

THE MPM GROUP, INC.

A PROFESSIONAL CONSULTING FIRM

INVESTIGATIONS • LITIGATION SUPPORT • SECURITY

COMPLEX DISCOVERY PREPARATION

Introduction

In the more recent *Complex* government prosecutions, such as multi-defendant, Title III (Wiretap), *Classified Information Procedures Act* (CIPA) cases, it has not been uncommon for federal and/or state governments to generate multi-gigabyte to multi-terabyte quantities of raw *Discovery* material consisting of various formats of typed text, digital audio tapes (phone/bugs), digital photographs or videotape



data. Consequently, depending on the type of investigation, attorneys can now expect to receive multi-thousand pages of *Discovery* material at any given time. Indeed, in an effort to meet their *Discovery* obligations, the government now seems content with dumping terabytes of data into a *Drop Box*, or handing an attorney a thumb drive or external hard drive, containing literally thousands of files, videos and audio recordings which counsel is then required to organize into some kind of usable format.

To help attorneys collect, map and manage any quantity of *Discovery* material, **The MPM Group**, a CJA approved vendor, now offers a set of unique services that streamlines the *Discovery* process while assisting counsel in the preparation of their trial strategy, consideration of any possible plea negotiations, and ultimately, assist in their preparation of the sentencing phase of the case. Obviously, this same *eDiscovery* process is equally effective in complex civil matters.

MPM has divided their *Discovery* program into 3-Categories:

I. The Collection and Management of *Discovery* Material

- Data Collection & Mapping
- Data Preservation & *eDiscovery*
- Hosting & Analytics
- Project Management
- Scanning Hardcopy Documents and Transferring them to Digital Format
- Trial Technology & Support
- Copying & Scanning
- Review Teams That Confirm Compliance and Accuracy



State-of-the-Art Facility



Technical Presentation Available Upon Request

II. *Discovery Material Organization & Analysis*

After the *eDiscovery* material completes the collection and mapping phase, all of the files are reviewed by former federal and/or state law enforcement professionals with a proven track record for these types of investigations.

- Their file analysis will include review of all Affidavits (Search Warrants, Title III Affidavits and Arrest Affidavits), prepared by government personnel, for sufficient probable cause, compliance with agency policies and proper informant utilization.
- The file is then put into a chronological “Series of Events” with a specific defendant’s alleged criminal behavior, as well as overt acts, with all supporting documentation such as investigative reports, surveillance reports, any laboratory reports, photo and audio evidence analysis, Informant Statements, etc., attached thereto. These “events” are incorporated into individual tabs within the “*Attorney Investigative File*,” which is maintained in a three (3) ring binder to ease defense counsel’s ability to add or remove material.
- Finally, if requested, pre-trial investigations can be conducted into the government’s case to include, but not limited to, follow-up interviews, locating exculpatory evidence, finding and subpoenaing witnesses, while at the same time searching for any weaknesses that might exist in the government’s case.

Accordingly, in lieu of trying to sort through terabytes of data, counsel has to simply review their *Attorney Investigative File*, with its all-inclusive *Table of Contents*, which will contain all tabbed references and supporting documents for their specific client with the other data contained in “non-essential” 3-ring binders also tabbed and described in the *Table of Contents*. Succinctly, the entire defense investigative file and remaining *Discovery* material is at counsel’s fingertips.



Finished Product with Red *Attorney Investigative File*

III. Legal Oversight and File Review

- Staff attorney(s) will ensure that any personnel with access to specific investigative files will be briefed and will be required to acknowledge, in writing, any *Non-Disclosure/Non-Dissemination Orders* from the Court. They will also be required to acknowledge, in writing, MPM’s routine *Non-Disclosure Agreement* regarding any court records and/or Attorney Work-Product.
- All file review(s) and file preparations are supervised by staff, or contract attorneys, with an expertise in the particular type of investigation being reviewed.
- If necessary, MPM’s own staff attorney, who is both **CJA** and **CIPA** approved, will personally evaluate any evidentiary material that is being purported to be “Classified” by the government pursuant to the Classified Intelligence Procedures Act. This type of attorney review is usually conducted in a U.S. government controlled Sensitive Compartmented Information Facility or “SCIF.”



Notwithstanding the fact that all-three of these *Discovery* services, working in concert, are considered the most effective for either criminal or civil litigation, attorneys can avail themselves of all-three services described herein or any combination thereof.

For specifics and pricing, please contact:

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The MPM Group, Inc. is a registered Woman Owned Small Business (8m) and is registered with the *System for Award Management* (SAM). As such, MPM is qualified to bid on/be awarded U.S. government contracts.
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