

**From:**

**To:**

**Cc:**

**Subject:** RE: overdue subpoena compliance: Amazon Ref. No. CRIMI031692 2019 DS

**Date:** Tue, 06 Aug 2019 14:46:10 +0000

**Importance:** Normal

**Attachments:** 2019-06-24,\_subpoena\_to\_Amazon.pdf

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To Whom it May Concern:

We are in receipt of Amazon's responses to the attached grand jury subpoena (the "Subpoena"), which were submitted several weeks past the return due date.

We note with concern that the Subpoena responses list more than 300 descriptions of responsive materials as "REDACTED." Please immediately produce either a complete response to the Subpoena without the redaction of non-privileged responsive materials, or provide a legal basis for your refusal to do so, so that we may seek court intervention as necessary.

We further note that Amazon has explicitly reserved objections including that the information and/or records requested are unusually voluminous in nature and that compliance would cause an undue burden for Amazon. Please advise immediately whether Amazon is in fact exercising any of these objections in its response to this Subpoena specifically; that is, whether Amazon has failed to produce responsive materials based on volume or burden. Please also advise whether Amazon has refused to provide any responsive materials for any reason, other than the "REDACTED" materials as described above.

Finally, we note that the Subpoena requested any and all records associated with nine email addresses, and the response appears to include materials in connection with just two email addresses. Please confirm that Amazon comprehensively reviewed its records for each of the other seven email accounts and found no responsive materials. Similarly, the Subpoena requested account notes and logs, including any customer service communications or other correspondence. No such records were produced. Please confirm that Amazon comprehensively reviewed its records for any such materials and that none were found.

If it is useful to discuss these issues via phone, I can be reached at 212-637-2415 and my colleague Alison Moe can be reached at 212-637-2225. **IF YOU CALL AND LEAVE A MESSAGE PLEASE PROVIDE A RETURN PHONE NUMBER AT WHICH WE MAY REACH YOU.**

thank you,

**From:**

**Sent:** Thursday, August 01, 2019 17:06

**Subject:** overdue subpoena compliance: Amazon Ref. No. CRIM1031692 2019 DS

Good afternoon,

Amazon's response to the attached grand jury subpoena is overdue by several weeks. The FBI has emailed and left messages with your legal department several times over the past weeks without a response.

Please respond promptly to resolve Amazon's non-compliance. Otherwise we will initiate contempt proceedings regarding your failure to comply with valid legal process.

Sincerely,

