

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

Subject: Re: Draft Indictment

Date: Fri, 14 Jun 2019 04:08:57 +0000

Importance: Normal

Exactly. I'm having trouble thinking of additional information that we could add without creating problems down the line.

On Jun 13, 2019, at 11:22 PM, [REDACTED] <[REDACTED]> wrote:

Initially my thought was that we could describe in detail, like, one generic visit ... but the problem is that it then instantly becomes impossible to screen new victims.

Sent from my iPhone

On Jun 13, 2019, at 23:10, [REDACTED] <[REDACTED]> wrote:

Not surprisingly I totally agree with you both, and I think we should hold pretty firm on asking anybody up the chain to pretty specifically identify what they want us to add (rather than a generic "beef it up" where we're negotiating against ourselves in terms of additions).

I think the arrest itself by SDNY will speak to the significance and seriousness of the case and Geoff can talk all he wants about how serious and significant it is without needing additional victim details.

Sent from my iPhone

On Jun 13, 2019, at 23:03, [REDACTED] <[REDACTED]> wrote:

I could not agree more—honestly, our main argument at trial will be that these details were never publicized, so they couldn't possibly make up their testimony.

All I can really think of that we could add—if they just want more information in the indictment—would be:

- A paragraph about the volume of victims (i.e., some recruiters worked for years, each recruiting dozens of victims).
- A paragraph that talks about the search warrant evidence.
- A paragraph that very, very vaguely explains that some victims were financially struggling and living by themselves as teens, and used the money to get by.

Any ideas?

From: [REDACTED] <[REDACTED]>

Sent: Thursday, June 13, 2019 10:55 PM

To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Fwd: Draft Indictment

I know we're on the same page here, but just wanted to emphasize my strong view that we should not be disclosing any details that would enable anyone to identify specific victims. Secondly, but still very importantly, we need to hold back details so that we can corroborate new witnesses.

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>