

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

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

**Subject:** RE: Draft Indictment

**Date:** Fri, 14 Jun 2019 13:52:36 +0000

**Importance:** Normal

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I went to speak to [REDACTED] about that and the option of charging it that way and superseding later – it is much preferable to it this way if we can because we do not want to charge a single victim count – both not to put it all on [REDACTED] and to not suggest our case is that narrow.

[REDACTED] gut is that we can, but in my comments I asked the team to do some research on the unit of prosecution.

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

**Sent:** Friday, June 14, 2019 9:51 AM

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

**Subject:** RE: Draft Indictment

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...

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**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>