

**From:** "████████ (USANYS)" <████████>  
**To:** "████████ (USANYS)" <████████>  
**Subject:** RE:  
**Date:** Fri, 26 Jun 2020 15:34:35 +0000

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I know this is a sensitive subject with the team, but do you think we have enough in the indictment to support the interstate travel component necessary to both sets of charges? We certainly allege that the victims were abused in multiple states which give rise to an inference of travel, but in terms of the enticing/causing to travel, this is about all we have:

GHISLAINE MAXWELL, the defendant, and Jeffrey Epstein enticed and caused minor victims to travel to Epstein's residences in different states, which MAXWELL knew and intended would result in their grooming for and subjection to sexual abuse.

That is probably sufficient to survive a motion to dismiss, but do you think it is worth pushing the team to try to add more?

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**From:** █████ (USANYS) <████████>  
**Sent:** Friday, June 26, 2020 10:30 AM  
**To:** █████ (USANYS) <████████>  
**Subject:**

Should we actually be including █████ name in the indictment as we do?