

FRENCH REPUBLIC
MINISTRY OF JUSTICE

APPEAL COURT OF PARIS

**PUBLIC PROSECUTOR'S OFFICE OF
PARIS COURT OF JUSTICE**

Paris, July 8, 2020

1st DIVISION

Section P4 - Public Prosecution Service for Minors. The Public Prosecutor

To

Prosecutor-General at the Appeal Court of
Paris.

SUBJECT: Request for international legal assistance in criminal matter addressed to the United States authorities concerning the investigation related to Jean-Luc BRUNEL and others, in connection with the "EPSTEIN case".

N/REF : prosecution number : 19 235 449

V/REF :

APPLICANT AUTHORITY

The Public Prosecutor at the Paris Court of Justice.

AUTHORITY ADDRESSED TO

The competent authorities of the United States of America.

Having regard to the accord between the European Union and the United States of America dated June 25, 2003 which entered into force on February 1, 2010 ;

Having regard to the Article 14 of the Treaty on Mutual Legal Assistance between France and the United States dated December 10, 1998, we request that this application and the acts resulting therefrom be kept confidential, without condition as to the duration, in accordance with the provisions of Article 11 of the French Code of Criminal Procedure relating to the secrecy of the investigation and the inquiry;

Having regard to the reciprocity;

The Public Prosecutor at the Paris Court of Justice, expressing high regards to the competent judicial authority of the United States of America, submits a request for mutual legal assistance in criminal matters in the investigation related to Jean-Luc BRUNEL and others in connection with the case termed as "EPSTEIN" case.

INVESTIGATIVE FRAMEWORK

Preliminary investigation initiated on August 30, 2019 on charges of rape committed against a minor of 15 years of age, rape committed against a minor of over 15 years of age, rape, sexual assault on a minor over 15 years of age, sexual assault, participation in an association

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of criminals for the preparation of a crime, participation in an association of criminals for the preparation of an offence punishable by at least 5 years' imprisonment;

Article 11 of the Criminal Procedure Code

Unless otherwise provided by law and without prejudice to the rights of the defense, the proceedings during the investigation and inquiry shall be secret.

Any person who assists in such proceedings shall be bound by professional secrecy under the conditions and is subject to the penalties laid down in articles 226 -13 and 226 -14 of the Criminal Procedure Code.

However, in order to prevent the dissemination of fragmented or inaccurate information or to put an end to a disturbance of public order, the public prosecutor may, ex officio and at the request of the investigating court or the parties, make public objective elements taken from the proceedings that do not include any assessment of the merits of the charges against the persons concerned.

Article 75 of the Criminal Procedure Code

The judicial police officers and, under their supervision, the investigating officers designated in Article 20 shall conduct preliminary investigations either on the instructions of the public prosecutor of the Republic or ex officio

These operations shall be under the supervision of the public prosecutor.

Article 75 -1 of the Criminal Procedure Code

When instructing the judicial police officers to carry out a preliminary investigation, the public prosecutor shall set the time limit within which the investigation must be carried out. He may extend it based on the justifications provided by the investigators.

Where the investigation is conducted ex officio, the judicial police officers shall report to the public prosecutor on the progress of the investigation when it has been under way for more than six months.

Article 75 -2 of the Criminal Procedure Code

A criminal investigation officer conducting a preliminary investigation into a crime or misdemeanour shall notify the public prosecutor as soon as a person against whom there is evidence that he or she has committed or attempted to commit the offence is identified.

Article 113 - 5 of the Criminal Procedure Code

French criminal law is applicable to anyone who is guilty on the territory of the French Republic, as an accomplice, of a crime or offence committed abroad if the crime or offence is punishable both by French law and by foreign law and if it has been established by a final decision of the foreign court.

Article 113 - 6 of the Criminal Procedure Code

French criminal law is applicable to any crime committed by a French person outside the territory of the French Republic.

It is applicable to crimes committed by French nationals outside the territory of the Republic if the acts are punishable under the law of the country where they were committed.

It is applicable to infringements of the provisions of Regulation (EC) No 561 /2006 of the European Parliament and of the Council of March 15, 2006 on the harmonization of certain social legislation relating to road transport, committed in another Member State of the European Union and established in France, subject to the provisions of Article 692 of the Code of Procedure



criminal or the justification of an administrative sanction that has been enforced or can no longer be enforced.

This article shall be applied even if the accused has acquired French nationality after the act attributed to him.

Article 113 - 7 of the Criminal Procedure Code

French criminal law is applicable to any crime, as well as to any offence punishable by imprisonment, committed by a French person or by a foreigner outside the territory of the French Republic when the victim is a French national at the time of the offence.

Article 222 - 23 of the Criminal Code

Any act of sexual penetration, of whatever nature, committed on another person or on a person perpetrated through violence, coercion, threat or surprise is rape.
Rape is punishable by 15 years' imprisonment.

Article 222 - 24 of the Criminal Code

Rape is punishable by twenty years' imprisonment:

- (1) Where it has resulted in mutilation or permanent disability
- (2) When it is committed on a minor under fifteen years of age;
- (3) When it is committed on a person whose particular vulnerability, due to age, illness, infirmity, physical or psychological disability or pregnancy, is apparent or known to the perpetrator;
- (3 A) When it is committed on a person whose particular vulnerability or dependence resulting from the precariousness of his economic or social situation is apparent or known to the perpetrator;
- (4) When it is committed by an ascendant or by any other person having de jure or de facto authority over the victim;
- (5) When it is committed by a person who abuses the authority conferred on him by his functions;
- (6) When it is committed by several persons acting as perpetrator or accomplice;
- (7) When it is committed with the use or threat of a weapon;
- (8) When the victim has been put in contact with the perpetrator through the use of an electronic communication network for the dissemination of messages to an unspecified public;
- (9) (Repealed)
- (10) When it is committed in conjunction with one or more other rapes committed on other victims,
- (11) Where it is committed by the spouse or partner of the victim linked to the victim by a civil solidarity pact ;
- (12) When it is committed by a person acting in a state of manifest intoxication or under the influence of narcotic products;



(13) Where it is committed, in the exercise of this activity, on a person who engages in prostitution, including occasionally ;

(14) Where a minor was present at the time of the offence and participated.

(15) Where a substance has been administered to the victim, without his knowledge, in order to impair his discernment or the control of his acts.

Article 222 - 29 of the Criminal Procedure Code

Sexual assaults other than rape are punishable by seven years' imprisonment and a fine of 100,000 euros when perpetrated :

(1) On a minor of fifteen years;

(2) On a person whose particular vulnerability due to age, illness, infirmity, physical or psychological disability or pregnancy is apparent or known to the perpetrator.

Article 450 - 1 of the Criminal Procedure Code

An association of criminals is any group formed or agreement established for the purpose of preparation, characterized by one or more material facts, one or more crimes or one or more offences punishable by at least five years' imprisonment.

Where the offences prepared are crimes or misdemeanours punishable by ten years' imprisonment, participation in a criminal conspiracy shall be punishable by ten years' imprisonment and a fine of 150,000 euros.

Where the offences prepared are crimes or misdemeanours punishable by at least five years' imprisonment, participation in a criminal conspiracy shall be punishable by five years' imprisonment and a fine of EUR 75 000.

STATEMENT OF CASE

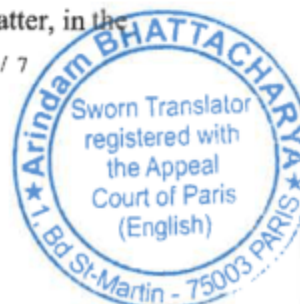
On August 23, 2019, the Minors' Section of the Paris Public Prosecutor's Office initiated a preliminary investigation into the charges of rape, rape of a minor over 15 years of age, rape of a minor under 15 years of age, sexual assault, sexual assault of a minor over 15 years of age, sexual assault of a minor under 15 years of age, participation in a criminal association with a view to committing a crime punishable by at least 5 years' imprisonment for the actions of Jeffrey EPSTEIN and his possible accomplices, at the prejudice of French victims. The investigations is initiated at the Central Office for the Repression of Violence against Persons of the Central Directorate of the Judicial Police.

In fact, on 23 July 2019 and 12 August 2019, the Public Prosecutor's Office received a report from the association for the defense of children's interests "*Innocence en danger*" in which it was stated that "*France is concerned by this case since the investigations conducted by the FBI have brought to light several persons of French nationality. From a reliable source, "Innocence en danger" recently confirmed that several victims of the prostitution network created by Jeffrey Epstein and his accomplices are also of French nationality.*" Attached to this report was a letter from Mrs. [REDACTED] in which she related that she had made «test-photograph» for the agency "Karin Models" during the summer of [REDACTED], when she was 18 years old. During this session, Jean-Luc BRUNEL - director of the model agency - had sexually assaulted her. The acts are barred by statutes of limitations.

According to reports in the national and international press, the EPSTEIN case had arisen several weeks earlier in the context of an investigation by the Federal Bureau of Investigations - New York office - following the revelations of several young women who had been sexually assaulted by the latter, in the

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United States and abroad. He is suspected of having sexually exploited dozens of young girls, some of them very young, between 2002 and 2005, and of having set up a "network" that would have benefited several other men, including French nationals, including Jean-Luc BRUNEL, a close friend of Jeffrey EPSTEIN who would have provided him with young girls from his agency's pool, and Ghislaine MAXWELL, who would have organized the arrival and stay in Jeffrey EPSTEIN's various residences of the future victims..

And according to press reports, the victims heard by the American investigation services reported sexual assaults and rapes committed by Jeffrey EPSTEIN both in the United States and in France - in PARIS, a city where he owned a mansion not far from the Arc de Triomphe, and by Jean-Luc BRUNEL, in various places but especially at his Parisian home on Avenue Hoche.

In the summer of 2019, upon his return from a stay in Paris, Jeffrey EPSTEIN was arrested, charged and detained in Manhattan. He was found hanging in his cell some time later.

The French investigation gathered several elements objectivizing the relationship between Jeffrey EPSTEIN and Jean-Luc BRUNEL. In addition, several testimonies collected reported the sexual abuses committed by Jean-Luc BRUNEL, these offences being barred by statutes of limitations :

██████████ born on ██████████ of ██████████ nationality, indicated having introduced herself, in ██████████, and when she was 18 years old, to several modeling agencies, including the KARINE agency. There she met Jean-Luc BRUNEL and they agreed for a photo session at the latter's home in Paris, in the Bourse district. Both of them were having dinner. ██████████ felt that she had been drugged, since she could not explain how she had suddenly, without understanding how, found herself in the room with Jean-Luc BRUNEL. She had not wanted sexual intercourse but had felt powerless in the face of the solicitations and insistence of the respondent, who penetrated her with his sexual organ. Another man, unidentified, had been in the apartment at the time of the rape, without participating in it. The photo session did not take place. She stated that at the time, Jean-Luc BRUNEL used to bring in girls from the East, particularly young girls. ██████████ stated that she had felt strong repercussions following the events. She had had no further contact with Jean-Luc BRUNEL after this specific episode, and did not wish to lodge a complaint.

██████████ born on ██████████ of ██████████ nationality, stated that she had met Jeffrey EPSTEIN and his partner Ghislaine MAXWELL at the age of 16, in the south of France near Saint Tropez. They had made friends and she went to their Parisian apartment on Avenue Foch in 2000. The same year, she left for Miami with the couple, 6 months later, she was invited to New York by Ghislaine MAXWELL, near the 5th avenue. It was during these 5 days that Jeffrey EPSTEIN was touching the girl, who tried in vain to resist him. She remembered in particular that he had penetrated her with a vibrator. She had never met Jean-Luc BRUNEL.

██████████ born ██████████, said she had met Jean-Luc BRUNEL through her modeling activities (Karin Models agency, located in Paris 8th district, Avenue Hoche). She had been invited to his Parisian apartment, drank a cocktail prepared by the defendant, then lost consciousness. The next day, she woke up in a bathrobe and noticed bruises on her thighs and crotch. She remembered that a man posing as Prince Albert de Monaco had called Jean-Luc BRUNEL while she was in the apartment.

██████████ born on ██████████ national, said she had met Jean-Luc BRUNEL through the Paris Planning agency (modeling agency) and Karin Models. She said she had met in a Parisian apartment at the invitation of Jean-Luc BRUNEL, with him and a certain ██████████ who worked at Paris Planning. They were leaving for the countryside to an undetermined place, where Jean-Luc BRUNEL tried to rape the young woman, who was resisting him. He then proceeded to touch the young woman.

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On August 12, 2019, the Paris Public Prosecutor's Office also received a report from a Parisian lawyer reporting the accusations of [REDACTED] born on [REDACTED], against Ghislaine MAXWELL, Jeffrey EPSTEIN and Jean-Luc BRUNEL, claiming that Ghislaine MAXWELL had recruited her at the age of 16 for sexual exploitation.

The Parisian residence of Jeffrey EPSTEIN located at 22 avenue Foch. Paris 16th district, was searched on Monday, September 23, 2019. It allowed the seizure of two MAC computers, several storage media such as USB keys, documents relating to Ghislaine MAXWELL, and many photographs of young and even very young women, including photographs of [REDACTED]. The computer verification of the seized material made it possible in particular to reveal the following elements:

- Numerous photographs showing young girls partially or totally undressed were found in the hard disk;
- 30 videos with shooting dates between 2011 and 2015, showing young girls, sometimes dancing in an apartment,
- Documents relating to the former Jeffrey EPSTEIN trials.

In addition, Jeffrey EPSTEIN's Gmail account (jeevacationegmail.com) was analyzed. 4500 emails were apprehended, notably referring to Jean-Luc BRUNEL, in addition to emails related to Jeffrey EPSTEIN's accusations, women or appointments.

Finally, a CD ROM with the inscription "CONFIDENTIAL - COMPREHENSIVE CHART" was used to retrieve an excel file containing a list of 62 names of women.

OBJECT OF THE REQUEST

With regard to the above-mentioned elements, we would be thankful to the competent authorities of the United States of America if they could communicate to us the acts of investigation carried out in the United States of America and in particular :

Any hearing (hearing as a defendant or as a witness) and any investigative acts (search, computer exploitation, documents seized, written statements), concerning the sexual exploitation of minors or adults, relating to the following persons:

- Jean-Luc BRUNEL,
- Ghislaine MAXWELL, arrested on American soil on Thursday, July 2, 2020,



Any information, hearings and acts of investigation concerning victims of French nationality, having been in contact with Jeffrey EPSTEIN, Jean-Luc BRUNEL or Ghislaine MAXWELL;

Any information useful to bring out the truth;

- Provide the results of the requested investigations in the form of a working copy that can be used.

We also inform them that we will make available to them all the investigative documents resulting from the procedure carried out in France.

DEADLINE

The competent authorities of the United States of America are requested to provide assistance as soon as possible.

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CONFIDENTIALITY

The competent authorities of the United States of America are requested to keep this application and its contents confidential.

CONTACTS

French Central Authority :

Office of International Mutual Assistance in Criminal Matters
Criminal Affairs and Pardons Branch
Ministry of Justice
[REDACTED]

Magistrate who issued this request for mutual legal assistance:
Aude GROUALLE, Vice-Prosecutor, Head of the Paris Public Prosecutor's Office for Minors
[REDACTED]

Barthélémy HENNUYER, Substitute
Minors' Section of the Paris Public Prosecutor's Office
[REDACTED]

The Public Prosecutor of the Republic at the Judicial Court of Paris thanks the judicial authorities of the United States of America for their helpfulness and valuable collaboration, assures them of its reciprocity and renews the expression of its highest consideration.

July 8, 2020

For the Public Prosecutor
Barthélémy HENNUYER, Substitute
Seal of the Paris court of Justice
Signature Illegible.

I, the undersigned Arindam Bhattacharya,
Sworn translator registered with the
Appeal Court of Paris, certify that the
following translation is true to the original
document in French
bearing the number PM 1720
Paris, Date : July 13, 2020

