart | WilmerHale**

7 World Trade Center  
250 Greenwich Street  
New York, NY 10007 USA  
+1 212 295 6401 (t)  
[allison.stoddart@wilmerhale.com](mailto:allison.stoddart@wilmerhale.com)

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Friday, October 8, 2021 10:01 AM  
**To:** Sahni, Anjan <[Anjan.Sahni@wilmerhale.com](mailto:Anjan.Sahni@wilmerhale.com)>; Stoddart, Allison <[Allison.Stoddart@wilmerhale.com](mailto:Allison.Stoddart@wilmerhale.com)>  
**Cc:** [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)

**EXTERNAL SENDER**

Anjan, Allison,

Hope you're both doing well. Following up on our last conversation, we wanted to send along a few documents in order to facilitate our conversation about identifying an appropriate witness from JP Morgan. Attached is a zip file containing a few draft exhibits. We are still working on finalizing exhibits, but we thought it made sense to start the conversation about this sooner rather than later. Please let us know if you have any questions or if a call would be useful.

Thanks,

Allison

[REDACTED]  
Assistant United States Attorney  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007  
(212) 637-2225