

GRAND JURY PRESENTATION
OPERATION LEAP YEAR

I. INTRODUCTION

- A. New Indictment
 - 1. Summarize Changes
 - 2. Summarize Current Charges
 - 3. Review Law/Instructions
 - 4. Go through legal allegations in introduction

- B. Summarize How the Evidence Will Be Presented
 - 1. Charts
 - 2. Break Overt Acts into Three Categories:
 - a. Flights – Manifests
 - b. Calls – Telephone Records
 - c. Meetings/Sexual Activity – Testimony re Interviews with the Girls

- C. Take Questions

- D. Call Special Agent [REDACTED]

II. RETURN DOCUMENTS RECEIVED IN RESPONSE TO SUBPOENAS ISSUED SINCE THE LAST DOCUMENT RETURN.

- A. Have additional subpoenas been issued on behalf of this grand jury regarding Operation Leap Year? And have documents been received in response to those subpoenas? What subpoenas were issued and what items were received? Did you bring those records with you today?

III. KUYRKENDALL TESTIMONY

- A. Hand out summary chart
 - 1. Review renumbering of Jane Does
 - a. [REDACTED] Can you explain to the grand jury how the Jane Does have been renumbered? (They were numbered to try to appear in a more chronological order depending on their

- first known contact with Mr. Epstein)
- b. [REDACTED] Which of these girls has the grand jury already heard testimony about?
2. Go over how chart is organized
 - a. [REDACTED] What does each column refer to?
 3. Generally review references to transcript pages
 - a. [REDACTED] What does the list of transcript pages refer to? How was that list created?
- B. Go through the allegations in the Introductory Section of the Indictment. Summarize evidence that hasn't already been presented (I think just the high school allegations)
- C. Hand out flight chart
1. What does this chart refer to? What does each column mean?
 2. Flip to a few overt acts and read the text aloud. What is the evidence in support of these allegations? (Flight manifests)
 3. Remind the grand jury how the flight manifests were obtained.
 4. So, for each flight referenced in the overt acts, what evidence was relied upon? And did you bring those flight manifests with you? Let's mark those manifests as Composite Grand Jury Exhibit Number JE-1.
 5. There are several dozen manifests contained within Exhibit JE-1. Have you marked in any way the manifests related to the flights referenced in the indictment? And in reviewing those manifests, what information will the grand jurors find? [Airplane used. Date. Departure airport. Arrival airport. Arrival time. Passenger names.]
- D. Hand out telephone call chart
1. What does this chart refer to? What does each column mean?
 2. Flip to a few overt acts and read the text aloud. What is the evidence in support of these allegations? (Telephone records)

3. Remind the grand jury how the telephone records were obtained and whose telephone records were obtained. Were there any records that you tried to obtain that you couldn't?
4. Have you pulled the telephone records that contain the telephone calls referred to in the indictment? And did you bring them with you? Let's mark those manifests as Composite Grand Jury Exhibit JE-2. Have you marked in any way the telephone bills that reference the calls listed in the indictment? And in reviewing those billing records, what information will the grand juror's find? (Telephone number called. Time and date of call. Call length.)
 - a. Can you tell the grand jury the telephone numbers that are relevant to the calls specifically listed in the indictment?

TAKE A BREAK
BEGIN TESTIMONY REGARDING THE GIRLS

IV. JANE DOES 1 and 2

- A. Who is Jane Doe #1?
 1. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #1?
 2. During what period of time did Jane Doe #1 have contact with JE?
 3. How old was she during that time frame?
 4. How did she meet JE?
 5. And what sexual activity was she involved in with JE?
 6. Did she recruit anyone to go to JE's home?
- B. Who is Jane Doe #2?
 1. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #2?
 2. During what period of time did Jane Doe #2 have contact with JE?

3. How old was she during that time frame?
4. How did she meet JE?
5. And what sexual activity was she involved in with JE?
6. How much was she paid for performing sexual massages for JE?
7. Did she recruit anyone to go to JE's home?
8. Please take us through the evidence supporting the overt acts related to Jane Doe #2.
9. What did Jane Doe #2 say about whether JE knew her age?
10. Who would contact Jane Doe #2 to make appointments? How would she be contacted?
11. Let's refer to Count 23. Is the evidence you just summarized the basis for the allegation that JE and SK procured Jane Doe #2 to engage in commercial sex acts knowing that she was under 18?

V. JANE DOE #3

- A. Who is Jane Doe #3? Have you testified about her previously?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #3?
- C. During what period of time did Jane Doe #3 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. What is the basis for the allegation in overt act #42?

VI. JANE DOE #4

- A. Who is Jane Doe #4? Have you testified about her previously?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #4?
- C. During what period of time did Jane Doe #4 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. Can you summarize the evidence supporting the allegations in overt acts 16-22, 138, and 165?
- I. And what additional evidence is there to support Count 5, which alleges that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #4 to engage in prostitution? How many telephone calls have you been able to document between Jane Doe #4 and [REDACTED]?
 - 1. How old was Jane Doe #4 during her sexual activity with JE? What is the sexual activity that occurred that violates Fl. Stat. 800.04?

VII. JANE DOE #5

- A. Who is Jane Doe #5? Have you testified about her previously? And did she also testify before this grand jury?
 - 1. Is there anything that you want to clarify or add regarding your earlier testimony?
- B. During what period of time did Jane Doe #5 have contact with JE?
- C. How old was she during that time frame?
- D. How did she meet JE?

- E. And what sexual activity was she involved in with JE?
- F. Did she recruit anyone to go to JE's home?
- G. Does your prior testimony cover the evidence supporting the allegations in overt acts 27-29, 80-81, 91, 153-154, 159, 175, 177, 179, 182, 185-186?
- H. And what additional evidence is there to support Count 6, which alleges that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #5 to engage in prostitution? Can you describe the telephone communications between [REDACTED] and the people who recruited Jane Doe #5 to give JE the massage? After that massage, when Jane Doe #5 became exclusively a recruiter, how many telephone calls have you been able to document between Jane Doe #5 and [REDACTED]

VIII. JANE DOE #6

- A. Who is Jane Doe #6? Have you testified about her previously?
 - 1. Is there anything that you want to clarify or add regarding your earlier testimony?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #6?
- C. During what period of time did Jane Doe #6 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. Does your prior testimony cover the evidence supporting the allegations in overt acts 23-24, 32-35, 37-38, 57, 59, 124, 174, 176?
- I. And what additional evidence is there to support Count 7, which alleges that JE and SK used a facility of interstate commerce to persuade, induce,

and entice Jane Doe #6 to engage in prostitution? How many telephone calls have you been able to document between Jane Doe #6 and [REDACTED]?

- J. Is there anything you want to add regarding Count 24, which alleges that JE and SK recruited and procured Jane Doe #6 to engage in commercial sex acts knowing that she was a minor?

IX. JANE DOE #7

- A. Who is Jane Doe #7? Have you testified about her previously?
1. Is there anything that you want to clarify or add regarding your earlier testimony?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #7?
- C. During what period of time did Jane Doe #7 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. Does your prior testimony cover the evidence supporting the allegations in overt acts 41-47, 51, 53?
- I. And what additional evidence is there to support Count 8, which alleges that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #7 to engage in prostitution? How many telephone calls have you been able to document between Jane Doe #7 and [REDACTED]?

X. JANE DOE #8

- A. Who is Jane Doe #8? Have you testified about her previously?
1. Is there anything that you want to clarify or add regarding your earlier testimony?

- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #8?
- C. During what period of time did Jane Doe #8 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. Does your prior testimony cover the evidence supporting the allegations in overt acts 25, 48-50, 52, 56, 58, 60, 63-65, 102, 111-112, 144?
- I. And what additional evidence is there to support Count 9, which alleges that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #8 to engage in prostitution? How many telephone calls have you been able to document between Jane Doe #8 and [REDACTED]?
 - 1. How old was Jane Doe #8 at the time? And what is the activity that she and JE engaged in that also violated Fl. Stat. 794.05?
- J. Is there anything you want to add regarding Count 25, which alleges that JE and SK recruited and procured Jane Doe #8 to engage in commercial sex acts knowing that she was a minor?

XI. JANE DOE #9

- A. Who is Jane Doe #9? Have you testified about her previously?
 - 1. Is there anything that you want to clarify or add regarding your earlier testimony?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #9?
- C. During what period of time did Jane Doe #9 have contact with JE?
- D. How old was she during that time frame?

- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. Does your prior testimony cover the evidence supporting the allegations in overt acts 55, 61, 66-67, 102, 107-108, 140, 142-143, 150?
- I. And what additional evidence is there to support Count 10, which alleges that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #9 to engage in prostitution? How many telephone calls have you been able to document between Jane Doe #9 and [REDACTED]?
- J. Is there anything you want to add regarding Count 26, which alleges that JE and SK recruited and procured Jane Doe #9 to engage in commercial sex acts knowing that she was a minor?

XII. JANE DOE #10

- A. Who is Jane Doe #10? Have you testified about her previously?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #10?
- C. During what period of time did Jane Doe #10 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. What evidence supports the allegations in overt acts 68-71, 145?
- I. And what additional evidence is there to support Count 11, which alleges that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #10 to engage in prostitution? How many telephone

calls have you been able to document between Jane Doe #10 and [REDACTED]?

- J. Is there anything you want to add regarding Count 27, which alleges that JE and SK recruited and procured Jane Doe #10 to engage in commercial sex acts knowing that she was a minor?

XIII. JANE DOE #11

- A. Who is Jane Doe #11? Have you testified about her previously?
 - 1. Is there anything that you want to clarify or add regarding your earlier testimony?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #11?
- C. During what period of time did Jane Doe #11 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. Can you summarize the evidence supporting the allegations in overt acts 78, 145-148, 168?
- I. And what additional evidence is there to support Count 12, which alleges that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #11 to engage in prostitution? How many telephone calls have you been able to document between Jane Doe #11 and [REDACTED]?
- J. Is there anything you want to add regarding Count 28, which alleges that JE and SK recruited and procured Jane Doe #11 to engage in commercial sex acts knowing that she was a minor?

XIV. JANE DOE #12

- A. Who is Jane Doe #12? Have you testified about her previously?

1. Is there anything that you want to clarify or add regarding your earlier testimony?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #12?
- C. During what period of time did Jane Doe #12 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. Can you summarize the evidence supporting the allegations in overt acts 80-84, 94, 106?

XV. JANE DOE #13

- A. Who is Jane Doe #13? Have you testified about her previously?
 1. Is there anything that you want to clarify or add regarding your earlier testimony?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #13?
- C. During what period of time did Jane Doe #13 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. Does your prior testimony cover the evidence supporting the allegations in

overt acts 72-76, 109-110, 114-117, 136-137, 149, 160, 169, 171, 175, 178?

- I. And what additional evidence is there to support Count 13, which alleges that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #13 to engage in prostitution? How many telephone calls have you been able to document between Jane Doe #13 and [REDACTED]
 1. How old was Jane Doe #13 during this period? And what is the sexual activity that she and JE engaged in that also violated Fl. Stat. 794.05?
- J. Is there anything you want to add regarding Count 29, which alleges that JE and SK recruited and procured Jane Doe #13 to engage in commercial sex acts knowing that she was a minor?

XVI. JANE DOE #14

- A. Who is Jane Doe #14? Have you testified about her previously?
 1. Is there anything that you want to clarify or add regarding your earlier testimony?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #14?
- C. During what period of time did Jane Doe #14 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. Does your prior testimony cover the evidence supporting the allegations in overt acts 103, 125-128, 135, 144, 152, 162-163, 166, 172, 180-181, 183, 208?
- I. And what additional evidence is there to support Count 14, which alleges that JE, SK, and [REDACTED] used a facility of interstate commerce to

persuade, induce, and entice Jane Doe #14 to engage in prostitution? How many telephone calls have you been able to document between Jane Doe #14 and [REDACTED]? And how many between Jane Doe #14 and Ross?

- J. Is there anything you want to add regarding Count 30, which alleges that JE, SK, and [REDACTED] recruited and procured Jane Doe #14 to engage in commercial sex acts knowing that she was a minor?

XVII. JANE DOE #15

- A. Who is Jane Doe #15? Have you testified about her previously?
1. Is there anything that you want to clarify or add regarding your earlier testimony?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #15?
- C. During what period of time did Jane Doe #15 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. Does your prior testimony cover the evidence supporting the allegations in overt acts 94-100, 106?
- I. And what additional evidence is there to support Count 15, which alleges that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #15 to engage in prostitution? How many telephone calls have you been able to document between Jane Doe #15 and [REDACTED]?

XVIII. JANE DOE #16

- A. Who is Jane Doe #16? Have you testified about her previously?
1. Is there anything that you want to clarify or add regarding your

earlier testimony?

- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #16?
- C. During what period of time did Jane Doe #16 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Does your prior testimony cover the evidence supporting the allegations in overt acts 153-158, 185-186?
- H. And what additional evidence is there to support Count 16, which alleges that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #16 to engage in prostitution? Can you describe the evidence regarding the indirect telephone contact between SK and Jane Doe #16 via Jane Doe #5? Are there controlled telephone calls?
 - 1. How old was Jane Doe #16? And what was the sexual activity that she and JE engaged in that also violated Fl. Stat. 800.04?

XIX. JANE DOE #17

- A. Who is Jane Doe #17? Have you testified about her previously?
 - 1. Is there anything that you want to clarify or add regarding your earlier testimony?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #17?
- C. During what period of time did Jane Doe #17 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?

- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. Does your prior testimony cover the evidence supporting the allegations in overt acts 118-119, 129-133, 187-188, 190, 193-194, 197-199, 201-202, 204-205, 207-213?
- I. And what additional evidence is there to support Count 17, which alleges that JE, [REDACTED] used a facility of interstate commerce to persuade, induce, and entice Jane Doe #17 to engage in prostitution? How many telephone calls have you been able to document between Jane Doe #17 and [REDACTED] Between Jane Doe #17 and Ross? And between Jane Doe #17 and [REDACTED]
 - 1. What was the sexual activity that Jane Doe #17 and JE engaged in that also violated Fl. Stat. 794.05?
- J. Is there anything you want to add regarding Count 31, which alleges that JE, [REDACTED] recruited and procured Jane Doe #17 to engage in commercial sex acts knowing that she was a minor?

XX. JANE DOE #18

- A. Who is Jane Doe #18? Have you testified about her previously?
 - 1. Is there anything that you want to clarify or add regarding your earlier testimony?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #18?
- C. During what period of time did Jane Doe #18 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?

- H. Does your prior testimony cover the evidence supporting the allegations in overt acts 118-123, 197?
- I. And what additional evidence is there to support Count 18, which alleges that JE, ██████████ used a facility of interstate commerce to persuade, induce, and entice Jane Doe #18 to engage in prostitution? How many telephone calls have you been able to document between Jane Doe #18 and ██████████? And how many between Jane Doe #18 and Ross?

XXI. JANE DOE #19

- A. Who is Jane Doe #19? Have you testified about her previously?
- B. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #19?
- C. During what period of time did Jane Doe #19 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. Did she recruit anyone to go to JE's home?
- H. Can you summarize the evidence supporting the allegations in overt acts 88-91?

XXII. TRAVEL COUNTS: COUNTS 19 THROUGH 22

- A. Count 19: July 16, 2004
 - 1. Who was aboard the flight on July 16, 2004?
 - 2. What telephone activity occurred prior to the flight on July 16th?
 - 3. And what telephone activity occurred while JE was in Palm Beach?
 - 4. What other documentary evidence is there to show that one of the

purposes of JE's July 16th trip was to engage in illicit sexual conduct?

B. Count 20: March 31, 2005

1. Who was aboard the flight on March 31, 2005?
2. What telephone activity occurred prior to the flight on March 31st?
3. And what telephone activity occurred while JE was in Palm Beach?
4. What other documentary evidence is there to show that one of the purposes of JE's March 31st trip was to engage in illicit sexual conduct?

C. Count 21: September 18, 2005

1. Who was aboard the flight on September 18, 2005?
2. What telephone activity occurred prior to the flight on September 18th?
3. And what telephone activity occurred while JE was in Palm Beach?
4. What other documentary evidence is there to show that one of the purposes of JE's September 18th trip was to engage in illicit sexual conduct?

D. Count 22: September 29, 2005

1. Who was aboard the flight on September 29, 2005?
2. What telephone activity occurred prior to the flight on September 29th?
3. And what telephone activity occurred while JE was in Palm Beach?
4. What other documentary evidence is there to show that one of the purposes of JE's September 29th trip was to engage in illicit sexual conduct?