

From: "████████>"
To: "████████>"
Subject: FW: victim notification
Date: Wed, 09 Dec 2020 00:00:15 +0000

This looks good to me, with one suggestion below.

From: █████
Sent: Tuesday, December 8, 2020 6:46 PM
To: █████ (USANYS) ; █████ (USANYS)
Cc: █████ ; █████ (USANYS)
Subject: victim notification
████████

Below is the text we would propose for a victim notification letter. We would plan to use VNS, and the letter is styled accordingly. One note: the letter does not expressly reference the CVRA, because other DOJ components are currently litigating whether the CVRA applies in the context of a pre-indictment plea (the issue is currently before the Eleventh Circuit, *en banc*). Since we're giving notice here regardless of whether it's required, because that's the right thing to do, there's no need to include language that touches on the CVRA issue.

Thanks,
████████

Dear [Name]:

Re: [Epstein case name auto generated from the VNS system]

The enclosed information is provided by the United States Department of Justice Victim Notification System (VNS). As a victim witness professional, my role is to assist you with information and services during this case. I am contacting you because you were identified by law enforcement as a victim or potential victim during the investigation of the above criminal case.

In connection with the above-referenced investigation, the United States Attorney's Office for the Southern District of New York intends to issue a felony plea offer to an individual named █████, who is also known as █████. █████ is currently not charged with any criminal offenses, and this office has not yet extended any plea offer to her. If you have any questions about the felony plea offer, or if you wish to inform the prosecutor of your views regarding a potential plea agreement, please contact the prosecutors in this case by [date]. This office will not issue a plea offer before [date], in order to provide time for victims to confer with the prosecutors in this case.

The prosecutors for this case are █████, █████, and █████. If you would like to arrange a time to speak with the prosecutors in this case, please either ask your attorney to contact the prosecutors directly, or if you are not represented by counsel, please contact █████, Victim / Witness Coordinator, at █████.

If a plea hearing is scheduled in this case, we will notify you of available information as soon as practicable.

Sincerely,

████████
Acting United States Attorney

████████
Victim Witness Coordinator

████████
Assistant United States Attorney
Southern District of New York

████████
New York, NY 10007

EFTA00027440