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**From:** Samuel Wilson  
**Sent:** Friday, September 24, 2021 10:22 AM  
**To:** James B. Barnes  
**Subject:** RE: USA v. Maximoff

Bucky,

Thank you for the heads up. My office looked over your memo, and Walker and Carter are not persuaded. Personally, I think the order in *Rosecan*, 2021 WL 1026070, is the correct reading of the statutes. We obviously concede there is no material difference between the language in sections 3282 and 3298 for bringing the charge.

As for the detention hearing, we are going to call Special Agent Woo and Officer Ty Hayward. You have Woo's affidavit in support of the Information. I will try to get you a report or declaration from Hayward over the weekend.

- S.

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THE UNITED STATES  
DEPARTMENT of JUSTICE