

From: "[REDACTED] (USANYS)" <[REDACTED]>
To: "[REDACTED] (USANYS)" <[REDACTED]>
Subject: Re:
Date: Mon, 10 Aug 2020 00:08:53 +0000

I would do three days before the arrest, so...

Sent from my iPhone

On Aug 9, 2020, at 7:32 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Ok. Not sure that's what we're going to do but will let you know tomorrow.

Sent from my iPhone

On Aug 9, 2020, at 7:17 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

No, it's three days. No mention of business. So technically three days would be Friday but as told to me at least the thinking was dropping this Friday afternoon could be perceived as poor form, so we're gonna do late Thursday instead.

Sent from my iPhone

On Aug 9, 2020, at 7:07 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Will confirm in morning. UMR is 3 business days no? And we'd want it ready to go upon sending umr which would mean a draft about a day in advance.

Sent from my iPhone

On Aug 9, 2020, at 7:02 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Laura said Thursday and late in the day. Can you confirm and let me know?

Sent from my iPhone

On Aug 9, 2020, at 6:58 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Ok. I think umr would go down to dc on Wed so we'd want it in shape then.

Sent from my iPhone

On Aug 9, 2020, at 6:53 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

They did. I haven't looked at it yet but will do and we can circulate before Thursday.

Sent from my iPhone

On Aug 9, 2020, at 6:51 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Ok, understood.

Did the team ever do a short form memo re WBTW in case we have to send something down?

Sent from my iPhone

On Aug 9, 2020, at 4:10 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Okay. Among the timing pressures on this, I think we need to have a plan in place so we can make a disclosure to the Court in connection with the first discovery deadline, which I believe is August 21.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, August 7, 2020 6:54 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Subject: Re:

Some but still working on it. [REDACTED] has been swamped but I need to get his attention.

Sent from my iPhone

On Aug 6, 2020, at 6:47 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Have we made any progress on the plan on this?

Sent from my iPhone

On Aug 4, 2020, at 4:05 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Great, thank you.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Tuesday, August 4, 2020 4:01 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE:

These are all the 302s from the Florida investigation. May want to just CTRL+F for Maxwell. [REDACTED] should be in there.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Tuesday, August 4, 2020 3:58 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE:

And can you have someone send the [REDACTED] 302 from FBI investigation?

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Sunday, August 2, 2020 2:03 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE:

One of the difficulties in answering this question is that we don't have the pros memo. Here's what I've been able to learn from what we do have:

We do have the transcripts of their grand jury testimony (although not the AUSA preamble). She is not mentioned in the introductory part of the agent's testimony where they are walking through the various targets and subjects of the investigation. By contrast, Epstein, [REDACTED] and [REDACTED] are (pp. 5-6). In fact, she only comes up once in the entire grand jury presentation, namely in the context of the agent's summary of how [REDACTED] met Epstein. Specifically, the agent testifies as follows:

I'm sorry, the question you asked me was: How did they meet? They met by a friend of Mr. Epstein's. Jane Doe Number One was working at Mar-a-Lago and a friend of Mr. Epstein's, Ghislaine Maxwell.

Would you like the spelling?

THE REPORTER: Yes, please.

THE WITNESS: G-H-I-S-L-A-I-N-E, Maxwell, who was a friend of Mr. Epstein, met Jane Doe Number One at Mar-a-Lago and Jane Doe Number One soon after began working and providing massages for Mr. Epstein

The fact that she has to spell it strongly suggests the name also didn't come up during whatever preamble the AUSA provided. But either way, that's it.

As you know, she is not mentioned in the NPA and, according the lawyer at OPR who is running the NPA investigation, Maxwell does not come up much, if at all, in the documents they have reviewed in connection with that issue.

There were no federal search warrants, so there would be no applications in which target subjects would be identified. There was a local search warrant, but we don't have a copy because we don't have the SDFL file and we haven't asked Palm Beach county for theirs. Presumably we will get that at some point.

Maxwell was added to the caption of the FBI file at some point, and she does come up in some of the 302s (including the [REDACTED] and [REDACTED] interviews in a manner we're now familiar with). That said, we have the FBI file, including all of their 302s, and we plan to produce those.

I think the proposal to get the physical file from SDFL makes sense and is manageable. We'll have to work through how to do that, but OPR has at least some of that material which we could get quickly and start with (including the pros memo), and once we figure out how to get the rest, 24 boxes of material is a doable project.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, July 31, 2020 3:17 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE:

Thanks – yes, having an understanding of how (if at all) Maxwell fits into the Florida evidence and investigation (beyond just the simple view that she wasn't the focus) would be helpful.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, July 31, 2020 11:14 AM
To: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE:

Asking the team to look into this. We don't have their pros memo (although OPR does and if we wanted to make a more targeted ask, we could conceivably start with that). We do have the one (state) search warrant application for the Palm Beach residence, team will check that now. Team is not aware of any other search warrant applications done as part of the SDFL investigation, but will take a look to confirm. We also have the grand jury testimony and I'm asking team to confirm that Maxwell was not mentioned in that testimony.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, July 31, 2020 10:55 AM
To: [REDACTED] (USANYS) <[REDACTED]>
Subject:

Do you know, or can you find out, whether Maxwell was identified as a target / subject / target subject or whatever the lingo may have been in any warrants or other materials from the SDFL case, to the extent we know?

[REDACTED]
*Counsel to the Acting U.S. Attorney
United States Attorney's Office
Southern District of New York*
[REDACTED]