

**From:** "[REDACTED]" <[REDACTED]>

**To:** "[REDACTED]" <[REDACTED]>

**Subject:** t/c with counsel for Bill Richardson, re: JE case

**Date:** Sun, 18 Aug 2019 21:12:39 +0000

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t/c with Jeff Brown, counsel to Bill Richardson, former governor of New Mexico

- received call approximately 17:02, call lasted approximately four minutes
- calling in connection with [REDACTED] allegation / testimony released in the civil papers
- deposition says, in sum and substance, was ordered to, but doesn't appear to say that anything actually happened
- counsel asked what category Richardson is in w/r/t our investigation – witness / subject / target
  - o I advised that in the general sense, anyone who we don't have reason to know has no exposure (witness), or believe does have exposure (target), would be a subject; more specifically here, we do not currently intend to subpoena or request to speak with Richardson based on our investigation at this time, and there are not specific allegations that we need to hear his side of at this time.
  - o I further advised that it would be helpful to get an attorney proffer about any knowledge or information pertaining to Epstein that Richardson might have; counsel said he believed that would be possible to do but he expected client would not have any knowledge regarding the charged conduct
- I advised that if in the course of our investigation we did want to speak with Richardson, or inquire for additional information, we would be in touch with counsel

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