

From: "[REDACTED] (USANYS)" <[REDACTED]>
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Epstein Civil Filing -- This Wednesday, July 1
Date: Mon, 29 Jun 2020 19:37:34 +0000

I thought we got a second sharing order to cover the pre-2019 stuff. Am I making that up?

From: [REDACTED]
Sent: Monday, June 29, 2020 3:36 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED]
Subject: Re: Epstein Civil Filing -- This Wednesday, July 1

Thanks [REDACTED]. It does. Either way, I am aiming to get this done quickly so that Crim can seek any necessary 6(e) order.

I was reviewing the existing 6(e) order, and it provides for sharing of:

Jeffrey Epstein's Will, dated August 8, 2019; The 1953 Trust Agreement, dated August 8, 2019; and earlier Jeffrey Epstein trust agreements referenced in The 1953 Trust Agreement, may be disclosed to Professor John Langbein of Yale Law School and to the Assistant U.S. Attorneys for the Southern District of New York designated below

Do you view this as limited to the 1953 trust, and the earlier January and February 2019 versions of the document? The first couple of paragraphs of the 1953 Trust do reference those earlier January and February versions:

WHEREAS, Grantor, residing at Little St. James Island, St. Thomas, U.S. Virgin Islands established The Jeffrey E. Epstein 2019 Trust **dated January 18, 2019**, with Darren K. Indyke, and Richard D. Kahn, as Trustees; and

WHEREAS, the Grantor retained the power to amend the trust in whole or in part, by a written instrument executed and acknowledged solely by the Grantor and delivered to no less than one Trustee of this Trust and exercised such right to amend the trust **on February 4, 2019**

I have not reviewed the trust documents that predate 2019 and I will refrain from doing so until you have a chance to weigh in on this. Unless you think that the "earlier" trust agreement referenced in the 1953 Trust encompasses the trust agreements that predate 2019, I will limit my review of trust documents and the Statement of Interest to just the 2019 trusts. I am copying Talia in case she has a different understanding.

Thanks!

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, June 29, 2020 3:25 PM

EFTA00099505

To: [REDACTED] >
Subject: RE: Epstein Civil Filing -- This Wednesday, July 1

Just emailing with Ilan, sounds like they are not thinking we need to file by Wednesday if that takes some of the pressure off.

From: [REDACTED] >
Sent: Monday, June 29, 2020 2:33 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: Re: Epstein Civil Filing -- This Wednesday, July 1

How does one become a Special Assistant to the AG?

On Jun 29, 2020, at 2:28 PM, McEnany, John (USANYS) <[REDACTED]> wrote:

As I mentioned a while ago, it is my thinking that to file in the Virgin Islands someone has to be designated a Special Assistant to the AG, or something like that. I'm not 100% sure of that and would have to check.

And you would need a 6(e) order.

I don't see that happening by Wednesday.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, June 29, 2020 2:01 PM
To: McEnany, John (USANYS) <[REDACTED]>
Cc: [REDACTED] >
Subject: Epstein Civil Filing -- This Wednesday, July 1

[REDACTED] – The Civil Division plans to move forward on Wednesday with a civil filing in the USVI that will use/attach various trust documents that we previously got them access to through a Rule 6 sharing order. Do we need further authority to use the material in the filing? Or is our existing sharing order sufficient? If we do need further authority, is that something you or someone in the office has done recently for purposes of obtaining a go-by? Thanks, [REDACTED]