

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No: _____

18 U.S.C. § 371
18 U.S.C. § 2423(e)
18 U.S.C. § 2423(d)
18 U.S.C. § 1591(a)(2)
18 U.S.C. § 2422(b)
18 U.S.C. § 2423(b)
18 U.S.C. § 1591(a)(1)

UNITED STATES OF AMERICA,

vs.

JEFFREY EPSTEIN,

_____,
_____,
_____, a/k/a "_____",
and _____,
Defendants.

_____/

INDICTMENT

The Grand Jury charges that:

BACKGROUND

At all times relevant to this Indictment:

1. Defendant JEFFREY EPSTEIN employed defendants _____, _____, _____, _____, a/k/a "_____", and _____ to perform, among other things, services as personal assistants.
1. Defendant JEFFREY EPSTEIN owned a property located at 358 El Brillo Way, Palm Beach, Florida, in the Southern District of Florida.
2. Defendant JEFFREY EPSTEIN was the principal owner of JEGE, INC., a Delaware corporation. JEGE, INC.'s sole business activities related to the operation and ownership of a Boeing 727-31 aircraft bearing tail number N908JE.
3. Defendant JEFFREY EPSTEIN served as president, sole director, and sole shareholder of JEGE, INC., and had the power to direct all of its operations.
4. Defendant JEFFREY EPSTEIN was a principal owner of Hyperion Air, Inc., a Delaware corporation. Hyperion Air, Inc.'s sole business activities related to the operation and ownership of a Gulfstream G-1159B aircraft bearing tail number N909JE.
5. Defendant JEFFREY EPSTEIN served as president, sole director, and sole shareholder of Hyperion Air, Inc., and had the power to direct all of its operations.

6. Pursuant to Florida Statutes Section 794.05, a “person 24 years of age or older who engages in sexual activity with a person 16 or 17 years of age commits a felony of the second degree.” For purposes of “this section, ‘sexual activity’ means oral, anal, or vaginal penetration by, or union with, the sexual organ of another; however, sexual activity does not include an act done for a bona fide medical purpose.” Florida Statutes Section 794.021 states that “ignorance of the age [of the victim] is no defense,” and that neither “misrepresentation of age by [the victim] nor a bona fide belief that such person is over the specified age [shall] be a defense.”
1. Beginning in 2002, pursuant to Florida Statutes Section 796.07(2)(a), it was unlawful for a person to “offer, or to offer or agree to secure, another for the purpose of prostitution or for any other lewd or indecent act.”
2. Beginning in 2002, pursuant to Florida Statutes Section 796.07(2)(e), it was unlawful for a person to “offer to commit, or to commit, or to engage in, prostitution, lewdness, or assignation.”
3. Beginning in 2002, pursuant to Florida Statutes Section 796.07(2)(f), it was unlawful for a person to “solicit, induce, entice, or procure another to commit prostitution, lewdness, or assignation.”
4. Beginning in 2002, pursuant to Florida Statutes Section 796.07(2)(i), it was unlawful for a person to “purchase the services of any person engaged in prostitution.”
5. For purposes of Florida Statutes Section 796.07, “prostitution” is defined as “the giving or receiving of the body for sexual activity for hire but excludes sexual activity between spouses”; “sexual activity” is defined as “oral, anal, or vaginal penetration by, or union with, the sexual organ of another; anal or vaginal penetration of another by any other object; or the handling or fondling of the sexual organ of another for the purpose of masturbation; however, the term does not include acts done for bona fide medical purposes.” Fl. Stat. 796.07(1)(a), 796.07(1)(d).
6. For purposes of Florida Statutes Section 796.07, “lewdness” is defined as “any indecent or obscene act;” and “assignation” is defined as “the making of any appointment or engagement for prostitution or lewdness, or any act in furtherance of such appointment or engagement.” Fl. Stat. 796.01(b), 796.01(c).
7. Pursuant to Florida Statutes Section 800.04(4)(a), a person who “[e]ngages in sexual activity with a person 12 years of age or older but less than 16 years of age” commits lewd or

lascivious battery, which is a felony of the second degree.

8. Pursuant to Florida Statutes Section 800.04(4)(b), a person who “[e]ncourages, forces, or entices any person less than 16 years of age to engage in . . . prostitution, or any other act involving sexual activity commits lewd or lascivious battery, a felony of the second degree.”
9. Pursuant to Florida Statutes Sections 800.04(5)(a) and 800.04(5)(c)(2), an adult “who intentionally touches in a lewd or lascivious manner the breasts, genitals, genital area, or buttocks, or the clothing covering them, of a person less than 16 years of age, or forces or entices a person under 16 years of age to so touch the perpetrator, commits lewd or lascivious molestation,” which is a felony of the second degree if the victim is 12 years of age or older but less than 16 years of age.
10. Pursuant to Florida Statutes Sections 800.04(6)(a) and 800.04(6)(b), an adult “who [i]ntentionally touches a person under 16 years of age in a lewd or lascivious manner or [s]olicits a person under 16 years of age to commit a lewd or lascivious act commits lewd or lascivious conduct,” which is a felony of the second degree.
11. Pursuant to Florida Statutes Sections 800.04(7)(a) and 800.04(7)(c), an adult “who: (1) [i]ntentionally masturbates; (2) [i]ntentionally exposes the genitals in a lewd or lascivious manner; or (3) [i]ntentionally commits any other sexual act that does not involve actual physical or sexual contact with the victim, including, but not limited to . . . the simulation of any act involving sexual activity in the presence of a victim who is less than 16 years of age, commits lewd or lascivious exhibition,” which is a felony of the second degree.
12. Pursuant to Florida Statutes Section 800.04(2), “[n]either the victim’s lack of chastity nor the victim’s consent is a defense to the crimes proscribed by [Section 800.04].”
13. Pursuant to Florida Statutes Section 800.04(3), “[t]he perpetrator’s ignorance of the victim’s age, the victim’s misrepresentation of his or her age, or the perpetrator’s bona fide belief of the victim’s age cannot be raised as a defense in a prosecution under [Section 800.04].”
14. Pursuant to Florida Statutes Section 800.02, a “person who commits any unnatural and lascivious act with another person commits a misdemeanor of the second degree.”
15. Defendant JEFFREY EPSTEIN was over the age of 24 and did not have any medical licensure.
16. During the periods of their involvement with the Defendants, Jane Does # 5, 6, 8, 12, 13, 14, 15, 16, 17, 18, and 19 attended Royal Palm Beach High School in Palm Beach County.

17. During the period of her involvement with the Defendants, Jane Doe #9 attended Lake Worth High School in Palm Beach County.
18. During the period of her involvement with the Defendants, Jane Doe #7 attended William T. Dwyer High School in Palm Beach County.
19. During the period of their involvement with the Defendants, Jane Does # 3 and 10 attended Palm Beach Central High School in Palm Beach County.
20. During the period of her involvement with the Defendants, Jane Doe #11 attended John I. Leonard High School in Palm Beach County.

COUNT 1
(Conspiracy: 18 U.S.C. § 371)

1. Paragraphs 1 through ___ of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
2. From at least as early as 2001, the exact date being unknown to the Grand Jury, through in or about October 2005, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN,
[REDACTED],
[REDACTED], a/k/a “[REDACTED],”
and
[REDACTED],

did knowingly and willfully combine, conspire, confederate and agree with each other and with others known and unknown to commit an offense against the United States, that is, to use a facility or means of interstate or foreign commerce to knowingly persuade, induce, and entice individuals who had not attained the age of 18 years to engage in prostitution, in violation of Title 18, United States Code, Section 2422(b).

Purpose and Object of the Conspiracy

1. It was the purpose and object of the conspiracy to procure females under the age of 18 to travel to 358 El Brillo Way, Palm Beach, Florida so that JEFFREY EPSTEIN could, in exchange for money, engage in lewd conduct with those minor females in order to satisfy JEFFREY EPSTEIN’s prurient interests.

Manner and Means

1. The manner and means by which the defendants and other participants sought to accomplish the purpose and object of the conspiracy included the following:

(a) It was part of the conspiracy that Defendants [REDACTED], [REDACTED], [REDACTED], [REDACTED], a/k/a "[REDACTED] [REDACTED]," and [REDACTED] [REDACTED] would contact minor females via the use of cellular and other telephones to arrange appointments for minor females to travel to 358 El Brillo Way to allow Defendant JEFFREY EPSTEIN to engage in lewd conduct with them.

(b) It was further a part of the conspiracy that Defendants JEFFREY EPSTEIN, [REDACTED], [REDACTED], and [REDACTED] [REDACTED], a/k/a "[REDACTED] [REDACTED]," would make payments to, or cause payments to be made to, minor females in exchange for engaging in lewd conduct.

(c) It was further a part of the conspiracy that Defendants JEFFREY EPSTEIN, [REDACTED], [REDACTED], and [REDACTED] [REDACTED], a/k/a "[REDACTED] [REDACTED]," would ask females to recruit other minor females to engage in lewd conduct with Defendant JEFFREY EPSTEIN.

(d) It was further a part of the conspiracy that Defendants JEFFREY EPSTEIN, [REDACTED], [REDACTED], and [REDACTED] [REDACTED], a/k/a "[REDACTED] [REDACTED]," would make payments to, or cause payments to be made to, the recruiters for bringing additional minor females to 358 El Brillo Way to engage in lewd conduct with Defendant JEFFREY EPSTEIN.

(e) It was further a part of the conspiracy that Defendant JEFFREY EPSTEIN would pay minor females to engage in lewd conduct with Defendant [REDACTED] [REDACTED] to satisfy Defendant JEFFREY EPSTEIN's prurient interests.

Overt Acts

1. In furtherance of this conspiracy and to effect the objects thereof, there was committed by at least one of the co-conspirators herein, at least one of the following overt acts, among others in the Southern District of Florida:

1. In 2001, Defendant [REDACTED] [REDACTED] led Jane Doe #2 from the kitchen of 358 El Brillo Way upstairs to the master bedroom area at 358 El Brillo Way.
2. In the beginning of 2001, Defendant JEFFREY EPSTEIN engaged in sexual intercourse with Jane Doe #1, who was then a seventeen-year-old girl, in the presence of Jane Doe #2, who was then a fourteen-year-old girl.
3. In or around 2001, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #2, who was then a fourteen-year-old girl.
4. In or around 2001, Defendant JEFFREY EPSTEIN made a payment of \$300 to Jane Doe #2.

5. In or around 2001, Defendant ██████████ ██████████ placed a telephone call to a telephone used by Jane Doe #2 to make an appointment for Jane Doe #2 to travel to 358 El Brillo Way.
6. In or around 2002, Defendant JEFFREY EPSTEIN paid \$400 to Jane Doe #2, who was then fifteen years' old, to pinch his nipples while he masturbated.
7. In or around 2002, Defendant JEFFREY EPSTEIN asked Jane Doe #2 if she had any younger friends who would be interested in engaging in similar activities with him.
8. In or around 2003, Defendant ██████████ ██████████ took nude photographs of Jane Doe #2, who was then a sixteen-year-old girl.
9. In or around 2003, Defendant ██████████ ██████████ paid \$500 to Jane Doe #2 for posing for nude photographs.
10. In or around 2003, Defendant ██████████ ██████████ told Jane Doe #2 that Defendant JEFFREY EPSTEIN had asked ██████████ to take nude photographs for Jane Doe #2.
11. In or around 2003, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #2, who was then a sixteen-year-old girl.
12. In or around 2003, Defendant JEFFREY EPSTEIN made a payment of \$300 to Jane Doe #2, who was then a sixteen-year-old girl.
13. In or around 2003, Defendant ██████████ ██████████ placed a telephone call to a telephone used by Jane Doe #2 to make an appointment for Jane Doe #2 to travel to 358 El Brillo Way.
14. In or around 2003, JEFFREY EPSTEIN engaged in sexual intercourse with an unidentified female in the presence of Jane Doe #2, who was then a sixteen-year-old girl.
15. In or around 2003, Defendant JEFFREY EPSTEIN paid \$300 to Jane Doe #2, who was then a sixteen-year-old girl, for allowing an unidentified female to perform oral sex on Jane Doe #2 in EPSTEIN's presence.
16. In or around the spring of 2003, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #4, who was then a fifteen-year-old girl.
17. In or around the spring of 2003, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #4.

18. In or around 2004, Defendant JEFFREY EPSTEIN directed Jane Doe #4, who was then a sixteen- or seventeen-year-old girl, to straddle an adult female and to touch the adult female's breasts.
19. In or around 2004, Defendant JEFFREY EPSTEIN placed a massaging device on the vagina of an adult female in the presence of Jane Doe #4, who was then a sixteen- or seventeen-year-old girl.
20. In or around 2004, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #4.
21. In or around 2004, Defendant JEFFREY EPSTEIN instructed Jane Doe #4 to pinch his nipples.
22. In or around 2004, Defendant JEFFREY EPSTEIN placed a massaging device on the vagina of Jane Doe #4, who was then a sixteen- or seventeen-year-old girl.
23. In or around the first half of 2004, Defendant JEFFREY EPSTEIN offered to pay Jane Doe #6 to bring additional girls to provide him with a massage.
24. In or around the first half of 2004, Defendant ██████████ ██████████ made a payment of \$200 to Jane Doe #6 for recruiting a minor female to travel to 358 El Brillo Way.
25. In or around the first half of 2004, Defendant JEFFREY EPSTEIN digitally penetrated Jane Doe #8, who was then a seventeen-year-old girl.
26. On or about March 11, 2004, Defendants JEFFREY EPSTEIN, ██████████ ██████████, and ██████████ ██████████ traveled from Teterboro, New Jersey, to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
27. In or around March 2004, Defendants JEFFREY EPSTEIN and ██████████ ██████████ caused Jane Doe #5, who was then a seventeen-year-old girl, to travel to 358 El Brillo Way, Palm Beach, Florida.
28. In or around March 2004, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #5, who was then a seventeen-year-old girl.
29. In or around March 2004, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #5.
30. On or about May 1, 2004, Defendants JEFFREY EPSTEIN, ██████████ ██████████, and ██████████ ██████████ traveled from New York, New York to Palm Beach

County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.

31. On or about May 14, 2004, Defendants JEFFREY EPSTEIN, [REDACTED], [REDACTED], and [REDACTED] [REDACTED] traveled from Canada to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.
32. On or about May 14, 2004, Defendant [REDACTED] [REDACTED] placed a telephone call to a telephone used by Jane Doe #6.
33. In or around May 2004, Defendant [REDACTED] [REDACTED] led Jane Doe #6 from the kitchen at 358 El Brillo Way upstairs to the master bedroom area at 358 El Brillo Way.
34. In or around May 2004, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #6, who was then a sixteen-year-old girl.
35. In or around May 2004, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #6.
36. On or about June 11, 2004, Defendants JEFFREY EPSTEIN and [REDACTED] [REDACTED] traveled from Chicago, Illinois to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
37. On or about June 11, 2004, Defendant [REDACTED] [REDACTED] made one or more telephone calls to a telephone used by Jane Doe #6.
38. On or about June 20, 2004, Defendant [REDACTED] [REDACTED] made one or more telephone calls to a telephone used by Jane Doe #6.
39. On or about June 20, 2004, Defendants JEFFREY EPSTEIN and [REDACTED] [REDACTED] traveled from the U.S. Virgin Islands to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.
40. On or about July 4, 2004, Defendants JEFFREY EPSTEIN, [REDACTED] [REDACTED], and [REDACTED] [REDACTED] traveled from Aspen, Colorado to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
41. On or about July 4, 2004, Defendant [REDACTED] [REDACTED] made one or more telephone calls to a telephone used by Jane Doe #7.
42. In or around July 2004, Defendant JEFFREY EPSTEIN led Jane Doe #3, who was then a fifteen-year-old girl, and Jane Doe #7, who was then a sixteen-years-old girl,

from the kitchen of 358 El Brillo Way, upstairs to the master bedroom area of 358 El Brillo Way.

43. In or around July 2004, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #7, who was then a sixteen-year-old girl.
44. In or around July 2004, Defendant JEFFREY EPSTEIN instructed Jane Doe #7, who was then a sixteen-year-old girl, to rub his nipples.
45. In or around July 2004, Defendant JEFFREY EPSTEIN stroked the vagina of Jane Doe #7, who was then a sixteen-year-old girl.
46. In or around July 2004, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #7.
47. In or around July 2004, Defendant JEFFREY EPSTEIN told Jane Doe #7 that if she reported to anyone what had occurred at Defendant JEFFREY EPSTEIN's home, bad things could happen to her.
48. In or around July 2004, Defendant JEFFREY EPSTEIN fondled the breasts of Jane Doe #8, who was then a seventeen-year-old girl.
49. In or around July 2004, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #8, who was then a seventeen-year-old girl.
50. In or around July 2004, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #8.
51. On or about July 15, 2004, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #7.
1. On or about July 15, 2004, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #8.
2. On or about July 16, 2004, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #7.
3. On or about July 16, 2004, Defendants JEFFREY EPSTEIN, [REDACTED] [REDACTED], and [REDACTED] [REDACTED] traveled from Teterboro, New Jersey to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
4. On or about July 16, 2004, Defendant [REDACTED] [REDACTED] caused Jane Doe #8 to make one or more telephone calls to a telephone used by Jane Doe #9.

5. On or about July 17, 2004, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #8.
6. On or about July 18, 2004, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #6.
7. On or about July 18, 2004, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #8.
8. On or about July 22, 2004, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #6.
9. On or about July 22, 2004, Defendant [REDACTED] [REDACTED] placed a telephone call to a telephone used by Jane Doe #8.
10. On or about July 22, 2004, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #9.
11. On or about July 22, 2004, Defendants JEFFREY EPSTEIN, [REDACTED], [REDACTED], and [REDACTED] [REDACTED] traveled from the U.S. Virgin Islands to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGER, INC.
12. In or around the last half of 2004, Defendants JEFFREY EPSTEIN and [REDACTED] [REDACTED] engaged in oral sex and sexual intercourse in the presence of Jane Doe #8, who was then a seventeen-year-old girl.
13. In or around the last half of 2004, Defendant JEFFREY EPSTEIN forcibly inserted his penis into the vagina of Jane Doe #8, who was then a seventeen-year-old girl.
14. In or around the last half of 2004, Defendant JEFFREY EPSTEIN made a payment of \$300 or more to Jane Doe #8.
15. In or around the last half of 2004, Defendant JEFFREY EPSTEIN placed a massaging device on the vagina of Jane Doe #9, who was then a seventeen-year-old girl.
16. In or around the last half of 2004, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #9.
17. In or around the last half of 2004, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #10, who was then a seventeen-year-old girl.
18. In or around the last half of 2004, Defendant JEFFREY EPSTEIN digitally penetrated Jane Doe #10, who was then a seventeen-year-old girl.

19. In or around the last half of 2004, Defendant JEFFREY EPSTEIN tried to place a massaging device on the vagina of Jane Doe #10, who was then a seventeen-year-old girl.
20. In or around the last half of 2004, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #10.
21. In or around the last half of 2004, Defendant [REDACTED] [REDACTED] led Jane Doe #13 from the kitchen of 358 El Brillo Way upstairs to the master bedroom area of 358 El Brillo Way.
22. In or around the last half of 2004, Defendant JEFFREY EPSTEIN asked Jane Doe #13 to provide her telephone number.
23. In or around the last half of 2004, Defendant JEFFREY EPSTEIN instructed Jane Doe #13, who was then a seventeen-year-old girl, to pinch his nipples.
24. In or around the last half of 2004, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #13, who was then a seventeen-year old girl.
25. In or around the last half of 2004, Defendant JEFFREY EPSTEIN made a payment of \$300 to Jane Doe #13.
26. On or about August 19, 2004, Defendants JEFFREY EPSTEIN and [REDACTED] [REDACTED] traveled from Van Nuys, California to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.
27. On or about August 21, 2004, Defendant [REDACTED] [REDACTED] placed one or more calls to a telephone used by Jane Doe #11.
28. On or about August 25, 2004, Defendants JEFFREY EPSTEIN, [REDACTED] [REDACTED], and [REDACTED] [REDACTED] traveled from Ecuador to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.
29. In or around the last quarter of 2004, Defendant [REDACTED] [REDACTED] caused Jane Doe #5 to place a telephone call to Jane Doe #12.
30. In or around the last quarter of 2004, Defendants JEFFREY EPSTEIN and [REDACTED] [REDACTED] caused Jane Doe #5 to travel with Jane Doe #12 to 358 El Brillo Way.
31. In or around the last quarter of 2004, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #12, who was then a sixteen-year-old girl.

32. In or around the last quarter of 2004, Defendant JEFFREY EPSTEIN fondled the breasts of Jane Doe #12, who was then a sixteen-year-old girl.
33. In or around the last quarter of 2004, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #12.
34. On or about September 16, 2004, Defendants JEFFREY EPSTEIN, [REDACTED], [REDACTED], and [REDACTED] traveled from New York, New York to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.
35. On or about October 2, 2004, Defendants EPSTEIN, [REDACTED], and [REDACTED] traveled from the U.S. Virgin Islands to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.
36. On or about October 29, 2004, Defendants JEFFREY EPSTEIN, [REDACTED], [REDACTED], and [REDACTED] traveled from Teterboro, New Jersey to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, INC.
37. In or around the end of 2004, Defendant [REDACTED] [REDACTED] led Jane Doe #19, who was then a sixteen-year-old girl, from the kitchen of 358 El Brillo Way, upstairs to the master bedroom.
38. In or around the end of 2004, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #19, who was then a sixteen-year-old girl.
39. In or around the end of 2004, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #19.
40. In or around the end of 2004, Defendant [REDACTED] [REDACTED] placed a telephone call to a telephone used by Jane Doe #5 to arrange for Jane Doe #19 to travel to 358 El Brillo Way.
41. On or about November 10, 2004, Defendants JEFFREY EPSTEIN and [REDACTED] [REDACTED] traveled from Teterboro, New Jersey to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
42. On or about November 18, 2004, Defendants JEFFREY EPSTEIN, [REDACTED], [REDACTED], [REDACTED], a/k/a “[REDACTED] [REDACTED],” and [REDACTED] [REDACTED] traveled from Teterboro, New Jersey to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

43. In or around December 2004, Defendant ██████████ ██████████ caused Jane Doe #12 to place a telephone call to Jane Doe #15.
44. In or around December 2004, Defendant JEFFREY EPSTEIN made a payment of \$100 to Jane Doe #12 for bringing Jane Doe #15 to 358 El Brillo Way.
45. In or around December 2004, Defendant ██████████ ██████████ led Jane Doe #15 from the kitchen of 358 El Brillo Way upstairs to the master bedroom area at 358 El Brillo Way.
46. In or around December 2004, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #15, who was then a sixteen-year-old girl.
47. In or around December 2004, Defendant JEFFREY EPSTEIN fondled the breasts of Jane Doe #15, who was then a sixteen-year-old girl.
48. In or around December 2004, Defendant JEFFREY EPSTEIN stroked the vagina of Jane Doe #15, who was then a sixteen-year-old girl.
49. In or around December 2004, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #15, who was then a sixteen-year-old girl.
50. On or about December 3, 2004, Defendants JEFFREY EPSTEIN, ██████████ ██████████, and ██████████ ██████████, a/k/a "██████████ ██████████," traveled from New York, New York to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGER, INC.
51. On or about December 4, 2004, Defendant ██████████ ██████████ provided a written message to Defendant JEFFREY EPSTEIN regarding Jane Does # 8 and 9, stating: "[Jane Doe #9] would like to work @ 4:00 pm if possible. [[Jane Doe #8] is scheduled for 5:00 today.] the movie is @ 7:30".
52. On or about December 6, 2004, Defendant ██████████ ██████████ placed one or more calls to a telephone used by Jane Doe #14.
53. On or about December 13, 2004, Defendant JEFFREY EPSTEIN traveled from the U.S. Virgin Islands to Palm Beach County, Florida, aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
54. On or about December 17, 2004, Defendants JEFFREY EPSTEIN and ██████████ ██████████ traveled from Teterboro, New Jersey to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

55. On or about December 18, 2004, Defendant ██████████ ██████████ caused Jane Doe #12 to place one or more telephone calls to a telephone used by Jane Doe #15.
56. In or around the last half of 2004 or January 2005, Defendant ██████████ ██████████ placed a massaging device on the vagina of Jane Doe #9, who was then a seventeen-year-old girl, in the presence of Defendant JEFFREY EPSTEIN.
57. In or around the last half of 2004 or January 2005, Defendant ██████████ ██████████ and Defendant JEFFREY EPSTEIN performed sexual acts in the presence of Jane Doe #9, who was then a seventeen-year-old girl.
58. In or around the end of 2004 and the beginning of 2005, Defendant JEFFREY EPSTEIN digitally penetrated Jane Doe #13, who was then a seventeen-year-old girl.
59. On or about December 23, 2004, Defendant JEFFREY EPSTEIN caused a Western Union wire transfer order to be sent to Jane Doe #13.
60. On or about December 29, 2004, Defendant ██████████ ██████████ placed a telephone call to a telephone used by Jane Doe #8.
61. On or about December 30, 2004, Defendant ██████████ ██████████ used a credit card to purchase Broadway tickets as an eighteenth birthday gift for Jane Doe #8.
62. On or about January 1, 2005, Defendants JEFFREY EPSTEIN, ██████████ ██████████, and ██████████ ██████████ traveled from Anguilla, British West Indies to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
63. In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN placed a massaging device on the vagina of Jane Doe #13, who was then a seventeen-year-old girl.
1. In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN engaged in sexual intercourse with Jane Doe #13, who was then a seventeen-year-old girl.
 2. In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN performed oral sex on Jane Doe #13, who was then a seventeen-year-old girl.
 3. In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN made a payment of \$600 to Jane Doe #13.
 4. In or around the first quarter of 2005, Defendants JEFFREY EPSTEIN and ██████████ ██████████ caused Jane Doe #17 to place a telephone call to Jane Doe #18 to ask her to travel to 358 El Brillo Way.

5. In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN made a payment to Jane Doe #17 for recruiting Jane Doe #18 to travel to 358 El Brillo Way.
6. In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #18, who was then a sixteen-year-old girl.
7. In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN instructed Jane Doe #18, who was then a sixteen-year-old girl, to remove all of her clothing.
8. In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN placed a massaging device on the vagina of Jane Doe #18, who was then a sixteen-year-old girl.
9. In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #18, who was then a sixteen-year-old girl.
10. In or around the first half of 2005, Defendant ██████████ ██████████ made a payment of \$200 to Jane Doe #6 for recruiting another minor female to travel to 358 El Brillo Way.
11. In or around the first half of 2005, Defendant ██████████ ██████████ led Jane Doe #14 from the kitchen of 358 El Brillo Way upstairs to the master bedroom area of 358 El Brillo Way.
12. In or around the first half of 2005, Defendant JEFFREY EPSTEIN instructed Jane Doe #14, who was then a seventeen-year-old girl, to pinch his nipples while he masturbated.
13. In or around the first half of 2005, Defendant JEFFREY EPSTEIN fondled the breasts of Jane Doe #14.
14. In or around the first half of 2005, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #14.
15. In or around the first nine months of 2005, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #17, who was then a seventeen-year-old girl.
16. In or around the first nine months of 2005, Defendant JEFFREY EPSTEIN placed a massaging device on the vagina of Jane Doe #17, who was then a seventeen-year-old girl.
17. In or around the first nine months of 2005, Defendant JEFFREY EPSTEIN asked Jane Doe #17, who was then a seventeen-year-old girl, how old she was.

18. In or around the first nine months of 2005, Defendant JEFFREY EPSTEIN engaged in sexual activity with Defendant ██████████ ██████████ in the presence of Jane Doe #17, who was then a seventeen-year-old girl.
19. In or around the first nine months of 2005, Defendant JEFFREY EPSTEIN asked Jane Doe #17, who was then a seventeen-year-old girl, to touch the breast of Defendant ██████████ ██████████.
20. On or about January 6, 2005, Defendant JEFFREY EPSTEIN traveled from Teterboro, New Jersey to Palm Beach County, Florida, aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
21. On or about January 7, 2005, Defendant ██████████ ██████████, a/k/a "██████████ ██████████," placed one or more calls to a telephone used by Jane Doe #14.
22. On or about January 8, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #13.
23. On or about January 9, 2005, Defendant ██████████ ██████████, a/k/a "██████████ ██████████," placed one or more telephone calls to a telephone used by Jane Doe #13.
24. On or about January 14, 2005, Defendant ██████████ ██████████ placed a telephone call to a telephone used by Jane Doe #4.
25. On or about January 14, 2005, Defendants JEFFREY EPSTEIN, ██████████ ██████████, ██████████ ██████████, a/k/a "██████████ ██████████," and ██████████ ██████████ traveled from the U.S. Virgin Islands to Palm Beach County, Florida, aboard the Boeing 727 aircraft owned by JEGE, INC.
26. On or about January 14, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #9.
27. On or about January 19, 2005, Defendants JEFFREY EPSTEIN, ██████████ ██████████, ██████████ ██████████, a/k/a "██████████ ██████████," and ██████████ ██████████ traveled from New York, New York to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.
28. On or about January 27, 2005, Defendant ██████████ ██████████, a/k/a "██████████ ██████████," placed one or more telephone calls to a telephone used by Jane Doe #9.

29. On or about January 28, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #9.
30. In or around the February 2005, Defendant JEFFREY EPSTEIN caused a payment of \$200 to be made to Jane Doe #8 for recruiting Jane Doe #14 to travel to 358 El Brillo Way.
31. In or around February 2005, Defendants JEFFREY EPSTEIN and ██████████ ██████████ caused Jane Doe #10 to recruit Jane Doe #11 to travel to 358 El Brillo Way.
32. In or around February 2005, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #11, who was then a seventeen-year-old girl.
33. In or around February 2005, Defendant JEFFREY EPSTEIN placed a massaging device on the vagina of Jane Doe #11, who was then a seventeen-year-old girl.
34. In or around February 2005, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #11.
35. On or about February 1, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #13.
36. On or about February 1, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #9.
37. On or about February 3, 2005, Defendants JEFFREY EPSTEIN, ██████████ ██████████, and ██████████ ██████████ traveled from Columbus, Ohio, to Palm Beach County, Florida, aboard the Boeing 727 aircraft owned by JEGE, INC.
38. On or about February 4, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #14.
39. On or about February 6, 2005, Defendants JEFFREY EPSTEIN and ██████████ ██████████ caused Jane Doe #5 to make one or more telephone calls to Jane Doe #16.
40. On or about February 6, 2005, Defendants JEFFREY EPSTEIN and ██████████ ██████████ caused Jane Doe #5 to transport Jane Doe #16 to 358 El Brillo Way, Palm Beach, Florida.
41. On or about February 6, 2005, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #16, who was then a fourteen-year-old girl.

42. On or about February 6, 2005, Defendant JEFFREY EPSTEIN digitally penetrated Jane Doe #16, who was then a fourteen-year-old girl.
43. On or about February 6, 2005, Defendant JEFFREY EPSTEIN placed a massaging device on the vagina of Jane Doe #16, who was then a fourteen-year-old girl.
44. On or about February 6, 2005, Defendant JEFFREY EPSTEIN made a payment of \$300 to Jane Doe #16.
45. On or about February 6, 2005, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #5.
46. On or about February 10, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #13.
47. On or about February 10, 2005, Defendants JEFFREY EPSTEIN, [REDACTED] [REDACTED], [REDACTED] [REDACTED], a/k/a “[REDACTED] [REDACTED],” and [REDACTED] [REDACTED] traveled from New York, New York to Palm Beach County, Florida, aboard the Boeing 727 aircraft owned by JEGER, INC.
48. On or about February 10, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #14.
49. On or about February 21, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #14.
50. On or about February 21, 2005, Defendants EPSTEIN, [REDACTED], and [REDACTED] traveled from the U.S. Virgin Islands to Palm Beach County, Florida, aboard the Boeing 727 aircraft owned by JEGER, INC.
51. On or about February 23, 2005, Defendant [REDACTED] [REDACTED] placed a telephone call to a telephone used by Jane Doe #4.
52. On or about February 24, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #14.
53. On or about February 24, 2005, Defendants JEFFREY EPSTEIN, [REDACTED] [REDACTED], and [REDACTED] [REDACTED] traveled from Teterboro, New Jersey to Palm Beach County, Florida, aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
54. In or around March 2005, Defendant JEFFREY EPSTEIN digitally penetrated Jane Doe #11, who was then a seventeen-year-old girl.

55. On or about March 1, 2005, Defendant [REDACTED] [REDACTED], a/k/a "[REDACTED] [REDACTED]," placed one or more telephone calls to a telephone used by Jane Doe #13.
56. On or about March 4, 2005, Defendants JEFFREY EPSTEIN, [REDACTED] [REDACTED], a/k/a "[REDACTED] [REDACTED]," and [REDACTED] [REDACTED] traveled from New York, New York to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.
57. On or about March 16, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #13.
58. On or about March 17, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #14.
59. On or about March 18, 2005, Defendant JEFFREY EPSTEIN traveled from New York, New York to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.
60. On or about March 18, 2005, Defendant [REDACTED] [REDACTED] left a telephone message for Defendant JEFFREY EPSTEIN regarding Jane Doe #6, stating: "Is it ok if [Jane Doe #6] will come at 5?"
61. On or about March 21, 2005, Defendant [REDACTED] [REDACTED], a/k/a "[REDACTED] [REDACTED]," placed one or more telephone calls to a telephone used by Jane Doe #13.
62. On or about March 29, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #6.
63. On or about March 29, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #5.
64. On or about March 29, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #13.
65. On or about March 30, 2005, [REDACTED] placed one or more calls to a telephone used by Jane Doe #5.
66. On or about March 30, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #14.
67. On or about March 31, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #14.

68. On or about March 31, 2005, Defendant ██████████ ██████████ placed one or more calls to a telephone used by Jane Doe #5.
69. On or about March 31, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #9.
70. On or about March 31, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #8.
71. On or about March 31, 2005, Defendant ██████████ ██████████, a/k/a “██████████ ██████████,” placed one or more telephone calls to a telephone used by Jane Doe #14.
72. On or about March 31, 2005, Defendant JEFFREY EPSTEIN traveled from New York, New York to Palm Beach County, Florida, aboard the Boeing 727 aircraft owned by JEGE, INC.
73. On or about March 31, 2005, Defendants JEFFREY EPSTEIN and ██████████ ██████████ caused Jane Doe #5 to make a call to a telephone used by Jane Doe #16.
74. On or about April 1, 2005, Defendants JEFFREY EPSTEIN and ██████████ ██████████ caused Jane Doe #5 to make one or more calls to a telephone used by Jane Doe #16.
75. On or about April 1, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #8.
76. On or about April 2, 2005, Defendant ██████████ ██████████, a/k/a “██████████ ██████████,” placed one or more telephone calls to a telephone used by Jane Doe #17.
77. On or about April 2, 2005, Defendant ██████████ ██████████, a/k/a “██████████ ██████████,” placed one or more telephone calls to a telephone used by Jane Doe #14.
78. On or about May 19, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #14.
79. On or about May 19, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #17.
80. On or about May 19, 2005, Defendants JEFFREY EPSTEIN, ██████████ ██████████, and ██████████ ██████████, a/k/a “██████████ ██████████,” traveled from Teterboro, New Jersey to Palm Beach County, Florida, aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

81. On or about June 30, 2005, Defendant ██████████ ██████████ caused one or more telephone calls to a telephone used by Jane Doe #17.
82. On or about June 30, 2005, Defendants JEFFREY EPSTEIN and ██████████ ██████████, traveled from Teterboro, New Jersey to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
83. In or around July 2005, Defendant ██████████ ██████████ led Jane Doe #18 from the kitchen of 358 El Brillo Way upstairs to the master bedroom area of 358 El Brillo Way.
84. On or about July 2, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #17.
85. On or about July 22, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #17.
86. On or about July 22, 2005, Defendants JEFFREY EPSTEIN and ██████████ ██████████, traveled from Teterboro, New Jersey to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
87. On or about August 18, 2005, Defendants JEFFREY EPSTEIN, ██████████ ██████████, a/k/a "██████████ ██████████," and ██████████ ██████████ traveled from Teterboro, New Jersey to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
88. On or about August 18, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #17.
89. On or about August 19, 2005, Defendant ██████████ ██████████, a/k/a "██████████ ██████████," placed one or more telephone calls to a telephone used by Jane Doe #17.
90. On or about August 21, 2005, Defendant ██████████ ██████████ placed one or more telephone calls to a telephone used by Jane Doe #17.
91. On or about September 3, 2005, Defendants JEFFREY EPSTEIN and ██████████ ██████████, a/k/a "██████████ ██████████," traveled from the U.S. Virgin Islands to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
92. On or about September 3, 2005, Defendant ██████████ ██████████, a/k/a "██████████ ██████████," placed one or more telephone calls to a telephone used by Jane Doe #17.

93. On or about September 18, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #17.
94. On or about September 18, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #14.
95. On or about September 18, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #9.
96. On or about September 18, 2005, Defendants JEFFREY EPSTEIN, [REDACTED] [REDACTED], and [REDACTED] [REDACTED], a/k/a “[REDACTED] [REDACTED],” traveled from Westchester County, New York to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
97. On or about September 18, 2005, Defendant [REDACTED] [REDACTED] sent a text message to a telephone used by Jane Doe #17.
98. On or about September 18, 2005, Defendant [REDACTED] [REDACTED] sent a text message to a telephone used by Jane Doe #14.
99. On or about September 29, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #17.
100. On or about September 29, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #14.
101. On or about September 29, 2005, Defendants JEFFREY EPSTEIN, [REDACTED] [REDACTED], a/k/a “[REDACTED] [REDACTED],” and [REDACTED] [REDACTED] traveled from Teterboro, New Jersey to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.
102. On or about September 30, 2005, Defendant [REDACTED] [REDACTED], a/k/a “[REDACTED] [REDACTED],” placed one or more telephone calls to a telephone used by Jane Doe #17.
103. On or about September 30, 2005, Defendant [REDACTED] [REDACTED], a/k/a “[REDACTED] [REDACTED],” placed one or more telephone calls to a telephone used by Jane Doe #14.
104. On or about October 1, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #14.
105. On or about October 1, 2005, Defendant [REDACTED] [REDACTED] sent a text message to a telephone used by Jane Doe # 14.

106. On or about October 1, 2005, Defendant [REDACTED] [REDACTED] left a telephone message for Defendant JEFFREY EPSTEIN stating: “[Jane Doe #14] confirmed at 11 AM and [Jane Doe #17] – 4PM”.

107. On or about October 2, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #14.

108. On or about October 2, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #17.

109. On or about October 2, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #9.

110. On or about October 3, 2005, Defendant [REDACTED] [REDACTED] caused one or more telephone calls to a telephone used by Jane Doe #17.

111. On or about October 3, 2005, Defendant [REDACTED] [REDACTED] left a telephone message for Defendant JEFFREY EPSTEIN stating: “[Jane Doe #17] will be ½ hour late”.

112. In or around the first week of October of 2005, Defendant JEFFREY EPSTEIN engaged in sexual intercourse with Jane Doe #17, who was then a seventeen-year-old girl.

113. In or around the first week of October of 2005, Defendant JEFFREY EPSTEIN made a payment of \$350.00 to Jane Doe #17, who was then a seventeen-year-old girl.

114. On or about October 4, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #14.

115. On or about October 4, 2005, Defendant [REDACTED] [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #6.

All in violation of Title 18, United States Code, Sections 371 and 2.

COUNT 2

(Conspiracy to Travel: 18 U.S.C. § 2423(e))

1. Paragraphs 1 through 32 of this indictment are re-alleged and incorporated by reference as fully set for the herein.

2. From at least as early as 2001 through in or around October 2005, the exact dates being unknown to the Grand Jury, the defendants,

JEFFREY EPSTEIN,
[REDACTED] [REDACTED],

[REDACTED], a/k/a "[REDACTED]"

and

[REDACTED]

did knowingly and willfully conspire with each other and with others known and unknown to travel in interstate commerce for the purpose of engaging in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), with another person, in violation of Title 18, United States Code, Section 2423(b); all in violation of Title 18, United States Code, Section 2423(e).

COUNT 3

(Facilitation of Unlawful Travel of Another: 18 U.S.C. § 2423(d))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
2. From at least as early as in or about 2001 through in or around October 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendant,

[REDACTED]

did, for the purpose of commercial advantage or private financial gain, arrange or facilitate the travel of a person, that is Defendant Jeffrey Epstein, knowing that such person was traveling in interstate commerce for the purpose of engaging in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f); in violation of Title 18, United States Code, Section 2423(d).

COUNT 4

(Sex Trafficking: 18 U.S.C. § 1591(a)(2))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
2. From at least as early as in or about 2001 through in or about October 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

[REDACTED]

[REDACTED], a/k/a "[REDACTED]"

and

[REDACTED]

did knowingly benefit, financially or by receiving anything of value, from participation in a venture, as defined in 18 U.S.C. § 1591(c)(3), which had engaged in an act described in violation of 18 U.S.C. § 1591(a)(1), that is, the recruiting, enticing, providing, or obtaining by any means a person, in or affecting interstate commerce, knowing that the person or persons had not attained the age of 18 years

and would be caused to engage in a commercial sex act as defined in 18 U.S.C. § 1591(c)(1); in violation of Title 18, United States Code, Sections 1591(a)(2), 1591(b)(2), and 2.

COUNT 5

(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
2. From in or around the spring of 2003 through on or about October 2, 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN

and

██████████ ██████████,

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #4, who was a person who had not attained the age of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 6

(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
2. In or around March 2004, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN

and

██████████ ██████████,

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #5, who was a person who had not attained the age of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 7

(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
2. From in or around April 2004 through on or around June 29, 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN,

[REDACTED], and
[REDACTED], a/k/a "[REDACTED]"

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #6, who was a person who had not attained the age of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 8
(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. In or around July 2004, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN
and

[REDACTED]

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #7, who was a person who had not attained the age of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 9
(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around July 2004 through on or around December 29, 2004, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN
and

[REDACTED]

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #8, who was a person who had not attained the age of 18 years, to engage in prostitution and in a sexual activity for which a person can be charged with a criminal offense, that is a violation of Florida Statutes Section 794.05; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 10
(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around July 2004 through on or about January 31, 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN,
[REDACTED],
[REDACTED], a/k/a “[REDACTED],”
and [REDACTED],

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #9, who was a person who had not attained the age of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 11
(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around the middle of 2004 through on or about April 22, 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN
and
[REDACTED],

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #10, who was a person who had not attained the age of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 12
(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around August 2004 through on or about May 27, 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN,
[REDACTED], and
[REDACTED], a/k/a “[REDACTED],”

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #11, who was a person who had not attained the age of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 13

(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around November 2004 through in or around March 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN,

██████████ ██████████, and

██████████ ██████████, a/k/a "██████████ ██████████,"

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #13, who was a person who had not attained the age of 18 years, to engage in prostitution and in a sexual activity for which a person can be charged with a criminal offense, that is a violation of Florida Statutes Section 794.05 ; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 14

(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around December 2004 through on or about June 5, 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN,

██████████ ██████████, and

██████████ ██████████, a/k/a "██████████ ██████████,"

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #14, who was a person who had not attained the age of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 15

(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. In or around December 2004, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN

and

██████████ ██████████,

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #15, who was a person who had not attained the age of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 16

(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. In or around February 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN

and

██████████ ██████████,

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #16, who was a person who had not attained the age of 18 years, to engage in prostitution and in a sexual activity for which any person can be charged with a criminal offense, that is violations of Florida Statutes Sections 800.04(5)(a), 800.04(6)(a), and 800.04(7)(a) ; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 17

(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. From in or around February 2005 through in or around the first week of October 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN,

██████████ ██████████,

██████████ ██████████, a/k/a "██████████ ██████████,"

and ██████████ ██████████,

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #17, who was a person who had not attained the age of 18 years, to engage in

prostitution and in a sexual activity for which a person can be charged with a criminal offense, that is a violation of Florida Statutes Section 794.05 ; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 18
(Enticement of a Minor: 18 U.S.C. § 2422(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
2. From in or around February 2005 through in or around April 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN,

[REDACTED] [REDACTED], and

[REDACTED] [REDACTED], a/k/a “[REDACTED] [REDACTED],”

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce and entice Jane Doe #18, who was a person who had not attained the age of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNTS 19 THROUGH 22
(Travel to Engage in Illicit Sexual Conduct: 18 U.S.C. § 2423(b))

1. Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about the dates enumerated as to each count listed below, from a place outside the Southern District of Florida to a place inside the Southern District of Florida, the Defendant(s) listed below traveled in interstate commerce for the purpose of engaging in illicit sexual conduct as defined in 18 U.S.C. § 2423(f), with a person under 18 years of age, that is, the person(s) listed in each count below:

COUNT	DATE(S)	MINOR(S) INVOLVED	DEFENDANT(S)
19	7/16/2004	Jane Doe #7 Jane Doe #8 Jane Doe #9	JEFFREY EPSTEIN [REDACTED] [REDACTED]
20	3/31/2005	Jane Doe #6 Jane Doe #8 Jane Doe #9 Jane Doe #13 Jane Doe #14 Jane Doe #16 Jane Doe #17	JEFFREY EPSTEIN [REDACTED] [REDACTED] a/k/a “[REDACTED] [REDACTED]”
21	9/18/2005	Jane Doe #9	JEFFREY EPSTEIN

		Jane Doe #14 Jane Doe #17	[REDACTED] [REDACTED] a/k/a "[REDACTED]"
22	9/29/05	Jane Doe #14 Jane Doe #17	JEFFREY EPSTEIN [REDACTED] [REDACTED] a/k/a "[REDACTED]" [REDACTED]

All in violation of Title 18, United States Code, Sections 2423(b) and 2.

COUNTS 23 THROUGH 32
(Sex Trafficking: 18 U.S.C. § 1591(a)(1))

- Paragraphs 1 through 32 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
- On or about the dates enumerated as to each count listed below, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the Defendants listed below did knowingly, in and affecting interstate and foreign commerce, recruit, entice, provide, and obtain by any means a person, that is, the person in each count listed below, knowing that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act as defined in 18 U.S.C. § 1591(c)(1):

COUNT	DATE(S)	MINOR(S) INVOLVED	DEFENDANT(S)
23	2001 - 2004	Jane Doe #2	JEFFREY EPSTEIN [REDACTED]
24	April 2004 through June 29, 2005	Jane Doe #6	JEFFREY EPSTEIN [REDACTED] a/k/a "[REDACTED]"
25	July 2004	Jane Doe #7	JEFFREY EPSTEIN [REDACTED]
26	July 2004 through December 29, 2004	Jane Doe #8	JEFFREY EPSTEIN [REDACTED]
27	July 2004 through January 31, 2005	Jane Doe #9	JEFFREY EPSTEIN [REDACTED] a/k/a "[REDACTED]" [REDACTED]
28	Mid-2004 through April 22, 2005	Jane Doe #10	JEFFREY EPSTEIN [REDACTED]
29	August 2004 through May 27, 2005	Jane Doe #11	JEFFREY EPSTEIN [REDACTED] [REDACTED]

			a/k/a "[REDACTED]"
30	November 2004 through March 2005	Jane Doe #13	JEFFREY EPSTEIN [REDACTED] [REDACTED] a/k/a "[REDACTED]"
31	December 2004 through June 5, 2005	Jane Doe #14	JEFFREY EPSTEIN [REDACTED] [REDACTED] a/k/a "[REDACTED]"
32	February 2005 through first week of October 2005	Jane Doe #17	JEFFREY EPSTEIN [REDACTED] [REDACTED] a/k/a "[REDACTED]"

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 2.

FORFEITURE 1

Upon conviction of the violation alleged in Count 1 of this indictment, the defendants, JEFFREY EPSTEIN, [REDACTED], [REDACTED], [REDACTED], [REDACTED], a/k/a "[REDACTED]" and [REDACTED], shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

Pursuant to Title 28, United States Code, Section 2461; Title 18, United States Code, Section 981(a)(1)(C); and Title 21, United States Code, Section 853.

If the property described above as being subject to forfeiture, as a result of any act or omission of the defendants, JEFFREY EPSTEIN, [REDACTED], [REDACTED], [REDACTED], [REDACTED], a/k/a "[REDACTED]" and [REDACTED],

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

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

All pursuant to Title 28 United States Code, Section 2461; Title 18, United States Code, Section 981(a)(1)(C); and Title 21 United States Code, Section 853.

FORFEITURE 2

Upon conviction of any of the violations alleged in Counts 2, 3, 5-50, 59, 60, of this indictment, the defendants, JEFFREY EPSTEIN, [REDACTED], [REDACTED], [REDACTED], [REDACTED], a/k/a "[REDACTED] [REDACTED]," and [REDACTED] [REDACTED], shall forfeit to the United States any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including but not limited to the following:

a. A parcel of land located at 358 El Brillo Way, Palm Beach, Florida 33480, including all buildings, improvements, fixtures, attachments, and easements found therein or thereon, and more particularly described as:

Being all of Lot 40 and the West 24.3 feet of Lot 39, El Bravo Park, as recorded in Plat Book 9, Page 9, in the records of Palm Beach County, Florida and BEING that portion lying West of Lot 40, El Bravo Park, in Section 27, Township 43 South, Range 43 East, as recorded in Plat Book 9, Page 9, Public Records of Palm Beach County, Florida, being bounded on the West by the West side of an existing concrete seawall and the northerly extension thereof as shown on the Adair & Brady, Inc., drawing IS-1298, dated March 25, 1981, and bounded on the East by the shoreline as shown on the plat of El Bravo Park, and bounded on the North and South by the Westerly extensions of the North and South lines respectively of Lot 40, containing 0.07 acres, more or less.

Pursuant to Title 18, United States Code, Section 2253.

If any of the forfeitable property described in the forfeiture section of this indictment, as a result of any act or omission of the defendants JEFFREY EPSTEIN, [REDACTED], [REDACTED], [REDACTED], [REDACTED], a/k/a "[REDACTED] [REDACTED]," and [REDACTED] [REDACTED],

- (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 divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(o), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

Pursuant to Title 18, United States Code, Section 2253.

FORFEITURE 3

Upon conviction of any of the violations alleged in Counts 4, 51-58, of this indictment, the defendants, JEFFREY EPSTEIN, [REDACTED], [REDACTED], [REDACTED], [REDACTED], a/k/a "[REDACTED] [REDACTED]," and [REDACTED] [REDACTED], shall forfeit to the United States any property, real or personal, that was used

or intended to be used to commit or to facilitate the commission of such violation; and any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of such violation, including but not limited to the following:

a. A parcel of land located at 358 El Brillo Way, Palm Beach, Florida 33480, including all buildings, improvements, fixtures, attachments, and easements found therein or thereon, and more particularly described as:

Being all of Lot 40 and the West 24.3 feet of Lot 39, El Bravo Park, as recorded in Plat Book 9, Page 9, in the records of Palm Beach County, Florida and BEING that portion lying West of Lot 40, El Bravo Park, in Section 27, Township 43 South, Range 43 East, as recorded in Plat Book 9, Page 9, Public Records of Palm Beach County, Florida, being bounded on the West by the West side of an existing concrete seawall and the northerly extension thereof as shown on the Adair & Brady, Inc., drawing IS-1298, dated March 25, 1981, and bounded on the East by the shoreline as shown on the plat of El Bravo Park, and bounded on the North and South by the Westerly extensions of the North and South lines respectively of Lot 40, containing 0.07 acres, more or less.

Pursuant to Title 18, United States Code, Section 1594(b).

A TRUE BILL

FOREPERSON

UNITED STATES ATTORNEY

ASSISTANT UNITED STATES ATTORNEY