

**From:** "[REDACTED] (USANYS)" <[REDACTED]>  
**To:** "[REDACTED] (USANYS)" <[REDACTED]>  
**Cc:** "[REDACTED] (USANYS)" <[REDACTED]>  
**Subject:** RE: Maxwell  
**Date:** Wed, 17 Jun 2020 02:33:31 +0000

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Sure, 10 works.

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Tuesday, June 16, 2020 10:02 PM  
**To:** [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** Re: Maxwell

Thanks. Can I call you in the morning? Would 9 or 10 work? I'll keep it quick, I promise.

Sent from my iPhone

On Jun 16, 2020, at 9:26 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Sure. Happy to talk now if you'd like, or tomorrow—my schedule is pretty flexible.

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Tuesday, June 16, 2020 9:22 PM  
**To:** [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** RE: Maxwell

You should talk to them, but if you can give me 30 seconds before hand, I'd appreciate it.

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Tuesday, June 16, 2020 8:55 PM  
**To:** [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** RE: Maxwell

The team also reached out to me this evening about this. Do you want me to talk to them, you, or both? Happy to speak to either group or both, but if the latter preferably jointly. Thanks.

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Saturday, June 13, 2020 8:47 AM  
**To:** [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** Re: Maxwell

Thanks, [REDACTED]. There is some time sensitivity, but it's definitely not an emergency. If the middle or end of next week is better for you, I'm sure that will be fine.

Sent from my iPhone

On Jun 13, 2020, at 12:14 AM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Sure, though early to mid-week may be unpredictable because I've been dragooned into a couple other near-term emergencies ([REDACTED]). Is this time-sensitive, too?

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**From:** [REDACTED] (USANYS) <[REDACTED]>

**Sent:** Friday, June 12, 2020 3:52 PM

**To:** [REDACTED] (USANYS) <[REDACTED]>

**Cc:** [REDACTED] (USANYS) <[REDACTED]>

**Subject:** Maxwell

Hey [REDACTED] – Do you have some time next week to chat briefly about our upcoming indictment of Ghislaine Maxwell? Maxwell, as you may know, was Jeffrey Epstein's former girlfriend and we are charging her for her role in recruiting and grooming minor girls to be abused by Epstein.

We are charging her with coercion/Mann Act conspiracy and substantive counts, principally, and have a somewhat complicated question about overt acts that is likely easier to explain by phone. The short version is that both statutes seem to require us to identify a particular state statute the defendant's conduct violated, and where we have victims who were abused – but not in a way that violates a particular state statute – can we still treat them as victims of the conspiracy and allege overt acts with respect to them?

To help facilitate this, a current draft of the Indictment is attached. Let us know what might work for you. Thanks so much, [REDACTED]

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