From: "[redacted])" <[redacted]>
To: "[redacted] ([redacted])" <[redacted]>
Subject: RE: Decision on motion to strike
Date: Sun, 07 Nov 2021 15:12:38 +0000

Will do!

From: [redacted] ([redacted]) <[redacted]>
Sent: Sunday, November 7, 2021 10:06 AM
To: [redacted]) <[redacted]>
Subject: RE: Decision on motion to strike

Let's put this language in our letter! Maybe in the paragraph I added at the end about checking ID's at the door? I think this is an important point.

First, as the Indictment itself makes clear, the defendant's and Epstein's interactions with Minor Victim-3 were **part of a broader scheme and agreement to entice and transport minor victims with intent to commit illegal sex acts. Even if Minor Victim-3 was not ultimately transported as a minor, the core of a conspiracy is an agreement to engage in criminal conduct; there is no legal requirement that the agreed upon crime be completed.**

Because a conspiracy does not require the completion of a substantive crime, it does not matter whether Minor Victim-3 was ever in fact transported as a minor, or whether the elements of the substantive crimes of transportation an enticement are satisfied as to her. *See Salinas*, 522 U.S. at 65.

From: [redacted]) <[redacted]>
Sent: Sunday, November 7, 2021 10:00 AM
To: [redacted] ([redacted]) <[redacted]>
Subject: RE: Decision on motion to strike

Sure thing. The discussion starts on page 184 of the PDF (157 of the pagination).

From: [redacted] ([redacted]) <[redacted]>
Sent: Sunday, November 7, 2021 9:58 AM
To: [redacted]) <[redacted]>
Subject: RE: Decision on motion to strike

thanks, would you mind also sending me our brief on this?

From: [redacted]) <[redacted]>
Sent: Sunday, November 7, 2021 9:49 AM
To: [redacted] ([redacted]) <[redacted]>
Subject: Decision on motion to strike

Hey [redacted],

Attached is Judge Nathan's first decision denying the pretrial motions. The (very brief) discussion of MV-3 starts on page 26.

Thanks,
[redacted]

[redacted]
Assistant United States Attorney
Southern District of New York
1 Saint Andrews Plaza
New York, New York 10007
[redacted]
[redacted]