

From: "██████████)" <██████████>
To: "██████████)" <██████████>, "██████████)" <██████████>
Subject: RE: █████ memo
Date: Tue, 07 Apr 2020 19:56:38 +0000

Thanks for coordinating with them—and this summary looks great to me.

From: █████ <██████████>
Sent: Tuesday, April 7, 2020 3:48 PM
To: █████ <██████████>
Cc: █████ <██████████>
Subject: RE: █████ memo

I spoke with █████. Bottom line, she thinks it's a close call between making █████ take a felony plea and declining to prosecute, but she ultimately comes down in favor of a felony plea. She does not think we should charge █████ with sex trafficking.

██████ asked me to send her and █████ a draft of the summary of their views that we plan to send up to the brass. Below is what I'd propose:

Our Office's Human Trafficking Coordinators have reviewed the prosecution team's Update Memo as well as █████ submission, and are aware of the details of the Epstein investigation. In the Coordinators' experience, our Office ordinarily would decline to prosecute a victim-participant like █████ absent certain aggravating factors, such as the use of violence by the victim-participant on others, or the victim-perpetrator continuing to run a sex trafficking operation in the absence of her abuser. Because those aggravating factors are not present here, the Coordinators believe it is a very close call between declining to prosecute █████ and requiring █████ to enter a felony plea. Ultimately, though, the Coordinators support a felony plea disposition along the lines set forth in █████ submission given the unique circumstances of her case. In particular, the Coordinators believe that the large number of underage victims, together with █████ obtrusive conduct, warrant a felony plea. The Coordinators support such a disposition, in part, because a plea will allow victims to gain a sense of closure and to have their voices heard at sentencing if they choose. Given the mitigating factors presented in █████ submission—most notably the sexual abuse she suffered at Epstein's hands—the Coordinators do not believe that our Office should charge █████ with sex trafficking.

What do you think?

From: █████ <██████████>
Sent: Monday, April 6, 2020 11:59 PM
To: █████ <██████████>
Cc: █████ <██████████>
Subject: RE: █████ memo

Great thanks

From: █████ <██████████>
Sent: Monday, April 06, 2020 23:11
To: █████ <██████████>

Cc: [REDACTED] <[REDACTED]>
Subject: Re: [REDACTED] memo

I have a call tentatively scheduled with [REDACTED] tomorrow afternoon. [REDACTED] has not confirmed whether she's joining.

On Apr 6, 2020, at 10:42 PM, [REDACTED] <[REDACTED]> wrote:

Have we heard anything from [REDACTED] and/or [REDACTED]? [REDACTED] comments ask about that specifically so wanted to check.

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