

UNITED STATES DISTRICT COURT

for the
Southern District of New York

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

See Attached Affidavit and its Attachment A

Case No. 19 MAG 6439
19 Cr. 490 (RMB)

APPLICATION FOR A SEARCH AND SEIZURE WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

located in the Southern District of New York, there is now concealed (identify the person or describe the property to be seized):

See Attached Affidavit and its Attachment A

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section(s)

Offense Description(s)

18 U.S.C. §§ 1591 & 371 Sex trafficking of minors; sex trafficking conspiracy

The application is based on these facts:

See Attached Affidavit and its Attachment A

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of ____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Sworn to before me and signed in my presence.

Date: 7-11-19

City and state: New York, NY

Applicant's signature

Special Agent [REDACTED] FBI

Printed name and title

Judge's signature

Hon. Henry Pitman, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

19MAG 6439

In the Matter of the Application of the United States Of America for a Search and Seizure Warrant for the Premises Known and Described as 9 East 71st Street, New York, New York and Any Closed Containers/Items Contained Therein

TO BE FILED UNDER SEAL

Agent Affidavit in Support of
Application for Search and Seizure
Warrant

SOUTHERN DISTRICT OF NEW YORK) ss.:

[REDACTED], being duly sworn, deposes and says:

I. Introduction

A. Affiant

1. I have been a Special Agent with the Federal Bureau of Investigation ("FBI") since 2017. As such, I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I have been employed by the FBI for approximately two years, and I am currently assigned to investigate violations of criminal law relating to the sexual exploitation of children. I have gained expertise in this area through classroom training and daily work related to these types of investigations. As part of my responsibilities, I have been involved in the investigation of sex trafficking cases, and have been involved in search warrants for physical premises.

2. I make this Affidavit in support of an application pursuant to Rule 41 of the Federal Rules of Criminal Procedure for a second warrant to search the premises specified below (the "Subject Premises") for the purpose of seizing the items and information described in Attachment A. This affidavit is based upon my personal knowledge; my review of documents and other evidence; and my conversations with other law enforcement personnel. Because this

affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

B. The Subject Premises

3. The Subject Premises are particularly described as a multi-story, single-family residence located at 9 East 71st Street, New York, New York, and include all locked and closed containers found therein. As detailed further herein, the Subject Premises is believed to be owned, possessed, and controlled by JEFFREY EPSTEIN, a target subject of this investigation. A photograph of the front entrance to the Subject Premises is included below:



C. The Target Subject and the Subject Offenses

4. The Target Subject of this investigation is JEFFREY EPSTEIN.
5. For the reasons detailed below, I believe that there is probable cause to believe that the Subject Premises contain evidence, fruits, and instrumentalities of violations of Title 18, United

States Code, Section 1591 (sex trafficking of minors); and Title 18, United States Code, Section 371 (sex trafficking conspiracy) (the "Subject Offenses") by the Target Subject.

II. Probable Cause and the First Warrant

A. Probable Cause Regarding the Target Subject's Commission of the Subject Offenses

6. On or about July 2, 2019, a grand jury in this District returned an Indictment charging JEFFREY EPSTEIN with the Subject Offenses. A copy of the Indictment is attached hereto as Exhibit A and is incorporated by reference.

B. Probable Cause Justifying Search of the Subject Premises

The Indictment and Victim-1

7. As set forth in Exhibit A, from at least in or about 2002, up to and including at least in or about 2005, JEFFREY EPSTEIN sexually abused multiple minor girls in the Southern District of New York and elsewhere. During that time and continuing to the present, EPSTEIN possessed and controlled the Subject Premises, which is described in Exhibit A as "the New York Residence."

8. As further set forth in paragraphs 8 through 10 of Exhibit A, from at least in or about 2002, up to and including at least in or about 2005, EPSTEIN sexually abused numerous minor victims at the Subject Premises. In particular, and as alleged in the Indictment, when a victim arrived at the Subject Premises, she would be escorted to a room inside the Subject Premises with a massage table, where she would perform a massage on EPSTEIN. The victims, who were as young as 14 years of age, were told by EPSTEIN or other individuals to partially or fully undress before beginning the "massage." During the encounter, EPSTEIN would escalate the nature and scope of physical contact with his victim to include, among other things, sex acts such as groping and direct and indirect contact with the victims' genitals. EPSTEIN typically would also

masturbate during these sexualized encounters, ask victims to touch him while he masturbated, and touch victims' genitals with his hands or with sex toys. Following each encounter, EPSTEIN or one of his employees or associates paid the victim in cash.

9. As set forth in paragraphs 12 through 13 of Exhibit A, to further facilitate his ability to abuse minor girls in New York, JEFFREY EPSTEIN asked and enticed certain of his victims to recruit additional minor girls to perform "massages" and similarly engage in sex acts with EPSTEIN. When a victim would recruit another minor girl for EPSTEIN, he paid both the victim-recruiter and the new victim hundreds of dollars in cash. EPSTEIN knew that his victims were underage, including because certain victims told him their age.

10. One of the victims identified in paragraph 22 of Exhibit A is Victim-1. As part of the FBI's investigation of EPSTEIN, other law enforcement officers have interviewed Victim-1.¹ I know from my conversations with other law enforcement officers who have interviewed Victim-1, that Victim-1 has provided the following information, in substance and in part:

a. Between approximately 2002 and 2005, EPSTEIN sexually abused Victim-1 on multiple occasions in the Subject Premises. This sexual abuse all occurred when Victim-1 was under the age of 18.

b. During that same period, Victim-1 observed multiple floors of the Subject Premises and numerous individual rooms within the Subject Premises. Victim-1 has provided detailed

¹ In meetings with the Government, Victim-1 has disclosed that, approximately a decade ago, she committed marriage fraud in order to obtain a green card and, subsequently, U.S. citizenship. She has also disclosed personal substance abuse, primarily involving the abuse of prescription drugs, during various periods between the early 2000s and 2019. Victim-1 has also disclosed having worked for approximately a year at a "happy-ending" massage parlor, performing paid sex acts. Victim-1 is currently pursuing a civil damages claim against EPSTEIN for his sexual abuse of her. Information provided by Victim-1 has proven reliable and has been corroborated by independent evidence, including documents and records obtained during the investigation and the accounts of other victims whom Victim-1 has never met.

descriptions of certain aspects of the interior of the Subject Premises, including Victim-1's memory of specific details regarding the layout, furnishings, decorations, and floor pattern of various areas within the Subject Premises.

The July 6, 2019 Search Warrant of the Subject Premises

11. On or about July 6, 2019, the Honorable Barbara Moses, United States Magistrate Judge, signed a search warrant authorizing a search of the Subject Premises. The search warrant is attached as Exhibit B and incorporated by reference herein.

12. At approximately 6 p.m. on or about July 6, 2019, law enforcement officers (the "Search Team") commenced executing the search warrant at the Epstein Residence.

13. Based on the Search Team's observations during an initial search of the Epstein Residence, at approximately 7 p.m., the Search Team stopped the search and froze the scene in order to seek a new search warrant.

14. On or about July 7, 2019, the Honorable Barbara Moses, United States Magistrate Judge, signed a search warrant authorizing a search of the Epstein Residence (the "Second Warrant"). The search warrant is attached as Exhibit B, and incorporated by reference herein. At approximately 2:30 a.m., the Search Team resumed the search, and commenced searching pursuant to the Second Warrant.

15. Based on my conversations with members of the search team, I have learned the following:

a. The Search Team observed a number of computing devices, including computers and tablet devices, throughout the Subject Premises. The Search Team did not seize any devices from the Subject Premises.

b. Inside a safe in a closet on the third floor, the Search team discovered and seized, among other items, several binders containing sleeves of compact discs, most of which are labeled with handwriting. In total, the binders contain dozens of compact discs. One disc is marked "Young-[REDACTED]" Another disc is marked "Nudes 00-24." Another is marked "Misc. Nudes." Yet another is marked "Girl Pics Nude." Some discs contain the word "Zorro" or "LSJ." For example, one disc is marked "Dana Zorro Pics." Based on my conversations with law enforcement agents who have participated in this investigation, I believe the name "Zorro" refers to Zorro Ranch, EPSTEIN's property in New Mexico, and the name LSJ refers to Little Saint James, EPSTEIN's property in the U.S. Virgin Islands. The majority of the discs contain titles that include female names. Some of the discs in the binders seized by the Search Team have titles that appear to refer to trips or vacations.²

c. In the drawer of a dresser in a room on the Fifth floor of the Epstein residence, the Search team discovered and seized, among other items, a shoebox (the "Shoebox") containing numerous compact discs. The majority of the discs are labeled, in handwriting, with female names. One disc is marked "Thai Massage." Another disc is marked "Blonde Girl Photo Shoot." Yet another disc is marked "Misc. Girls Nude/Dinner--Scientists." The discs in the Shoebox were seized by the Search Team. In another drawer of that same dresser, the Search Team discovered loose polaroid photographs depicting young, nude females who, based on the training and experience of law enforcement officers who observed them, appear to be teenagers. In that same drawer, the Search Team discovered a folder marked, in handwriting, [REDACTED] which contained

² During the search, the Search Team left behind binders that contained discs, where the majority of the discs were labeled in a manner that did not appear to refer to girls or nudes. Accordingly, this application does not seek authorization to search those compact discs, which were left at the Epstein Residence.

photographs, including nude and sexually suggestive photographs of a young girl who, based on the training and experience of law enforcement officers who observed them, appears to be younger than 18. The folder contains other nude photographs of young girls who appear to be teenagers, based on my training and experience. Inside the folder is a compact disc marked "[REDACTED] at LJS 6/03" (the "[REDACTED] Disc"), which was seized by the Search Team.

d. In a closet on the Fifth Floor of the Epstein Residence, the Search Team discovered, among other items, a box marked "women/old photos." The box contained, among other items, approximately seven compact discs, which are labeled with hand-written titles. One disc is marked "nudes 00-24." Another is labeled "Photographer-[REDACTED] 03" The remaining discs contain titles that include female names. All of the foregoing discs were seized by the Search Team.

e. In that same closet, the Search Team discovered numerous black binders containing what appear to be print outs of digital photographs (with file names underneath) and compact discs. The Search Team seized approximately ten binders (the "Seized Binders")³ which appeared to contain, among other photographs, photographs of nude or partially nude young girls, some of which are in sexually suggestive poses. Based on the training and experience of law enforcement officers who observed them, some of the young girls appear to be teenagers, some of whom appear to be under the age of 18. The Seized Binders also include photographs of what appear to be family functions, events, and travel.⁴

³ The Search Team did not seize the remaining binders.

⁴ During the search, the Search Team took a narrowly tailored approach to the warrant, and accordingly left behind binders that contained discs where the majority of the discs were labeled in a manner that did not appear to refer to girls or nudes. However, given the materials discovered on the discs seized from the Subject Premises, as discussed below, this application seeks a warrant to seize any and all computing devices and media storage devices, including but not limited to materials that the Search Team did not seize during the execution of the Second Warrant.

f. The compact discs seized by the Search Team and described in paragraphs 15(a)-(d) are currently stored within the Southern District of New York in containers marked with FBI evidence numbers 15, 16, 17, 18, and 22 (the "Seized Discs").

16. On or about July 7, 2019, the Honorable Barbara Moses, United States Magistrate Judge, signed a search warrant to search and seize electronic media stored on the Seized Discs (the "Compact Disc Search Warrant"). The search warrant is attached as Exhibit C, and incorporated by reference herein.

17. Based on my conversations with law enforcement agents who have reviewed the Seized Discs pursuant to the Compact Disc Search Warrant (the "Reviewing Agents"), I have learned the following:

a. The discs contain approximately thousands of nude or partially nude photographs of girls or young women, many of which are in sexually suggestive poses. Based on my conversations with the Reviewing Agents, who have particular training and experience relating to child erotica and visual depictions of children in child exploitation cases, I have learned that the Reviewing Agents believe that many of the nude or partially nude images they have reviewed appear to depict girls under the age of 18. Moreover, many of the photographs appear to be labeled with file names that suggest the photographs depict these girls at properties associated with JEFFREY EPSTEIN. For example, some file names are marked "Zorro" or "LSJ."

b. Among the photographs on the Seized Discs, the Reviewing Agents identified partially-nude photographs of a young girl, labeled with an associated name that matched a particular individual ("Individual-1"). After identifying those photographs, the Government was advised by Individual-1's counsel that Individual-1 recalls the month and year during which she

believes those partially-nude photographs were taken, and also the location where they were taken, and that she was 17 years old at the time.

18. Based on my training and experience, given that media storage devices seized from the Subject Premises appear to contain nude and semi-nude images of underage girls, and because there is probable cause to believe that Epstein engaged in sex trafficking of underage girls, there is probable cause to believe that computers and other storage media in the Subject Premises—*i.e.*, the same residence in which the Seized Discs were located—will contain evidence of the Subject Offenses. In my training and experience, individuals who store nude and/or sexually suggestive photographs of minors on compact discs or other external storage devices typically access those images from computers and other electronic devices in order to view those images, and individuals who store such materials on compact discs typically store similar files on other computing devices and storage devices.

19. According to recent media reporting, Epstein has hosted one or more individuals at the Subject Premises as recently as a few months ago, as of July 2019, and one individual has been quoted in recent reporting stating that the individual was present with Epstein in the Subject Premises during that time. Additionally, according to international flight records that I have reviewed, a private jet owned and utilized by Epstein has traveled to the tri-state area at least in or about April 2019, May 2019, June 2019, and July 2019. Accordingly, there is probable cause to believe that Epstein recently has been present at the Subject Premises.

III. Procedures for Searching ESI

A. Review of ESI

20. Law enforcement personnel (including, in addition to law enforcement officers and agents, and depending on the nature of the ESI and the status of the investigation and related proceedings, attorneys for the government, attorney support staff, agency personnel assisting the

government in this investigation, and outside technical experts under government control) will create a forensic image of the Subject Devices (if practicable) and review the ESI contained therein for information responsive to the warrant.

21. In conducting this review, law enforcement personnel may use various techniques to determine which files or other ESI contain evidence or fruits of the Subject Offenses. Such techniques may include, for example:

- surveying directories or folders and the individual files they contain (analogous to looking at the outside of a file cabinet for the markings it contains and opening a drawer believed to contain pertinent files);
- conducting a file-by-file review by “opening” or reading the first few “pages” of such files in order to determine their precise contents (analogous to performing a cursory examination of each document in a file cabinet to determine its relevance);
- “scanning” storage areas to discover and possibly recover recently deleted data or deliberately hidden files; and
- performing electronic keyword searches through all electronic storage areas to determine the existence and location of data potentially related to the subject matter of the investigation⁵; and
- reviewing metadata, system information, configuration files, registry data, and any other information reflecting how, when, and by whom the computer was used.

22. Law enforcement personnel will make reasonable efforts to restrict their search to data falling within the categories of evidence specified in the warrant. Depending on the circumstances, however, law enforcement personnel may need to conduct a complete review of all the ESI from seized devices or storage media to evaluate its contents and to locate all data responsive to the warrant.

⁵ Keyword searches alone are typically inadequate to detect all relevant data. For one thing, keyword searches work only for text data, yet many types of files, such as images and videos, do not store data as searchable text. Moreover, even as to text data, there may be information properly subject to seizure but that is not captured by a keyword search because the information does not contain the keywords being searched.

B. Return of ESI

23. If the Government determines that the electronic devices are no longer necessary to retrieve and preserve the data, and the devices themselves are not subject to seizure pursuant to Federal Rule of Criminal Procedure 41(c), the Government will return these items, upon request. Computer data that is encrypted or unreadable will not be returned unless law enforcement personnel have determined that the data is not (i) an instrumentality of the offense, (ii) a fruit of the criminal activity, (iii) contraband, (iv) otherwise unlawfully possessed, or (v) evidence of the Subject Offenses.

IV. Conclusion and Ancillary Provisions

24. Based on the foregoing, given that media storage devices seized from the Subject Premises appear to contain evidence of the Subject Offenses, I respectfully submit there is probable cause to believe that evidence of the Subject Offenses, and in particular the items described in Attachment A, will be located within the Subject Premises and therefore request the court to issue a warrant to seize the items and information specified in Attachment A to this affidavit and to the Search and Seizure Warrant.



Special Agent
Federal Bureau of Investigation

Sworn to before me on
July 11, 2019

S/Henry Pitman
THE HONORABLE HENRY B. PITMAN
UNITED STATES MAGISTRATE JUDGE

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JEFFREY EPSTEIN,

Defendant.

SEALED
INDICTMENT

19 Cr.

19 CRIM 490

COUNT ONE

(Sex Trafficking Conspiracy)

The Grand Jury charges:

OVERVIEW

1. As set forth herein, over the course of many years, JEFFREY EPSTEIN, the defendant, sexually exploited and abused dozens of minor girls at his homes in Manhattan, New York, and Palm Beach, Florida, among other locations.

2. In particular, from at least in or about 2002, up to and including at least in or about 2005, JEFFREY EPSTEIN, the defendant, enticed and recruited, and caused to be enticed and recruited, minor girls to visit his mansion in Manhattan, New York (the "New York Residence") and his estate in Palm Beach, Florida (the "Palm Beach Residence") to engage in sex acts with him, after which he would give the victims hundreds of dollars in cash. Moreover, and in order to maintain and increase his supply of victims, EPSTEIN also paid certain of his victims to recruit additional girls to be similarly abused by EPSTEIN. In

this way, EPSTEIN created a vast network of underage victims for him to sexually exploit in locations including New York and Palm Beach.

3. The victims described herein were as young as 14 years old at the time they were abused by JEFFREY EPSTEIN, the defendant, and were, for various reasons, often particularly vulnerable to exploitation. EPSTEIN intentionally sought out minors and knew that many of his victims were in fact under the age of 18, including because, in some instances, minor victims expressly told him their age.

4. In creating and maintaining this network of minor victims in multiple states to sexually abuse and exploit, JEFFREY EPSTEIN, the defendant, worked and conspired with others, including employees and associates who facilitated his conduct by, among other things, contacting victims and scheduling their sexual encounters with EPSTEIN at the New York Residence and at the Palm Beach Residence.

FACTUAL BACKGROUND

5. During all time periods charged in this Indictment, JEFFREY EPSTEIN, the defendant, was a financier with multiple residences in the continental United States, including the New York Residence and the Palm Beach Residence.

6. Beginning in at least 2002, JEFFREY EPSTEIN, the defendant, enticed and recruited, and caused to be enticed and

recruited, dozens of minor girls to engage in sex acts with him, after which EPSTEIN paid the victims hundreds of dollars in cash, at the New York Residence and the Palm Beach Residence.

7. In both New York and Florida, JEFFREY EPSTEIN, the defendant, perpetuated this abuse in similar ways. Victims were initially recruited to provide "massages" to EPSTEIN, which would be performed nude or partially nude, would become increasingly sexual in nature, and would typically include one or more sex acts. EPSTEIN paid his victims hundreds of dollars in cash for each encounter. Moreover, EPSTEIN actively encouraged certain of his victims to recruit additional girls to be similarly sexually abused. EPSTEIN incentivized his victims to become recruiters by paying these victim-recruiters hundreds of dollars for each girl that they brought to EPSTEIN. In so doing, EPSTEIN maintained a steady supply of new victims to exploit.

The New York Residence

8. At all times relevant to this Indictment, JEFFREY EPSTEIN, the defendant, possessed and controlled a multi-story private residence on the Upper East Side of Manhattan, New York, i.e., the New York Residence. Between at least in or about 2002 and in or about 2005, EPSTEIN abused numerous minor victims at the New York Residence by causing these victims to be recruited to engage in paid sex acts with him.

9. When a victim arrived at the New York Residence, she typically would be escorted to a room with a massage table, where she would perform a massage on JEFFREY EPSTEIN, the defendant. The victims, who were as young as 14 years of age, were told by EPSTEIN or other individuals to partially or fully undress before beginning the "massage." During the encounter, EPSTEIN would escalate the nature and scope of physical contact with his victim to include, among other things, sex acts such as groping and direct and indirect contact with the victim's genitals. EPSTEIN typically would also masturbate during these sexualized encounters, ask victims to touch him while he masturbated, and touch victims' genitals with his hands or with sex toys.

10. In connection with each sexual encounter, JEFFREY EPSTEIN, the defendant, or one of his employees or associates, paid the victim in cash. Victims typically were paid hundreds of dollars in cash for each encounter.

11. JEFFREY EPSTEIN, the defendant, knew that many of his New York victims were underage, including because certain victims told him their age. Further, once these minor victims were recruited, many were abused by EPSTEIN on multiple subsequent occasions at the New York Residence. EPSTEIN sometimes personally contacted victims to schedule appointments at the New York Residence. In other instances, EPSTEIN directed

employees and associates, including a New York-based employee ("Employee-1"), to communicate with victims via phone to arrange for these victims to return to the New York Residence for additional sexual encounters with EPSTEIN.

12. Additionally, and to further facilitate his ability to abuse minor girls in New York, JEFFREY EPSTEIN, the defendant, asked and enticed certain of his victims to recruit additional girls to perform "massages" and similarly engage in sex acts with EPSTEIN. When a victim would recruit another girl for EPSTEIN, he paid both the victim-recruiter and the new victim hundreds of dollars in cash. Through these victim-recruiters, EPSTEIN gained access to and was able to abuse dozens of additional minor girls.

13. In particular, certain recruiters brought dozens of additional minor girls to the New York Residence to give massages to and engage in sex acts with JEFFREY EPSTEIN, the defendant. EPSTEIN encouraged victims to recruit additional girls by offering to pay these victim-recruiters for every additional girl they brought to EPSTEIN. When a victim-recruiter accompanied a new minor victim to the New York Residence, both the victim-recruiter and the new minor victim were paid hundreds of dollars by EPSTEIN for each encounter. In addition, certain victim-recruiters routinely scheduled these

encounters through Employee-1, who sometimes asked the recruiters to bring a specific minor girl for EPSTEIN.

The Palm Beach Residence

14. In addition to recruiting and abusing minor girls in New York, JEFFREY EPSTEIN, the defendant, created a similar network of minor girls to victimize in Palm Beach, Florida, where EPSTEIN owned, possessed and controlled another large residence, i.e., the Palm Beach Residence. EPSTEIN frequently traveled from New York to Palm Beach by private jet, before which an employee or associate would ensure that minor victims were available for encounters upon his arrival in Florida.

15. At the Palm Beach Residence, JEFFREY EPSTEIN, the defendant, engaged in a similar course of abusive conduct. When a victim initially arrived at the Palm Beach Residence, she would be escorted to a room, sometimes by an employee of EPSTEIN's, including, at times, two assistants ("Employee-2" and "Employee-3") who, as described herein, were also responsible for scheduling sexual encounters with minor victims. Once inside, the victim would provide a nude or semi-nude massage for EPSTEIN, who would himself typically be naked. During these encounters, EPSTEIN would escalate the nature and scope of the physical contact to include sex acts such as groping and direct and indirect contact with the victim's genitals. EPSTEIN would also typically masturbate during these encounters, ask victims

to touch him while he masturbated, and touch victims' genitals with his hands or with sex toys.

16. In connection with each sexual encounter, JEFFREY EPSTEIN, the defendant, or one of his employees or associates, paid the victim in cash. Victims typically were paid hundreds of dollars for each encounter.

17. JEFFREY EPSTEIN, the defendant, knew that certain of his victims were underage, including because certain victims told him their age. In addition, as with New York-based victims, many Florida victims, once recruited, were abused by JEFFREY EPSTEIN, the defendant, on multiple additional occasions.

18. JEFFREY EPSTEIN, the defendant, who during the relevant time period was frequently in New York, would arrange for Employee-2 or other employees to contact victims by phone in advance of EPSTEIN's travel to Florida to ensure appointments were scheduled for when he arrived. In particular, in certain instances, Employee-2 placed phone calls to minor victims in Florida to schedule encounters at the Palm Beach Residence. At the time of certain of those phone calls, EPSTEIN and Employee-2 were in New York, New York. Additionally, certain of the individuals victimized at the Palm Beach Residence were contacted by phone by Employee-3 to schedule these encounters.

19. Moreover, as in New York, to ensure a steady stream of minor victims, JEFFREY EPSTEIN, the defendant, asked and enticed certain victims in Florida to recruit other girls to engage in sex acts. EPSTEIN paid hundreds of dollars to victim-recruiters for each additional girl they brought to the Palm Beach Residence.

STATUTORY ALLEGATIONS

20. From at least in or about 2002, up to and including in or about 2005, in the Southern District of New York and elsewhere, JEFFREY EPSTEIN, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, sex trafficking of minors, in violation of Title 18, United States Code, Section 1591(a) and (b).

21. It was a part and object of the conspiracy that JEFFREY EPSTEIN, the defendant, and others known and unknown, would and did, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, and obtain, by any means a person, and to benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing that the person had not attained the age of 18 years and would be caused to engage in a

commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and (b)(2).

Overt Acts

22. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about 2004, JEFFREY EPSTEIN, the defendant, enticed and recruited multiple minor victims, including minor victims identified herein as Minor Victim-1, Minor Victim-2, and Minor Victim-3, to engage in sex acts with EPSTEIN at his residences in Manhattan, New York, and Palm Beach, Florida, after which he provided them with hundreds of dollars in cash for each encounter.

b. In or about 2002, Minor Victim-1 was recruited to engage in sex acts with EPSTEIN and was repeatedly sexually abused by EPSTEIN at the New York Residence over a period of years and was paid hundreds of dollars for each encounter. EPSTEIN also encouraged and enticed Minor Victim-1 to recruit other girls to engage in paid sex acts, which she did. EPSTEIN asked Minor Victim-1 how old she was, and Minor Victim-1 answered truthfully.

c. In or about 2004, Employee-1, located in the Southern District of New York, and on behalf of EPSTEIN, placed

a telephone call to Minor Victim-1 in order to schedule an appointment for Minor Victim-1 to engage in paid sex acts with EPSTEIN.

d. In or about 2004, Minor Victim-2 was recruited to engage in sex acts with EPSTEIN and was repeatedly sexually abused by EPSTEIN at the Palm Beach Residence over a period of years and was paid hundreds of dollars after each encounter. EPSTEIN also encouraged and enticed Minor Victim-2 to recruit other girls to engage in paid sex acts, which she did.

e. In or about 2005, Employee-2, located in the Southern District of New York, and on behalf of EPSTEIN, placed a telephone call to Minor Victim-2 in order to schedule an appointment for Minor Victim-2 to engage in paid sex acts with EPSTEIN.

f. In or about 2005, Minor Victim-3 was recruited to engage in sex acts with EPSTEIN and was repeatedly sexually abused by EPSTEIN at the Palm Beach Residence over a period of years and was paid hundreds of dollars for each encounter. EPSTEIN also encouraged and enticed Minor Victim-3 to recruit other girls to engage in paid sex acts, which she did. EPSTEIN asked Minor Victim-3 how old she was, and Minor Victim-3 answered truthfully.

g. In or about 2005, Employee-2, located in the Southern District of New York, and on behalf of EPSTEIN, placed a telephone call to Minor Victim-3 in Florida in order to schedule an appointment for Minor Victim-3 to engage in paid sex acts with EPSTEIN.

h. In or about 2004, Employee-3 placed a telephone call to Minor Victim-3 in order to schedule an appointment for Minor Victim-3 to engage in paid sex acts with EPSTEIN.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Sex Trafficking)

The Grand Jury further charges:

23. The allegations contained in paragraphs 1 through 19 and 22 of this Indictment are repeated and realleged as if fully set forth within.

24. From at least in or about 2002, up to, and including in or about 2005, in the Southern District of New York, JEFFREY EPSTEIN, the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, and obtain by any means a person, knowing that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, and did aid and abet the same, to wit, EPSTEIN recruited, enticed, harbored, transported, provided, and obtained numerous

individuals who were less than 18 years old, including but not limited to Minor Victim-1, as described above, and who were then caused to engage in at least one commercial sex act in Manhattan, New York.

(Title 18, United States Code, Sections 1591(a),
(b)(2), and 2.)

FORFEITURE ALLEGATIONS

25. As a result of committing the offense alleged in Count Two of this Indictment, JEFFREY EPSTEIN, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(c)(1), any property, real and personal, that was used or intended to be used to commit or to facilitate the commission of the offense alleged in Count Two, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense alleged in Count Two, or any property traceable to such property, and the following specific property:

a. The lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 9 East 71st Street, New York, New York, with block number 1386 and lot number 10, owned by Maple, Inc.

Substitute Asset Provision

26. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

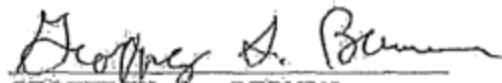
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1594; Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461.)



FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JEFFREY EPSTEIN,

Defendant.

INDICTMENT

(18 U.S.C. §§ 371, 1591(a), (b) (2),
and 2)

GEOFFREY S. BERMAN
United States Attorney


Foreperson

EXHIBIT B

UNITED STATES DISTRICT COURT

for the
Southern District of New York

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

See Attachment A

Case No.

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Southern District of New York
(Identify the person or describe the property to be searched and give its location):

See Attachment A

The person or property to be searched, described above, is believed to conceal (Identify the person or describe the property to be seized):

See Attachment A

The search and seizure are related to violation(s) of (insert statutory citations):

Title 18, United States Code, Sections 371 and 1591

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property.

YOU ARE COMMANDED to execute this warrant on or before

7-20-19

(not to exceed 14 days)

☒ in the daytime 6:00 a.m. to 10 p.m. ☐ at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the Clerk of the Court.

☐ Upon its return, this warrant and inventory should be filed under seal by the Clerk of the Court.

USMJ Initials

☐ I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box) ☐ for _____ days (not to exceed 30).

☐ Until, the facts justifying, the later specific date of

Date and time issued:

7-6-19 10:14 a.m.

Judge's signature

City and state: New York, NY

Hon. Barbara Moses, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

I. Premises to be Searched—Subject Premises

1. The premises to be searched (the "Subject Premises") are described as a nearly 19,000 square foot multi-story single-family residence located at 9 East 71st Street, New York, New York, and include all locked and closed containers found therein. A photograph of the front entrance to the Subject Premises is included below:



II. Items to Be Seized

1. This warrant authorizes executing agents to photograph, video record and otherwise document the full interior of the Subject Premises, including any items, furnishings, or possessions therein.

2. In addition, this warrant authorizes the seizure of certain evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Sections 1591 (sex trafficking of minors) and 371 (sex trafficking conspiracy) (the "Subject Offenses") described as follows:

- a. Evidence concerning occupancy or ownership of the Subject Premises, including utility and telephone bills, mail envelopes, addressed correspondence, diaries, statements, identification documents, address books, telephone directories, and photographs of its occupant(s).
- b. Evidence concerning the layout, furnishings, decorations, and floor pattern of the Subject Premises, including photographs and blueprints of the Subject Premises.

EXHIBIT C

UNITED STATES DISTRICT COURT

for the
Southern District of New York

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

See Attachment A

Case No.

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Southern District of New York
(Identify the person or describe the property to be searched and give its location):

See Attachment A

The person or property to be searched, described above, is believed to conceal (Identify the person or describe the property to be seized):

See Attachment A

The search and seizure are related to violation(s) of (insert statutory citations):

Title 18, United States Code, Sections 371 and 1591

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property.

YOU ARE COMMANDED to execute this warrant on or before July 7, 2019

(not to exceed 14 days)

☐ in the daytime 6:00 a.m. to 10 p.m. ☒ at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the Clerk of the Court.

☐ Upon its return, this warrant and inventory should be filed under seal by the Clerk of the Court.

USMJ Initials.

☐ I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box) ☐ for _____ days (not to exceed 30).

☐ until, the facts justifying the later specific date of _____

Date and time issued:

7-7-19 R. O. Sam.

Judge's signature

City and state: New York, NY

Hon. Barbara Moses, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

I. Premises to be Searched—Subject Premises

1. The premises to be searched (the "Subject Premises") are described as a multi-story single-family residence located at 9 East 71st Street, New York, New York, and include all locked and closed containers found therein. A photograph of the front entrance to the Subject Premises is included below:



II. Items to Be Seized

A. Evidence, Fruits, and Instrumentalities of the Subject Offenses

This warrant authorizes the seizure of certain evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Sections 1591 (sex trafficking of minors) and 371 (sex trafficking conspiracy) (the "Subject Offenses") described as follows:

- i. Any and all taxidermied dogs.
- ii. Any and all massage tables and massage paraphernalia.
- iii. Any and all busts or three-dimensional representations of female human torsos.
- iv. Any and all photos or representations depicting nude or partially nude women located in the Massage Room, as defined herein.
- v. Any and all sex toys and sex paraphernalia located in the Massage Room, as defined herein.

- vi. A binder labeled "PB Girls" and any other documents or communications with or regarding victims or potential victims of the Subject Offenses.