

From: [REDACTED]
[REDACTED]
Cc: "[REDACTED]"
[REDACTED]
Subject: [REDACTED] draft facts
Date: Tue, 06 Oct 2020 23:59:21 +0000

Chiefs,

Below for review is a draft factual statement as a potential proposal to Sarah Kellen Vicker's lawyers. We are undecided as to how to phrase the first paragraph and would welcome your thoughts on that and any other part of this draft. Happy to discuss.

Thanks,
Maurene

The parties agree that the following facts will be included, without objection, in the Presentence Report for the Court to consider at sentencing:

First Paragraph Option #1: Between approximately 2001 and 2013, [REDACTED] was employed by Jeffrey Epstein as a personal assistant. [REDACTED] has been evaluated by an expert psychologist who specializes in victims of sex trafficking, who completed a report dated April 20, 2020 regarding [REDACTED] experiences before, during, and after her employment with Epstein. The parties agree that the contents of the expert's report may be considered at sentencing, and the parties do not dispute the contents or conclusions of the report.

First Paragraph Option #2: Between approximately 2001 and 2013, [REDACTED] was employed by Jeffrey Epstein as a personal assistant. At the time she was hired, [REDACTED] was financially destitute, had a history of being sexually abused by an older male, and had been completely cut off from her family. Shortly after hiring [REDACTED], Epstein began sexually abusing her. That sexual abuse continued for years, and included at least one instance in which Epstein forcibly raped [REDACTED]. Epstein also controlled various aspects of [REDACTED] life, including her diet, her clothing, her hair, and her sleep. [REDACTED] job responsibilities included numerous tasks involving Epstein's daily schedule, travel, and residences. One of those responsibilities involved scheduling massage appointments for Epstein. When [REDACTED] was first hired, she used a directory provided to her by Ghislaine Maxwell to contact women and girls to massage Epstein. Over the ensuing years, [REDACTED] would add new names to the directory when directed to do so by Epstein.

During the period of her employment between approximately 2002 and 2005, [REDACTED] scheduled hundreds of appointments for women and girls, including dozens of minors, to massage Epstein. At those massage appointments, Epstein sexually abused dozens of minor victims. The majority of the massage appointments that [REDACTED] scheduled took place at Epstein's residence in Palm Beach, Florida, though some took place at Epstein's residence in New York, New York. During that same period, Epstein received approximately two to three massages per day. [REDACTED] was primarily responsible for scheduling those appointments in Palm Beach, but she occasionally scheduled them by phone while she was in New York City. When minor victims arrived for the appointments at Palm Beach, [REDACTED] sometimes met them, walked them up to the massage room, and set up the massage table for the appointment. After at least some of the appointments, [REDACTED] paid minor victims in cash. Epstein encouraged minor victims to bring other girls to massage him, which led to an increasing number of victims coming to massage Epstein at his residences.

Through the process of arranging and facilitating massage appointments for Epstein, █████ met dozens of underage victims, who ranged in age from 14 to 17 years old. None of those victims explicitly told █████ that they were underage. Some of those victims did not have licenses, and █████ arranged for a driver to pick them up and take them to their appointments with Epstein. Some of those victims told █████ they could not attend certain appointment times because they were attending school. Epstein told █████ that at least one of those victims was studying for the SATs.

During the massage appointments with minor girls that █████ scheduled, Epstein sexually abused the minor girls by, among other things, masturbating while the victims touched Epstein, touching the victim's genitals, using a sex toy on a victim's genitals, engaging in oral sex, and/or engaging in sexual intercourse. Although █████ was not present for the vast majority of this abuse, she witnessed some of these massages. In particular, █████ was present for and participated in one massage during which Epstein touched a minor victim's genitals. █████ walked in on one instance in which a different minor victim was performing oral sex on Epstein. █████ walked in on at least one additional massage during which a different minor victim was nude while massaging Epstein. At Epstein's direction, █████ took nude or partially nude photographs of more than one minor victim.

In or about 2005, █████ learned that law enforcement was investigating Epstein for sex crimes involving minors, arising from the massage appointments that █████ had facilitated. After learning about the investigation into Epstein, █████ called multiple minor victims and encouraged them not to talk to law enforcement. At Epstein's direction, █████ offered financial incentives to victims for not speaking with law enforcement. Beginning in approximately 2006, multiple minor victims were interviewed by federal law enforcement officers who were conducting a criminal investigation of Epstein and his associates for sex trafficking of minors, among other federal offenses. During those interviews, minor victims reported to federal agents that Epstein paid them for sexualized massages while they were underage girls, including during massages that █████ scheduled.