

**From:** "[REDACTED] (USANYS)" <[REDACTED]>

**To:** "[REDACTED] (USANYS)" <[REDACTED]>

**Subject:** FW: Case blurbs for transition team

**Date:** Wed, 30 Dec 2020 19:04:37 +0000

**Attachments:** Transition\_Team\_Write\_Up\_v3.docx

---

Here is a revised version. Thanks.

---

**From:** [REDACTED] (USANYS) <[REDACTED]>

**Sent:** Wednesday, December 30, 2020 2:00 PM

**To:** [REDACTED] (USANYS) <[REDACTED]>

**Cc:** [REDACTED] (USANYS) <[REDACTED]>

**Subject:** RE: Case blurbs for transition team

[REDACTED]

Here is a revised version addressing your comments and [REDACTED] comments.

Thanks,

[REDACTED]

---

**From:** [REDACTED] (USANYS) <[REDACTED]>

**Sent:** Wednesday, December 30, 2020 10:50 AM

**To:** [REDACTED] (USANYS) <[REDACTED]>

**Cc:** [REDACTED] (USANYS) <[REDACTED]>

**Subject:** RE: Case blurbs for transition team

Thanks, [REDACTED]. I tried to shorten the description a bit (please see the attached) but I'm told that the description should only contain public information (i.e., what could be gleaned from the public docket and press announcements). Can you please look it over and send me back a revised version. Also, if you think that I removed anything that is critical please reinsert it.

---

**From:** [REDACTED] (USANYS) <[REDACTED]>

**Sent:** Tuesday, December 29, 2020 10:34 PM

**To:** [REDACTED] (USANYS) <[REDACTED]>

**Cc:** [REDACTED] (USANYS) <[REDACTED]>

**Subject:** RE: Case blurbs for transition team

[REDACTED]

Attached is a draft of the Purdue write up. Please let us know if you have any edits or questions.

Thanks,

[REDACTED]

---

**From:** [REDACTED] (USANYS) <[REDACTED]>

**Sent:** Tuesday, December 29, 2020 5:31 PM

To: [REDACTED] (USANYS) <[REDACTED]>  
Cc: [REDACTED] (USANYS) <[REDACTED]>  
Subject: RE: Case blurbs for transition team

Sure.

---

From: [REDACTED] (USANYS) <[REDACTED]>  
Sent: Tuesday, December 29, 2020 4:51 PM  
To: [REDACTED] (USANYS) <[REDACTED]>  
Cc: [REDACTED] (USANYS) <[REDACTED]>  
Subject: Re: Case blurbs for transition team

Thanks! Can we go longer? There's a lot to explain.

On Dec 29, 2020, at 4:46 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Just passing this along for the Perdue description.

---

From: [REDACTED] (USANYS) <[REDACTED]>  
Sent: Tuesday, December 29, 2020 4:45 PM  
To: [REDACTED] (USANYS) <[REDACTED]>  
Cc: [REDACTED] (USANYS) <[REDACTED]>  
Subject: Case blurbs for transition team

In case it's helpful for your formatting of the Purdue blurb, I've pasted below the current drafts of the two Criminal Division case write ups we've prepared for the transition team. Thanks!

**Case name:** *United States v. Turkiye Halk Bankasi AS, a/k/a "Halkbank"*

**Docket number:** S6 15 Cr. 867 (RMB)

**Brief description of the charges/claims:** In October 2019, USAO-SDNY charged Halkbank with fraud, money laundering, and sanctions offenses related to the bank's participation in a multibillion-dollar scheme to evade U.S. sanctions on Iran. As set forth in the indictment, an investigation by USAO-SDNY and the FBI revealed that Halkbank and its officers, agents, and co-conspirators directly and indirectly used money service businesses and front companies in Iran, Turkey, the United Arab Emirates, and elsewhere to violate and to evade and avoid prohibitions against Iran's access to the U.S. financial system, restrictions on the use of proceeds of Iranian oil and gas sales, and restrictions on the supply of gold to the Government of Iran and to Iranian entities and persons. Halkbank knowingly facilitated the scheme, participated in the design of fraudulent transactions intended to deceive U.S. regulators and foreign banks, and lied to U.S. regulators about Halkbank's involvement. USAO-SDNY previously tried and convicted Halkbank's former Deputy General Manager of International Banking at Halkbank for his participation in the scheme.

**Current case status:** Trial is scheduled for May 2021. On December 23, 2020, the Second Circuit stayed proceedings in the district court pending expedited resolution of Halkbank's mandamus petition challenging the district court's denial of a motion to dismiss pursuant to the Foreign Sovereign Immunities Act.

**Link to most recent press release (if applicable):** <https://www.justice.gov/usao-sdny/pr/turkish-bank-charged-manchattan-federal-court-its-participation-multibillion-dollar>

**Case name:** *United States v. Ghislaine Maxwell*

**Docket number:** 20 Cr. 330 (AJN)

**Brief description of the charges/claims:** In July 2020, USAO-SDNY charged Maxwell in a six-count indictment with facilitating the sexual abuse of three minor victims by Jeffrey Epstein between approximately 1994 and 1997. The charges resulted from a multi-year investigation by the USAO-SDNY and the FBI into Jeffrey Epstein and his co-conspirators, including Maxwell. Maxwell played a critical role in the scheme by helping to identify, entice, and groom

minor girls to engage in sex acts with Epstein. Her presence as an adult woman normalized Epstein's abusive behavior, and she took part in at least some acts of sexual abuse. Maxwell and Epstein enticed and caused minor victims to travel to Epstein's residences in different states, which Maxwell knew and intended would result in their grooming for and subjection to sexual abuse, resulting in charges related to the enticement and transportation of minors to participate in illegal sex acts, and conspiracy to do the same, in violation of 18 U.S.C. § 2422, 2423, and 371. In a later effort to cover up her crimes, Maxwell lied under oath during a civil deposition, including when asked about her interactions with minor girls, resulting in two perjury charges, in violation of 18 U.S.C. § 1623.

**Current case status:** Maxwell has been detained since her arrest, and the Court has denied two separate bail motions, most recently as of December 28, 2020. Trial is scheduled for July 2021, and pretrial motions are due in January 2021.

**Link to most recent press release (if applicable):** <https://www.justice.gov/usao-sdny/pr/ghislaine-maxwell-charged-manhattan-federal-court-conspiring-jeffrey-epstein-sexually> .