

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

Subject: RE: updates
Date: Sat, 06 Jul 2019 20:39:51 +0000
Importance: Normal

From Geoff:

.....
Where we currently say "In fall 2007, the defendant entered into a non-prosecution agreement with the SDFL in connection with the conduct at issue in that investigation -- *i.e.*, the abuse of numerous minor girls in the Palm Beach area."

He would like us to change to:

"In fall 2007, the defendant entered into a non-prosecution agreement with the SDFL in connection with the conduct at issue in that investigation, which the non-prosecution agreement identifies as including investigations into the defendant's abuse of minor girls in the Palm Beach area."

His concern is their investigation (like ours) involved some girls who were 18 at the time and also we don't want to ourselves characterize the scope of the NPA.

.....
Fix the typo:

" the defendant cannot overCOME the statutory presumption in favor of detention in this case."

.....
"As an initial matter, all of the conduct is timely charged, pursuant to 18 U.S.C. § 3283, which permits the prosecution of sex offenses against children at any time during the lifetime of the minor victim."

[REDACTED] per our discuss, let's modify this language

.....
"he currently is a registered sex offender."

Geoff asks "Is it worth pointing out that, I believe, he is in the highest risk category for re-offense?"

.....
What about pointing out that he, at least as of 2011, has no appreciation of the gravity of his offense or necessarily re-offense. This is from a NY Post article:

"I'm not a sexual predator, I'm an offender. It's the difference between a murderer and a person who steals a bagel."

[REDACTED] think this is a good suggestion

.....
"GEOFFREY S. BERMAN
ACTING United States Attorney"

Oops. Let's fix. Thanks

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

Sent: Saturday, July 6, 2019 4:23 PM

To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

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

Subject: Fwd: updates

In addition to these, I have a number of smaller things from Geoff that I will forward on shortly.

Sent from my iPhone

Begin forwarded message:

From: "[REDACTED]" <[REDACTED]>

Date: July 6, 2019 at 3:15:59 PM EDT

To: "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "Berman, Geoffrey (USANYS)" <[REDACTED]>

Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

Subject: RE: updates

Thanks for circulating. I think this is very well done. I have a few comments and suggested edits in the attached. Also, we should be careful when conforming on Monday morning – if we are submitting it to a magistrate judge, as expected, we should change the header to so reflect.

From: [REDACTED] <[REDACTED]>

Sent: Saturday, July 6, 2019 1:18 PM

To: [REDACTED] (USANYS) <[REDACTED]>; Berman, Geoffrey (USANYS) <[REDACTED]>

Cc: Birger, Laura (USANYS) <[REDACTED]>; Stewart, Craig (USANYS) <[REDACTED]>; Strauss, Audrey (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: RE: updates

Attached is the most recent draft, which includes placeholders that we would plan to update on Monday morning before filing. Any comments are most welcome, and thanks in advance.

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

Sent: Saturday, July 6, 2019 12:51 PM

To: Berman, Geoffrey (USANYS) <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; Birger, Laura (USANYS) <[REDACTED]>; Stewart, Craig (USANYS) <[REDACTED]>; Strauss, Audrey (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: Re: updates

EFTA00083659

Great news. The team will be circulating a draft detention memo shortly.

Sent from my iPhone

On Jul 6, 2019, at 12:44 PM, Berman, Geoffrey (USANYS) <[REDACTED]> wrote:

[REDACTED] tells me that he is confirmed on board. Wheels up. Geoff

On Jul 6, 2019, at 11:10 AM, [REDACTED] <[REDACTED]> wrote:

Good morning all—

[REDACTED] asked me to pass along two quick updates. First, Judge Moses signed the search warrant this morning. Second, our case agent told us that FBI received a flight manifest from CBP last night. The passengers listed are Epstein and two pilots. Of course, that is subject to change, and I'm told that FBI will try to get confirmation of the passengers after the flight takes off.

[REDACTED]
Assistant United States Attorney
Southern District of New York

[REDACTED]
[REDACTED]