

From: "██████████)" <██████████>
To: "██████████ (USANYS)" <██████████>, "██████████)" <██████████>
"██████████ (USANYS)" <██████████>
Cc: "██████████ (USANYS)" <██████████>

Subject: RE: Epstein Victim Impact Statements

Date: Wed, 30 Oct 2019 17:37:40 +0000

██████████ and I were doing parallel work and she beat me to it, but in case it's helpful, in addition to the individuals who spoke or were present for their letters being read (10 identified by name and 7 Jane Does), Brad Edwards stated that he had 15 clients present (eight of whom spoke) and "at least 20 more who didn't make this hearing today for a multitude of reasons." (Tr. at 29). And I similarly don't recall anyone who expressed directly to us that they wanted to attend but couldn't, with the exception of █████ as █████ mentioned.

Also to the extent it's helpful, the Tuesday, August 27 hearing was ordered on Wednesday, August 21, and that day we posted the following general notification to the case page on our Office's website:

August 21, 2019 update:

On August 21, 2019, a hearing was ordered by the Court in the case of *United States v. Jeffrey Epstein*, 19 Cr. 490 (RMB). The hearing is in connection with the *nolle prosequi* order proposed to the Court on August 19, 2019, by the United States Attorney, following the death of defendant Jeffrey Epstein. At the hearing, counsel for the victims and the victims will be heard, if they wish to be. The hearing is scheduled for Tuesday, August 27, 2019, at 10:30 a.m. before the Honorable Richard M. Berman, United States District Judge for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, in Courtroom 17B.

<https://www.justice.gov/usao-sdny/programs/victim-witness-services/united-states-v-jeffrey-epstein-19-cr-490-rmb>

And I believe the notification from █████ went out that afternoon as well.

From: █████ (USANYS) <██████████>
Sent: Wednesday, October 30, 2019 13:24
To: █████ <██████████>; █████ <██████████>;
██████████ <██████████>; █████ (USANYS) <██████████>
Cc: █████ (USANYS) <██████████>
Subject: RE: Epstein Victim Impact Statements

Thanks very much. I agree on the third question. If we could come up with a number on the first, with the caveat that it is an approximation, that would be great.

From: █████ <██████████>
Sent: Wednesday, October 30, 2019 1:23 PM
To: █████ (USANYS) <██████████>; █████ <██████████>;
██████████ <██████████>; █████ (USANYS) <██████████>
Cc: █████ (USANYS) <██████████>
Subject: RE: Epstein Victim Impact Statements

For the first question, the AUSAs contacted the attorneys we were aware of who represented victims to tell them that their clients were welcome to attend and to make a statement. I believe [REDACTED] also sent out notifications, and hopefully she can tell us how many she sent.

For the second question, based on my review of the transcript (attached), a total of 17 victims were present at the hearing and either spoke at the hearing or had someone read a statement for them. An additional 7 did not attend the hearing but had someone else speak for them or read a statement from them. It is possible there were others present who were not referenced on the record.

I don't think we can answer the third question. I don't recall anyone off the top of my head who wanted to attend but was unable to, but it's possible there were some in that position.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Wednesday, October 30, 2019 1:06 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;
[REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: FW: Epstein Victim Impact Statements
Importance: High

Are we able to answer these questions for ODAG quickly? I am sure we can answer the second, and maybe the first – not sure about the third.

From: [REDACTED] (ODAG) <[REDACTED]>
Sent: Wednesday, October 30, 2019 12:53 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (ODAG) <[REDACTED]>
Subject: Epstein Victim Impact Statements
Importance: High

[REDACTED],

The Petitioner in the Epstein CVRA case has filed an appeal to the 11th Circuit. One of their issues is the District Court's refusal to hold a hearing allowing the Epstein victims to "have their day in court." The Court's ruling is, in part, on the basis that a hearing held in SDNY satisfied this request. The Petitioner has alleged that not all of the Epstein victims who wanted to speak were able to do so at the New York hearing because they did not have sufficient notice and were unable to travel to NY.

Can your office provide us some details about the following: 1) how many victims were contacted about making a victim impact statement; 2) how many victims were able to travel and make an in-person victim impact statement; and 3) how many victims indicated they wanted to make a victim impact statement but were unable to do so given the notice/timing of the hearing?

Please provide as much of this information as possible today. I'm very sorry for the quick turnaround but the Department's response to the mandamus petition is due tomorrow.

I really appreciate your assistance.

[REDACTED]
National Coordinator for Child Exploitation Prevention & Interdiction
Office of the Deputy Attorney General
Direct: [REDACTED]

