

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

Subject: RE: Draft Maxwell Indictment

Date: Fri, 12 Jun 2020 21:16:27 +0000

Attachments: 2020-06-11_Maxwell_draft_indictmentLGB.docx

Hi all,
Thanks for circulating. I had some preliminary, high level comments, reflected in the attached. Perhaps we could set up a time next week to talk these through?
Have a great weekend.

From: [REDACTED] <[REDACTED]>
Sent: Thursday, June 11, 2020 6:13 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: Draft Maxwell Indictment

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] [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]'s 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]'s identity.

Thanks,
[REDACTED]