

From: "[REDACTED] (USANYS)" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Subject: RE: webex!
Date: Fri, 29 May 2020 20:24:28 +0000

Of course! That list looks right to me, and it would be my pleasure to talk Tuesday. Does 1:00 work on your end?

On May 29, 2020, at 4:20 PM, [REDACTED] <[REDACTED]> wrote:

Ilan,

Thanks very much again for your thoughts and input yesterday in our discussion (and afterward), and we wanted to circle back on the possibility of chatting again early next week? In the first instance we wanted to confirm that the statements Geoff was particularly thinking of are the following (condensed from the original for brevity):

- 1) "I never gave [REDACTED] a massage" (Boies deposition)
- 2) "I wasn't aware that [Epstein] was having sexual activities with anyone when I was with him other than myself" (Boies deposition)
- 3) "I'm not aware of anybody that I interacted with, other than obviously [REDACTED] who was 17 at this point" (McCawley deposition)
- 4) The series of answers relating to sex toys (Boies deposition)
- 5) Awareness of [REDACTED] age (McCawley deposition)
- 6) Didn't know about Epstein having a scheme to recruit underage girls for sexual massages

And then assuming that's correct, we thought it might be helpful to talk relatively briefly about strategy on one or two of those statements in particular, and then more broadly how to best formulate the indictment, based on your thoughts, what Geoff has conveyed to you, or both.

Would there be a time on Tuesday that would work for you, building in the 24-hour notice period for a webex?

thanks,

[REDACTED]

[REDACTED]
Assistant U.S. Attorney
Southern District of New York

[REDACTED]