

**From:** "[REDACTED] (USANYS)" <[REDACTED]>  
**To:** "[REDACTED] (USANYS)" <[REDACTED]>  
**Subject:** Re: [REDACTED]  
**Date:** Thu, 19 Nov 2020 14:12:05 +0000

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Okay, great. Will send back.

Sent from my iPhone

On Nov 19, 2020, at 9:10 AM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Those edits look good. And yes, I agree.

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Thursday, November 19, 2020 9:04 AM  
**To:** [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** RE: [REDACTED]

I think the change from testified to informed law enforcement is a good one. I added a little more color to that point below. On the Fatico, I think I would stay silent on that issue for purposes of this, but that's the line I would be inclined to use in a sentencing submission or at a sentencing proceeding if we had to – i.e., [REDACTED] doesn't dispute that these victims told law enforcement these facts, and the Government doesn't dispute that [REDACTED] disputes those accounts but neither party seeks a Fatico hearing to resolve the issue.

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Thursday, November 19, 2020 8:56 AM  
**To:** [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** FW: [REDACTED]

I made a couple of edits to the new language, but interested in your thoughts. First, I changed "would call to testify" to "reported," since we are framing it as victims reported this information to law enforcement; I don't like stipulating to the fact that they would testify when we know they may not. I believe this edit is consistent with our last conversation with [REDACTED]. I also edited the last sentence to more specifically delineate what [REDACTED] denies.

I think that the way we would handle this would be how [REDACTED] just handled it in the [REDACTED] sentencing submission – neither party requests a Fatico, but the Government credits these accounts and wishes to bring them to the Court's attention.

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Wednesday, November 18, 2020 5:56 PM  
**To:** [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** [REDACTED]

[REDACTED] and [REDACTED],

Following up on our conversation today, below is a draft statement that includes the language we discussed.

For reference, Victim-1 is [REDACTED], who has been publicly identified as a victim, and who has filed a lawsuit under her real name. Of the three victims referenced below, she would be the most likely to be willing to testify, although her attorney has informed us that her preference would be a plea. Victim-2 is [REDACTED], who is pursuing a lawsuit against Epstein's estate under a pseudonym, and who strongly prefers to remain anonymous. Her attorney has told us that she would prefer that the case be resolved by a guilty plea. We think it is unlikely she would be willing to testify at a trial, based on our conversations with her attorney. Victim-3 is [REDACTED]; her attorney has told us that she prefers that we resolve the case through a guilty plea, and that [REDACTED] would not testify at a trial. [REDACTED] identity was inadvertently released to the public by the State's Attorney's Office during the initial investigation, and [REDACTED] remains upset that her information was made public. She has never come forward publicly as an Epstein victim and does not wish to do so.

[REDACTED]

[REDACTED]

[REDACTED] between approximately 2002 and 2005, as part of [REDACTED] to schedule appointments at the direction of Epstein and Maxwell, [REDACTED] scheduled hundreds of appointments for women and girls, including dozens of minors, to massage Epstein. Over the course of that several year period, Epstein received approximately two to three massages per day, and during those massage appointments, Epstein sexually abused dozens of minor victims. The vast majority of the massage appointments that [REDACTED] scheduled took place at Epstein's residence in Palm Beach, Florida, though some victims recall that [REDACTED] arranged massages which took place at Epstein's residence in New York, New York. [REDACTED] has reported that she has no recollection of scheduling massages for anyone in New York. [REDACTED] did occasionally schedule massages to take place in Florida by phone while she was in New York City. When [REDACTED] was first hired, she used a directory provided to her by Epstein's [REDACTED] and 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 or Maxwell.

Through the process of arranging and facilitating massage appointments for Epstein, [REDACTED] met dozens of underage victims, who ranged in age from 14 to 17 years old. For example, 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.

None of those victims told [REDACTED] that they were underage. [REDACTED] did know that some of those victims did not have their own cars, and [REDACTED] arranged for a driver to pick them up and take them to their appointments with Epstein. Additionally, some of those victims told [REDACTED] they could not attend certain appointment times because they were attending school. Epstein also told [REDACTED] that at least one of those victims was studying for the SATs.

During some of the massage appointments with minor girls that [REDACTED] scheduled, Epstein sexually abused the minor girls by, among other things, [REDACTED] while the victims touched Epstein, [REDACTED], [REDACTED], and/or [REDACTED]. Some of the victims of Epstein's abuse have reported to law enforcement, including representatives of the U.S. Attorney's Office for the Southern District of New York and the FBI New York Field Office, that [REDACTED] witnessed some of the sexual abuse that occurred. In particular, one victim ("Victim-1") has informed law enforcement that [REDACTED] was present for and participated in one massage when Victim-1 was a minor, during which Epstein touched Victim-1's genitals. Another victim ("Victim-2") has informed law enforcement that [REDACTED] walked in on one instance in which Victim-2, a minor, was performing oral sex on Epstein. A third victim ("Victim-3") has informed law enforcement that [REDACTED] walked in when Victim-3 was a minor and was nude in Epstein's massage room. [REDACTED] has informed law enforcement that she denies participating in any of the incidents described by Victim-1, Victim-2, and Victim-3.

In or about 2005, [REDACTED] learned that law enforcement was investigating Epstein for sex crimes involving minors, arising from the massage appointments, some of which [REDACTED] had scheduled. After learning about the investigation into Epstein, at Epstein's direction, [REDACTED] called multiple minor victims and encouraged them to "help" Epstein and conveyed that Epstein would help them if they helped him. [REDACTED] encouraged them to talk to Epstein's investigator, offered that Epstein would pay for an attorney for them, and, in one or two cases, [REDACTED] offered financial incentives to victims. [REDACTED] understood that by asking her to make these calls, Epstein intended to dissuade the victims from speaking to law enforcement, and by agreeing to make the calls and take these steps, she was aiding him in this objective. 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 [REDACTED] scheduled.

[REDACTED]  
Assistant United States Attorney  
Southern District of New York

[REDACTED]  
New York, NY 10007  
[REDACTED]