



U.S. Department of Justice

Criminal Division

VAA:WHG:TNB:AF:ss
DOJ No. CRM-182-[number]
Office of International Affairs

Washington, D.C.

FROM: The Central Authority of the United States
TO: The Central Authority of France
SUBJECT: Request for Assistance in the Prosecution of Ghislaine Maxwell
DATE: January [REDACTED], 2021

INTRODUCTION

The Central Authority of the United States requests the assistance of the appropriate authorities in France pursuant to the 1998 U.S.-France Mutual Legal Assistance Treaty, as supplemented by the 2004 U.S.-France Mutual Legal Assistance Instrument (collectively, “the Treaty”). The United States Attorney for the Southern District of New York (“the prosecutor”) and the Federal Bureau of Investigation (collectively, the “U.S. authorities”) are prosecuting charges of violations of United States criminal law concerning Ghislaine Maxwell and her role in the sexual exploitation and abuse of multiple minor girls by Jeffrey Epstein from at least in or about 1994, up to and including at least in or about 1997.

The U.S. authorities request to conduct a voluntary interview of French citizen [REDACTED] [REDACTED] (“[REDACTED]” or the “Witness”) and request the assistance of French authorities in arranging for such an interview. The U.S. authorities understand that [REDACTED] was a witness to certain events, conduct, or conversations relevant to its prosecution of Maxwell and, in particular, that [REDACTED] was sexually abused by Epstein

in New York after meeting ~~both him~~ Epstein and Maxwell in [REDACTED] in approximately [REDACTED]. In addition, the U.S. authorities seek the assistance of French authorities to obtain records of prior interviews of the witness by French law enforcement, as well as certain materials seized from the Parisian residence of Jeffrey Epstein in September 2019, including documents relating to Maxwell and photographs of women, including of the witness.

A trial date of July 12, 2020 has been set in United States v. Ghislaine Maxwell. In light of the trial date, the U.S. authorities would like to interview the witness as soon as possible in order to evaluate if additional charges may be brought against Maxwell. The U.S. authorities believe that [REDACTED] may be a critical witness and the subject of additional charges against Maxwell. Accordingly, we request that the execution of this request be carried out on an expedited basis, and that [REDACTED], [REDACTED], [REDACTED] [REDACTED] for the United States (contact information below) be notified in order to facilitate rapid execution of the request and transmission of the evidence sought.

REQUEST FOR CONFIDENTIALITY

This request is sensitive in that it recounts specifics and evidentiary detail that may not be known, the exposure of which could impede the prosecution of Maxwell and the U.S. authorities' ongoing investigation with regard to the integrity of evidence and witness accounts. Premature notification of this request could seriously jeopardize the investigation or compromise the trial of Maxwell, by prompting a witness to alter or prepare his/her answers to specific questions, by prompting others to destroy or tamper with evidence; change patterns of behavior; intimidate potential witnesses; or alert others who could do the same. Indeed, the parties' disclosure of information produced in

discovery in the prosecution of Maxwell is governed by a protective order which is attached as Attachment B. Accordingly, pursuant to Article 14 of the Treaty, please keep this request confidential in all respects, and do not share its contents, its subject matter, or the fact that the request has been made with any private persons (including the subject(s) of the investigation), or any government officials whose knowledge is not absolutely necessary for purposes of executing this request. In addition, please advise all who must be made aware of this request for assistance that the request, its contents and its subject matter are to be kept confidential and should not be shared except as described above. In order to avoid disclosure to third parties (including parties civiles), if a related criminal investigation exists in France, please ensure that this mutual legal assistance request is NOT placed in the French criminal dossier without the express authorization of the United States; instead, we ask that this request for assistance be placed in a separate mutual legal assistance dossier. If this request cannot be executed without breaching confidentiality, please notify [REDACTED], [REDACTED], [REDACTED] for the United States, whose contact information is listed below.

THE FACTS

U.S. citizen Jeffrey Epstein is alleged to have engaged in the sexual abuse of minor girls during the period of approximately 1994 through 2005. On or about July 2, 2019, a grand jury in the Southern District of New York returned an indictment charging Epstein with violations of U.S. criminal laws in connection with his sexual abuse of minors, including with engaging in a conspiracy to sexually traffic in minors. Epstein was arrested pursuant to the indictment on or about July 6, 2019, and had been detained pending trial in New York. On or about August 10, 2019, Epstein committed suicide in his cell.

Notwithstanding Epstein's death, the investigation that led to his indictment remains ongoing. That ~~ongoing~~ investigation has revealed evidence of additional criminal conduct by Epstein and his associates, including Ghislaine Maxwell.

On or about June 29, 2020, a grand jury in the Southern District of New York returned an Indictment charging Maxwell with violations of U.S. criminal laws in connection with her role in assisting, facilitating, and contributing to Epstein's sexual abuse of minors 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 Indictment alleges that from at least in or about 1994, up to and including at least in or about 1997, Maxwell enticed and conspired with Epstein to entice and cause minor victims to travel to New York, which Maxwell knew and intended would result in their grooming and subjection to sexual abuse by Epstein. Maxwell was arrested pursuant to the Indictment on or about July 2, 2020, and has been detained pending trial in New York since that date. Finally, the Indictment also alleges that [insert sentence about perjury counts – since you have it listed as an offense in the following section].

The U.S. authorities have learned that [REDACTED] may have been a witness to certain events of relevance to its prosecution. In particular, the U.S. authorities understand that [REDACTED] met Epstein and Maxwell in [REDACTED] when she was [REDACTED] year old in approximately [REDACTED] that [REDACTED] subsequently traveled with Epstein and Maxwell to the United States; and that Maxwell invited [REDACTED] to New York, where Epstein sexually abused her.

THE OFFENSES

Title 18, United States Code, Section 371

Conspiracy

If two or more persons conspire ... to commit any offense against the United States ... and one or more of such persons do any act to effect the object of the conspiracy, each shall [have committed a crime and be] imprisoned not more than five years.

Title 18, United States Code, Section 2423

Transportation of Minors

(a) Transportation with intent to engage in criminal sexual activity

- (1) A person who knowingly transports an individual who has not attained the age of 18 years in interstate or foreign commerce, or in any commonwealth, territory or possession of the United States, with intent that the individual engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, shall [have committed a crime and be] imprisoned not less than 10 years or for life.¹

Title 18, United States Code, Section 2422

Coercion and Enticement

- (1) (b) Whoever, using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall [have committed a crime and be] imprisoned not less than 10 years or for life.²

Title 18, United States Code, Section 1623

Perjury

- (a) Whoever under oath (or in any declaration, certificate, verification, or statement under penalty of perjury as permitted under section 1746 of title 28, United States Code) in any proceeding before or ancillary to any court or grand jury of the United States knowingly makes any false material declaration or makes or uses any other information, including any book, paper, document, record, recording, or other material, knowing the same to contain any false material declaration, shall be fined under this title or imprisoned not more than five years, or both.

RELEVANT ENTITIES AND INDIVIDUALS

Name: [REDACTED]
Date of birth: [REDACTED]
Place of birth: France
Citizenship: French

¹ The penalties stated herein apply to conduct that occurred after July 27, 2006. For conduct that occurred prior to that time, the penalties would be lower and may not include mandatory minimum sentences.

² The penalties stated herein apply to conduct that occurred after July 27, 2006. For conduct that occurred prior to that time, the penalties would be lower and may not include mandatory minimum sentences.

Name: Ghislaine Maxwell
Date of Birth: [REDACTED]
Place of Birth: Maison-Laffitte, France
Citizenship: U.S., UK, France

ASSISTANCE NEEDED

Testimony

U.S. authorities seek to conduct an investigative interview of the witness identified above. The specific subject matters of questioning are set forth in Attachment A.

Records

The U.S. authorities also seek certain records which are relevant to the prosecution of Maxwell. The U.S. authorities learned of certain of these records from the July 8, 2020 request for international legal assistance from the French Ministry of Justice. In particular, the U.S. authorities request that an appropriate custodian of official records produce true and correct copies of the following documents:

- a. Any notes, memoranda, or recordings of interviews of [REDACTED] [REDACTED] conducted by French law enforcement.
- b. Materials seized from Jeffrey Epstein's Parisian residence located at [REDACTED], Paris 16th district, which was searched on September 23, 2019; in particular:
 - i. Photographs of [REDACTED] [REDACTED] and other females found at Epstein's residence and on seized devices;
 - ii. Any and all documents, records, recordings, and photographs relating to Ghislaine Maxwell;
 - iii. Contents of a CD Rom with the inscription "CONFIDENTIAL – COMPREHENSIVE CHART"
 - iv. Photographs of both the interior and exterior of Epstein's Parisian residence located at [REDACTED], Paris 16th district

PROCEDURES TO BE FOLLOWED

Testimony

The U.S. authorities specifically request to conduct the questioning themselves in the presence of French authorities to ensure that all necessary lines of inquiry are completed in the most efficient fashion. The U.S. authorities—who have significant experience conducting interviews of victims—request to conduct a voluntary interview of the witness that is sensitive to the difficult nature of the subject matter and guided by the witness’s comfort level. The U.S. authorities believe [REDACTED] to be an important witness whose experience falls squarely within the conspiracy charge pending against Maxwell and who may be the subject of additional charges against Maxwell. As a result, the U.S. authorities respectfully submit that it is important that they conduct the questioning themselves in the presence of French authorities to assess the viability of additional charges. The U.S. authorities also request that they be permitted to conduct the interview by video, should that be deemed necessary, in light of the COVID-19 pandemic and travel restrictions and difficulties.

The U.S. authorities request that the following individuals be permitted to conduct the interview:

- a. [REDACTED]
Assistant U.S. Attorney, Southern District of New York
[REDACTED]
[REDACTED]
- b. [REDACTED]
Assistant U.S. Attorney, Southern District of New York
[REDACTED]
[REDACTED]
- c. [REDACTED]
Assistant U.S. Attorney, Southern District of New York
[REDACTED]
[REDACTED]
- d. [REDACTED]

Special Agent, Federal Bureau of Investigation
[REDACTED]
[REDACTED]

e. [REDACTED]
Detective, New York City Police Department³
[REDACTED]
[REDACTED]

Official Records

Please ask the French authority executing this request to do the following:

1. secure certified copies of the official records pursuant to article 20;
2. have the official providing the documents attach an attestation that the documents are official records provided in his official capacity pursuant to French law, by completing an Attestation of Authenticity of Official Records (form enclosed); and,
3. present the records with certificate to the Central Authority for France for transmittal to the Office of the Justice Attaché, U.S. Embassy Paris.

COORDINATION WITH U.S. LIAISON MAGISTRATE IN FRANCE

Please coordinate the general execution of this request for assistance with [REDACTED]
[REDACTED], [REDACTED] for the United States, at
the U.S. Embassy in Paris at [REDACTED], or via email at [REDACTED].

Thank you in advance for your assistance with the prosecution of Ghislaine Maxwell.

Date

Associate Director
Office of International Affairs
Criminal Division

³ NYPD detective serving on the FBI task force, and assisting in the federal investigation.

|

ATTACHMENT A

The U.S. authorities would seek to question [REDACTED] [REDACTED] regarding the following topics during a voluntary interview:

1. The history and nature of [REDACTED] relationship with Jeffrey Epstein.
2. The history and nature of [REDACTED] relationship with Ghislaine Maxwell.
3. The details of [REDACTED] time spent with Epstein and/or Maxwell in France, the United States, and any other locations.
4. The details regarding any trips [REDACTED] took with and/or to visit Maxwell and/or Epstein.
5. The details regarding any trips Maxwell and/or Epstein took to visit [REDACTED].
6. The details regarding any payments made by Epstein, Maxwell, or any female associated with Maxwell and/or Epstein to [REDACTED].
7. The details of any conversations [REDACTED] participated in or witnessed during which anyone discussed Epstein's sexual preferences, practices or history; Maxwell's sexual preferences, practices, or history; and/or Maxwell's role assisting Epstein or other men in locating females with whom to engage in sexual activity.
8. Communications, including email correspondence, between [REDACTED] and Maxwell and/or Epstein.
9. Photographs of [REDACTED] with Epstein and/or Maxwell or of [REDACTED] at the time she met Epstein and Maxwell.
10. [REDACTED] involvement, if any, in any sexual contact and/or relationship with Epstein and/or Maxwell.
11. Any knowledge [REDACTED] had or may have had of inappropriate relationships, including improper or unlawful sexual contact, involving Epstein, Maxwell, and/or their associates with any minor.

ATTACHMENT B

ATTESTATION OF AUTHENTICITY OF OFFICIAL RECORDS

I, _____, attest that my position with the
(Name)
Government of France is _____ and that in that
(Official Title)
position I am authorized by French law to attest that the

documents attached hereto and described below:

- (1) are true copies of official records which are authorized by the laws of France to be recorded or filed in _____,
(Name of Public Office or Agency)
which is a government office or agency.
- (2) set forth matters which are required by the laws of France to be reported and recorded or filed.

Description of Documents:

(Official Seal)

(Signature)

(Date)