

August 28, 2020

**CONFIDENTIAL SETTLEMENT COMMUNICATIONS**

Epstein Victims' Compensation Program  
Attn: Jordana H. Feldman, Administrator  
[REDACTED]  
Washington, D.C. [REDACTED]

**Re: *Epstein VCP Claim Submission***  
***Claim ID: TM3Q-W2NJ*** ([REDACTED])

Dear Ms. Feldman:

We are submitting this confidential letter to the Epstein VCP on behalf of [REDACTED]. In 1994, Ms. [REDACTED] was a 13-year-old girl attending [REDACTED] when she first met Jeffrey Epstein and Ghislaine Maxwell<sup>1</sup>. Over the next several years, [REDACTED] was sexually abused and raped by Epstein more than 200 times in Palm Beach, New York, New Mexico and Los Angeles. Maxwell also played a major role in this abuse. Maxwell not only assisted in and facilitated Epstein's abuse of [REDACTED] but she also personally abused [REDACTED] on numerous occasions as well during this time.

[REDACTED] eventually escaped from Epstein and Maxwell's web of exploitation and abuse. In [REDACTED] she moved to [REDACTED] to pursue a career as an actress. But it was not until approximately early 2002 when she was in her early 20s that she gained the strength and courage to put an end to Epstein's advances. [REDACTED] went on to become [REDACTED].

After Epstein's arrest in 2008, [REDACTED] identity was uncovered in documents seized from his home. For more than a decade since that time, she has been relentlessly pursued by attorneys, investigators, journalists and other victims looking for information concerning her connection to Epstein. It was not until recently, however, that she decided to share her story. Along with this letter and claim form, we are providing you with a never before seen video testimonial from [REDACTED] concerning the horrific abuse she endured and the resulting damages she suffered and will continue to suffer for the remainder of her life with commentary from [REDACTED] and Dr. Lynn Ponton, professor emeritus of child & adolescent psychiatry at University of California, San

<sup>1</sup> While [REDACTED] first met them when she was 13, she turned 14 on [REDACTED] [REDACTED]—towards the end of the summer camp. The abuse started when [REDACTED] was 14.

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Francisco. We are also submitting additional evidence we have obtained thus far concerning Epstein and Maxwell's liability and [REDACTED] damages. That evidence will be referenced herein by its Bates number. Finally, we would also, of course, welcome the opportunity for you to meet [REDACTED] and spend some time with her in any forum you deem appropriate.

I would like to first briefly discuss the status of [REDACTED] pending lawsuit against the Epstein Estate and Maxwell. [REDACTED] filed the lawsuit under the pseudonym Jane Doe on [REDACTED]. A copy of the complaint is being submitted along with these materials (*see* TM3Q-W2NJ – 1-10). Limited discovery has taken place so far. And despite our attempts to take depositions, we have been met with strong opposition from the defense and have had to reschedule them to dates in the future. Additionally, every other case against these defendants stemming from the same facts and circumstances has been voluntarily stayed by the parties in those other cases. Accordingly, it is our understanding that we are the only active pending case against these defendants in the SDNY. The defendants have repeatedly urged us to stay the case to pursue this claims process despite the protocols for the VCP explicitly stating: "Individuals who have filed a lawsuit need not agree to a stay of litigation or make any other concession in any pending litigation to be eligible to participate in the Program." Maxwell also recently filed a motion to stay the case in its entirety. The Estate has joined in the request. I expect that a ruling on that motion will take place after this claim has been submitted.

We recently made separate confidential settlement demands under FRE 408 on the Epstein Estate and Maxwell. We demanded \$50 million against the Estate and \$25 million against Maxwell. We are confident a jury will agree that [REDACTED] is a very credible and sympathetic witness who has suffered lifelong harm at the hands of a pair of pedophile monsters and the ultimate award in this case will be a reflection of the horrific abuse endured by [REDACTED]. To be clear, the demands we made on the Estate and Maxwell are what we believe the true verdict value is of this case.

In addition to [REDACTED] civil case, she has been actively involved in the SDNY's pending prosecution against Maxwell. Indeed, the true identity of [REDACTED] in the government's indictment against Maxwell is [REDACTED] (*see* TM3Q-W2NJ – 108-125). Over the course of the last year, [REDACTED] and I have met with prosecutors from the SDNY along with FBI agents concerning their investigation and, ultimately, their arrest of Maxwell. I can represent to you that both the AUSAs and FBI agents who have interviewed [REDACTED] in connection with their investigation have found her to be extremely credible, sympathetic and trustworthy.

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██████████ is not coming forward now to become famous. She is not seeking attention and she is not seeking headlines. She refuses to let what Epstein and Maxwell did to her define who she is to the world. ██████████ now recognizes, however, that she must confront the years of abuse she endured if she is to continue with her own life. This is why she is cooperating with the government in their case against Maxwell. This is why she has filed the lawsuit against the Epstein Estate and Maxwell. And what she seeks is what any victim who files suit against her abusers would want under our system of justice—fair and just compensation, based on the evidence, for the lifelong harm she has suffered.

As stated above, Jeffrey Epstein and Ghislaine Maxwell met ██████████ when she was a 13-year-old girl attending ██████████ sitting around a picnic table with other campers. As discussed in the video, Epstein and Maxwell ingratiated themselves into ██████████ life pretending to know her ██████████. Around this same time, ██████████ beloved father—██████████—died of cancer (something both Epstein and Maxwell were aware of) which, in addition to her young age, made her particularly susceptible and vulnerable. ██████████ along with her siblings and mother deeply grieved over the death of her father. Over the next several years, Epstein and Maxwell, while knowing ██████████ was just a child, preyed on this vulnerability by first buying her presents, pretending to care about her, acting as mentors to her and then sexually abusing her. Indeed, over those next several years, ██████████ was sexually abused and raped by Epstein on over 200 occasions. The abuse started off with Epstein ██████████ and then advanced to engaging ██████████. To be clear, ██████████ estimates that Epstein ██████████ her on over 200 occasions between the ages of 14 and 18. Maxwell, however, also abused ██████████ on numerous occasions during this time. Indeed, Maxwell attempted to normalize such behavior by being naked in front of ██████████ and ██████████ and other parts of her body. She was also physically present while Epstein engaged in sexual abuse of ██████████ and would participate in such abuse.

The aforementioned abuse first started in Palm Beach at Epstein's home and then in New York City at Epstein's Manhattan townhouse as well as at his Zorro Ranch located south of Santa Fe in New Mexico and, finally, in Los Angeles after ██████████ moved there in 1999.

*Based on information we have learned from the US government, ██████████ is likely the first known sex abuse minor victim of Epstein and Maxwell. Accordingly, we contend that Epstein and Maxwell's system of abuse all started with them exploiting and abusing ██████████ who they used as a guinea pig to refine their criminal enterprise and widen their network of additional sex abuse victims. For more details concerning the abuse she suffered, please refer to the civil complaint (see TM3Q-W2NJ – 1-10), the criminal indictment (see TM3Q-W2NJ – 108-125) and the video testimonial.*

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Before Epstein committed suicide in his jail cell on August 10, 2019, he was facing federal charges for sex trafficking of minors for this very same despicable conduct. Maxwell is now in jail and facing federal charges for recruiting and enticing minors to travel to engage in illegal sex acts for this very same despicable conduct.

To corroborate our claims, we have sought out several of Epstein's former employees who have all attested under oath that they remember ██████████ being with Epstein during this timeframe. For instance, ██████████ worked for Epstein between 1991 and 2002. (*see* TM3Q-W2NJ – 25). Part of his duties included managing Epstein's Palm Beach estate. Mr. ██████████ stated in his sworn declaration that he recalls ██████████ being at Epstein's house with her mother on several occasions and even remembers picking her up alone from her home and taking her to Epstein's Palm Beach estate on El Brillo Way. (*Id.*). Mr. ██████████ also testified in a 2009 deposition that ██████████ *"was a girl that was very, very talented. Mr. Epstein help her become an actress. Now she's ██████████. She came with her mother to the house. And she -- he help her come up with her career."* (*see* TM3Q-W2NJ – 131-133). Mr. Alessi also testified in that deposition that ██████████ *"was very young because she was in high school. And sometimes either I pick her mother and herself from her house or I pick her from ██████████. I can't remember exactly what that place is, the name of the place."* (*Id.*). He went on to testify that *"[t]he only girl that I picked up from the school was ██████████"* (*Id.*).

██████████ is another person who worked for Epstein. Mr. ██████████ worked as a ██████████ for Epstein starting in 1991. Mr. ██████████ stated in his sworn declaration that through ██████████ for Epstein he remembers meeting ██████████ in the mid to late 1990s. (*see* TM3Q-W2NJ – 26-27). Mr. ██████████ also provided flight logs that contain ██████████ name as a passenger on Epstein's plane in 1996 and 1997. (*see* TM3Q-W2NJ – 28-56). ██████████ was between 16 and 17 years old while she was on these flights. We have also obtained a flight log from Mr. ██████████ reflecting that ██████████ was a passenger on Epstein's plane on March 31, 2001 from Santa Fe to Palm Beach. (*see* TM3Q-W2NJ – 130). Epstein, Maxwell and others were also on board.

██████████ is another ██████████ who worked for Epstein starting in 1991. Mr. ██████████ has also declared under penalty of perjury that he recalls meeting ██████████ in the early 1990s in connection with his employment with Epstein. (*see* TM3Q-W2NJ – 57).

In addition to the above witnesses, there are several others who can attest to seeing ██████████ with Epstein and Maxwell during this timeframe. These individuals include: Darren

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Indyke<sup>2</sup>, [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], and Mark Epstein. Additionally, [REDACTED] family, including her siblings and mother, all knew about Epstein and Maxwell's grooming and pursuit of her and, later, of their abuse to her.

Furthermore, in response to a *Touhy* request, we received documents from the SDNY obtained during their investigation of Epstein and Maxwell. Because of their ongoing case against Maxwell, however, they were limited in what they could provide to us. What they did provide sheds additional light on Epstein's manipulation and exploitation of [REDACTED]

In order to keep [REDACTED] under his control, Epstein exploited her youth and modest circumstances in life by showering her with presents. For instance, in early August of 2000, after she moved to LA, we know that Epstein sent [REDACTED] a Fedex package containing a birthday present (her birthday is [REDACTED]). (see TM3Q-W2NJ- 70, 75). Later that year in December, he also sent her a Christmas present via Fedex. (see TM3Q-W2NJ – 83). And then in the following year, on February 13, 2001, Epstein sent her another Fedex package containing a gift for Valentine's Day. (see TM3Q-W2NJ – 95). It was not until later that year, though, that [REDACTED] who had now been living across the country from Epstein for a couple of years, was finally able to mentally break free from his control and manipulation and worked up the courage and strength to stop returning his calls. That is when Epstein's advances ceased.

But then, on October 20, 2003, Epstein had his attorney Darren Indyke send [REDACTED] a Fedex envelope containing a letter from his office in New York to her home in Newport Beach, CA. (see TM3Q-W2NJ – 61). [REDACTED] has a strong recollection that this was the correspondence from Mr. Indyke demanding that she repay Epstein for back rent for her old apartment in New York. At this point, Epstein was clearly upset that [REDACTED] had stopped communicating with him and instructed his attorney to send the threatening letter demanding money.

The FBI also seized a framed photograph of [REDACTED] from Epstein's home that he kept on a bookcase. (see TM3Q-W2NJ – 126). This framed photograph of [REDACTED] was taken by

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<sup>2</sup> [REDACTED] first met Mr. Indyke at Epstein's office in New York City when she was 15 years old. After [REDACTED] moved to Los Angeles and stopped returning Epstein's calls, Mr. Indyke personally demanded that she pay back rent (approximately \$10,000) to Epstein for her apartment in New York that was paid for by Epstein. Mr. Indyke made a number of threats to [REDACTED] regarding paying back this rent. [REDACTED] was frightened and believed Mr. Indyke was doing this to retaliate against her for shutting down contact and communication with Epstein. Mr. Indyke eventually stopped pursuing her.

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a professional photographer in Miami that was paid for by Epstein. [REDACTED] is only 14 years old in that picture. The other photograph you see that Epstein kept in front of the framed photo is a headshot of [REDACTED] that was taken 5 years later in LA when she was 19 years old. At that time, as [REDACTED] regrettably now understands as an adult, she was still brainwashed by Epstein into thinking he had helped her and was looking out for her best interests.

As a result of Epstein and Maxwell's horrific and depraved behavior and conduct, [REDACTED] has suffered and continues to suffer tremendously. As discussed by [REDACTED], her brother [REDACTED] and Dr. Ponton in the video, the unimaginable abuse extended for more than 6 years and started in [REDACTED] adolescence when she was only 14. In particular, the sexual and emotional abuse took away important developmental milestones for [REDACTED] during her adolescence including developing normal friendships and relationships with her peers. The abuse resulted in a permanent loss of [REDACTED] ability to experience pleasure and comfort in her own life, including her inability to take pleasure in her own family. In addition to the actual sexual abuse she suffered, [REDACTED] was routinely ridiculed and humiliated by Epstein and Maxwell for gaining too much weight or not dressing in a certain way or not having sex with boys yet. This shame and humiliation robbed her of self-confidence and destroyed her adolescent sense of strength. It made her self-isolate and fear others. In fact, the sexual and emotional abuse by Epstein and Maxwell made [REDACTED] feel fearful and hunted her entire life. The abuse has resulted in chronic, on-going post-traumatic stress disorder and intermittent depression.

What Jeffrey Epstein and Ghislaine Maxwell did to [REDACTED], and other minor victims, is grievously wrong. Epstein and Maxwell are unsympathetic child abusers who never showed remorse. The lifelong harm they have caused our client cannot be undone. Her damages are significant and are commensurate with the settlement demands we previously made in her case.

Thank you for your consideration of [REDACTED] claim. We hope you find the video testimonial along with the other materials submitted in support of her claim helpful for your evaluation. We also look forward to you meeting with [REDACTED] at your convenience.

Very truly yours,

PANISH SHEA & BOYLE LLP

[REDACTED]  
Robert Glassman