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July 29, 2020

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Reconsideration of the Court's July 23 Ruling
Giuffre v. Ghislaine Maxwell, No. 15 Civ. 7433 (LAP)

Dear Judge Preska:

As counsel for Ms. Maxwell we write to request that the Court vindicate its Protective Order and punish its violation. Ms. Maxwell's two deposition transcripts were designated "Confidential" and subject to the protection of the Protective Order. Both transcripts ended up in the hands of the government, which used them to bring an indictment against Ms. Maxwell, charging her with, among other things, perjury in her deposition testimony. This is a serious violation of the Protective Order, and merits the commencement of contempt proceedings.

We also write to seek reconsideration of the Court's July 23, 2020 ruling concluding that the transcripts of Ms. Maxwell's April 2016 deposition and Doe 1's deposition should be unsealed in their entirety (with the exception of non-party names). We recognize that a reconsideration motion is an extraordinary request, but we suggest it is appropriate under the circumstances. There are new facts since Ms. Maxwell lodged her objections to the unsealing of the transcript of her deposition, and there is a need to correct clear error or prevent manifest injustice relating to the unsealing of the transcript.

We respectfully request that the Court keep sealed Ms. Maxwell's and Doe 1's deposition transcripts and any sealed or redacted order or paper that quotes from or discloses information from the transcripts ("deposition material"). We do not seek unnecessary delay; however, if the Court denies our request for reconsideration, we do wish to seek relief from the Second Circuit. Accordingly, in the event the Court denies this reconsideration request, we ask that the Court stay any unsealing of the deposition material for at least two business days to give us time to apply to the Second Circuit for a stay of the unsealing order pending appeal. As the

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courts have recognized, temporary stays of unseal orders are appropriate so that “[t]he genie is [not] out of the bottle,” *Gambale v. Deutsche Bank AG*, 377 F.3d 133, 144 (2d Cir. 2004), before the interested parties have an opportunity to seek review of the orders. *See, e.g., United States v. Martoma*, No. S1 12 CR 973 PGG, 2014 WL 164181, at *8 (S.D.N.Y. Jan. 9, 2014) (“The Court stays immediate disclosure of these materials to permit Defendant to make application to the U.S. Court of Appeals for the Second Circuit for a more extended stay.”); *Brown v. Maxwell*, 929 F.3d 41, 54 (2d. Cir. 2019) (recognizing likelihood of future appeals in this matter).

1. There are new, intervening and significant facts since briefing closed on the first round of review of sealed materials. After many months of relentless negative media coverage of Mr. Epstein and allegations that Ms. Maxwell was involved in his criminal activities, the government secured an indictment against her. On July 2, one day after Ms. Maxwell filed her reply in support of her objection to unsealing documents containing references to Does 1 and 2, the government staged a dramatic, forced entry at dawn into her home and arrested her. EXHIBIT A, at 3.

Immediately after Ms. Maxwell’s arrest, Acting U.S. Attorney Audrey Strauss held a press conference and made numerous comments attacking Ms. Maxwell’s credibility and expressing her opinion of Ms. Maxwell’s guilt, e.g., that she was guilty of “[l]ying” in her deposition “because the truth, as alleged, was almost unspeakable.” *Id.* Plaintiff’s counsel piled on, offering their own opinions about Ms. Maxwell’s guilt. For example, Mr. Edwards opined that Ms. Maxwell was “a main facilitator” of Mr. Epstein’s crimes who “started the whole thing.” *Id.* Ms. McCawley praised the prosecutors: “[They] have done an incredible job and they’re being very meticulous, they want to make sure that the Indictments stick. . . . They took a lot of time to be very careful and thoughtful and that gives me a lot of hope that [Ms. Maxwell] will remain in prison for the remainder of her life. . . . [Ms. Maxwell] was really the central figure” *Id.* at 6.

Ms. Maxwell’s motion for an order barring such extrajudicial comments led Judge Nathan to admonish “counsel for all involved parties [to] exercise great care to ensure compliance with this Court’s local rules, including Local Criminal Rule 23.1, and the rules of professional responsibility.” EXHIBIT B. She further “warn[ed] counsel and agents for the parties and counsel for potential witnesses that going forward it will not hesitate to take appropriate action in the face of violations of any relevant rules.” *Id.* Judge Nathan said she would ensure “strict compliance” with the rules and “ensure that the Defendant’s right to a fair trial will be safeguarded.” *Id.*

On July 8 the government filed a superseding indictment alleging that Ms. Maxwell “assisted, facilitated, and contributed” to Mr. Epstein’s abuse of minors. The indictment quickly turned to this civil action, alleging that in 2016 Ms. Maxwell made “efforts to conceal her conduct”

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by “repeatedly provid[ing] false and perjurious statements” in deposition testimony.
 EXHIBIT C ¶ 8.

Quoting verbatim from Ms. Maxwell’s April 2016 deposition transcript, the indictment alleges Ms. Maxwell gave false testimony (a) when she testified “I don’t know what you’re talking about” in response to a question whether Mr. Epstein “ha[d] a scheme to recruit underage girls for sexual massages . . . [i]f you know”; and (b) when she testified, “I’m not aware of anybody that I interacted with [other than plaintiff] who was 17 at this point.” *Id.* ¶ 21. None of these questions and answers was used in the summary judgment papers or released by the Second Circuit. The transcript containing this testimony is sealed.

2. The Court should commence proceedings to vindicate the government and plaintiff’s violation of the Protective Order. Only two parties—plaintiff and Ms. Maxwell—and their counsel had proper access to the transcripts of Ms. Maxwell’s deposition. The transcripts, which were designated “Confidential,” were the subject of the Protective Order strictly limiting the persons to whom the parties may disclose “Confidential”-designated documents. For example, the parties could only disclose such documents to “attorneys actively working on this case” and “persons regularly employed or associated with the attorneys who are working on this case.” Doc.62, *quoted in* Doc.1071 at 3. This language was negotiated by the parties to specifically *exclude* an exception for investigations by law enforcement.

On February 26, 2016, counsel for plaintiff proposed protective order language that would have allowed for a “law enforcement” exception: Paragraph I(a)4 of plaintiff’s draft proposed that: “CONFIDENTIAL information shall not be disclosed or used for any purpose except the preparation and trial of this case and any related matter, including but not limited to, investigations by law enforcement.” *See* Exhibit D at 3. This language was rejected by Ms. Maxwell because of her concerns that plaintiff and her lawyers were acting as either express or *de facto* agents of the Government. The language agreed upon, and made an Order of this Court specifically excluded an exception for law enforcement. Had the language not been made an order of the Court, Ms. Maxwell would have proceeded in a different fashion. She relied on this language and the protection afforded to her by this Court under established Second Circuit law.

In its Order dated July 1, 2020, the Court said it was “troubled” to learn that plaintiff’s successor counsel, Cooper & Kirk, had received from plaintiff’s former counsel, Boies Schiller Flexner, various discovery materials that were subject to the Protective Order. Doc.1071 at 4. The Court rejected Cooper & Kirk’s suggestion that it properly was a recipient of the material:

[W]hatever Cooper & Kirk’s intentions in requesting and obtaining the *Maxwell* materials from Boies Schiller, the *Maxwell* Protective Order explicitly provides that (1) discovery materials designated CONFIDENTIAL cannot be

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disclosed or used outside of the *Maxwell* action and (2) that properly designated discovery materials may only be disclosed to *specific groups of individuals*, including attorneys “actively working on” the *Maxwell* litigation.

Doc.1071 at 4-5 (emphasis supplied)

Five things are plain. **One**, as the indictment and superseding indictment establish, the government has a copy of the transcripts from Ms. Maxwell’s April and July 2016 depositions, both of which were designated “Confidential.” **Two**, the government had no ability legally to obtain the deposition transcripts. In *Martindell v. International Telephone and Telegraph Corp.*, 594 F.2d 291, 293 (2d Cir. 1979), *cited with approval in In re Teligent, Inc.*, 640 F.3d 53, 58 (2d Cir. 2011), the government moved in a civil action to which it was not a party for access to transcripts of depositions twelve witnesses, including some of the civil defendants. The government said it was investigating possible violations of federal criminal laws, including perjury, subornation of perjury, obstruction of justice and conspiracy. The government:

speculated that the pretrial deposition testimony might be relevant to its investigation into matters similar to those that had been the subject of the *Martindell* action and might be useful in appraising the credibility, accuracy and completeness of testimony given by witnesses in the Government’s investigation or might provide additional information of use to the Government. The Government, moreover, feared that unless it could obtain the deposition transcripts, it would be unable to secure statements from the witnesses because they would claim their Fifth Amendment rights in any investigative interviews by the Government.

594 F.2d at 293. The district court denied the government’s request, holding that “the deposition testimony had been given in reliance upon the protective order, thus rendering unnecessary invocation by the witnesses of their Fifth Amendment rights, that the requested turnover would raise constitutional issues, and that principles of fairness mandated enforcement of the protective order.” *Id.* The Second Circuit affirmed:

In the present case the deponents testified in reliance upon the Rule 26(c) protective order, absent which they may have refused to testify. . . . [T]he witnesses were entitled to rely upon the terms of a concededly valid protective order and Judge Conner did not abuse his discretion in refusing to vacate or modify that order.

Id. at 296-97.

Three, the government did not obtain a copy of the deposition transcripts from Ms. Maxwell or her counsel. **Four**, following plaintiff’s counsel’s admitted violation of the Protective Order

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earlier this month, it is clear now that there has been a *second* violation of the Protective Order in a manner consistent with the plaintiff's intent and goals—namely, the prosecution of Ms. Maxwell and the pursuit of a sentence that would imprison her “for the remainder of her life,” EXHIBIT A, at 3. **Five**, no one should be permitted to violate this Court's Protective Order with impunity.

As it did in connection with plaintiff's violation of the Protective Order via her attorneys, the Court should enter orders to determine the nature and extent of the violation of the Order, identify those persons who violated the Order, and impose appropriate sanctions. Until this process is completed, the Court should stay any disclosure of the transcripts of Ms. Maxwell's deposition and deposition material. We respectfully submit that in the event the Court finds a violation of the Protective Order, this Court should direct the government to return to the Court any copies of the deposition transcripts and enter an order to show cause why the person(s) who violated the Order should not be held in contempt. *See, e.g., Blum v. Schlegel*, 108 F.3d 1369 (2d Cir. 1997); *Hunt v. Enzo Biochem, Inc.*, 904 F. Supp. 2d 337, 340 (S.D.N.Y. 2012).

3. The indictment provides a compelling reason not to unseal the transcript of Ms. Maxwell's deposition. That Ms. Maxwell was under criminal investigation, the Court ruled, “is not entitled to much weight here.” Tr. of July 23 Hearing, at 5. The Court said Ms. Maxwell had not explained how the sealed material could inappropriately influence potential witnesses or victims. *Id.* The effect of Ms. Maxwell's indictment, arrest, upcoming trial and of Judge Nathan's efforts to ensure a fair trial was not discussed in our objections since none of these things had happened before briefing was closed.

Two cases are instructive. In each the courts indicated that in deciding whether to unseal materials it was important to give weight to the impact on a criminal defendant's right to a fair trial. In *Nixon v. Warner Communications, Inc.*, 435 U.S. 589 (1978), a number of media moved the district court to release audio tapes admitted into evidence in the trial of four of President Nixon's former advisors. The media intended to copy the tapes for broadcasting and sale to the public. District Judge Sirica denied the motion, principally on the ground that the rights of the four defendants, who had been convicted and had filed notices of appeal, would be prejudiced if they prevailed in their appeals. 435 U.S. at 595, 602 n.14. Judge Sirica noted that the transcripts of the audio tapes had been released to the public. *Id.* at 595. The D.C. Circuit Court of Appeals held Judge Sirica abused his discretion.

The Supreme Court reversed the court of appeals and rejected the media's arguments that release of the tapes was required under the common law right of access and the First Amendment. The Court noted apparently with approval that (a) “Judge Sirica's view” that “the public's ‘right to know’ did not . . . overcome the need to safeguard the defendants' rights on appeal,” and (b) “Judge Sirica's principal reason for refusing to release the tapes

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[was] fairness to the defendants, who were appealing their convictions.” *Id.* at 595, 602 n.14. The Court indicated that the public interest in access to the tapes properly was balanced against “the duty of the courts,” *id.* at 602, including the duty to ensure fairness to the defendants, *see id.* at 602 n.14.

In *In re New York Times Co.*, 828 F.2d 110 (2d Cir. 1987), *cited with approval in United States v. Longueuil*, 567 Fed. App’x 13, 16 (2d Cir. 2014), Judge Weinstein denied the media’s motion to unseal papers filed in connection with an unsuccessful defense motion to suppress evidence obtained by electronic surveillance. He found that “defendants’ interest in a fair trial and the interests of third parties [referenced in] the motion papers justified continued sealing of the papers.” 828 F.2d at 112; *see id.* at 112 (defendants opposed unsealing on the grounds it would prejudice their Sixth Amendment right to a fair trial, their privacy rights, and third parties’ privacy rights). The Second Circuit vacated the order in part because “the wholesale sealing” of the motion papers was “more extensive than necessary to protect defendants’ fair trial rights, their privacy rights, and the third persons’ privacy interests. *Id.* at 116. The court noted, “now that the jury has been impaneled, defendants’ fair trial rights can certainly be adequately protected by sequestration.” *Id.*

In *Nixon* and *New York Times*, the courts properly were concerned about the effect of unsealing materials notwithstanding that they were core judicial documents—audio tapes admitted into evidence at the merits trial and motion papers seeking suppression of evidence which the judge denied. And the courts continued to hold these concerns even after the defendants had been convicted and had launched appeals (*Nixon*) and after the petit jury had been empaneled (*New York Times*).

The courts have recognized that the right to a fair criminal trial is a compelling interest in “weighing the interests advanced by the parties in light of the public interests and the duty of the courts,” *Nixon*, 435 U.S. at 602. *See United States v. Cicale*, No. 05-CR-60-2 (NGG), 2018 WL 388941, at *3 (E.D.N.Y. Jan. 11, 2018) (“Compelling interests warranting closure of a courtroom—and, by extension, sealing of court documents—‘may include the defendant’s right to a fair trial’”) (quoting with alterations *United States v. Doe*, 63 F.3d 121, 128 (2d Cir. 1995)); *United States v. Martoma*, No. S1 12 CR 973 PGG, 2014 WL 164181, at *4 (S.D.N.Y. Jan. 9, 2014) (“A court’s conclusion that a qualified First Amendment right of access to certain judicial documents exists does not end the inquiry, however. ‘Courts must balance the right [of access] against other important values, like the Sixth Amendment right of the accused to a fair trial . . . and the defendant’s . . . privacy interests.’”) (internal quotations omitted; quoting *United States v. Rajaratnam*, 708 F. Supp. 2d 371, 374-75 (S.D.N.Y. 2010)); *Travelers Indem. Co. v. Excalibur Reins. Corp.*, 3:11-CV-1209 CSH, 2013 WL 4012772, at *3 (D. Conn. Aug. 5, 2013) (“The public’s right to access court documents is not, however, absolute in that it may be surmounted by a party’s showing that sealing will further other substantial interests, for example, a criminal defendant’s right to a fair trial or a third party’s privacy

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interests.”); *United States v. McVeigh*, 119 F.3d 806, 813 (10th Cir. 1997) (upholding district court’s sealing of discovery materials deemed inadmissible at trial, holding that “disclosure of such [materials] would play a negative role in the functioning of the criminal process, by exposing the public generally, as well as potential jurors, to incriminating evidence that the law has determined may not be used to support a conviction”), *cited with approval in United States v. Avenatti*, (S1) 19 CR 373 PGG, 2020 WL 70952, at *3 (S.D.N.Y. Jan. 6, 2020).

Based on these cases, the Court may make specific findings supporting the sealing of Ms. Maxwell’s deposition transcript: The Court may take judicial notice, as Judge Nathan herself may have, of the widespread negative media publicity and speculation directed at Mr. Epstein and Ms. Maxwell. *See Condit v. Dunne*, 317 F. Supp. 2d 344, 358 (S.D.N.Y. 2004). We attach a compilation of such articles in EXHIBIT E. The Court also may take judicial notice of Ms. Maxwell’s arrest and indictment, and the government’s charge against her based on her answers in a deposition transcript that was subject to this Court’s Protective Order. The unsealing of Ms. Maxwell’s deposition transcript would result in substantial negative media publicity and speculation in an internet world in the same way that Judge Sirica found release of the audio tapes in *Nixon* would generate publicity and affect those defendants’ right to a fair trial. And the Court may take judicial notice of Judge Nathan’s own concerns about the need for counsel for the parties and witnesses in the criminal case to comply with Local Criminal Rule 23.1 to “safeguard” and “protect [Ms. Maxwell’s] right to a fair trial by an impartial jury,” EXHIBIT C. The public’s right of access to Ms. Maxwell’s deposition transcript is substantially outweighed by the compelling interest in ensuring her right to a fair trial. Particularly is this true in light of the other countervailing interests discussed in our objection papers and below.

4. The deposition transcripts obtained by the government and the indictment’s perjury counts place in a new light plaintiff’s earlier litigation conduct—suggesting the planned use of Ms. Maxwell’s deposition as a perjury trap. Throughout much of the first year of this litigation plaintiff through her counsel had represented to the Court and defense counsel that plaintiff was privy to and participating in an ongoing criminal investigation in which Ms. Maxwell was a “person of interest.” Doc.101 at 2. Toward that end plaintiff withheld documents responsive to defense discovery requests for any documents relating to such a criminal investigation; plaintiff asserted such documents were subject to a law enforcement, “investigative” or public interest “privilege.” *Id.* at 2-3. In response to Ms. Maxwell’s motion to compel the production of documents, plaintiff submitted the “law enforcement materials” *ex parte* and *in camera* to the Court. Doc.128. Ms. Maxwell objected to the submission of the materials *ex parte* and *in camera*. Doc.130. The Court denied the motion to compel. Doc. 264-1. The materials never have been produced to the defense.

Based on plaintiff’s claim of an ongoing investigation, Ms. Maxwell requested, prior to her deposition, that plaintiff disclose any alleged “on-going criminal investigation by law

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enforcement" or alternatively to stay this action pending completion of any such investigation. Doc.101. In part, Ms. Maxwell needed information concerning any such investigation to assess "the impact on any 5th Amendment privilege." *Id.* at 2, 4-5. Judge Sweet denied that motion. The day before Ms. Maxwell's deposition, the Court ordered that "[a]ny materials that the plaintiff has with respect to any criminal investigations will be turned over [by plaintiff] except for any statements made by plaintiff to law enforcement authority." Tr. of Apr. 21, 2016 at 21. Plaintiff produced no such materials and Ms. Maxwell was deposed the next day. In reliance on the protective order which included no exception for any law enforcement need or subpoena and based on plaintiff's failure to disclose any "on-going criminal investigation," she did not assert the 5th Amendment during that deposition.

This background is given a new context in light of (a) the provision of the sealed transcripts to the government without court authorization and (b) the indictment and perjury charges lodged against Ms. Maxwell based upon the transcripts. Under *Martindell*, decided forty years ago and still binding precedent in this district, it is settled law that the government may not breach a protective order to gain access to deposition transcripts in a civil lawsuit. As the Second Circuit held in that case, the government "may not . . . simply by picking up the telephone or writing a letter to the court . . . insinuate itself into a private civil lawsuit between others." 594 F.2d at 294. The court rejected the government's argument that the district court's "solicitude for the witnesses' Fifth Amendment" over the government's desire for the deposition transcripts was an abuse of discretion. It held that "a more significant counterbalancing factor" is the civil rules' goal of encouraging witnesses to participate in civil litigation:

Unless a valid Rule 26(c) protective order is to be fully and fairly enforceable, witnesses relying upon such orders will be inhibited from giving essential testimony in civil litigation, thus undermining a procedural system that has been successfully developed over the years for disposition of civil differences. In short, witnesses might be expected frequently to refuse to testify pursuant to protective orders if their testimony were to be made available to the Government for criminal investigatory purposes in disregard of those orders.

594 F.2d at 296. After balancing the interests at stake, the court held that absent improvidence in issuing the protective order or some extraordinary circumstance or compelling need, witnesses must be permitted to rely on the protective order's enforceability. *Id.* The protective order should not be vacated or modified "to accommodate the Government's desire to inspect protected testimony for possible use in a criminal investigation, either as evidence *or as the subject of a possible perjury charge.*" *Id.* (emphasis supplied).

The procedural history of this litigation culminating in plaintiff's gratuitously attaching the entire transcripts of both Ms. Maxwell's depositions to court submissions, and leaking or

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causing someone to leak the transcripts to the government, which then charged Ms. Maxwell with perjury counts, suggest plaintiff in conjunction with the government sought to circumvent *Martindell*: they set a perjury trap for Ms. Maxwell when plaintiff took her deposition. Ms. Maxwell requests that this Court examine the law enforcement materials submitted *ex parte* and *in camera* in connection with its vindication of the Protective Order. In the meantime we respectfully submit it is appropriate to maintain the seal over the depositions.

5. Ms. Maxwell's reliance on the Protective Order is entitled to substantial weight. In its July 23 ruling the Court did not address a substantial ground Ms. Maxwell asserted in support of her objection to unsealing her deposition transcript. The first countervailing interest Ms. Maxwell presented was that she reasonably relied on the Protective Order in disclosing intimate information about her personal life. Doc.1057 at 4-5. As we pointed out, *id.* at 5, even without any evidentiary or other showing from an interested party, the Second Circuit in *Brown v. Maxwell* protected from disclosure “deposition responses concerning intimate matters where the questions were likely only permitted—and the responses only compelled—because of a strong expectation of continued confidentiality.” 929 F.3d 41, 48 n.22 (2d Cir 2019). The Protective Order was entered before Ms. Maxwell's deposition was taken; in fact plaintiff's counsel explicitly consented to the Order because “‘I just want [Ms. Maxwell's] deposition . . . It is that important to me.’” Doc.1073 at 8 (quoting Doc.66 at 9). The Court may make specific findings supporting the sealing of the transcript based on the information Ms. Maxwell supplied from the court submissions. *See id.* We incorporate by reference here the facts asserted and arguments made in the objection and reply in support of this countervailing interest.

For the foregoing reasons we respectfully request that the Court reconsider its decision to unseal (1) the transcripts of Ms. Maxwell's and Doe 1's depositions, and (2) court submissions excerpting from, quoting from or summarizing the contents of the transcripts.

Very truly yours,



Ty Gee

C: Counsel of Record *via* ECF

EXHIBIT A



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July 21, 2020

VIA ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*, Case No. 20 Cr. 330 (AJN), Local Criminal Rule 23.1

Dear Judge Nathan,

On behalf of our client, Ghislaine Maxwell, we write to request that the Court enter an order prohibiting the Government, its agents and counsel for witnesses from making extrajudicial statements concerning this case. Although Ms. Maxwell is presumed innocent, the Government, its agents, witnesses and their lawyers have made, and continue to make, statements prejudicial to a fair trial. The Sixth Amendment to the United States Constitution guarantees an accused the right to an impartial jury. This fundamental guarantee is part of a criminal defendant’s basic right to a fair trial, which requires that a defendant must be judged by a jury of her peers based on evidence presented at trial, not in the media. The Court, to safeguard the due process rights of the accused, has “an affirmative constitutional duty to minimize the effects of prejudicial pretrial publicity.” *Gannett Co. v. DePasquale*, 443 U.S. 368, 378 (1979). This District has given effect to this Sixth Amendment right through Local Criminal Rule 23.1. Accordingly, Ms. Maxwell requests that the Court exercise its express power under Local Criminal Rule 23.1(h) and enter an Order requiring compliance with that rule to prevent further unwarranted and prejudicial pretrial publicity by the Government, its agents, and lawyers for alleged witnesses.

Legal Standard

More than fifty years ago, warning of the danger of pretrial publicity to fair trials, the Supreme Court directed trial judges to take “such steps by rule and regulation that will protect their processes from prejudicial outside interferences. *Neither prosecutors, counsel for defense, the accused, witnesses, court staff nor enforcement officers coming under the jurisdiction of the court should be permitted to frustrate its function.*” *Sheppard v. Maxwell*, 384 U.S. 333, 363 (1966) (emphasis added).

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In an effort to protect the trial process from “prejudicial outside interferences,” this Court promulgated Local Criminal Rule 23.1(a) which provides, in relevant part, that:

It is the duty of the lawyer or law firm, ... and government agents and police officers, not to release or authorize the release of non-public information or opinion which a reasonable person would expect to be disseminated by means of public communication, in connection with pending or imminent criminal litigation with which they are associated, if there is a substantial likelihood that such dissemination will interfere with a fair trial or otherwise prejudice the due administration of justice.

To avoid any confusion this Court identified seven “subject matters” that “presumptively involve a substantial likelihood that their public dissemination will interfere with a fair trial or otherwise prejudice the due administration of justice.” *Id.* at (d). Accordingly, lawyers for parties and witnesses and their agents are prohibited from publicly disseminating information concerning:

- (1) The prior criminal record (including arrests, indictments or other charges of crime), or *the character or reputation of the accused*...;
- (2) The existence or contents of any confession, admission or statement given by the accused, or the refusal or failure of the accused to make any statement;
- (3) The performance of any examinations or tests or the accused’s refusal or failure to submit to an examination or test;
- (4) The identity, testimony or *credibility of prospective witnesses*, except that the lawyer or law firm may announce the identity of the victim if the announcement is not otherwise prohibited by law;
- (5) The possibility of a plea of guilty to the offense charged or a lesser offense;
- (6) Information the lawyer or law firm knows is likely to be inadmissible at trial and would if disclosed create a substantial likelihood of prejudicing an impartial trial; and
- (7) *Any opinion as to the accused’s guilt or innocence or as to the merits of the case or the evidence in the case.*

Id. at (d)(1-7) (emphasis added).

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Recent Prejudicial Public Statements by the Government, its Agents and Counsel to Prospective Witnesses

Recent public statements by the Government, its agents and counsel for prospective witnesses have included presumptively prejudicial information.

On July 2, 2020 Ms. Maxwell was arrested without notice to her lawyers who had been in active communication with the Government for one year. Because plain vanilla surrenders lack the fanfare and attendant media coverage afforded to secret, armed, raids at dawn, the Government chose to invade Ms. Maxwell's New Hampshire residence, arrest her, and stage a media presentation that included numerous statements that prejudice Ms. Maxwell's right to a fair trial.

Immediately following Ms. Maxwell's arrest, Acting U.S. Attorney Audrey Strauss held a press conference in which she commented on Ms. Maxwell's credibility and her *incorrect* opinions concerning "guilt or innocence or as to the merits of the case or the evidence in the case" in violation of Local Rule 23.1(d)(1), (4) and (7):

Per the New York Law Journal:

'Maxwell lied because the truth, as alleged, was almost unspeakable,' Strauss said at a press conference announcing the charges. 'Maxwell enticed minor girls, got them to trust her and then delivered them into the trap that that she and Epstein had set for them. She pretended to be a woman they could trust, all the while she was setting them up to be sexually abused by Epstein and, in some cases, by Maxwell herself.'¹

As reported in the Washington Post,

Strauss, the acting U.S. attorney in Manhattan, said the socialite told that lie and others in deposition because the truth 'was almost unspeakable.'

Acting U.S. Attorney Audrey Strauss called the sex abuse described in the Maxwell case 'the prequel' to the charges they lodged against Epstein....

Maxwell played a critical role in helping Epstein to identify, befriend, and groom minor victims for abuse' ... 'In some cases Maxwell participated in the abuse itself.'²

¹ <https://www.law.com/newyorklawjournal/2020/07/02/ghislaine-maxwell-arrested-in-connection-with-jeffrey-epstein-sex-trafficking-ring/?slreturn=20200614124921>

² https://www.washingtonpost.com/national-security/ghislaine-maxwell-arrested-jeffrey-epstein/2020/07/02/20c74502-bc69-11ea-8cf5-9c1b8d7f84c6_story.html

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Although Ms. Strauss sprinkled her comments with the phrase “as alleged,” she presented certain of her statements as fact.³ Regardless, after Ms. Strauss’s remarks, FBI Special Agent William Sweeney went even further, calling Ms. Maxwell “one of the villains in this investigation” and compared her to a snake that “slithered away to a gorgeous property in New Hampshire.” Thus, Mr. Sweeney offers the Government’s, again flatly wrong, opinions about character and guilt while, at the same time, invoking a semi-biblical reference involving a snake slithering away to a garden in New Hampshire. These types of comments, which serve no compelling law enforcement or investigatory purpose, are prohibited by the local rules of this District.

New York attorney David Boies and his partner Sigrid McCawley, who represent several witnesses in this matter, have also made public and presumptively prejudicial statements in recent days, notwithstanding the fact that such conduct is prohibited by Local Rule 23.1, which applies to lawyers practicing in this District, generally, and lawyers for witnesses, specifically. *See* Rule 23.1(a) and (b).

As reported by the Washington Post, Mr. Boies expressed his views on the prohibited subject of “the possibility of a plea of guilty to the offense charged or a lesser offense” in violation of sections (d)(5) and (7) of the Rule:

Boies said he thinks Maxwell will be ‘under tremendous pressure to cooperate’ as she looks for ways to shave time off what may be a significant prison sentence. Maxwell could potentially help prosecutors shed light on Epstein’s dealings with other wealthy and influential people who may have had encounters with underaged victims, he said, adding ‘There were a lot of people with a lot of public stature who were involved with Epstein.’⁴

Ms. McCawley echoed Mr. Boies, saying that, “The pain [Maxwell] has caused will never go away but today is a step toward healing.” *Id.*

Bradley Edwards, another attorney representing witnesses in this matter made similar presumptively prejudicial statements following Ms. Maxwell’s arrest:⁵

‘The reality of how this organization worked was that 99.9% of it was orchestrated for Jeffrey Epstein’s personal sexual satisfaction. So to the degree that um there was a main facilitator that started the whole thing, it was Ghislaine.

³ A purported transcript of the press conference is contained on the internet at <https://www.rev.com/blog/transcripts/announcement-transcript-of-charges-against-ghislaine-maxwell-in-new-york-jeffrey-epstein-associate-arrested>.

⁴ https://www.washingtonpost.com/national-security/ghislaine-maxwell-arrested-jeffrey-epstein/2020/07/02/20c74502-bc69-11ea-8cf5-9c1b8d7f84c6_story.html

⁵ <https://www.youtube.com/watch?v=mDKHdzix2kQ>

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Page 5

So to cooperate in the way that that kind of rumors out there would mean that she's cooperating downwards. She'd be cooperating with people who are much less culpable than her. Will she name names to try to shave years off of what would be a lengthy prison sentence maybe, I think you should probably expect that if she's going to share information that's going to actually help her, it's probably gonna be about unrelated crimes that she may be aware about because with respect to this particular operation, in terms of living people, she's as high as it gets. ... I think like most of my clients would really hope that she does cooperate, at least shares the information that she has. I mean I know that it would only be to help herself but the public deserves to know who was involved besides her and Jeffrey Epstein, and only she knows that.

The violations of Rule 23.1 did not stop after Ms. Maxwell's arrest and detention. Following the detention hearing on July 14, 2020, Mr. Boies, counsel for one of the accusers who spoke at the hearing, commented on the content of the hearing. As reported by Bloomberg, Mr. Boies offered his gratuitous critique of defense counsel, commented on the credibility of Ms. Maxwell and his client, and commented on what Mr. Boies considers "evidence" in this case, all in violation of subsections (1), (4), (6), and (7) of the Rule:

That's a dangerous tactic that might backfire at trial, said David Boies, who represents ██████ and several other women who say they were sexually abused by Epstein and Maxwell. ... It's "a tone-deaf argument" that cost Maxwell her credibility, said Boies, who listened to the hearing remotely.

'To mount a 'blame the victim' defense, particularly in today's world and trying to blame these girls for what happened is so contrary to the evidence, is so contrary to people's normal sense of morality,' Boies said. 'I think that's just going to enrage a jury if she goes to trial -- which I would not do if I were representing her.'

Boies said he was confident ██████ would stand up to cross-examination if there's a trial. ██████, who addressed the court by telephone, urged the judge not to grant Maxwell bail, calling her a 'sexual predator who groomed and abused me.' Maxwell 'lied under oath and tormented her survivors,' ██████ said. Boies said that ██████ was a 16-year-old who 'wanted to go to college' when she met Maxwell. 'Maxwell and Epstein tell ██████ and her mother 'we're having a group of high school students to this ranch to help them get into college,' Boies said. 'But when ██████ gets there, there are no high school students, all these claims are fraudulent and she's in this isolated place in New Mexico.'⁶

⁶ <https://www.bnnbloomberg.ca/ghislaine-maxwell-may-play-the-victim-card-in-trial-defense-1.1465631>

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July 21, 2020
Page 6

Mr. Boies and Ms. McCawley gave on-air interviews with ABC News following Ms. Maxwell's detention that contained repeated, presumptively prejudicial quotes, including:⁷

Boies: Remember these girls were abused twice, once sexually years ago and then a second time when Epstein and Maxwell and all their enablers began these vicious attacks on their credibility. ... No question about it. Maxwell knows where a lot of the bodies are buried. If I was somebody who had participated in their sex trafficking, um, I would not be sleeping easily tonight.

Boies: I think that [the accusers] want to see her go to trial. On the other hand, the arrest and conviction that would come from a plea deal is an enormous step and I think they also recognize that Jeffrey Epstein and Maxwell did not act alone. There are lots of other people that need to be brought to justice.

McCawley: I think that the prosecutors in the Southern District of New York have done an incredible job and they're being very meticulous, they want to make sure that the Indictments stick. ...They took a lot of time to be very careful and thoughtful and that gives me a lot of hope that she will remain in prison for the remainder of her life. ... This morning was a very joyful and tearful filled morning, it was a wonderful moment in my journey with these survivors, to be able to call them and tell them that the one person's who's been out in the public without being held accountable was finally in prison....She was really, Ghislaine was really the central figure, so she worked hand-in-hand with Jeffrey Epstein to be able to facilitate these crimes over the course of more than two decades; and she was the main person who assisted him and allowed him to be able to perpetrate so many crimes against young females.

These comments violate subsections (6) and (7) of the Rule.

It appears that given any opportunity lawyers associated with the prosecution of this case will offer any opinion that damages Ms. Maxwell's opportunity for a fair trial. Entry of an order prohibiting extrajudicial statements, therefore, is a necessary remedy to avoid further dissemination of prejudicial information. The Court, under Local Criminal Rule 23.1(h) should enter an Order, punishable by contempt, that all lawyers associated with this case, and their agents, comply with the Rule and refrain from publicly commenting on the seven prohibited topics identified in subsection (d).

⁷ <https://abcnews.go.com/US/ghislaine-maxwell-epsteins-alleged-recruiter-private-battle-public/story?id=71705375>

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Respectfully Submitted,



Jeffrey S. Pagliuca

cc:



U.S. Attorney's Office for the Southern District of New York

Mark Cohen
Christian Everdell
Cohen & Gresser LLP

Laura A. Menninger
Haddon, Morgan & Foreman, P.C.

EXHIBIT B

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	x	
	:	
UNITED STATES OF AMERICA	:	<u>SUPERSEDING INDICTMENT</u>
	:	
- v. -	:	S1 20 Cr. 330 (AJN)
	:	
GHISLAINE MAXWELL,	:	
	:	
Defendant.	:	
	:	
- - - - -	x	

COUNT ONE
**(Conspiracy to Entice Minors to Travel to Engage in
Illegal Sex Acts)**

The Grand Jury charges:

OVERVIEW

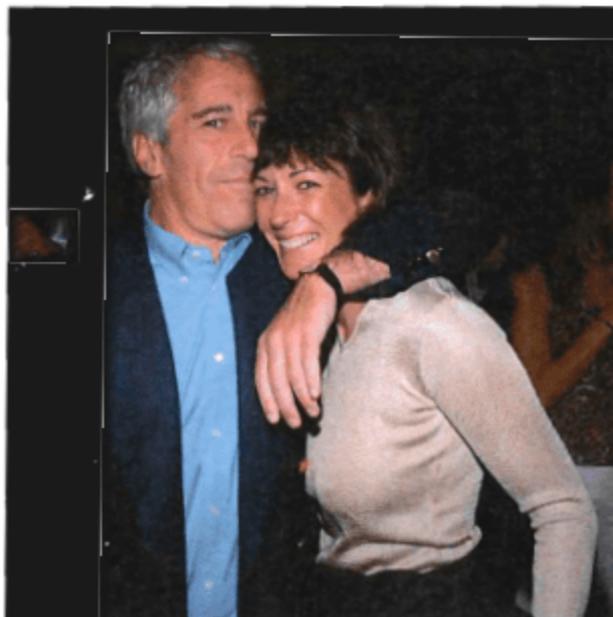
1. The charges set forth herein stem from the role of GHISLAINE MAXWELL, the defendant, in the sexual exploitation and abuse of multiple minor girls by Jeffrey Epstein. In particular, from at least in or about 1994, up to and including at least in or about 1997, MAXWELL assisted, facilitated, and contributed to Jeffrey Epstein's abuse of minor girls by, among other things, helping Epstein to recruit, groom, and ultimately abuse victims known to MAXWELL and Epstein to be under the age of 18. The victims were as young as 14 years old when they were groomed and abused by MAXWELL and Epstein, both of whom knew that certain victims were in fact under the age of 18.

2. As a part and in furtherance of their scheme to abuse minor victims, GHISLAINE MAXWELL, the defendant, and Jeffrey Epstein enticed and caused minor victims to travel to

Epstein's residences in different states, which MAXWELL knew and intended would result in their grooming for and subjection to sexual abuse. Moreover, in an effort to conceal her crimes, MAXWELL repeatedly lied when questioned about her conduct, including in relation to some of the minor victims described herein, when providing testimony under oath in 2016.

FACTUAL BACKGROUND

3. During the time periods charged in this Indictment, GHISLAINE MAXWELL, the defendant, had a personal and professional relationship with Jeffrey Epstein and was among his closest associates. In particular, between in or about 1994 and in or about 1997, MAXWELL was in an intimate relationship with Epstein and also was paid by Epstein to manage his various properties. Over the course of their relationship, MAXWELL and Epstein were photographed together on multiple occasions, including in the below image:



4. Beginning in at least 1994, GHISLAINE MAXWELL, the defendant, enticed and groomed multiple minor girls to engage in sex acts with Jeffrey Epstein, through a variety of means and methods, including but not limited to the following:

a. MAXWELL first attempted to befriend some of Epstein's minor victims prior to their abuse, including by asking the victims about their lives, their schools, and their families. MAXWELL and Epstein would spend time building friendships with minor victims by, for example, taking minor victims to the movies or shopping. Some of these outings would involve MAXWELL and Epstein spending time together with a minor victim, while some would involve MAXWELL or Epstein spending time alone with a minor victim.

b. Having developed a rapport with a victim, MAXWELL would try to normalize sexual abuse for a minor victim by, among other things, discussing sexual topics, undressing in front of the victim, being present when a minor victim was undressed, and/or being present for sex acts involving the minor victim and Epstein.

c. MAXWELL'S presence during minor victims' interactions with Epstein, including interactions where the minor victim was undressed or that involved sex acts with Epstein, helped put the victims at ease because an adult woman was present. For example, in some instances, MAXWELL would

massage Epstein in front of a minor victim. In other instances, MAXWELL encouraged minor victims to provide massages to Epstein, including sexualized massages during which a minor victim would be fully or partially nude. Many of those massages resulted in Epstein sexually abusing the minor victims.

d. In addition, Epstein offered to help some minor victims by paying for travel and/or educational opportunities, and MAXWELL encouraged certain victims to accept Epstein's assistance. As a result, victims were made to feel indebted and believed that MAXWELL and Epstein were trying to help them.

e. Through this process, MAXWELL and Epstein enticed victims to engage in sexual activity with Epstein. In some instances, MAXWELL was present for and participated in the sexual abuse of minor victims. Some such incidents occurred in the context of massages, which developed into sexual encounters.

5. GHISLAINE MAXWELL, the defendant, facilitated Jeffrey Epstein's access to minor victims knowing that he had a sexual preference for underage girls and that he intended to engage in sexual activity with those victims. Epstein's resulting abuse of minor victims included, among other things, touching a victim's breast, touching a victim's genitals, placing a sex toy such as a vibrator on a victim's genitals,

directing a victim to touch Epstein while he masturbated, and directing a victim to touch Epstein's genitals.

MAXWELL AND EPSTEIN'S VICTIMS

6. Between approximately in or about 1994 and in or about 1997, GHISLAINE MAXWELL, the defendant, facilitated Jeffrey Epstein's access to minor victims by, among other things, inducing and enticing, and aiding and abetting the inducement and enticement of, multiple minor victims. Victims were groomed and/or abused at multiple locations, including the following:

a. A a multi-story private residence on the Upper East Side of Manhattan, New York owned by Epstein (the "New York Residence"), which is depicted in the following photograph:



b. An estate in Palm Beach, Florida owned by Epstein (the "Palm Beach Residence"), which is depicted in the following photograph:



c. A ranch in Santa Fe, New Mexico owned by Epstein (the "New Mexico Residence"), which is depicted in the following photograph:



d. MAXWELL's personal residence in London, England.

7. Among the victims induced or enticed by GHISLAINE MAXWELL, the defendant, were minor victims identified herein as Minor Victim-1, Minor Victim-2, and Minor Victim-3. In particular, and during time periods relevant to this Indictment, MAXWELL engaged in the following acts, among others, with respect to minor victims:

a. MAXWELL met Minor Victim-1 when Minor Victim-1 was approximately 14 years old. MAXWELL subsequently interacted with Minor Victim-1 on multiple occasions at Epstein's residences, knowing that Minor Victim-1 was under the age of 18 at the time. During these interactions, which took place between approximately 1994 and 1997, MAXWELL groomed Minor Victim-1 to engage in sexual acts with Epstein through multiple means. First, MAXWELL and Epstein attempted to befriend Minor Victim-1, taking her to the movies and on shopping trips. MAXWELL also asked Minor Victim-1 about school, her classes, her family, and other aspects of her life. MAXWELL then sought to normalize inappropriate and abusive conduct by, among other things, undressing in front of Minor Victim-1 and being present when Minor Victim-1 undressed in front of Epstein. Within the first year after MAXWELL and Epstein met Minor Victim-1, Epstein began sexually abusing Minor Victim-1. MAXWELL was present for

and involved in some of this abuse. In particular, MAXWELL involved Minor Victim-1 in group sexualized massages of Epstein. During those group sexualized massages, MAXWELL and/or Minor Victim-1 would engage in sex acts with Epstein. Epstein and MAXWELL both encouraged Minor Victim-1 to travel to Epstein's residences in both New York and Florida. As a result, Minor Victim-1 was sexually abused by Epstein in both New York and Florida. Minor Victim-1 was enticed to travel across state lines for the purpose of sexual encounters with Epstein, and MAXWELL was aware that Epstein engaged in sexual activity with Minor Victim-1 after Minor-Victim-1 traveled to Epstein's properties, including in the context of a sexualized massage.

b. MAXWELL interacted with Minor Victim-2 on at least one occasion in or about 1996 at Epstein's residence in New Mexico when Minor Victim-2 was under the age of 18. Minor Victim-2 had flown into New Mexico from out of state at Epstein's invitation for the purpose of being groomed for and/or subjected to acts of sexual abuse. MAXWELL knew that Minor Victim-2 was under the age of 18 at the time. While in New Mexico, MAXWELL and Epstein took Minor Victim-2 to a movie and MAXWELL took Minor Victim-2 shopping. MAXWELL also discussed Minor Victim-2's school, classes, and family with Minor Victim-2. In New Mexico, MAXWELL began her efforts to groom Minor Victim-2 for abuse by Epstein by, among other things, providing

an unsolicited massage to Minor Victim-2, during which Minor Victim-2 was topless. MAXWELL also encouraged Minor Victim-2 to massage Epstein.

c. MAXWELL groomed and befriended Minor Victim-3 in London, England between approximately 1994 and 1995, including during a period of time in which MAXWELL knew that Minor Victim-3 was under the age of 18. Among other things, MAXWELL discussed Minor Victim-3's life and family with Minor Victim-3. MAXWELL introduced Minor Victim-3 to Epstein and arranged for multiple interactions between Minor Victim-3 and Epstein. During those interactions, MAXWELL encouraged Minor Victim-3 to massage Epstein, knowing that Epstein would engage in sex acts with Minor Victim-3 during those massages. Minor Victim-3 provided Epstein with the requested massages, and during those massages, Epstein sexually abused Minor Victim-3. MAXWELL was aware that Epstein engaged in sexual activity with Minor Victim-3 on multiple occasions, including at times when Minor Victim-3 was under the age of 18, including in the context of a sexualized massage.

MAXWELL'S EFFORTS TO CONCEAL HER CONDUCT

8. In or around 2016, in the context of a deposition as part of civil litigation, GHISLAINE MAXWELL, the defendant, repeatedly provided false and perjurious statements, under oath, regarding, among other subjects, her role in facilitating the

abuse of minor victims by Jeffrey Epstein, including some of the specific events and acts of abuse detailed above.

STATUTORY ALLEGATIONS

9. From at least in or about 1994, up to and including in or about 1997, in the Southern District of New York and elsewhere, GHISLAINE MAXWELL, the defendant, Jeffrey Epstein, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, enticement, in violation of Title 18, United States Code, Section 2422.

10. It was a part and object of the conspiracy that GHISLAINE MAXWELL, the defendant, Jeffrey Epstein, and others known and unknown, would and did knowingly persuade, induce, entice, and coerce one and more individuals to travel in interstate and foreign commerce, to engage in sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422.

Overt Acts

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

a. Between in or about 1994 and in or about 1997, when Minor Victim-1 was under the age of 18, MAXWELL participated in multiple group sexual encounters with Epstein and Minor Victim-1 in New York and Florida.

b. In or about 1996, when Minor Victim-1 was under the age of 18, Minor Victim-1 was enticed to travel from Florida to New York for purposes of sexually abusing her at the New York Residence, in violation of New York Penal Law, Section 130.55.

c. In or about 1996, when Minor Victim-2 was under the age of 18, MAXWELL provided Minor Victim-2 with an unsolicited massage in New Mexico, during which Minor Victim-2 was topless.

d. Between in or about 1994 and in or about 1995, when Minor Victim-3 was under the age of 18, MAXWELL encouraged Minor Victim-3 to provide massages to Epstein in London, England, knowing that Epstein intended to sexually abuse Minor Victim-3 during those massages.

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

COUNT TWO

(Enticement of a Minor to Travel to Engage in Illegal Sex Acts)

The Grand Jury further charges:

12. The allegations contained in paragraphs 1 through 8 of this Indictment are repeated and realleged as if fully set forth within.

13. From at least in or about 1994, up to and including in or about 1997, in the Southern District of New York and elsewhere, GHISLAINE MAXWELL, the defendant, knowingly did persuade, induce, entice, and coerce an individual to travel in interstate and foreign commerce to engage in sexual activity for which a person can be charged with a criminal offense, and attempted to do the same, and aided and abetted the same, to wit, MAXWELL persuaded, induced, enticed, and coerced Minor Victim-1 to travel from Florida to New York, New York on multiple occasions with the intention that Minor Victim-1 would engage in one or more sex acts with Jeffrey Epstein, in violation of New York Penal Law, Section 130.55.

(Title 18, United States Code, Sections 2422 and 2.)

COUNT THREE

(Conspiracy to Transport Minors with Intent to Engage in Criminal Sexual Activity)

The Grand Jury further charges:

14. The allegations contained in paragraphs 1 through 8 of this Indictment are repeated and realleged as if fully set forth within.

15. From at least in or about 1994, up to and including in or about 1997, in the Southern District of New York and elsewhere, GHISLAINE MAXWELL, the defendant, Jeffrey Epstein, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to

wit, transportation of minors, in violation of Title 18, United States Code, Section 2423(a).

16. It was a part and object of the conspiracy that GHISLAINE MAXWELL, the defendant, Jeffrey Epstein, and others known and unknown, would and did, knowingly transport an individual who had not attained the age of 18 in interstate and foreign commerce, with intent that the individual engage in sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2423(a).

Overt Acts

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

a. Between in or about 1994 and in or about 1997, when Minor Victim-1 was under the age of 18, MAXWELL participated in multiple group sexual encounters with EPSTEIN and Minor Victim-1 in New York and Florida.

b. In or about 1996, when Minor Victim-1 was under the age of 18, Minor Victim-1 was enticed to travel from Florida to New York for purposes of sexually abusing her at the

New York Residence, in violation of New York Penal Law, Section 130.55.

c. In or about 1996, when Minor Victim-2 was under the age of 18, MAXWELL provided Minor Victim-2 with an unsolicited massage in New Mexico, during which Minor Victim-2 was topless.

d. Between in or about 1994 and in or about 1995, when Minor Victim-3 was under the age of 18, MAXWELL encouraged Minor Victim-3 to provide massages to Epstein in London, England, knowing that Epstein intended to sexually abuse Minor Victim-3 during those massages.

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

COUNT FOUR
(Transportation of a Minor with Intent to Engage in Criminal Sexual Activity)

The Grand Jury further charges:

18. The allegations contained in paragraphs 1 through 8 of this Indictment are repeated and realleged as if fully set forth within.

19. From at least in or about 1994, up to and including in or about 1997, in the Southern District of New York and elsewhere, GHISLAINE MAXWELL, the defendant, knowingly did transport an individual who had not attained the age of 18 in interstate and foreign commerce, with the intent that the individual engage in sexual activity for which a person can be charged with a criminal offense, and attempted to do so, and

aided and abetted the same, to wit, MAXWELL arranged for Minor Victim-1 to be transported from Florida to New York, New York on multiple occasions with the intention that Minor Victim-1 would engage in one or more sex acts with Jeffrey Epstein, in violation of New York Penal Law, Section 130.55.

(Title 18, United States Code, Sections 2423(a) and 2.)

COUNT FIVE
(Perjury)

The Grand Jury further charges:

20. The allegations contained in paragraphs 1 through 8 of this Indictment are repeated and realleged as if fully set forth within.

21. On or about April 22, 2016, in the Southern District of New York, GHISLAINE MAXWELL, the defendant, having taken an oath to testify truthfully in a deposition in connection with a case then pending before the United States District Court for the Southern District of New York under docket number 15 Civ. 7433, knowingly made false material declarations, to wit, MAXWELL gave the following underlined false testimony:

- Q. Did Jeffrey Epstein have a scheme to recruit underage girls for sexual massages? If you know.
- A. I don't know what you're talking about.

. . .

Q. List all the people under the age of 18 that you interacted with at any of Jeffrey's properties?

A. I'm not aware of anybody that I interacted with, other than obviously [the plaintiff] who was 17 at this point.

(Title 18, United States Code, Section 1623.)

COUNT SIX
(Perjury)

The Grand Jury further charges:

22. The allegations contained in paragraphs 1 through 8 of this Indictment are repeated and realleged as if fully set forth within.

23. On or about July 22, 2016, in the Southern District of New York, GHISLAINE MAXWELL, the defendant, having taken an oath to testify truthfully in a deposition in connection with a case then pending before the United States District Court for the Southern District of New York under docket number 15 Civ. 7433, knowingly made false material declarations, to wit, MAXWELL gave the following underlined false testimony:

Q: Were you aware of the presence of sex toys or devices used in sexual activities in Mr. Epstein's Palm Beach house?

A: No, not that I recall. . . .

Q. Do you know whether Mr. Epstein possessed sex toys or devices used in sexual activities?

A. No.

. . .
Q. Other than yourself and the blond and brunette that you have identified as having been involved in three-way sexual activities, with whom did Mr. Epstein have sexual activities?

A. I wasn't aware that he was having sexual activities with anyone when I was with him other than myself.

Q. I want to be sure that I'm clear. Is it your testimony that in the 1990s and 2000s, you were not aware that Mr. Epstein was having sexual activities with anyone other than yourself and the blond and brunette on those few occasions when they were involved with you?

A. That is my testimony, that is correct.

. . .
Q. Is it your testimony that you've never given anybody a massage?

A. I have not given anyone a massage.

Q. You never gave Mr. Epstein a massage, is that your testimony?

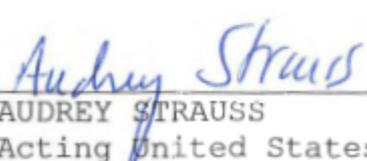
A. That is my testimony.

Q. You never gave [Minor Victim-2] a massage is your testimony?

A. I never gave [Minor Victim-2] a massage.

(Title 18, United States Code, Section 1623.)


FOREPERSON


AUDREY STRAUSS
Acting United States Attorney

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

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

GHISLAINE MAXWELL,

Defendant.

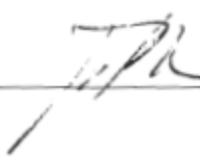
SUPERSEDING INDICTMENT

S1 20 Cr. 330 (AJN)

(18 U.S.C. §§ 371, 1623, 2422, 2423(a),
and 2)

AUDREY STRAUSS

Acting United States Attorney



Foreperson

EXHIBIT D

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TO: Laura Menninger, Esq. Haddon, Morgan and Foreman, P.C.	Fax No. Telephone No.	303.832.2628 303.831.7364
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FROM: Sigrid S. McCawley, Esq.

Total Number of Pages: 26
(including this cover sheet)

DATE: February 26, 2016

RE: [REDACTED] v. Maxwell,
Case no. 15-cv-07433-RWS

MESSAGE: Attached please find a copy of my email transmission to you from today at 12:10 pm, along with the accompanying Agreed Protective Order in both redline and clean version. Thank you.

THE ATTORNEY-CLIENT AND/OR ATTORNEY WORK-PRODUCT PRIVILEGES

This facsimile transmission is intended solely for the above-named recipient and may contain confidential information which is exempt from disclosure and protected by the attorney-client and/or attorney work-product privileges. Any unauthorized use or disclosure is strictly prohibited and may result in civil and/or criminal liability. If any of the information contained in this transmission is misdirected to you, please call (954) 356-0011 collect and mail such information back to us. Thank you.

United States District Court
Southern District Of New York



Plaintiff,

v.

15-cv-07433-RWS

Ghislaine Maxwell,

Defendant.

AGREED PROTECTIVE ORDER

Upon a showing of good cause in support of the entry of a protective order to protect the discovery and dissemination of confidential information, including sensitive personal information relating to a victim of sexual abuse, copyright or trade secrets, commercially sensitive information, or proprietary information.

I. Purposes And Limitations

(a) The Parties acknowledge that this Order does not confer blanket protections on all disclosures during discovery. Designations under this Order shall be made sparingly, with care, and shall not be made absent a good faith belief that the designated material satisfies the criteria set forth herein. If it comes to a Designating Party's attention that designated material does not qualify for protection at all, or does not qualify for the level of protection initially asserted, the Designating Party must promptly notify all other parties that it is withdrawing or changing the designation.

IT IS ORDERED:

1. This Protective Order shall apply to all documents, materials, and information, including without limitation, documents produced, answers to interrogatories, responses to requests for admission, deposition testimony, and other information disclosed pursuant to the disclosure or discovery duties created by the Federal Rules of Civil Procedure.
2. As used in this Protective Order, "document" is defined as provided in FED.R.CIV.P. 34(a). A draft or non-identical copy is a separate document within the meaning of this term.
3. Information designated "CONFIDENTIAL" shall be information that is confidential and is covered by common law and statutory privacy protections of (a) plaintiff [REDACTED] and (b) defendant Ghislaine Maxwell or any non-party that was subject to sexual abuse.
4. CONFIDENTIAL information shall not be disclosed or used for any purpose except the preparation and trial of this case and any related matter, including but not limited to, investigations by law enforcement.
5. CONFIDENTIAL documents, materials, and/or information (collectively "CONFIDENTIAL INFORMATION") shall not, without the consent of the party producing it or further Order of the Court, be disclosed *except that* such information may be disclosed to:
 - a. attorneys actively working on this case;
 - b. persons regularly employed or associated with the attorneys actively working on this case whose assistance is required by said attorneys in the preparation for trial, at trial, or at other proceedings in this case;

- c. the parties;
 - d. expert witnesses and consultants retained in connection with this proceeding, to the extent such disclosure is necessary for preparation, trial or other proceedings in this case;
 - e. the Court and its employees ("Court Personnel") in this case;
 - f. stenographic reporters who are engaged in proceedings necessarily incident to the conduct of this action;
 - g. deponents, witnesses, or potential witnesses;
 - h. any person (1) who authored or received the particular Protected Material; (2) who has or had at any point in time access to the Protected Material outside of the context of this action; or (3) for which there is a good faith basis to conclude that the individual has earlier received or seen such Protected Material; and
 - i. any other persons by written agreement of the parties or by Order of a Court of competent jurisdiction.
6. Prior to disclosing any CONFIDENTIAL INFORMATION to any person listed above (other than counsel, persons employed by counsel, Court Personnel and stenographic reporters), counsel shall provide such person with a copy of this Protective Order and obtain from such person a written acknowledgment stating that he or she has read this Protective Order and agrees to be bound by its provisions. All such acknowledgments shall be retained by counsel and shall be subject to *in camera* review by the Court if good cause for review is demonstrated by opposing counsel.

7. Documents are designated as CONFIDENTIAL by placing or affixing on them (in a manner that will not interfere with their legibility) the following or other appropriate notice: "CONFIDENTIAL." Discovery material designated CONFIDENTIAL shall be identified by Bates number. To the extent practical, the respective legend shall be placed near the Bates number.
8. Designation of a document as CONFIDENTIAL INFORMATION shall constitute a representation that such document has been reviewed by an attorney for the designating party, that there is a valid and good faith basis for such designation, made at the time of disclosure or production to the receiving party, and that disclosure of such information to persons other than those permitted access to such material would cause a privacy harm to the designating party.
9. Whenever a deposition involves the disclosure of CONFIDENTIAL INFORMATION, the deposition or portions thereof shall be designated as CONFIDENTIAL and shall be subject to the provisions of this Protective Order. Such designation shall be made on the record during the deposition whenever possible, but a party may designate portions of depositions as CONFIDENTIAL after transcription, provided written notice of the designation is promptly given to all counsel of record within thirty (30) days after notice by the court reporter of the completion of the transcript, and until the expiration of such thirty (30) days after notice by the court reporter of the

completion of the transcript, no party or counsel for any such party may share the contents of the deposition outside the limitations of this Protective Order.

10. Whenever a party seeks to file any document or material containing CONFIDENTIAL INFORMATION with the Court in this matter, it shall be accompanied by a Motion to Seal pursuant to Section 6.2 of the Electronic Case Filing Rules & Instructions for the Southern District of New York.

11. **Challenging Designations Of Protected Material**

- (a) A Party shall not be obligated to challenge the propriety of any designation of Discovery Material under this Order at the time the designation is made, and a failure to do so shall not preclude a subsequent challenge thereto. Moreover, failure to challenge the designation of any Discovery Material as CONFIDENTIAL shall not in any way constitute an admission that such material contains any competitively sensitive information, trade secret information, or other protectable material.

- (b) In the event that counsel for the Party receiving Protected Material objects to the CONFIDENTIAL designation of any or all such items, said counsel shall provide the Producing Party and, if different, the Designating Party written notice of, and the basis for, such objections. The Parties will use their best efforts to resolve such objections among themselves. Should the Receiving Party, the Producing Party and, if different, the Designating Party be unable to resolve the

objections, the Receiving Party may seek a hearing before this Court with respect to the propriety of the designation. The Designating Party will cooperate in obtaining a prompt hearing with respect thereto. Pending a resolution, the discovery material in question shall continue to be treated as Protected Material as provided hereunder. The burden of proving that Discovery Material is properly designated shall at all times remain with the Designating Party.

12. At the conclusion of this case, unless other arrangements are agreed upon, each document and all copies thereof which have been designated as CONFIDENTIAL shall be returned to the party that designated it CONFIDENTIAL, or the parties may elect to destroy CONFIDENTIAL documents. Where the parties agree to destroy CONFIDENTIAL documents, the destroying party shall provide all parties with an affidavit confirming the destruction.
13. With respect to any Discovery Material produced by such non-party, the non-party may invoke the terms of this Order in writing to all Parties by designating Discovery Material "CONFIDENTIAL". Any such Protected Material produced by the non-party designated "CONFIDENTIAL" shall be subject to the restrictions contained in this Order and shall only be disclosed or used in a manner consistent with this Order.
14. In the event that any Producing Party inadvertently produces Discovery Material eligible for designation as CONFIDENTIAL without such designation, the Parties agree that the Producing Party may retroactively apply the correct designation. If a

Producing Party makes a subsequent designation, the Receiving Party will treat the Protected Material according to the retroactive designation, including undertaking best efforts to retrieve all previously distributed copies from any recipients now ineligible to access the Protected Material.

16. Limitations. Nothing in this Order shall restrict in any way the use or disclosure of Protected Material by a Receiving Party (a) that is or has become publicly known through no fault of the Receiving Party; (b) that is lawfully acquired by or known to the Receiving Party independent of the Producing Party; (c) that was previously produced, disclosed, and/or provided by the Producing Party to the Receiving Party or a non-party without an obligation of confidentiality and not by inadvertence or mistake; (d) with the consent of the Producing Party and, if different, the Designating Party; (e) pursuant to Order of the Court; or (f) for purposes of law enforcement.
15. This Protective Order shall have no force and effect on the use of any CONFIDENTIAL INFORMATION at trial in this matter. This Protective Order may be modified by the Court at any time for good cause shown following notice to all parties and an opportunity for them to be heard.

BY THE COURT

UNITED STATES DISTRICT JUDGE

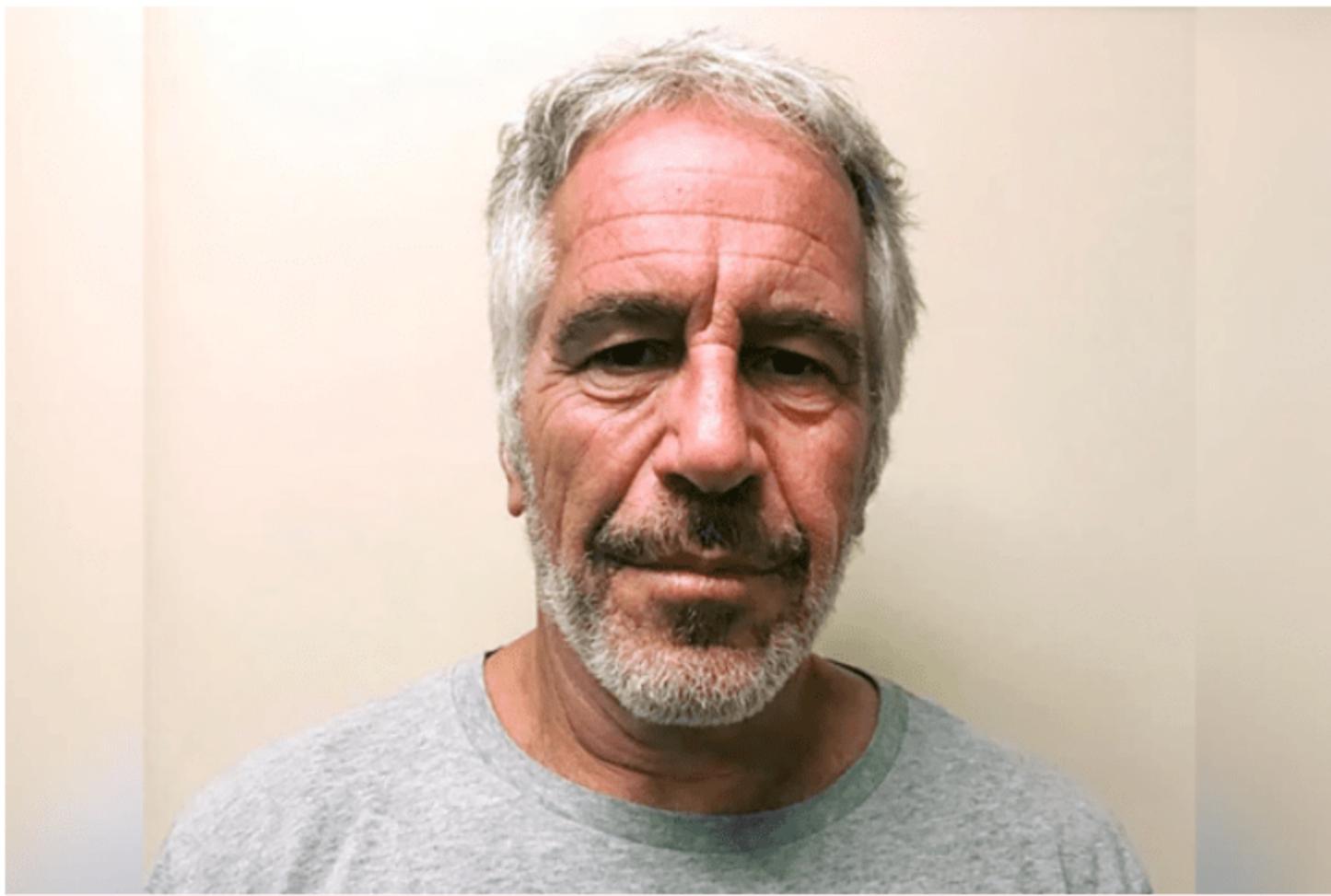
EXHIBIT E

METRO

New Jeffrey Epstein accuser says he molested her at 13, told her to wear children's underwear

By Emily Saul

January 18, 2020 | 12:04am | Updated



Jeffrey Epstein
AP

A woman claiming she was Jeffrey Epstein's "first-known victim" says she was **sexually abused by the now-dead pedophile** — who called himself her "Godfather" — when she was 13 years old.

Jane Doe met Epstein and his friend, Ghislaine Maxwell, in the summer of 1994 at Michigan's Interlochen Arts Camp, where she was in voice training, according to newly filed court papers suing Epstein's estate and Maxwell.

The duo quickly took her under their wing, taking her to movies and on shopping trips in her home state of Florida and all the while grooming her for abuse, the Manhattan federal court suit says.

Epstein "started to slowly display his pedophilic ways when shopping with Doe and Maxwell. Instead of letting Doe pick out clothes she wanted to wear, Epstein insisted that she pick out and wear little children's cotton underwear," the suit says.

She was first allegedly abused in a pool house that same year when Epstein pulled her onto her his lap and began masturbating — claiming this was what “professionals” did.

The attacks escalated, the court papers claim. The financier would regularly sexually assault her and force her to perform sex acts in Palm Beach, New York City and his New Mexico ranch, always traveling to the locations on his private plane dubbed the “Lolita Express.”

At 16, Epstein put Doe up in one of his apartments in New York City — near his own townhouse, where he would allegedly rape her the next year.

SEE ALSO

**Feds finally start
investigating Jeffrey
Epstein's gal pal Ghislaine
Maxwell**

“In 1997, while at Epstein’s townhouse on 9 East 71st Street in the City of New York, Epstein asked 17-year-old Doe if she had a boyfriend. Doe replied that she did not,” the lawsuit reads. “Epstein responded that when she did have a boyfriend she would want the sex to be ‘good’ and that she should ‘get it over with already,’ meaning lose her virginity.”

“Despite Doe’s resistance, Epstein then pushed Doe down onto her stomach and raped her. From that point forward for several years in New York, Epstein raped Doe on multiple occasions,” the papers claim, noting **Maxwell was often present** when the abuse took place.

The court papers also claim Epstein introduced her to President Trump when she was 14 years old, allegedly elbowing Trump and saying, “This is a good one, right?”

“Trump smiled and nodded in agreement,” the suit states.

A spokesperson for the president did not immediately return a request for comment.

Doe is suing Epstein’s estate, alleging sexual assault, sexual battery, false imprisonment and other charges. Her complaint joins over a dozen filed by other women claiming they were trafficked and abused by the multi-millionaire.

Epstein was **found dead in his jail cell** in August while awaiting trial for sex trafficking. His death was officially ruled a suicide by hanging.

Lawyers for Maxwell and Epstein’s estate did not immediately return emails.

NEWS

Epstein, Maxwell wanted me to have surrogate baby: Virginia Roberts

By Post Staff Report

March 22, 2020 | 3:24pm



Virginia Roberts Gluffre
William Farrington

Former teen “sex slave” [redacted] says she finally fled Jeffrey Epstein and Ghislaine Maxwell after three years, when they asked her, at age 19, to bear their surrogate baby.

SEE ALSO



Epstein’s former gal pal
sues his estate

The latest creepy allegation by [REDACTED] who has also accused Epstein of **pimping her out to Prince Andrew** when she was just 17, was revealed by her attorney, Bradley Edwards, in his new memoir, "Relentless Pursuit."

"It was the final straw," Edwards writes in an excerpt published in the Daily Mail.

"She knew she had to escape."

FILED UNDER **GHISLAINE MAXWELL, JEFFREY EPSTEIN, PRINCE ANDREW, [REDACTED]** **3/22/20**

Socialite Ghislaine Maxwell 'groped a 16-year-old girl during a naked massage,' victims' lawyer says

[dailymail.co.uk/news/article-8163681/Socialite-Ghislaine-Maxwell-groped-16-year-old-girl-naked-massage-victims-lawyer-says.html](https://www.dailymail.co.uk/news/article-8163681/Socialite-Ghislaine-Maxwell-groped-16-year-old-girl-naked-massage-victims-lawyer-says.html)

March 28, 2020

Socialite Ghislaine Maxwell 'groped a 16-year-old girl during a naked massage while Jeffrey Epstein watched,' lawyer who dedicated his life to nailing Prince Andrew's paedophile friend claims in new book

- Ghislaine Maxwell, 58, allegedly sexually assaulted 16-year-old ██████████
- It reportedly happened at paedophile Epstein's 7,500-acre New Mexico ranch
- A lawyer for more than 20 of Epstein's victims has made the allegation

By [Mark Hookham](#) For The Mail On Sunday

Published: 18:03 EDT, 28 March 2020 | Updated: 15:59 EDT, 2 July 2020

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Socialite [Ghislaine Maxwell](#) allegedly groped a teenage girl during a naked massage while paedophile [Jeffrey Epstein](#) watched, a [new book](#) claims.

Maxwell, 58, allegedly sexually assaulted 16-year-old ██████████ at Epstein's 7,500-acre ranch in New [Mexico](#), according to the book by Bradley Edwards, a lawyer for more than 20 of Epstein's victims.

The book, from which we are summarising stories in The Mail on Sunday, details Maxwell's alleged role in recruiting and grooming underage girls for Epstein. According to some accounts, she was even involved in some of the abuse herself.





Ghislaine Maxwell, 58, attending to an Alzheimer's Association event in New York in 2010

It raises serious questions as to why Maxwell, whose whereabouts have been a mystery for months, has never been charged with any wrongdoing. She has always maintained that allegations against her are abhorrent and untrue.

The book also claims that:

Maxwell, Epstein's ex-girlfriend, was at the wedding of former US President Bill Clinton's daughter Chelsea in July 2010, a year after Epstein was released from jail as a convicted sex offender;

She loved to take nude photographs of girls and allegedly took many of the pictures displayed on the walls of Epstein's mansions.

According to one witness, she felt 'indebted' to Epstein for helping her following the mysterious death in 1991 of her father, disgraced tycoon Robert Maxwell;

Epstein 'wasn't beyond killing someone' to keep his sex addiction alive, the witness claimed.

██████████ now 40, helped keep Epstein behind bars last July after giving evidence about her ordeal as a teenager during a bail hearing. The financier was found dead in his cell the following month. Ms ██████████ is now suing Epstein's estate and Maxwell in the New York district court for damages.

According to Ms ██████████ testimony, detailed in the book, she was flown to the financier's vast Zorro Ranch after he offered to pay for her to attend a summer educational programme in Thailand.



Prince Andrew pictured with his arm around [REDACTED] who has accused the Queen's 'favourite son' of having sex with her [REDACTED]

NEWS

When will feds arrest Jeffrey Epstein ‘fixer’ Ghislaine Maxwell?

By Ben Feuerherd

May 28, 2020 | 4:17pm | Updated



Jeffrey Epstein and Ghislaine Maxwell
Patrick McMullan via Getty Images

Nine months after Attorney General William Barr warned that Jeffrey Epstein’s co-conspirators “should not rest easy,” the pedophile’s alleged madam, Ghislaine Maxwell, remains at large — and is using a potential criminal investigation to **thwart civil action** against her.

Maxwell is currently a co-defendant in several civil cases brought by alleged Epstein sex-trafficking victims.

Among them is ██████████ who claims in her suit against Maxwell and the proprietors of Epstein’s estate that she was **lured to his New Mexico ranch** as a teenager and sexually abused by the pair.

According to the suit, Maxwell allegedly forced ██████████ to undress in view of Epstein after promising to give her a massage.

“Maxwell touched intimate parts of ██████████ body against her will for the sexual benefit of Maxwell and Epstein,” the suit states. “Maxwell exposed ██████████ breasts and groped her,” it adds.

Through her attorney [REDACTED] as sought to depose Maxwell and have her respond to written questions related to the alleged sexual abuse.

 Ghislaine Maxwell

Paul Bruinooge/Patrick McMullan via Getty Images

But **the former fixer** has successfully dodged a grilling in the case, citing an ongoing criminal investigation into co-conspirators of Epstein — all while not admitting she herself is being probed by the feds.

An investigation into Epstein's accomplices was **alluded to by Barr** days after the pedophile's suicide in a Lower Manhattan lockup, and has been mentioned repeatedly by the US Attorney's Office in New York, according to court filings.

A spokesperson for the Southern District of New York declined to comment on the investigation.

Maxwell's attorney cited the investigation in an effort to block her testimony in the Farmer case.

SEE ALSO

Ghislaine Maxwell wins questioning delay in sexual battery suit

"The Southern District of New York has publicly and repeatedly announced its 'ongoing' criminal investigation into alleged Epstein 'co-conspirators' on the same topic as Plaintiff alleges in this case," Maxwell's attorney wrote in a May 13 letter to Manhattan federal Judge Debra Freeman seeking to stay discovery in the case.

"Denial of a stay, particularly a stay of Ms. Maxwell's deposition, pending outcome of the criminal investigation could impair her Fifth Amendment privilege against self-incrimination," added her attorney, Laura Menninger.

Farmer's attorney, David Boies, noted in his response that Maxwell has not publicly admitted she herself is the **center of a federal investigation**, but is nevertheless using it to shield herself.

"Maxwell has provided no information about the subject matter of the criminal investigation into Epstein's co-conspirators, the status of the investigation, or even disclosed whether she herself is a target of the Southern District's investigation," Boies wrote.

SEE ALSO

Epstein investigators contacted by 'dozens' since his death

"When Plaintiff's counsel asked Maxwell's counsel for information about the criminal investigation during their meet and confer, Maxwell's counsel refused to provide any details," he added.

Freeman agreed Maxwell could potentially incriminate herself by giving a deposition and ordered that she not be required to sit for one as part of the suit.



Maxwell, who is apparently in hiding, has not given testimony or a public statement since Epstein's arrest and suicide. Attorneys for Farmer and Maxwell did not immediately respond.

FILED UNDER [GHISLAINE MAXWELL](#), [JEFFREY EPSTEIN](#), [LAWSUITS](#), [SEX TRAFFICKING](#), [WILLIAM BARR](#), [5/28/20](#)

Ghislaine Maxwell felt no guilt in procuring girls for Jeffrey Epstein, claims friend

[dailymail.co.uk/femail/article-8384165/Ghislaine-Maxwell-felt-no-guilt-procuring-girls-Jeffrey-Epstein-claims-friend.html](https://www.dailymail.co.uk/femail/article-8384165/Ghislaine-Maxwell-felt-no-guilt-procuring-girls-Jeffrey-Epstein-claims-friend.html)

June 3, 2020

- **US-based [REDACTED] 57, has spoken out in new documentary**
- **Claims Ghislaine Maxwell felt 'no guilt' in procuring girls for Jeffrey Epstein**
- **[REDACTED] reveals she 'feared for her life' at the hands of Epstein and Maxwell**
- **Who Killed Jeffrey Epstein? premieres at 11pm Saturday 6th June on Quest Red and dplay**
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Ghislaine Maxwell felt no guilt in procuring girls for [Jeffrey Epstein](#) to satisfy his 'incredible sex drive,' [Prince Andrew's](#) distant cousin has claimed - adding that 'if anything, she was proud.'

In Quest Red's new true [crime](#) documentary special Who Killed Jeffrey Epstein? it is alleged that socialite Ghislaine Maxwell - Epstein's former partner - procured girls for Epstein to 'satisfy his insatiable sex drive.'

Socialite writer Christina Oxenberg, 57, from the US, who is a friend of Maxwell, notes that Maxwell felt no guilt in procuring girls for his pleasure.

'She says he has an incredible sex drive, he has to have three orgasms a day, so I help him out by bringing in the females,' explains Christina. 'She felt no compunction about telling me this, if anything she was proud.'

Christina is the daughter of a Serbian princess and sister of the Hollywood actress, Catherine Oxenberg - who rescued her eldest daughter India, now 28, from the Nxivm sex cult run by its leader, Keith Raniere, after an 18 month battle.

India was among the women he recruited under the guise of offering them self-help courses. Her actress mother pulled her out of it in 2018 after fighting relentlessly in the press to expose Raniere and his practices.



Christina Oxenberg claims that Ghislaine Maxwell felt no guilt in procuring girls for Jeffrey Epstein to satisfy his 'incredible sex drive' in Quest Red's new true crime documentary special Who Killed Jeffrey Epstein?



Jeffrey Epstein and Ghislaine Maxwell attend de Grisogono Sponsors The 2005 Wall Street Concert Series Benefitting Wall Street Rising on March 15, 2005 in New York



Prince Andrew and [REDACTED] aged 17 at Ghislaine Maxwell's townhouse in London, Britain on March 13, 2001

The documentary dives headfirst into the Epstein story, examining the mysterious circumstances surrounding the financier's death, aiming to answer one vital question: Did Epstein take his own life, or was it something much more sinister?

On 10th August 2019, disgraced American financier Jeffrey Epstein was found dead in his New York prison cell as he awaited his trial on sex trafficking charges.

It was a dramatic end to one of the world's most mysterious billionaires, with the coroner officially ruling the cause of death as suicide.

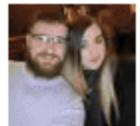
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But it wasn't long before the circumstances surrounding Epstein's death were called into question.



Having being linked with some of the world's most influential and powerful celebrity figures – including Prince Andrew, Donald Trump and Bill Clinton – some believe that Epstein may have been murdered.



The Washington Post

Democracy Dies in Darkness

Ghislaine Maxwell, longtime associate of Jeffrey Epstein, charged in sex abuse case

By **Shayna Jacobs** and **Devlin Barrett**

July 2, 2020 at 3:14 p.m. MDT

NEW YORK — Ghislaine Maxwell, a longtime confidante of sex offender Jeffrey Epstein, was arrested Thursday in New Hampshire on charges she recruited and groomed underage girls for abuse by her then-boyfriend, officials said.

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A grand jury indictment unsealed Thursday charged Maxwell, daughter of the late media tycoon Robert Maxwell, with perjury and conspiring to entice minors to travel to engage in sex acts.

Maxwell has been under investigation for months as a possible accomplice to Epstein's history of sexual abuse of underage girls. Epstein, who committed suicide while in federal custody last summer, dated Maxwell for years, and the indictment charges she played a key role in grooming girls for him to abuse.

Beginning in at least 1994, the indictment alleges, Maxwell “enticed and groomed multiple minor girls to engage in sex acts with Jeffrey Epstein, through a variety of means and methods.”

Acting U.S. Attorney Audrey Strauss called the sex abuse described in the Maxwell case “the prequel” to the charges they lodged last year against Epstein covering alleged acts of abuse in the early 2000s.

“Maxwell played a critical role in helping Epstein to identify, befriend, and groom minor victims for abuse,” said Strauss, who oversees the federal prosecutor’s office in the Southern District of New York. “In some cases, Maxwell participated in the abuse herself.”

A lawyer for Maxwell, Jeff Pagliuca, did not immediately respond to messages seeking comment.

David Boies, who along with Sigrid McCawley represents a dozen of Epstein’s accusers, said their clients were elated by the development. “It’s just an enormous step,” he said.

Boies said he thinks Maxwell will be under “tremendous pressure to cooperate” as she looks for ways to shave time off what may be a significant prison sentence. Maxwell could potentially help prosecutors shed light on Epstein’s dealings with other wealthy and influential people who may have had encounters with underage victims, he said, adding, “There were a lot of people with a lot of public stature ... who were involved with Epstein.”

“The pain [Maxwell] has caused will never go away but today is a step toward healing,” McCawley added in a statement, praising prosecutors on the case for their “unrelenting courage.”

U.S. Magistrate Judge Andrea Johnstone ordered Maxwell to remain in custody at a brief hearing via videoconference in federal court in New Hampshire, where another of her attorneys, Lawrence Vogelman, did not seek an immediate bail hearing because her lawyers plan to make those arguments after she is transferred to New York.

AD

In a court filing, prosecutors said Maxwell should stay behind bars pending trial because she might flee given her “extensive international ties,” noting she has citizenship in two countries and three passports in her name. Maxwell, 58, faces the possibility of 35 years in prison if convicted and has “absolutely no reason to stay in the United States,” prosecutors argued in the filing.

Prosecutors also said the Epstein investigation is not over and asked any victims or witnesses to Epstein’s abuse of minors to contact the FBI.

William Sweeney, head of the FBI’s New York office, called Maxwell “one of the villains” of the Epstein saga and said that agents kept close tabs on her after she “slithered away to a gorgeous property in New Hampshire.”

AD

The indictment charged that Maxwell “would try to normalize sexual abuse for a minor victim by, among other things, discussing sexual topics, undressing in front

of the victim, being present when a minor victim was undressed, and/or being present for sex acts involving the minor victim and Epstein.”

One of the victims was 14 years old when Epstein and Maxwell began grooming her for sex acts with Epstein, according to the indictment.

The victims were groomed or abused at a number of Epstein’s luxurious homes, including his sprawling Upper East Side townhouse in Manhattan, an estate in Palm Beach, Fla., a ranch in Santa Fe, N.M., and Maxwell’s home in London, according to the charges.

“Minor Victim-2,” according to the indictment, was under 18 when she was flown to New Mexico at Epstein’s invitation. “In New Mexico, Maxwell began her efforts to groom Minor Victim-2 for abuse by Epstein by, among other things, providing an unsolicited massage to Minor Victim-2, during which Minor Victim-2 was topless,” the indictment charged.

Maxwell is also accused of grooming and befriending a third victim, whom she met in London between 1994 and 1995. She allegedly encouraged that victim to give Epstein massages “knowing that Epstein would engage in sex acts with Minor Victim-3 during those massages.”

The indictment also accuses Maxwell of lying in a deposition in 2016 when asked about these activities by a lawyer for one of Epstein’s alleged victims, when she denied any knowledge of him engaging in sex acts with minors. When asked if Epstein had a scheme to recruit underage girls for sexual massages, Maxwell replied, “I don’t know what you’re talking about,” the indictment says.

AD

Strauss, the acting U.S. attorney in Manhattan, said the socialite told that lie and others in the deposition because the truth “was almost unspeakable — Maxwell enticed minor girls, got them to trust her, then delivered them into the trap that she and Epstein had set for them. She pretended to be a woman they could trust, all the while she was setting them up to be sexually abused by Epstein.”

Maxwell’s arrest was first reported Thursday by NBC News.

Epstein, 66, was a registered sex offender who was arrested last year on federal sex trafficking charges for alleged abuses of underage girls in New York and Florida. His suicide in a Manhattan federal detention center led to charges against two of his guards who were accused of failing to check on him in his cell in the hours before he was found hanging from a bedsheet.

Epstein’s ability to avoid a lengthy prison sentence has raised questions about whether the wealthy, politically connected sex offender — with ties to both President Trump and former president Bill Clinton — was able to manipulate state and federal officials to go easy on him.

Years before his 2019 arrest, Epstein had resolved similar allegations with a plea deal involving state charges in Florida that allowed him to spend a little more than a year in jail and leave daily for work — an arrangement widely criticized as too lenient. As part of that deal, prosecutors agreed not to pursue cases against Epstein’s associates who might have recruited girls for him.

AD

Gloria Allred, a lawyer representing more than a dozen of Epstein's alleged victims, said her clients hope Maxwell "will be accountable if the evidence presented in court proves beyond a reasonable doubt that she had a role in assisting and recruiting young girls to be sex trafficked and sexually victimized by Jeffrey Epstein."

The investigation into Epstein's conduct continued after his jailhouse death and has ensnared Britain's Prince Andrew, another old friend of the late financier.

Federal prosecutors complained earlier this year that Andrew has provided "zero cooperation" to authorities.

One of Epstein's accusers, [REDACTED] claims she was paid by Epstein for sexual encounters with the prince when she was 17. The prince has denied any wrongdoing.

On Thursday, Strauss made clear prosecutors still want to talk to him.

"We would welcome Prince Andrew coming in to talk to us," she said. "We would like to have the benefit of his statement."

Epstein's alleged victims continue to pursue lawsuits against his estate, which is valued at hundreds of millions of dollars.

METRO

Ghislaine Maxwell leaves luxe life behind for tiny jail cell in Brooklyn

By Vincent Barone

July 7, 2020 | 8:47pm | Updated



Stephen Yang

From beef bourguignon to beef jerky: Ghislaine Maxwell has traded in her palatial New Hampshire cabin for stripped-down confinement at Brooklyn's Metropolitan Detention Center.

The Oxford-educated British socialite had been lying low in a million-dollar New Hampshire hideaway featuring a cathedral ceiling, a massive floor-to-ceiling stone fireplace and a gourmet kitchen, [according to the home's listing](#).

Jeffrey Epstein's alleged right-hand woman cooked stews for herself in a kitchen with two ovens, a six-burner stove and a luxury refrigerator.

Maxwell, 58, on Monday was transferred to the city's largest federal jail, where she is expected to be kept in a 10-foot-by-12-foot cell.

The notorious facility is in the midst of a lawsuit that has [sounded the alarm](#) over its potential to foster a dangerous coronavirus outbreak. It's the same facility where officers last month [pepper-sprayed](#) inmate Jamel Floyd to death.

In January 2019, inmates went freezing for weeks when an electrical fire knocked out power in the building, an **environment described** as a “humanitarian crisis.”



The interior of the Metropolitan Detention Center
DOJ

Maxwell will be given a T-shirt and other basic clothing at the MDC along with a thin mattress, pillow and blanket. She may be allowed to have an approved religious medallion or book, such as the Bible — but cannot have any other personal possessions.

After schmoozing among the global elite, Maxwell has apparently had a difficult time socializing with her fellow inmates. One inmate at a New Hampshire jail where she was briefly held **reportedly called her** a “snooty b—h.”

Injuring a high-profile inmate like Maxwell “would be a badge of honor,” former MDC warden Cameron Lindsay said.

“You go from living a life like Maxwell to all of a sudden being in a situation where you’re being strip-searched and having people look into your body cavities,” Lindsay added.

FILED UNDER **BROOKLYN, GHISLAINE MAXWELL, JAIL, JEFFREY EPSTEIN, 7/7/20**

For Ghislaine Maxwell, Epstein's alleged recruiter, a private battle has become a public reckoning

She has been charged with conspiring with the infamous sex offender.

By James Hill and Pete Madden
July 10, 2020, 2:06 AM • 11 min read



Ghislaine Maxwell behind bars as new details emerge

Jeffrey Epstein's ex-girlfriend Ghislaine Maxwell is accused of facilitating Epstein's sex crimes by helping him "recruit, groom and ultimately abuse" three unnamed teens between 1994 and 1997.

Ghislaine Maxwell, a British socialite and longtime companion of disgraced financier Jeffrey Epstein, is facing a reckoning for her alleged role in facilitating Epstein's sexual abuse of young women.

Federal prosecutors say Maxwell played a "key role" in a multi-state sex trafficking scheme, in which she not only allegedly "befriended" and later "enticed and groomed multiple minor girls to engage in sex acts with Epstein, through a variety of means and methods," but was also, at times, "present for and involved" in the abuse herself.

Maxwell is scheduled to appear before a federal judge in New York on Tuesday, where she is expected to publicly address those allegations for the first time. But court filings make clear that Tuesday's hearing is only the latest chapter in long-running legal battles waged mostly out of public view.

Maxwell has been named as a defendant in five lawsuits from alleged Epstein victims, and in at least three others, alleged victims identify her as

Top Stories

For Ghislaine Maxwell, Epstein's alleged recruiter, a private battle has become a public reckoning



Jul 10, 2:06 AM

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Jul 29, 2:16 AM

Congressman who refused to wear a mask tests positive for COVID-19



1 hour ago

Woman dead after attack by great white shark off Maine coast



Jul 28, 2:08 PM

Contentious 5-hour House hearing with AG William Barr concludes



Jul 28, 2:12 PM





Jeffrey Epstein and Ghislaine Maxwell attend de Grisogona Sponsors The 2005 Wall Street Concert Series Benefitting Wall Street Rising, with a Performance by Rod Stewart at Cipriani Wall Street on... more
Patrick McMullan/Patrick McMullan via Getty Image, FILE

But in lawsuits several of Epstein's alleged victims tell an entirely different story, one that often places Maxwell in a role that was central to their abuse.

One anonymous victim, identified only as Jane Doe, alleged that Epstein and Maxwell "attempted to groom and mentor" her when she was just 13 years old.

"They took her to movies, went shopping with her and lounged around Epstein's estate with her," Doe alleged in her complaint. "Epstein and Maxwell then started to make sexual references when they were with her."

Ultimately, according to Doe's complaint, Maxwell "regularly facilitated Epstein's abuse of Doe and was frequently present when it occurred."

+ MORE: Ghislaine Maxwell given paper clothes at correctional center to avoid suicide attempt: Sources

[REDACTED] and another anonymous alleged victim identified only as Doe 1000, have alleged that Maxwell not only recruited girls for Epstein but, in their cases, even participated in their abuse. [REDACTED] alleged Epstein and Maxwell sexually abused her between 2000 and 2002 and claims that she was directed to have sex with some of their prominent friends. [REDACTED] alleged that Maxwell "groped her" and "touched intimate parts of [her] body against her will for the sexual benefit of Maxwell and Epstein"; Doe alleged "Epstein and Maxwell proceeded to sexually assault Jane Doe simultaneously and by forcible compulsion" and that Maxwell "forcibly penetrated Jane Doe with a sex toy."

Maxwell has, in court filings, strenuously denied any such misconduct.

"She absolutely denies that she participated in this or any other sexual abuse or trafficking or assault," her lawyer wrote in response to [REDACTED] allegations, "and no court, judge or jury has ever determined that she has."



Jeffrey Epstein and Ghislaine Maxwell attend an event in New York City, June 13, 1995. Patrick McMullan via Getty Images, FILE

Following Epstein's arrest last July and his death in prison a month later, Maxwell's whereabouts became the subject of intense scrutiny. She sold her former residences in New York and London and shuttered her non-profit ocean conservation organization. Various press reports placed her in Massachusetts, California, France and Israel, and attorneys for several of Epstein's alleged victims struggled to locate her in order to serve their lawsuits. She was ultimately arrested by the FBI in Bradford, New Hampshire, where prosecutors say she was living at a 156-acre property, nicknamed "Tucked Away."

Prosecutors are now arguing that Maxwell poses an "extreme" flight risk, citing her "three passports, large sums of money, extensive international connections."

Maxwell is a citizen of the United States, United Kingdom and France, prosecutors said, and she has traveled abroad frequently within the last three years. Prosecutors also believe she possesses "significant sums of money," citing a government investigation that identified "more than 15 different bank accounts held by or associated with the defendant from 2016 to the present, and during that same period, the total balances of those accounts have ranged from a total of hundreds of thousands of dollars to more than \$20 million."

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As with Epstein, however, prosecutors have found the full extent of Maxwell's wealth difficult to determine.

one of Epstein's primary "recruiters," claims that Maxwell, through her attorneys, has repeatedly denied.

"Maxwell had no involvement in or knowledge of Epstein's alleged misconduct," one lawyer for Maxwell wrote earlier this year in her own lawsuit against the Epstein estate.

+ MORE: As feds continue to seek interview with Prince Andrew, Attorney General William Barr says Jeffrey Epstein probe marches on

In court filings related to that lawsuit, in which she claimed that Epstein had "promised that he would indemnify, defend, and advance any expenses incurred by reason of my prior employment relationship with him and his affiliated businesses," Maxwell contended that she had "incurred substantial expenses defending myself against false accusations and investigations." She claimed to owe more than \$318,000 to a criminal defense firm, more than \$101,000 to a civil litigation firm, and more than \$194,000 in security and relocation costs. The estate, according to court records, declined to reimburse the costs.

According to Joshua Schiller of Boies, Schiller, Flexner, LLP, a firm that represents three Epstein's alleged victims who have filed civil suits against her, Maxwell has been at the forefront of the fight with Epstein's alleged victims long before her recent arrest.

"[Maxwell] has been using this Court as a sword and a shield for many years," Schiller wrote in a filing earlier this year, "and she, Jeffrey Epstein, and their other co-conspirators have attempted to thwart their victims from obtaining justice for decades."



Ghislaine Maxwell at Spring Studios in New York City, Oct. 18, 2016. Patrick McMullan via Getty Images, File

Maxwell, 58, is the Oxford-educated daughter of Robert Maxwell, the larger than life publishing baron whose rags-to-riches story captivated England. She lived an extravagant life among the British elite until her father's business empire collapsed in the wake of his death. She fled to New York looking for a fresh start and was soon seen in the company of the mysterious multimillionaire Epstein.

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"The defendant's financial resources appear to be substantial," prosecutors wrote, "and her numerous accounts and substantial money movements render her total financial picture opaque and indeterminate, even upon a review of bank records available to the Government."

Brad Edwards, an attorney who represents several of Epstein's alleged victims, believes that there is still much more to learn about Maxwell.

"I think that's the tip of the iceberg," Edwards told ABC News. "And I would expect the same thing that happened after Jeffrey Epstein was arrested. There's going to be a flood of calls and more information coming in."

But her role in Epstein's story, he said, is already clear.

"Ghislaine Maxwell created Jeffrey Epstein," Edwards told ABC News. "She helped to create the monster that we later understood him to be."

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In a letter to a Florida state prosecutor related to Epstein's 2008 guilty plea, Epstein's attorneys describe his relationship with Maxwell as one of two "long-term intimate relationships" Epstein had in adulthood. They met through mutual friends in 1991, his attorneys said, and parted "amicably" in 2000 because "the demands of his work ... precluded a good married life with children." The same letter contains what purports to be a quote from Maxwell, in which she describes Epstein as a "thoughtful, kind, generous, loving man."

Maxwell has asserted in court filings that she entered Epstein's employ in 1999, where she remained, despite the end of their romantic relationship, until at least 2006.

Maxwell's only sworn testimony on the nature of her work for Epstein can be found in excerpts -- unsealed by a federal court last year -- of two 2016 depositions related to a defamation lawsuit filed by Virginia Giuffre, one of Epstein's alleged victims, who has accused Maxwell of recruiting her into Epstein's alleged child trafficking scheme, an accusation Maxwell denied.



According to Maxwell's testimony, she was responsible for the staffing and management of Epstein's various properties.

"There were six homes," Maxwell said. "I hired assistants, I hired architects, I hired decorators, I hired cooks, I hired cleaners, I hired gardeners, I hired pool people, I hired pilots, I hired all sorts of people."

"A very small part of my job," she added, "was from time to time to find adult professional massage therapists for Jeffrey."

She denied, under oath, that she had ever hired underage girls to work for Epstein, assertions that are now the subject of perjury charges.

"As far as I'm concerned, everyone who came to his house was an adult, professional person," Maxwell said. "I am not aware of teenagers who worked in his home."

'I'm no Cruella de Vil': Ghislaine Maxwell insists she is not an 'evil villain'

 [dailymail.co.uk/news/article-8513675/Im-no-Cruella-Vil-Ghislaine-Maxwell-insists-not-evil-villain.html](https://www.dailymail.co.uk/news/article-8513675/Im-no-Cruella-Vil-Ghislaine-Maxwell-insists-not-evil-villain.html)

July 11, 2020

- **Maxwell says she is not the 'cartoon caricature of a villain' she is portrayed as**
- **The 58-year-old is scheduled to appear before a judge in New York on Tuesday**
- **She will be charged with procuring girls as young as 14 for Jeffrey Epstein**
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Defiant [Ghislaine Maxwell](#) has rounded on her accusers, insisting that her portrayal as a 'cartoon caricature of a villain' is utterly false.

Friends say that the 58-year-old socialite, who is scheduled to appear before a judge in New York on Tuesday to be formally charged with procuring girls as young as 14 for [Jeffrey Epstein](#) – the serial paedophile and her former boyfriend – 'is no Cruella de Vil'.

Referring to the glamorous but evil character from the Disney film One Hundred And One Dalmatians, one friend told The Mail on Sunday: 'This cartoon caricature of a villain she is being painted as is utterly untrue and false.

'This is a real human being with real feelings.'



Ghislaine Maxwell, 58, has rounded on her accusers, insisting that her portrayal as a 'cartoon caricature of a villain' is utterly false

Breaking a year-long silence since Epstein's death, sources close to Maxwell have gone on the offensive to put her side of the story.

After a year during which she was neither seen nor heard, her allies now reveal how she intends to salvage her liberty and reputation against claims that she supplied deprived Epstein with young girls.

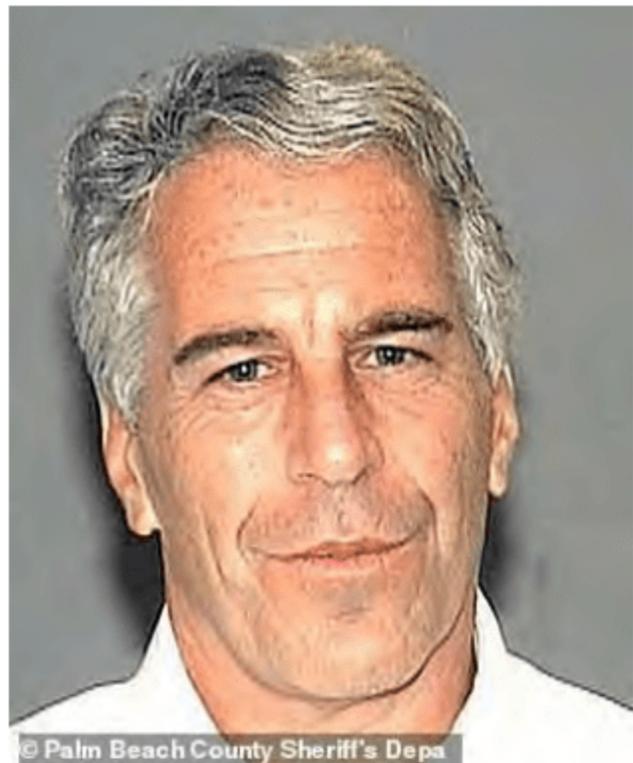
Maxwell's allies have told The Mail on Sunday that she:

- Is not the person who introduced billionaire Epstein to Prince Andrew;
- Fears dying of Covid-19 while in prison;
- Insists she and Epstein had not met in person for 15 years;
- Weeps over friends who have lost jobs because of their association with her;
- Has not had a haircut in a year and is being moved 'from cell-to-cell' for her own safety.

Maxwell is scheduled to appear before a judge in New York on Tuesday to be formally charged with procuring girls as young as 14 for Jeffrey Epstein – the serial paedophile and her former boyfriend

The daughter of the late newspaper tycoon Robert Maxwell will make global headlines on Tuesday when she appears in court via remote link from her New York jail cell.

She will be formally charged with sex offences between 1994 and 1997 and will plead not guilty to them all. Her lawyers will argue for her release from the high-security Metropolitan Detention Center in Brooklyn on £4 million bail, arguing that her life is in danger from coronavirus and ‘multiple and credible’ death threats.



Maxwell, who is a long-time friend of Prince Andrew and who saw him most recently in 2019, was arrested at her £800,000 New Hampshire hideaway on July 2.

Prosecutor Audrey Strauss condemned her as ‘playing a critical role in finding and grooming victims’, while scores of Epstein’s victims claim that she acted as his ‘madam’, often driving from his £20 million mansion in Palm Beach, Florida, to nearby trailer parks to ‘procure’ vulnerable young girls for the paedophile.

But last night a source close to Maxwell hit back, saying: ‘Ghislaine is no Cruella de Vil. She is being portrayed as this evil character and a cartoon-like villain but she is nothing like that. She is a real person and is determined to prove her innocence despite the fact that she has been characterised as some sort of monster.’

Maxwell insists that her romance with Epstein ended in 2001 and that she did not see him in person after 2005 when she was photographed with him at a party.

At the time, she was dating billionaire Gateway computer founder Ted Waitt.



A source close to Maxwell hit back, saying: 'Ghislaine is no Cruella de Vil'. Pictured: The character played by Glenn Close in the 1996 film 101 Dalmatians

'The reality is that Ghislaine's relationship with Epstein ended in 2001,' says the friend. 'Starting in late 2002, early 2003, she was dating Ted and she loved him deeply. Epstein kept trying to woo her back but she wasn't interested.'

However, the friend adds, Maxwell continued to work for the twisted tycoon. 'She hired Epstein's pool guys, the IT guys.'

'She managed his household. They weren't that close. It was a professional relationship.'

When Epstein negotiated an infamous plea deal, pleading guilty to two child sex prostitution charges in 2008 and serving just 12 months in prison – most on day release –

Four more women accused of supplying young girls for Epstein to abuse

[dailymail.co.uk/news/article-8513823/Four-women-accused-supplying-young-girls-Epstein-abuse.html](https://www.dailymail.co.uk/news/article-8513823/Four-women-accused-supplying-young-girls-Epstein-abuse.html)

July 12, 2020

Epstein's other 'recruiters': Four more women accused of supplying young girls for him to abuse face probe as it's revealed Ghislaine Maxwell moved house 36 times in a year before she was caught

- Sara Kellen, Adriana Ross, Lesley Groff and Nadia Marcinkova are under investigation for their role in Epstein's sex-trafficking ring, according to reports
- The four women are accused of helping to procure and groom the girls
- In one case a previous victim went on to help groom other young women
- Ms Kellen, dubbed Maxwell's 'lieutenant', 'flew on the lolita express almost as many times as the disgraced couple'
- Reports suggest that Ms Maxwell moved 36 times before her arrest last week

By [Ryan Fahey For Mailonline](#)

Published: 20:46 EDT, 11 July 2020 | Updated: 09:08 EDT, 12 July 2020

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Four more women accused of supplying young girls for billionaire paedophile Jeffrey Epstein to abuse are facing investigation as it's revealed Ghislaine Maxwell moved house 36 times in a year before she was caught by the FBI.

Sara Kellen, Adriana Ross, Lesley Groff and Nadia Marcinkova are being investigated for their alleged role in Epstein's sex-trafficking ring, according to a report in the Sunday Telegraph.

Ms Kellen, dubbed Ghislaine Maxwell's 'lieutenant' by Epstein's victims, is said to have flown on the paedophile's 'lolita express' almost as many times as the disgraced couple.

Ms Kellen, who is said to have taken a leading role in the sex ring, and the other three women, have previously been accused of recruiting and grooming underage girls for Epstein to sleep with.

One was also said to have been involved in a sexual relationship with the financier.



██████ Kellen worked as an assistant for Jefferey Epstein and was named in his 2008 plea agreement as 'potential co-conspirators'



Nada Marcinkova who now goes by Nadia, was allegedly one of Epstein's victims according to interviews with victims back in 2005, before she began procuring girls for the paedophile herself



Ghislaine Maxwell breaks down in tears as she is DENIED bail and must stay locked up until her July 2021 trial as judge rules Epstein's 'madam' has shown 'sophistication in hiding her finances AND herself and poses significant flight risk'

- Ghislaine Maxwell cried as she was denied bail on Tuesday, with a judge ruling she must stay locked up until her trial in July of 2021
- The British socialite, 58, pleaded not guilty to the sex trafficking charges brought against her
- She hung her head as she learned her fate, wearing a prison-issued brown top and with her normally short hair now long and swept back into a bun
- Judge Alison Nathan ruled Maxwell was a significant flight risk, citing her 'substantial international' ties and 'extraordinary financial resources'
- Maxwell appeared via video, accused of grooming girls as young as 14 for Jeffrey Epstein to abuse between 1994 and 1997
- She had offered a \$5 million bond co-signed by two of her sisters and backed up by more than \$3.75 million in property in the UK
- Prosecutors fought for no bail, presenting evidence that she is 'skilled at living in hiding', citing her three passports and claimed she is worth more than \$10M
- They said Maxwell refused to open the front door to the FBI and tried to flee to another room when they raided her \$1 million home on July 2
- A victim also argued she was a flight risk and wrote: 'Without Ghislaine, Jeffrey couldn't have done what he did. She is a predator and a monster'

By [CHEYENNE ROUNDTREE FOR DAILYMAIL.COM](#) and [DANIEL BATES FOR DAILYMAIL.COM](#)
PUBLISHED: 13:21 EDT, 14 July 2020 | UPDATED: 17:20 EDT, 14 July 2020

Ghislaine Maxwell cried as she was denied bail on Tuesday and learned she must stay locked up until her trial next summer, as Jeffrey Epstein's accused madam pleaded not guilty to the sex trafficking charges brought against her.

The 58-year-old wiped tears away and hung her head as she learned her fate, wearing a prison-issued brown top and with her normally short hair now long and swept back into a bun, appearing via video link.

U.S. District Judge Alison Nathan denied Maxwell's proposal of a \$5 million bond co-signed by two of her sisters and backed up by more than \$3.75 million in property in the UK.

Maxwell's legal team had argued she would be confined to a 'luxury hotel' in the New York area, surrender all her travel documents and be subject to GPS monitoring.

But Judge Nathan ruled the British socialite was a significant flight risk, citing her 'substantial international' ties and 'extraordinary financial resources', setting an anticipated trial date for July 12, 2021.

Maxwell is accused of grooming girls as young as 14 for Epstein to abuse between 1994 and 1997, a period when she was his girlfriend.

She faces up to 35 years in prison if found guilty of the charges, as prosecutors successfully argued that along with her three passports, connections to some of the world's most powerful people and her own fortune of more than \$10 million - Maxwell had every incentive to try and flee.

Maxwell will now return to the fortress-like Metropolitan Detention Center in Brooklyn where she has been given paper clothes to ensure she doesn't kill herself.



Ghislaine Maxwell cried as she was denied bail on Tuesday and learned she must stay locked up until her trial next summer, as Jeffrey Epstein's accused madam pleaded not guilty to the sex trafficking charges brought against her



But Judge Nathan ruled the British socialite was a significant flight risk, citing her 'substantial international' ties and 'extraordinary financial resources', setting an anticipated trial date for July 12, 2021



Maxwell is accused of grooming girls as young as 14 for Epstein to abuse between 1994 and 1997, a period when she was his girlfriend. She faces up to 35 years in prison if found guilty of the charges, as prosecutors successfully argued that along with her three passports, connections to some of the world's most powerful people and her own fortune of more than \$10 million - Maxwell had every incentive to try and flee



Maxwell is currently in custody in the Metropolitan Detention Center in Brooklyn (pictured) where she is wearing paper clothes to ensure she doesn't kill herself

Maxwell is being closely watched as the Department of Justice wants to ensure she does not kill herself like Epstein, who hanged himself last August while awaiting trial on sex trafficking charges.

During the two hour and 20 minute hearing at Manhattan's Federal Court, Maxwell appeared via video from the Metropolitan Detention Center in Brooklyn.

The small room she was in had white walls, a white bed, a window with frosted glass and a door at the back.

She was wearing a dark brown prison issued top and her dark hair was far longer than in the past - she reportedly has not had a haircut in a year - and was swept behind her head in a bun.

At the start of the hearing, Maxwell rested her elbows on a table in front of the camera and put her head on her hands.

She appeared nervous and pensive and kept looking from side to side, as she leaned into the camera.

Maxwell briefly spoke and only to confirm she could hear the judge and to enter her plea by saying: 'Not guilty, your honor'.

Her demeanor changed when prosecutor [REDACTED] began outlining the allegations against her, sitting back in her chair and bowing her head when [REDACTED] accused her of 'sexual abuse of minors'.

With every allegation, Maxwell either scratched her face or moved her hair, but was emotionless as victim impact statements were read aloud.

It wasn't until Judge Nathan started reading her decision that Maxwell finally broke down. She began moving uneasily in her chair as the judge said the evidence against her was 'strong'.

When Judge Nathan said a 'combination of factors' showed she had the 'motive and opportunity' to flee before her trial, Maxwell wiped a tear away.

The second tear fell as the judge said Maxwell was 'sophisticated at hiding her financial resources'.



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For the rest of the decision, Maxwell rested her head in her hands as she had done at the start of the hearing.

Maxwell sat though prosecutors detailing how she was 'skilled at living in hiding' and as two victims argued she was a flight risk, with one writing: 'Without Ghislaine, Jeffrey couldn't have done what he did. She is a predator and a monster.'

Prosecutors argued against Maxwell being granted bail, citing that due to holding both French and British passports, she has the ability to 'live beyond the reach of extradition indefinitely'.

Prosecutor █████ argued: 'She is good at living under an assumed identity. There really can be no question that she can live in hiding.'

She revealed when Maxwell bought her \$1 million home in Bradford, New Hampshire last December, she toured the property with a real estate agent using an alias.

█████ said: 'The real estate agent told the FBI agent the buyers for the house introduced themselves as Scott and Janet Marshall. Both had British accents.'

'Scott Marshall told her he was retired from the British military and was currently working on a book. Janet Marshall described herself as a journalist.'

Last summer, DailyMail.com previously tracked down Maxwell in Manchester-by-the-Sea, living at a home owned by her tech CEO lover Scott Borgerson. It is unclear if the man who toured the New Hampshire home with Maxwell was Borgerson.

█████ also read out a victim impact statement from a woman identified as Jane Doe, who also made the case that Maxwell was a flight risk.

The victim said she knew Maxwell for 10 years and the socialite intended to 'deliver' her to Epstein, all the while knowing the 'heinous dehumanization that awaited me'.

The woman claimed Maxwell 'was in charge' and 'egged' Epstein on.

She described Maxwell as 'sociopathic' and said she would 'have done anything to get what she wanted - to satisfy Jeffrey Epstein'.



Victim [REDACTED] (pictured) also spoke at the hearing, detailing how she met Maxwell when she was 16 years old. [REDACTED] has previously gone on record with her claims against Maxwell



Prosecutor [REDACTED] said when Maxwell bought her \$1 million Bradford, New Hampshire home (pictured), she toured the home back in November of 2019 using the alias of Janet Marshall and claimed to the real estate agent that she worked as a journalist

The victim added that 'if [Maxwell] is out, I need to be protected', citing a phone call she received in the middle of the night threatening her two-year-old child.

█ also spoke at the hearing, detailing how she met Maxwell when she was 16 years old. █ has previously gone on record with her claims against Maxwell.

She said Maxwell 'has never shown any remorse [and] tormented her survivors... She has associates across the globe, some of great means.'

Maxwell's attorney Mark Cohen tried to argue his client was not a flight risk, claiming she has community ties and is 'part of a very large and close family'.

He said: 'Our client is not Jeffrey Epstein, and she has been the target of endless media spin', leading prosecutor █ to later shoot back: 'These are the facts. It is not dirt, it is not spin, it is evidence to the court.'

Cohen claimed Maxwell had received numerous threats and denied she had refused to open her front door to the FBI when they raided her home on July 2.

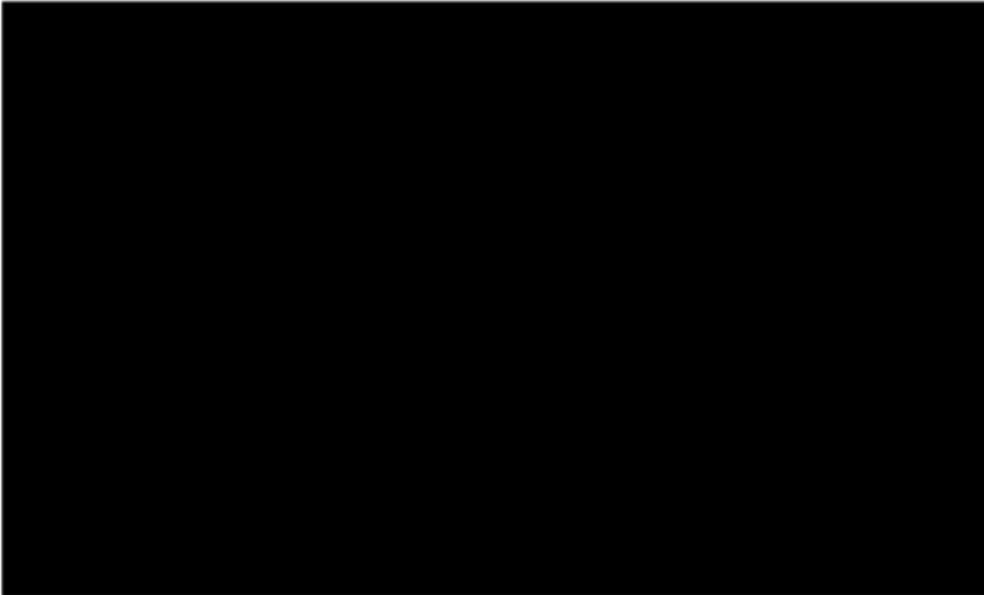
He claimed her front door was unlocked, the windows were open and she had 'surrendered' to the agents.

Addressing reports that Maxwell had wrapped her mobile phone in tin foil, which prosecutors called a 'seemingly misguided effort to evade detection' by law enforcement, Cohen claimed her phone had been hacked and she had to preserve the phone as evidence.



MAXWELL'S LEGAL TEAM: Pictured l-r: Jeffrey S. Pagliuca, Christian R Everdell, Laura A. Menninger and Mark Cohen. In their filings to the court Maxwell's lawyers had argued that she is at increased risk of catching the coronavirus whilst in prison. They claim that the restrictions

on access to her lawyers caused by the pandemic would mean it was impossible for her to get a fair trial



Also on the case is (l-r) [REDACTED], [REDACTED] and [REDACTED], James Comey's daughter



Pictured: Acting United States Attorney for the Southern District of New York Audrey Strauss speaks during a news conference to announce charges against Ghislaine Maxwell

Cohen went above the issue of Maxwell being a flight risk to complain that the charges against her are from 25 years ago, calling the indictment 'an effort to dance around' the controversial non-prosecution sweetheart deal Epstein and his associates received in Florida in 2007.

With her bail now denied, Maxwell will return to the Metropolitan Detention Center in Brooklyn.

Journalists had started lining up outside the federal court in downtown Manhattan at 6am to get a seat inside the courtroom.

They were allowed in at 11.45am and had to stand 6ft apart while they waited to ensure social distancing.

The hearing took place in the jury assembly room which normally has space for hundreds of people but had a dramatically reduced capacity of just 60 due to the coronavirus.

A dial-in phone line allowed 1,000 more people to listen in - the capacity was increased from 500 due to world-wide interest.

Inside the room there were two projector screens, which showed the proceedings live.

All parties, including the judge, appeared remotely and no one was physically in court.

Maxwell's lawyer was visible at all times in a box on the screen. Maxwell had her own box, the judge had one and the prosecutors had another.

Maxwell's mugshot has not been released by the federal authorities and the hearing offered the first chance to see her in at least a year.

Maxwell's whereabouts had largely been unknown since Epstein's arrest last July.

Although DailyMail.com tracked her down to the New England coast last summer, she vanished again, later popping up in a photo at an In-N-Out in Los Angeles.

The FBI managed to finally trace her down in the quiet and rural town of Bradford, New Hampshire earlier this month, where she had been living since December.



Maxwell's mugshot has not been released by the federal authorities and the hearing offered the first chance to see her in at least a year. Maxwell's whereabouts had largely been unknown since Epstein's arrest last July. Although DailyMail.com tracked her down to the New England

coast last summer, she vanished again, later popping up in a photo at an In-N-Out in Los Angeles



Maxwell was romantically involved with Jeffrey Epstein from around 1992, but then became his 'right-hand woman', managing his property empire and, it is alleged, his trafficking of minors

Officials said her conduct during the 8.30am raid at the property called 'Tuckedaway' was 'troubling'.

They wrote that when the FBI arrived they were confronted by a locked gate which they forced their way through.

The filing said: 'As the agents approached the front door to the main house, they announced themselves as FBI agents and directed the defendant to open the door.

'Through a window, the agents saw the defendant ignore the direction to open the door and, instead, try to flee to another room in the house, quickly shutting a door behind her. Agents were ultimately forced to breach the door in order to enter the house to arrest the defendant, who was found in an interior room in the house.

'Moreover, as the agents conducted a security sweep of the house, they also noticed a cell phone wrapped in tin foil on top of a desk, a seemingly misguided effort to evade detection, not by the press or public, which of course would have no ability to trace her phone or intercept her communications, but by law enforcement'.

After Maxwell, the daughter of late newspaper tycoon Robert Maxwell, was arrested the FBI spoke to a security guard who worked on the property who said that her brother had hired him from a company staffed with former British military soldiers.

The filing states: 'The guard informed the FBI that the defendant had not left the property during his time working there, and that instead, the guard was sent to make purchases for the property using the credit card. As these facts make plain, there should be no question that the defendant is skilled at living in hiding'.

In their filings to the court Maxwell's lawyers had argued that she is at increased risk of catching the coronavirus whilst in prison. So far there have only been five cases and no deaths at the prison.

They claim that the restrictions on access to her lawyers caused by the pandemic would mean it was impossible for her to get a fair trial.

The prosecutors said that in fact the prison had made substantial efforts to accommodate her and keep her safe.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA :

-v.- : 20 Cr. 330 (AJN)

GHISLAINE MAXWELL, :

Defendant. :

-----X

**THE GOVERNMENT’S REPLY MEMORANDUM
IN FURTHER SUPPORT OF DETENTION**

The Government respectfully submits this reply memorandum in further support of its motion for detention, dated July 2, 2020 (the “Detention Memorandum”) (Dkt. 4), and in response to the defendant’s memorandum in opposition (the “Opposition Memorandum”) (Dkt. 18).

The charges against Ghislaine Maxwell arise from her essential role in sexual exploitation that caused deep and lasting harm to vulnerable victims. At the heart of this case are brave women who are victims of serious crimes that demand justice. The defendant’s motion wholly fails to appreciate the driving force behind this case: the defendant’s victims were sexually abused as minors as a direct result of Ghislaine Maxwell’s actions, and they have carried the trauma from these events for their entire adult lives. They deserve to see her brought to justice at a trial.

There will be no trial for the victims if the defendant is afforded the opportunity to flee the jurisdiction, and there is every reason to think that is exactly what she will do if she is released. For the reasons detailed in the Detention Memorandum, and as further discussed below, the defendant poses a clear risk of flight, and no conditions of bail could reasonably assure her continued appearance in this case. Among other concerns: (1) she is a citizen of a country that does not extradite its own citizens; (2) she appears to have access to considerable wealth

domestically and abroad; (3) her finances are completely opaque, as her memorandum pointedly declines to provide the Court with information about her financial resources; and (4) she appears to be skilled at living in hiding. These are glaring red flags, even before the Court considers the gravity of the charges in this case and the serious penalties the defendant faces if convicted at trial.

Instead of attempting to address the risks of releasing a defendant with apparent access to extraordinary financial resources, who has the ability to live beyond the reach of extradition in France, and who has already demonstrated a willingness and ability to live in hiding, the defendant instead proposes a bail package that amounts to little more than an unsecured bond. Among other things, the proposed bail package contemplates the defendant pledging as the sole security a property that is beyond the territory and judicial reach of the United States, and which therefore is of no value as collateral. She proposes six unidentified co-signers, an unknown number of whom even reside in the United States, and *none* of whose assets are identified. The Court and the Government have no information whatsoever regarding whether these co-signers would be able to pay the proposed \$5 million bond should the defendant flee – or if, of equal concern, the co-signers are themselves so wealthy that it would be no financial burden whatsoever to do so. The defendant does not identify what residence she proposes to live at in the Southern District of New York, nor does she identify any meaningful ties to the area. And most importantly, the defendant's memorandum provides the Court with no information whatsoever about her own finances or her access to the wealth of others, declining to provide the Court the very information that would inform any decision about whether a bond is even meaningful to the defendant – and which the Government submits would reveal the defendant's financial means to flee and live comfortably abroad for the rest of her life.

Finally, the Government recognizes that the COVID-19 pandemic is – and should be – a relevant factor for the Court and the parties in this case. However, the Bureau of Prisons (“BOP”) is taking very significant steps to address that concern, and the defendant has offered no reason why she should be treated any differently from the many defendants who are currently detained at the Metropolitan Detention Center (“MDC”) pending trial, including defendants who have medical conditions that place them at heightened risk. Inmates at the MDC are able to assist in their own defense, especially long before trial, through established policies and procedures applicable to every pretrial detainee. This defendant should not be granted the special treatment she requests.

The defendant faces a presumption of detention, she has significant assets and foreign ties, she has demonstrated her ability to evade detection, and the victims of the defendant’s crimes seek her detention. Because there is no set of conditions short of incarceration that can reasonably assure the defendant’s appearance, the Government urges the Court to detain her.

ARGUMENT

Each of the relevant factors to be considered as to flight risk – the nature and circumstances of the offense, the strength of the evidence, and the history and characteristics of the defendant – weigh strongly in favor of detention, and the defendant’s proposed package would do absolutely nothing to mitigate those risks.

I. The Defendant’s Victims Seek Detention

As the Court is aware, pursuant to the Crime Victims’ Rights Act (“CVRA”), a crime victim has the right to be reasonably heard at certain public proceedings in the district court, including proceedings involving release. 18 U.S.C. § 3771(a)(4). Consistent with that requirement, the Government has been in contact with victims and their counsel in connection with its application for detention. Counsel for one victim has already conveyed to the Government that

their client opposes bail for the defendant, and has asked the Government to convey that view to the Court. The Government also expects that one or more victims will exercise their right to be heard at the July 14, 2020 hearing in this matter, and will urge the Court not to grant bail. More generally, as noted above, the Government is deeply concerned that if the defendant is bailed, the victims will be denied justice in this case. That outcome is unacceptable to both the victims and the Government.

II. The Government's Case Is Strong

The defendant's motion argues, in a conclusory fashion, that the Government's case must be weak because the conduct charged occurred in the 1990s. That argument, which ignores the many specific allegations in the Indictment, could not be more wrong. As the superseding indictment (the "Indictment") makes plain, multiple victims have provided detailed, credible evidence of the defendant's criminal conduct. And while that conduct did take place a number of years ago, it is unsurprising that the victims have been unable to forget the defendant's predatory conduct after all this time, as traumatic childhood experiences often leave indelible marks. The recollections of the victims bear striking resemblances that corroborate each other and provide compelling proof of the defendant's active participation in a disturbing scheme to groom and sexually abuse minor girls. In addition to compelling victim accounts, as the Government has explained, the victims' accounts are corroborated by documentary evidence and other witnesses.

In particular, the victims' accounts are supported by contemporaneous documents and records, such as flight records, diary entries, and business records. The powerful testimony of these victims, who had strikingly similar experiences with Maxwell, together with documentary

evidence and witness testimony, will conclusively establish that the defendant groomed the victims for sexual abuse by Jeffrey Epstein.¹

The defendant's motion alludes to defenses in this case, all of which are legal or procedural in nature, and none of which pass muster, let alone counsel in favor of bail. To begin with, the notion that the defendant is protected from prosecution by the Non-Prosecution Agreement ("NPA") between Jeffrey Epstein and the U.S. Attorney's Office in the Southern District of Florida ("SDFL") is absurd. That agreement affords her no protection in this District, for at least three reasons. First, the defendant was not a party to that agreement nor named in it as a third-party beneficiary, and the defendant offers no basis to think she would have standing to claim any rights under the NPA. Tellingly, the defendant cites no authority for the proposition that an agreement she was not a party to and that does not even identify her by name could possibly be invoked to bar her prosecution. Second, and equally important, the NPA does not bind the Southern District of New York, which was not a party to the agreement. *See United States v. Annabi*, 771 F.2d 670, 672 (2d Cir. 1985) (per curiam) ("A plea agreement binds only the office of the United States Attorney for the district in which the plea is entered unless it affirmatively appears that the agreement contemplates a broader restriction."); *United States v. Prisco*, 391 F. App'x 920, 921 (2d Cir. 2010). This rule applies even when the text of the agreement refers to the signing party as the "Government." *Annabi*, 771 F.2d at 672.

Third, and perhaps most important, even assuming the NPA could be read to protect this defendant and bind this Office, which are both legally unsound propositions, the Indictment

¹ Additionally, and beyond the strong evidence set forth in the Indictment, in just the past week, and in response to the charges against the defendant being made public, the Federal Bureau of Investigation ("FBI") and the U.S. Attorney's Office have been in touch with additional individuals who have expressed a willingness to provide information regarding the defendant. The Government is in the process of receiving and reviewing this additional evidence, which has the potential to make the Government's case even stronger.

New York prosecutors said in a filing Monday this was evidence that Maxwell was 'skilled at living in hiding' and should be denied bail

Proposed Bail Conditions. In light of the above, we propose the following bail conditions, which are consistent with those that courts in this Circuit have imposed in analogous situations: (i) a \$5 million personal recognizance bond, co-signed by six financially responsible people, all of whom have strong ties to Ms. Maxwell, and secured by real property in the United Kingdom worth over \$3.75 million; (ii) travel restricted to the Southern and Eastern Districts of New York; (iii) surrender of all travel documents with no new applications; (iv) strict supervision by Pretrial Services; (v) home confinement at a residence in the Southern District of New York with electronic GPS monitoring; (vi) visitors limited to Ms. Maxwell's immediate family, close friends and counsel; (vii) travel limited to Court appearances and to counsel's office, except upon application to Pretrial Services and the government; and (viii) such other terms as the Court may deem appropriate under Section 3142.

Her bail request (pictured) was filed in the US District Court in Manhattan and claims she was not 'hiding' from authorities, is not a flight risk and is at risk of contracting COVID-19 if she continues to be held in the Brooklyn jail

The case against her is 'strong' and multiple victims have provided 'detailed, credible evidence of the defendant's criminal conduct' - with more women coming forward in the past week.

The victims have made clear they want Maxwell remanded in custody and say they were 'directly abused as a result of Ghislaine Maxwell's actions'.

The document states: 'While that conduct did take place a number of years ago, it is unsurprising that the victims have been unable to forget the defendant's predatory conduct after all this time, as traumatic childhood experiences often leave indelible marks.'

'The recollections of the victims bear striking resemblances that corroborate each other and provide compelling proof of the defendant's active participation in a disturbing scheme to groom and sexually abuse minor girls'.

The prosecutors said that it was 'curious' that Maxwell claimed to have access to millions of dollars had not offered 'a single dime' as collateral for her bond.

They claimed that Maxwell's finances were 'completely opaque' and she had not even indicated which properties she would use for her bond.

Some of the co-signers are 'themselves so wealthy that it would be no financial burden whatsoever' if they lost their \$5 million by Maxwell skipping bail, the document states.

Epstein's victims have long demanded Maxwell's arrest and lawyers for them say that a slew of new accusers have come forward since she was apprehended.

Prosecutors will likely be looking to do a plea deal with Maxwell to lighten some of the six charges against her, two of which are perjury for allegedly lying during depositions.

They will be questioning her about powerful men in Epstein's orbit including Bill Clinton with whom she flew on Epstein's private jet, called the 'Lolita Express', on a tour of Africa in 2002.

Maxwell was also good friends with Prince Andrew and one of Epstein's victims, [REDACTED] [REDACTED] ims she was loaned out to the Duke three times for sex when she was 17.

Ghislaine Maxwell's attack-the-victim strategy may backfire

bnnbloomberg.ca/ghislaine-maxwell-may-play-the-victim-card-in-trial-defense-1.1465631

July 15, 2020



Ghislaine Maxwell Photographer: Laura Cavanaugh/Getty Images , Photographer: Laura Cavanaugh/Getty Images

The bail hearing for Ghislaine Maxwell ended with a judge ruling that she must spend the next year behind bars awaiting trial on sex-trafficking charges tied to her former boyfriend Jeffrey Epstein. But it also offered hints at her defense strategy.

During the two-hour video-conference hearing Tuesday, Maxwell's lawyers questioned the credibility of her accusers as well as the strength of the government's case.

While the arguments were designed to win bail, they'll likely be the same ones used at the 58-year-old's trial, which is scheduled to start next July. The federal charges stem from events that are more than two decades old, Maxwell's lawyer, Mark Cohen, said, noting that the government doesn't have "tapes or video" or other such evidence to support the allegations.

"Absolutely, the defense is telegraphing where they're going," said David Weinstein, a former federal prosecutor who listened in on Maxwell's hearing. "While the defense isn't putting all of their cards on the table, they showed they're going to argue that she was as

much a victim of Epstein -- much in the same way as these girls were -- and that she didn't know what was going on behind closed doors."

Cohen briefly took aim at ██████ of Maxwell's accusers. He said she has sued Maxwell and is seeking a payout from a fund set up for Epstein's victims, Cohen said. Established in May, Epstein's victims can be compensated by the financier's estate, valued at more than US\$600 million.

That's a dangerous tactic that might backfire at trial, said David Boies, who represents ██████ and several other women who say they were sexually abused by Epstein and Maxwell.

It's "a tone-deaf argument" that cost Maxwell her credibility, said Boies, who listened to the hearing remotely.

"To mount a 'blame the victim' defense, particularly in today's world and trying to blame these girls for what happened is so contrary to the evidence, is so contrary to people's normal sense of morality," Boies said. "I think that's just going to enrage a jury if she goes to trial -- which I would not do if I were representing her."

Boies said he was confident ██████ would stand up to cross-examination if there's a trial.

█████, who addressed the court by telephone, urged the judge not to grant Maxwell bail, calling her a "sexual predator who groomed and abused me." Maxwell "lied under oath and tormented her survivors," ██████ said.

Boies said that ██████ as a 16-year-old who "wanted to go to college" when she met Maxwell.

"Maxwell and Epstein tell ██████ and her mother 'we're having a group of high school students to this ranch to help them get into college,'" Boies said. "But when ██████ gets there, there are no high school students, all these claims are fraudulent and she's in this isolated place in New Mexico."

Remote Hearing

Because of the pandemic, Maxwell's hearing was held remotely with press and the public permitted to hear arguments over the phone. About 60 members of the press were allowed to watch the proceeding on monitors in a jury room in the Manhattan courthouse, with the judge, lawyers and Maxwell all in different locations.

Prosecutors also offered detail on their evidence, saying they have travel records, photographs and other documents that will support the charges.

Along with ██████ remarks, Assistant U.S. Attorney ██████ read from a letter written by another of Maxwell's alleged victims, who asked to be identified only as Jane Doe. It's possible that the woman may testify at the trial as well.

"Without Ghislaine Maxwell, Jeffrey Epstein could not have done what he did; she egged him on," the woman said in the letter. She called Maxwell "a monster."

The judge scheduled the trial for July 12. The defense must file its pretrial motions by Dec. 21.

--With assistance from Bob Van Voris.

Ghislaine Maxwell's neighbours tried to make her leave town

[dailymail.co.uk/news/article-8525759/Neighbors-Ghislaine-Maxwell-lover-tried-ostracize-couple-make-leave-town.html](https://www.dailymail.co.uk/news/article-8525759/Neighbors-Ghislaine-Maxwell-lover-tried-ostracize-couple-make-leave-town.html)

July 16, 2020

- Ghislaine Maxwell had been living with her tech CEO lover Scott Borgerson at his home in Manchester-by-the-Sea outside of Boston until last December
- In February 2019 neighbors learned the quiet, well-dressed woman in their midst had been accused of procuring young girls for pedophile Jeffrey Epstein
- 'They were absolutely appalled to learn who they were allowing to have the run of their property,' one resident exclusively told DailyMail.com
- Neighbors tried to harass and 'ostracize' Maxwell into leaving, and make her and Borgerson 'feel they weren't welcome on Sharksmouth or in Manchester'
- It led to a court case where Borgerson successfully fought the neighbors' decision to stop them from using paths and a beach near the home that were part of a 40-acre estate with other homes
- A judge only made his ruling on March 11 this year, three months after Maxwell had left Sharksmouth for good, moving to her hideaway in Bradford, NH
- Borgerson is believed to have met Maxwell six years ago through speaking engagements connected to ocean preservation
- They were both pictured speaking at the Arctic Circle Assembly in Reykjavik, Iceland, in 2014

Ghislaine Maxwell's neighbors were so disgusted when they discovered an accused sex trafficker was living among them that they tried to harass her into leaving, DailyMail.com has learned exclusively.

It led to a court case where Maxwell's 14-years-younger lover Scott Borgerson successfully fought the neighbors' decision to prevent them from using paths and a beach near their Massachusetts oceanfront property, part of the 40-acre estate shared by other owners.

But the decision was not handed down until after Maxwell, 58, had already left for her new life of seclusion in neighboring New Hampshire.

The small-town dispute involving the woman who was among the most-wanted in America, all played out in quaint Manchester-by-the-Sea, a well-to-do town 30 miles north of Boston where Maxwell was holed up with wealthy tech CEO Borgerson.

But in February 2019 neighbors learned the quiet, well-dressed woman in their midst had been accused of procuring young girls for pedophile Jeffrey Epstein — and they decided to act.

'They were absolutely appalled to learn who they were allowing to have the run of their property,' one resident told DailyMail.com.

'The second they learned she was involved with Epstein they decided to try to limit how much they could use their land.'

Ghislaine Maxwell and Scott Borgerson's neighbors were so disgusted when they discovered an accused sex trafficker was living among them that they tried to harass her into leaving. Borgerson is believed to have met Maxwell six years ago through speaking engagements connected to ocean preservation, a subject on which they share a passion. They were both pictured speaking at the Arctic Circle Assembly in Reykjavik, Iceland, in 2014 (left and right)







It led to a court case where Maxwell's lover Scott Borgerson successfully fought the neighbors' decision to prevent them from using paths and a beach near their Massachusetts oceanfront property. Borgerson, 44, bought the Phippin House (pictured), a 7-bedroom property, for \$2.4M in June 2016, using a limited liability company called Tidewood

Jeffrey Epstein's victim ██████████ claims it was the British socialite who always set the trap

[dailymail.co.uk/news/article-8535303/Jeffrey-Epsteins-victim-Maria-Farmer-claims-British-socialite-set-trap.html](https://www.dailymail.co.uk/news/article-8535303/Jeffrey-Epsteins-victim-Maria-Farmer-claims-British-socialite-set-trap.html)

July 17, 2020

'Ghislaine Maxwell was the mastermind': Jeffrey Epstein's victim ██████████ who was the first to blow the whistle on him claims it was the British socialite who always set the trap

By [Tom Leonard for the Daily Mail](#)

Published: 17:25 EDT, 17 July 2020 | Updated: 17:25 EDT, 17 July 2020

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For talented young artist ██████████, it was the night she'd been working towards for months — her graduation show at the prestigious New York Academy of Art.

██████████, then 25, was ecstatic, having sold all three of her exhibited paintings for five-figure sums.

Then a senior staff member appeared at her shoulder, took her arm and pointed out two people she'd never seen before.

██████████ outside New York court on July 15, 2019

‘This couple here are going to buy your art . . . they’re very important benefactors of the academy,’ she was told.

It was Jeffrey Epstein and Ghislaine Maxwell, and they got the painting they wanted — a semi-naked man observing a sleeping girl, inspired by Edgar Degas’s *The Rape* — for \$6,000, half the price ██████████ had been offered earlier.

Fast-forward 25 years and this week ██████████ younger sister gave an emotional statement to a Manhattan court about why Maxwell should not be granted bail.

Speaking via an audio feed from her home in Texas, psychotherapist ██████████ ██████████, one of three women whose claims are the basis for the criminal case against the British socialite, said Maxwell was a ‘sexual predator’ who had ‘never shown any remorse for her heinous crimes or the devastating, lasting effects her actions caused’.

██████████, who says she feels guilty for unwittingly bringing her then teenage sister into the orbit of Maxwell and Epstein, was the first person to report the pair’s alleged sexual abuse of underage girls in 1996. But her attempts to get the police and FBI to investigate the attack on ██████████, then 16, were ignored, leaving Epstein free to pursue his depravity.

The sisters’ story is shocking and their determination to get justice remarkable. Now, at last, their voices are being heard. ██████████ testimony was a key factor in the judge’s decision to deny Maxwell bail and keep her in a New York jail cell before her trial next year — which is as it should be, ██████████ told the Mail yesterday.

For her, Epstein — who was found dead in his remand jail cell last year — isn’t the worst villain in this scandal.



‘That woman was much more sinister than Epstein, and to me, much more dangerous,’ she says. ‘She was definitely the mastermind. She was in charge.’

█████ worked for Epstein, a financial guru, for a year, during which time she says she saw first hand Maxwell’s astonishing charm and her terrifying viciousness.



NEWS

Ghislaine Maxwell was ‘a sexual predator,’ alleged victim says in new testimony

By Isabel Vincent

July 18, 2020 | 6:32pm



Ghislaine Maxwell
Patrick McMullan via Getty Images

Ghislaine Maxwell had to find three girls a day to be sexually abused by her longtime associate, convicted pedophile Jeffrey Epstein, according to blockbuster new testimony by an alleged victim who has waived her anonymity in the case.

“She was a sexual predator who abused me and countless other children and young women,” ██████████ told a federal judge who denied Maxwell, 58, bail Tuesday and ordered her to spend a year awaiting trial at the Brooklyn Detention Center, where **she has been held** since shortly after her July 2 arrest in New Hampshire.

Farmer, now 41, is believed to be one of three victims — all of them minors at the time of the alleged abuse between 1994 and 1997 — in the case against Maxwell. She is is charged with helping Epstein sexually abuse girls as young as 14. If convicted, Maxwell faces up to 35 years in prison.

Maxwell has denied any wrongdoing.

Although prosecutors have not revealed all of [REDACTED] evidence, details of her abuse, which began when she was 16 and flown to Epstein's ranch in New Mexico, were contained in a civil lawsuit filed last December.

Papers filed in Maxwell's case on Saturday allege that "Maxwell spent years overseeing and managing Epstein's sex-trafficking network . . . Epstein's preference was to have three different girls a day for his sexual pleasure and Maxwell was in charge of recruiting the girls," according to a report in the Sunday Times of London.

The documents say that [REDACTED] parents divorced when she was young and her "mother struggled financially to support [REDACTED] her siblings".

"Maxwell appeared charming and friendly to [REDACTED] Upon arriving, Maxwell and Epstein took Annie shopping and lavished her with gifts, including beauty products and [REDACTED] brand new cowboy boots." Annie's older sister Maria, an artist, also claims that she was abused by Epstein.

Maxwell and Epstein also took [REDACTED] to see a movie while she was in New Mexico. While they were standing in line, Maxwell "pulled down Epstein's sweatpants, exposing part of his buttocks. Both Epstein and Maxwell repeatedly fondled each other in front of [REDACTED] to normalize sexual behavior to a child."

"Upon returning [to the ranch] from the movie, Maxwell repeatedly told [REDACTED] that she wanted to give her a massage . . . Maxwell directed Annie to take off all of her clothes and lay on the massage table.

SEE ALSO

**Ghislaine Maxwell's
'lieutenant' [REDACTED]
may be arrested next, her
parents fear**

"Maxwell touched intimate parts of [REDACTED] body against her will for the sexual benefit of Maxwell and Epstein. Maxwell exposed [REDACTED] breasts and groped her. [REDACTED] was extremely distressed and afraid. She was a child in a massive ranch, away from her family, and isolated from any source of help."

The following morning, the court papers say, Epstein went to [REDACTED] bedroom got into bed demanding a "cuddle" and sexually assaulted her.

[REDACTED] lawyers claim that she decided to go public with her allegations only after Epstein's apparent suicide in a Manhattan federal lockup in August: "Until his death, the plaintiff feared that Epstein and his co-conspirators, including Maxwell, would harm her or her family, or ruin her life, if she came forward."

Maxwell, who has claimed that she only has \$1 million left in her bank accounts, used to keep a "sex swing" and would hang upside down "like a bat" on another device in an attempt to look younger, the newspaper reported.

Ghislaine Maxwell paid \$25k to Jacob Wohl to 'smear victims'

[dailymail.co.uk/news/article-8531293/Ghislaine-Maxwell-paid-25K-Jacob-Wohl-smear-victims-AG-fired.html](https://www.dailymail.co.uk/news/article-8531293/Ghislaine-Maxwell-paid-25K-Jacob-Wohl-smear-victims-AG-fired.html)

July 21, 2020

EXCLUSIVE: Ghislaine Maxwell paid \$25K to fake news purveyor Jacob Wohl to 'smear Epstein victims and to get prosecutor Geoffrey Berman fired in attempt to stall sex trafficking investigation against her'

- Ghislaine Maxwell hired Jacob Wohl to smear alleged victims of Jeffrey Epstein and her, a former friend told DailyMail.com in an exclusive interview
- As part of a \$25k deal, Wohl and his lobbyist colleague Jack Burkman also allegedly pushed to get former New York US Attorney Geoffrey Berman fired
- Wohl and Burkman are far-right lobbyists who have become a laughing stock in DC after several failed attempts to smear top political figures
- Maryland paralegal Kristin Spealman claims she was initially contacted by the duo to use her in a smear campaign against Nancy Pelosi and Ted Cruz
- Spealman told DailyMail.com they bragged to her they had been hired in early June for \$25,000 to dig up dirt on Maxwell's alleged sex trafficking victims
- Federal documents filed this month show a company linked to Maxwell had hired Wohl and Burkman to lobby on 'issues relating to US DOJ, Senate Judiciary, House Judiciary,' DailyMail.com can exclusively reveal
- Berman's removal was intended to stall or stop the criminal investigation into Maxwell, Spealman said
- Berman was ultimately pushed out by Barr in June, but two weeks later Maxwell was charged as part of Epstein's sex trafficking ring

By [Josh Boswell](#) For [DailyMail.com](#)

Published: 09:15 EDT, 21 July 2020 | Updated: 02:55 EDT, 22 July 2020

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Ghislaine Maxwell hired fake news purveyor Jacob Wohl to smear her and Jeffrey Epstein's alleged victims, a former friend has told DailyMail.com in an exclusive interview.

As part of a \$25,000 deal made in June, Wohl and his lobbyist colleague Jack Burkman also allegedly pushed to get New York US Attorney Geoffrey Berman, who had led Epstein's case, fired in order to stall or stop the criminal investigation into Maxwell.

Wohl and Burkman are far-right lobbyists who have become a laughing stock in DC after several failed attempts to smear top political figures including Elizabeth Warren, Kamala Harris, Nancy Pelosi, Ted Cruz, Robert Mueller and Dr. Anthony Fauci by paying women to make false claims of sordid affairs and drug-dealing.

One of the women they tried to use for their smear plots, Maryland model and paralegal Kristin Spealman, told DailyMail.com the men had been hired by Maxwell, who currently faces trial over charges she and Epstein trafficked underage girls for sex.

Spealman, 36, said the lobbyists bragged to her they had been hired in early June for \$25,000 to dig up dirt on Maxwell's alleged sex trafficking victims and to get Berman fired using Burkman's supposed influence with Attorney General William Barr.

Berman ultimately stepped down after a push from Barr. But less than two weeks later, Maxwell was charged on July 2 as being part of Epstein's sex trafficking ring and taken into custody.



Ghislaine Maxwell hired fake news purveyor and accused felon Jacob Wohl to smear alleged victims of her and Jeffrey Epstein, Wohl's former friend has told DailyMail.com in an exclusive interview

As part of a \$25,000 deal made in June, Wohl (left) and his lobbyist colleague Jack Burkman (right) also allegedly pushed to get New York US Attorney Geoffrey Berman, who had led Epstein's case, fired to stall or stop the criminal investigation into Maxwell





MAUREEN CALLAHAN

OPINION

Authorities are letting Jeffrey Epstein's fixer Ghislaine Maxwell get away with it

By Maureen Callahan

June 22, 2020 | 5:00pm



Jeffrey Epstein and Ghislaine Maxwell

Photo by Joe Schildhorn/Patrick McMullan via Getty Images

We got Osama bin Laden, but we can't **catch a repulsive fugitive socialite?**

Since the death of sex trafficker-rapist-pedophile Jeffrey Epstein last August, the woman who allegedly recruited his many, many underage girls and sexually abused them herself has been in hiding.

And Ghislaine Maxwell has hardly been moving cave-to-cave.

Most recent reports put the 58-year-old in a luxury apartment in Paris, **right off the Champs Elysees.**

At the risk of stating the obvious, Paris, too, is on COVID-19 lockdown. [The Sun reports](#) that Maxwell is currently living on Avenue Matignon in the city's 8th arrondissement, in an apartment reportedly owned by a Normandy-based millionaire.

This would put her just five minutes away from the late Epstein's own Parisian apartment, which was raided shortly after his suicide.

So: where is the urgency? Why hasn't this depraved criminal suspect, one who by many credible accounts sexually abused minors for years, been arrested yet?

France may not have an extradition treaty with the U.S., but that doesn't explain why French authorities haven't taken her into custody. It's well-known that Jeffrey Epstein was a sexual predator who knew no geographic boundaries. Maxwell appears to have been his madam, his pimp, his enabler, his co-conspirator, and reportedly a sexual offender herself.

The world would be better off without her moving around in it. Yet it seems there are powerful people who disagree. What other explanation is there?

Maxwell is one of the world's most wanted women, sought by the FBI for questioning. Yet before the lockdown, she was seen swanning around Paris, patronizing high-profile, four-star restaurants and cafés, dropping into art galleries, a scarf tied around her head as if she were Jackie O on Fifth Avenue.

These are the defiant actions of a remorseless woman who knows she is well protected. Her hiding seems almost performative. Maxwell isn't hunkered down on a private island or on a yacht in international waters. Her whereabouts are well known.

Yet we're still playing "Where in the World is Ghislaine Maxwell?"

 [Luxury apartments on Avenue Matignon in Paris where Maxwell has reportedly been living.](#)

Luxury apartments on Avenue Matignon in Paris where Maxwell has reportedly been living.

Getty Images

There's a reason conspiracy theories still swirl around Epstein's suicide. At the time, he was likely the most high value suspect in U.S. federal custody. As it was, his arrest was long overdue. His case made international headlines. He was on suicide watch.

SEE ALSO

**Ghislaine Maxwell
reportedly hiding from the
feds in plush Paris
apartment**

And he was friends with very powerful men, heads of state and royals among them, hosted at his homes and on his private island, flying on his private jet, known to all as The Lolita Express.

So the idea that none of these men knew about Jeffrey Epstein, again, defies the most basic logic.

Sure, [Prince Andrew has "stepped down"](#) as a senior royal. So what? What does that even mean? He has never faced any consequences of any kind, even though Virginia Guiffre Roberts has made consistent and credible claims that Epstein sex [trafficked her to Andrew when she was just 17](#).

And that Maxwell recruited and groomed her back in 1999, along with many other underage girls through the years.

Maxwell doesn't even have the temerity of a Roman Polanski, who also fled to France and whose stance for decades has been "Yes, I raped a 13-year-old girl. Bygones."

We are living in a fraught and electric moment, one in which all manner of injustice is no longer tolerated, protests in the streets day after day, forcing us to ask hard and painful questions in pursuit of a fairer and freer world.

— ADVERTISEMENT —



Don't let Ghislaine Maxwell benefit from this as a distraction. Make her part of it. Make her — and whoever else, no matter how powerful — pay.

FILED UNDER **FBI, FRANCE, GHISLAINE MAXWELL, JEFFREY EPSTEIN, PARIS, SEX TRAFFICKING, 6/22/20**

Ghislaine Maxwell latest news: Socialite and Jeffrey Epstein said to have had 'mysterious' relationship over the years

thesun.co.uk/news/12041691/ghislaine-maxwell-live-jeffrey-epstein-latest-news/

July 29, 2020

JAIL BIRD

- Who is [Ghislaine Maxwell](#) and where is she now?
- Is [Scott Borgerson](#) Ghislaine Maxwell's husband?
- Who was Ghislaine's famous father [Robert Maxwell](#)?
- More news on [Ghislaine Maxwell](#)

Live Blog

- [Alex Winter](#)
- [Debbie White](#)
- 29 Jul 2020, 15:09
- Updated: 29 Jul 2020, 15:09

Ghislaine Maxwell and Jeffrey Epstein are said to have had a "mysterious" relationship over the years.

The two are thought to have linked up not long after she moved to New York in 1991.

One [pal claims that Epstein and Maxwell were not linked romantically](#) as has been often reported, but instead their relationship was a financial one.

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Follow our live blog below for all the latest news and updates on the Ghislaine

Maxwell case.

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Jeffrey Epstein rape survivor, now 22, claims paedophile was abusing girls right up to his death

 thesun.co.uk/news/12220305/jeffrey-epstein-rape-survivor-claims-billionaire-abusing-girls-right-death/

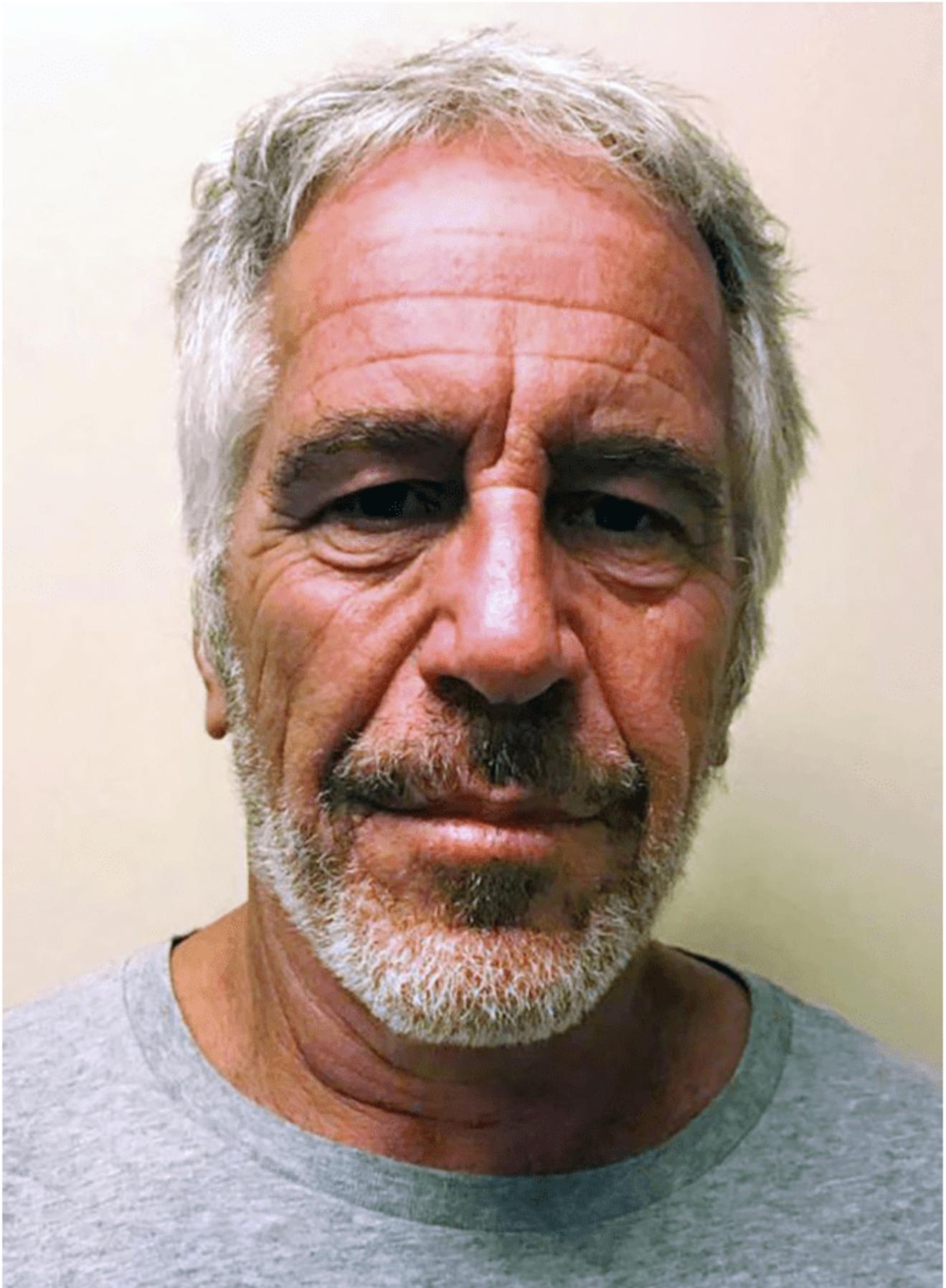
Patrick
Knox

July 24, 2020

A JEFFREY Epstein rape survivor believes the warped financier was still abusing girls right up until he was jailed and hanged himself.

The former model claimed this will leave behind a “second wave” of younger victims too afraid to even tell their parents.

[Click here for the latest news on Ghislaine Maxwell](#)



Jeffrey Epstein's mugshot after his arrest in 2019.... one of his victims claims he was abusing right up to this pointCredit: AFP or licensors





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The girl alleges she was raped by Epstein in his Manhattan mansion — dubbed the House of Horrors by many of his victimsCredit: Getty Images - Getty

The woman who was speaking to [DailyMail.com](https://www.dailymail.com) says she was raped and molested during two visits to Epstein's mansion in New York, in the summer of 2015.

She said: "I believe he was abusing young girls right up until the day he was arrested.

"There are likely to be multiple young victims out there who are still in their teens, perhaps still living with their parents and too ashamed and confused to speak out.

"I know how it feels because I was one of them. I thought about suicide, I tried to cut my wrists. These girls need support before it's too late.

"They need to know it's OK to tell their stories."

She contacted the FBI and police after Epstein's arrest last July 6 on federal sex trafficking charges filed in the Southern District of New York because she knew Epstein was locked up.

The 22-year-old, who is thought to be the youngest woman to come forward, wants to remain anonymous because she fears reprisals from Epstein's powerful pals and accomplices.

This is despite the 66-year-old being found hanged in a New York jail cell nearly a year ago.

Marie was an aspiring 16-year-old model in the Autumn of 2014 when she met an older woman called Madison in a bar.



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Epstein victim

Last week Ms Maxwell pleaded not guilty to charges that in the 1990s she recruited three girls, one aged 14, for Epstein to sexually abuse.

It is also alleged that she sometimes participated in the abuse during massage sessions at Epstein's Manhattan mansion and properties in Palm Beach, New Mexico and London. She also denies this.

When Epstein brought her into a dimly lit room with red velvet curtains she claimed he began fondling her, saying it was normal for young models to do "favours" for older men in the fashion industry.

She was later raped by Epstein, who in doing so took her virginity.

Epstein was subject to two criminal indictments.

One focused largely on his activities in Palm Beach, Florida before 2008 when Epstein signed a controversial non-prosecution deal to avoid federal charges.

The other cites abuse in New York, Florida and other locations between 2002 and "at least in or about 2005".

But civil lawsuits give a broader timeframe for his crimes..

A January 2020 suit filed by prosecutors in the US Virgin Islands alleges that Epstein trafficked, raped and abused children on his private island as recently as 2019.

This was the year he was arrested and was later found dead last August 10.

Jeffrey Epstein accusers claim he rigged his New York mansion with CCTV and kept videos to use as blackmail

Ghislaine Maxwell latest news: Socialite and Jeffrey Epstein said to have had 'mysterious' relationship over the years

[S thesun.co.uk/news/12041691/ghislaine-maxwell-live-jeffrey-epstein-latest-news/](https://thesun.co.uk/news/12041691/ghislaine-maxwell-live-jeffrey-epstein-latest-news/)

July 29, 2020

JAIL BIRD

- Who is [Ghislaine Maxwell](#) and where is she now?
- Is [Scott Borgerson](#) Ghislaine Maxwell's husband?
- Who was Ghislaine's famous father [Robert Maxwell](#)?
- More news on [Ghislaine Maxwell](#)

Live Blog

- [Alex Winter](#)
- [Debbie White](#)
- 29 Jul 2020, 15:09
- Updated: 29 Jul 2020, 15:09

Ghislaine Maxwell and Jeffrey Epstein are said to have had a "mysterious" relationship over the years.

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