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Subject: Discovery Plan - WORK PRODUCT

Attachments: Scanned from a Xerox Multifunction Printer.pdf Untitled attachment.html

House Managers
EX. 649

CAMMACK 001990

| Task | Purpose | Source/Target | Tool | Resources Needed | Timing | Sequence |
|--|---|---|---|--|--|---|
| Telephonic communications between and among persons in each group | Establish timing of steps taken against NP and WC and structure of personal relationships | All (with the possible exception or a limitation as to the Cl's. | Grand jury subpoenas for phone logs, records, text, instant messages, deleted social media posts | Completion of all information on forms; lists of items to be requested; discrete time frames | Immediate. Plus scheduled follow up and supplementation based on first round | Discuss |
| Email communications – basic information | Same | Same | Sealed Search Warrants | Same, plus search warrant affidavit and plan for returns | Immediate. | Discuss |
| Email communications content | Same | Same | Sealed Search Warrants | Same, plus search warrant affidavit and plan for returns | Immediately following receipt of records from first two and initial interviews | Discuss |
| Announced or Unannounced Visits in Person | Obtain Facts (and in certain cases to put them on notice) Identify witness willing to tell the unvarnished story of what happened | U.S. District Clerk's Office U.S. Magistrate's Office U.S. Attorney's Office FBI SSB | Personal vehicle and phone and GPS | Outline of questions and topics and aggregate documents or other items to be presented to person; identify who else would be there | Decide | Charitable Trusts Section Investigation Section U.S. District Clerk U.S. Magistrate Deputized Participants in Raid |
| Obtain underlying documents to complete story and to seize computers and electronic storage devices | Search Warrants | Mitte's Offices Milligan's Offices SSB U.S. District Clerk | Search Teams, including teams to take electronic storage devices | Unassailable Affidavit Showing Probable Cause | Decide | Mitte's Offices Milligan's Offices |

| Obtain | Grand Jury | Magistrate U.S. Attorney's Office FBI All identified | Grand jury | Grand jury | Very soon. | Discuss |
|-----------|-------------------------|--|------------|--|-------------|---------|
| testimony | Subpoenas to Testify | persons | subpoenas | bailiff access or DA's office access to system for issuance of subpoenas | 72.7.33011. | 0.30033 |

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ATTORNEY WORK PRODUCT