

From: "[REDACTED]" <[REDACTED]>
To: "[REDACTED](USANYS)" <[REDACTED]>, "[REDACTED](USANYS)" <[REDACTED]>, "[REDACTED](USANYS)" <[REDACTED]>, "[REDACTED](USANYS)" <[REDACTED]>, "Graff, Ilan (USANYS)" <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED](USANYS)" <[REDACTED]>, "[REDACTED](USANYS)" <[REDACTED]>

Subject: Draft Maxwell Indictment

Date: Thu, 11 Jun 2020 22:12:47 +0000

Attachments: 2020-06-11,_Maxwell,_draft_indictment.docx

All,

Attached please find draft of the Maxwell indictment.

One thing to flag for discussion: The perjury charge in Count Five currently includes Maxwell's testimony about [REDACTED] age. Our understanding is that we need to include the full transcript excerpt in the indictment and that, although we can anonymize [REDACTED] name, we need to use the same alias (here, "Minor Victim-1") whenever we refer to her in the entire indictment. As a result, anyone who has access to the deposition transcript will be able to identify [REDACTED] as Minor Victim-1. That would significantly undermine the assurances we have made [REDACTED] that we will do everything in our power to protect her identity. Our hope is that either (a) there is a legally permissible way to further anonymize the reference to [REDACTED] in that perjury count, or (b) if not, we will be permitted to cut that specification from the indictment to protect [REDACTED] identity.

Thanks,

[REDACTED]