

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

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

Subject: RE: Draft Indictment

Date: Fri, 14 Jun 2019 13:51:03 +0000

Importance: Normal

Also, on Count 1, are we sure we can charge a single count covering all conduct? I presume we plan to supersede, so this may be moot, but it'd be embarrassing to stumble out of the gate if we have to charge each person trafficked as a separate substantive...

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

Sent: Thursday, June 13, 2019 10:57 PM

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

Subject: Re: Draft Indictment

Good — you may have to be the one to help get it there. Will loop you in if chain continues.

Sent from my iPhone

On Jun 13, 2019, at 10:35 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

I agree with this.

Sent from my iPhone

On Jun 13, 2019, at 10:19 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Sent from my iPhone

Begin forwarded message:

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

Date: June 13, 2019 at 10:19:35 PM EDT

To: "[REDACTED]" <[REDACTED]>

Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

Subject: Re: Draft Indictment

Thanks [REDACTED] Let's chat tomorrow — I do think this is too sparse. I understand the concerns and they are right ones, but more needs to be done to (i) instill public confidence in the significance and seriousness of this case in light of the prior history: and (ii) relatedly, to give Geoff more to work with at a press conference to further that end. It is a balance, and there are definitely steps we should take to protect the victims (esp those who remain truly anonymous), but I think we'll need to bulk up a bit.

Sent from my iPhone

On Jun 13, 2019, at 9:47 PM, [REDACTED] <[REDACTED]> wrote:

[REDACTED]

Attached is a draft indictment for your review. We tried to keep the facts sparse, both to protect the victims and to avoid publicizing details that will help us vet new witnesses later on if the details remain confidential.

Thanks—

[REDACTED]

[REDACTED]
Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007

[REDACTED]

[REDACTED]

<2019-06-13, Epstein Indictment.docx>