

From: "[REDACTED] (USANYS)" <[REDACTED]>

To: "[REDACTED] (USANYS)" <[REDACTED]>

Subject: FW: draft urgent matter report

Date: Tue, 25 Jun 2019 19:10:37 +0000

Importance: Normal

Attachments: 2019-06-24,_JE,_urgent_matter_report.docx

I'm reviewing

From: [REDACTED] <[REDACTED]>

Sent: Tuesday, June 25, 2019 11:59 AM

To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: RE: draft urgent matter report

As requested, below is a draft urgent matter report, based on the example from the [REDACTED] case. It's also attached in Word version in case that's easier to work off of for any edits.

FROM: UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF NEW YORK
PHONE: 212-637-2200

DISTRICT POC: Geoffrey S. Berman, U.S. Attorney
Phone [REDACTED]
[REDACTED]

SYNOPSIS:

The USAO-SDNY plans to indict Jeffrey Epstein on one count of sex trafficking of a minor and one count of conspiracy to commit sex trafficking of a minor. The charges stem from Epstein's sexual abuse of minor girls in Palm Beach, Florida, and New York, New York, from at least in or about 2002, through up to and including in or about 2005. We plan to seek the indictment on or about July 2, 2019.

DESCRIPTION:

Since approximately December 2018, the USAO-SDNY has been investigating Jeffrey Epstein, a wealthy financier who during the relevant period maintained multiple residences in the continental United States and elsewhere, including in New York, New York (the "New York Residence"), and Palm Beach, Florida (the "Palm Beach Residence"). Beginning in at least 2002, Epstein enticed and recruited, and caused to be enticed and recruited, dozens of minor girls to engage in sex acts with him at the New York Residence and the Palm Beach Residence in exchange for money. In both New York and Florida, Epstein perpetrated this abuse in similar ways. Victims were initially recruited to provide "massages" to Epstein, which would be performed nude or partially nude, became increasingly sexual in nature, and would typically include one or more sex acts. Epstein paid his victims several hundred dollars in cash for each encounter. Moreover, Epstein paid certain of his victims to recruit additional minor girls to be similarly sexually abused. In this manner, Epstein maintained a steady supply of new victims to exploit. In particular, three victims in New York and Florida have described this pattern of conduct and abuse; each of the three victims also recruited other girls for Epstein to victimize in exchange for payment from Epstein.

Epstein previously was investigated for this conduct by the Southern District of Florida U.S. Attorney's Office ("SDFL"), which entered into a non-prosecution agreement with Epstein (the "NPA"). By its terms, the NPA does not purport to bind any prosecuting authority other than the SDFL, and only purports to provide coverage for certain listed Florida victims. Here, the substantive count does not include as a victim any individuals based in Florida. Additionally, although the charged conduct occurred some time ago, for each count the sexual abuse occurred, in part, after April 2003, when 18 U.S.C. § 3283 was revised to permit the prosecution of sex offenses against minors at any time during the lifetime of the minor victim. Related, although currently the statute for conspiring to commit sex trafficking is 18 U.S.C. § 1594, that statute was not enacted until 2008, after the conduct described herein; accordingly, we intend to charge a conspiracy under 18 U.S.C. § 371.

The USAO-SDNY intends to indict Epstein on one count of sex trafficking of a minor, in violation of 18 U.S.C. § 1591, and one count of conspiracy to commit sex trafficking of a minor, in violation of 18 U.S.C. § 371.