



U.S. Department of Justice

Criminal Division

VAA:WHG:JEC:JTM

DOJ No. CRM-182-73090

Office of International Affairs

Washington, D.C. 20530

FROM: The Central Authority of the United States
TO: The Central Authority of the United Kingdom
SUBJECT: Request for Assistance in the Matter of Material Witness PA
DATE: April 3, 2020

The Central Authority of the United States of America (“U.S.”) requests the assistance of the Central Authority of the United Kingdom (“UK”) under the 1994 Treaty of Mutual Legal Assistance in Criminal Matters between the U.S. and the UK, as amended by the 16 December 2004 Instrument and exchange of notes (“the Treaty”). The United States Attorney for the Southern District of New York and the Federal Bureau of Investigation (collectively the “U.S. authorities”) seek to interview H.R.H. Prince Andrew Albert Christian Edward, the Duke of York, also known as Andrew Mountbatten-Windsor (“Prince Andrew” or “the witness”), relating to two ongoing criminal investigations. In addition, U.S. authorities seek records of certain communications and meetings between Prince Andrew and the subjects of one investigation.

With regard to the interview, U.S. authorities request to conduct a voluntary interview of Prince Andrew and request the assistance of UK authorities in arranging for such an interview. In the event that the witness declines to participate in a voluntary interview, U.S. authorities request that UK authorities conduct a compelled interview of the witness under oath.

The U.S. authorities may use the requested records and information in the U.S. criminal investigation and proceedings, as defined at Article 19 of the Treaty, and in other U.S. criminal investigations and proceedings, as well as non-criminal judicial or administrative proceedings directly related to the U.S. criminal investigations and proceedings, pursuant to Article 7 of the Treaty.

CONFIDENTIALITY

The U.S. authorities are conducting ongoing criminal investigations. Notwithstanding that one or more of the persons referenced in this request is aware to some extent of the U.S. authorities' attention to this matter, this request also recounts specifics and evidentiary detail that may not be known, exposure of which could impede the investigation with regard to the integrity of evidence and witness accounts. Because the persons referenced in this request are generally aware of the U.S. authorities' investigations, U.S. authorities are not requesting that the existence of this legal assistance request be kept confidential. However, premature notification of the specific subject matter and the questions outlined in the attachments to this request could seriously jeopardize the investigations or compromise any trial, 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. Accordingly, and pursuant to articles 4(3)(j) and 7 of the Treaty, please keep the contents of this request, including the subject matter of questioning and the questions themselves, confidential and please ensure that they are not shared with any persons (including the witness, the witness's representatives, or subjects of the investigation), or with 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 that the contents are to be kept confidential and

should not be shared with any witness, potential subjects of the investigation or any other persons. If this request cannot be executed without breaching such confidentiality, please notify U.S. authorities through the U.S. Department of Justice, Office of International Affairs prior to taking any action. U.S. authorities also request that UK authorities keep a written log of all those individuals who have been made aware of the contents of this request, noting when those individuals were so made aware.

THE FACTS

Investigation I: The Jeffrey Epstein Investigation

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's associates, including Ghislaine Maxwell.

The investigation to date has revealed that Prince Andrew may have been a witness to and/or participant in certain events of relevance to the ongoing investigation. For example, one victim has alleged that Maxwell introduced her to Prince Andrew who, according to this victim, was present for certain of the victim's interactions with Epstein and Maxwell. Additionally, documentary evidence uncovered during the course of this investigation has revealed information suggesting that Prince Andrew had knowledge that Maxwell recruited females to

engage in sex acts with Epstein and other men. Finally, there is evidence that Prince Andrew engaged in sexual conduct involving one of Epstein's victims. Prince Andrew is not presently a target of the investigation, and U.S. authorities have not, to date, gathered evidence that he has committed any crime under U.S. law.

Investigation II: The Peter Nygard Investigation

The U.S. authorities are investigating Peter Nygard, a Canadian citizen, and other co-conspirators' involvement in an international sex trafficking ring victimizing adult women and minor girls. The investigation concerns, among other things, allegations of sex trafficking at various locations inside and outside the United States, including Nygard's estate in Lyford Cay, Bahamas, referred to as "Nygard Cay." Sex trafficking victims were transported internationally, including between the Bahamas and locations in the United States.

The investigation of Peter Nygard and others is ongoing and no charges have been filed as of this date. The investigation has revealed that, on at least one occasion, Prince Andrew travelled to Nygard Cay in the Bahamas, a location where Nygard is believed to have trafficked minor and adult female victims. U.S. authorities seek to question Prince Andrew regarding his visit(s) to Nygard Cay during the time period under investigation, and other information he may have about Peter Nygard and related individuals. Prince Andrew is not presently a target of this investigation, and U.S. authorities have not, to date, collected evidence that he committed any crime under U.S. law.

THE OFFENSES

The criminal conduct being investigated currently implicates the following offenses. Note that pursuant to Articles 7 and 19 of the Treaty, U.S. authorities may determine that additional or different offenses may also be implicated in this matter:

Title 18, United States Code, Section 1591

Sex Trafficking of Minors and by Force, Fraud, and Coercion

- (a) Whoever knowingly –
 - (1) in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, recruits, entices, harbors, transports, provides, obtains, advertises, maintains, patronizes, or solicits by any means a person; or
 - (2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1), knowing, or, except where the act constituting the violation of paragraph (1) is advertising, in reckless disregard of the fact, that means of force, threats of force, fraud, coercion described in subsection (e)(2), or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall [have committed a crime].
- (b) The punishment for an offense under subsection (a) is –
 - (1) if the offense was effected by means of force, threats of force, fraud, or coercion ...or by any combination of such means, or if the person recruited, enticed, harbored, transported, provided, obtained, advertised, patronized, or solicited had not attained the age of 14 years at the time of such offense, by a fine under this title and imprisonment for any term of years not less than 15 or for life; or
 - (2) if he offense was not so effected, and the person recruited, enticed, harbored, transported, provided, obtained, advertised, patronized, or solicited had attained the age of 14 years but had not attained the age of 18 years at the time of such offense, by a fine under this title and imprisonment for not less than 10 years or for life.¹

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.

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.²

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.³

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.

PERSONS INVOLVED

Name: H.R.H. Prince Andrew Albert Christian Edward, Duke of York
Also known as Andrew Mountbatten-Windsor

Date of birth: 19 February 1960

Place of birth: Buckingham Palace, London, England

Citizenship: UK

Address: Royal Lodge, Windsor, England

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.

³ 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.

d.

[REDACTED]

e.

[REDACTED]

Detective, New York City Police Department⁴

[REDACTED]

[REDACTED]

For Investigation II (Nygard):

a.

b.

c.

d.

e.

[REDACTED]

If the witness requests, U.S. authorities are prepared to conduct the interview pursuant to a “proffer letter” similar to that attached as Attachment B. The letter outlines the conditions under which U.S. authorities will not use the witness’s statements against him.

⁴ NYPD detective serving on the FBI task force, and assisting in the federal investigation.

⁵ NYPD detective serving on the FBI task force, and assisting in the federal investigation.

Voluntary Interview Conducted by UK Authorities

In the event that UK authorities decline to permit the U.S. case team to directly question the witness, U.S. authorities request that UK authorities question the witness about the subject matters set forth in Attachment C. As noted on that list, U.S. authorities request that additional follow-up questions be asked by UK authorities to clarify answers given or to follow relevant lines of inquiry. In the event it would assist UK authorities, U.S. authorities will produce a list of specific questions covering each of the topics outlined in Attachment C.

U.S. authorities also request to be present during the questioning of the witness by UK authorities. Those observing would include at least two members of the teams listed above. U.S. authorities also request that they be permitted to propose, during or at the conclusion of the interview, additional questions to be asked by UK authorities of the witness after hearing the witness's initial responses.

U.S. authorities request that UK authorities record the interview using audio and video recording equipment. U.S. authorities further request that the witness be cautioned in the event of a voluntary interview that if he were to provide false information to authorities in connection with this mutual legal assistance request, he could be prosecuted for perverting the course of justice in the UK, and he may be prosecuted for making a false statement, in violation of Title 18, United States Code, Section 1001, in the U.S.

Compelled Interview

If the witness declines to participate in either type of voluntary interview requested above, U.S. authorities request that UK authorities conduct a compelled interview under oath employing the subject matters set out in Attachment C. As noted above, if it would assist UK authorities, U.S. authorities will produce a list of specific questions covering each of the topics outlined in

Attachment C. U.S. authorities also request that the compelled interview be audio- or video-recorded. If the witness declines to respond to questions by asserting his right to remain silent, U.S. authorities request that such a declination be to each question set forth in Exhibit C and that declination be on the audio or video recording under oath.

Prior to conducting the compelled interview, U.S. authorities request that the witness be read the following caution on the record:

- Pursuant to the 1994 Treaty of Mutual Legal Assistance in Criminal Matters between the United States of America and the United Kingdom, as amended by the 16 December 2004 Instrument and exchange of notes, and [relevant provisions of UK domestic law], you have been subpoenaed to answer questions under oath.
- Authorities in the United States are conducting an investigation of possible violations of Federal criminal laws including Sex Trafficking in violation of 18 United States Code Section 1591, Transportation of Minors to Engage in Sex in violation of 18 United States Code Section 2423, Coercion and Enticement of Minors to Engage in Sex in violation of 18 United States Code Section 2422, and related crimes.
- You may refuse to answer any question if a truthful answer to the question would tend to incriminate you.
- Anything you do say may be used against you.
- If you have retained counsel, you will be permitted a reasonable opportunity to consult with counsel if you so desire.
- Note that if you make any knowingly false statements you can be prosecuted for perverting the course of justice and other related crimes under the laws of the United Kingdom.

Future Testimony

If the witness provides relevant information during the interview, the U.S. authorities request that the witness be asked if he is willing to testify in U.S. criminal proceedings in the Southern District of New York related to one or more of these investigation and any ensuing prosecutions at some future date.

Documents

U.S. authorities also seek certain records which are relevant to the Epstein Investigation. In particular, the U.S. authorities request production of the following categories of communication, including email, text, recorded or transcribed voicemail, and any other written correspondence or notes of oral communications, which is in the custody or control of the witness or his representatives:

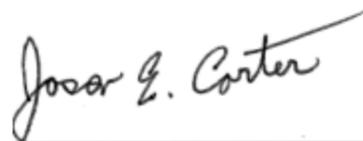
- a. Any notes or calendar entries reflecting communications or meetings with the following individuals: Jeffrey Epstein; Ghislaine Maxwell; or [REDACTED].
- b. Any documents reflecting travel to the following locations: residence located at 9 East 71st Street, New York, New York; "Zorro Ranch," located in Santa Fe, New Mexico; 358 El Brillo Way, Palm Beach, Florida; any other property owned or leased by Jeffrey Epstein or Ghislaine Maxwell.
- c. Any documents, such as receipts or tickets, reflecting events or meals at which the following individuals were present: Jeffrey Epstein; Ghislaine Maxwell; or [REDACTED].
- d. Any communication to, from, or copying Ghislaine Maxwell involving the following topics:
 - i. [REDACTED].
 - ii. Any females Maxwell, Jeffrey Epstein or any associate or representative of Maxwell or Epstein arranged for Prince Andrew to meet;
 - iii. Any females Maxwell, Epstein or any associate or representative of Maxwell or Epstein arranged for other adult men to meet.
 - iv. Massage, massages, and/or masseuses.
 - v. Any investigation into Epstein or his associates, including but not limited to any prosecutions brought by the U.S. authorities against Epstein.
 - vi. Any civil lawsuits threatened or brought against Prince Andrew, Maxwell, Epstein, and/or their associates.
 - vii. Any reference to or evidence of the destruction of evidence, the obstruction of investigations, or other efforts to conceal criminal activity by Epstein, Maxwell, or their associates.
 - viii. Any payments made, in cash or in kind, to Maxwell, Epstein, or their representatives or associates.
 - ix. Any sexual encounters and/or romantic relationships involving Prince Andrew and any female he met through Maxwell and/or Epstein.
 - x. The involvement of Maxwell and/or any associate of Maxwell's in recruiting, enticing, transporting or trafficking minors for the purpose of engaging in unlawful sexual contact.

- e. Any communication to, from, or copying Jeffrey Epstein involving the following topics:
- i. [REDACTED]
 - ii. Any females Epstein or his associates or representatives, including Maxwell, arranged for Prince Andrew to meet.
 - iii. Any females Epstein or his associates or representatives, including Maxwell, arranged for other adult men to meet.
 - iv. Massage, massages, and/or masseuses.
 - v. Any investigation into Epstein or his associates or representatives, including but not limited to any prosecutions brought by the U.S. authorities against Epstein.
 - vi. Any civil lawsuits threatened or brought against Prince Andrew, Maxwell, and/or their associates.
 - vii. Any reference to or evidence of the destruction of evidence, the obstruction of investigations, or other efforts to conceal criminal activity by Epstein, Maxwell, or their associates.
 - viii. Any payments made, in cash or in kind, to Maxwell, Epstein, or their representatives or associates.
 - ix. Any sexual encounters and/or romantic relationships involving Prince Andrew and any female he met through Maxwell and/or Epstein.
 - x. The involvement of Epstein and/or any associate of Epstein's in recruiting, enticing, transporting or trafficking minors for the purpose of engaging in unlawful sexual contact

CONCLUSION

We thank you for your assistance with this matter of Material Witness PA and ask that you keep us apprised of all developments.

3 April 2020
Date



Jason E. Carter
Associate Director
Office of International Affairs
Criminal Division
U.S. Department of Justice

ATTACHMENT A

The Jeffrey Epstein Investigation

The U.S. Authorities would seek to question Prince Andrew regarding the following topics during a voluntary interview:

1. The history and nature of Prince Andrew's relationship with Jeffrey Epstein.
2. The history and nature of Prince Andrew's relationship with Ghislaine Maxwell.
3. The history and nature of Prince Andrew's relationship with [REDACTED].
4. The details regarding any trips Prince Andrew took with and/or to visit Maxwell and/or Epstein.
5. The details regarding any trips Maxwell and/or Epstein took to visit Prince Andrew.
6. The details regarding any payments Prince Andrew made to or received from Maxwell, Epstein, or any female associated with Maxwell and/or Epstein.
7. The names and identifying features of any females Prince Andrew met through Epstein and/or Maxwell.
8. The details of any conversations Prince Andrew 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.
9. The details of Prince Andrew's interactions with and/or conversations regarding [REDACTED].
10. Communications, including email correspondence, between Prince Andrew and Maxwell regarding Maxwell's attempts to introduce Prince Andrew to females.
11. Any knowledge Prince Andrew had or may have had of inappropriate relationships, including improper or unlawful sexual contact, involving Epstein and/or his associates with any minor.
12. Prince Andrew's involvement, if any, in any sexual contact and/or relationship with any person Prince Andrew met through or with Epstein and/or Maxwell.

The Peter Nygard Investigation

1. The history and nature of Prince Andrew's relationship with Peter Nygard.
2. The details regarding any trips Prince Andrew took with and/or to visit Nygard.
3. The details of any trips Prince Andrew took to Nygard Cay, whether or not Nygard was present.
4. The names and/or descriptions of any females Prince Andrew met through Nygard or at Nygard Cay.

ATTACHMENT B

PROFFER AGREEMENT

With respect to the meeting of _____ (“Client”) and his attorney, _____, Esq., with Assistant United States Attorney _____ to be held at the Office of the United States Attorney for the Southern District of New York on [Meeting Date] (“the meeting”), the following understandings exist:

(1) **THIS IS NOT A COOPERATION AGREEMENT.** The Client has agreed to provide the Government with information, and to respond to questions, so that the Government may evaluate Client’s information and responses in making prosecutive decisions. By receiving Client’s proffer, the Government does not agree to make a motion on the Client’s behalf or to enter into a cooperation agreement, plea agreement, immunity or non-prosecution agreement. The Government makes no representation about the likelihood that any such agreement will be reached in connection with this proffer.

(2) In any prosecution brought against Client by this Office, except as provided below the Government will not offer in evidence on its case-in-chief, or in connection with any sentencing proceeding for the purpose of determining an appropriate sentence, any statements made by Client at the meeting, except (a) in a prosecution for false statements, obstruction of justice or perjury with respect to any acts committed or statements made during or after the meeting or testimony given after the meeting; or (b) if, at any time following the meeting, Client becomes a fugitive from justice.

(3) Notwithstanding item (2) above: (a) the Government may use information derived directly or indirectly from the meeting for the purpose of obtaining leads to other evidence, which evidence may be used in any prosecution of Client by the Government; (b) in any prosecution brought against Client, the Government may use statements made by Client at the meeting and all evidence obtained directly or indirectly therefrom for the purpose of cross-examination should Client testify; and (c) the Government may also use statements made by Client at the meeting to rebut any evidence or arguments offered by or on behalf of Client (including arguments made or issues raised sua sponte by the District Court) at any stage of the criminal prosecution (including bail, all phases of trial, and sentencing) in any prosecution brought against Client.

(4) The Client understands and agrees that in the event the Client seeks to qualify for a reduction in sentence under Title 18, United States Code, Section 3553(f), United States Sentencing Guidelines, Sections 2D1.1(b)(18) or 5C1.2, or Fed. R. Crim. P. 35(b), the Office may offer or use at any stage of the criminal proceeding any statement made by Client during the meeting, and all evidence obtained directly or indirectly therefrom, to the extent such use is consistent with Section 402 of the First Step Act of 2018.

(5) To the extent that the Government is entitled under this Agreement to offer in evidence any statements made by Client or leads obtained therefrom, Client shall assert no claim under the United States Constitution, any statute, Rule 410 of the Federal Rules of Evidence, or

any other federal rule that such statements or any leads therefrom should be suppressed. It is the intent of this Agreement to waive all rights in the foregoing respects.

(6) If this Office receives a request from another prosecutor's office for access to information obtained pursuant to this Proffer Agreement, this Office may furnish such information but will do so only on the condition that the requesting office honor the provisions of this Agreement.

(7) It is further understood that this Agreement is limited to the statements made by Client at the meeting and does not apply to any oral, written or recorded statements made by Client at any other time. No understandings, promises, agreements and/or conditions have been entered into with respect to the meeting other than those set forth in this Agreement and none will be entered into unless in writing and signed by all parties.

(8) The understandings set forth in paragraphs 1 through 7 above extend to the continuation of this meeting on the dates that appear below.

(9) Client and Attorney acknowledge that they have fully discussed and understand every paragraph and clause in this Agreement and the consequences thereof.

Dated: New York, New York

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

Client

by: _____
Assistant United States Attorney

Attorney for Client

Witness

ATTACHMENT C

The Jeffrey Epstein Investigation

1. Please provide a list of all dates of travel or visits to any of the following locations:
 - a. An Epstein-owned property located at 358 El Brillo Way, Palm Beach, Florida
 - b. An Epstein-owned private island known as "Little St. James," located in the U.S. Virgin Islands
 - c. An Epstein-owned mansion located at 9 East 71st Street, New York, New York
 - d. An Epstein-owned property known as "Zorro Ranch," located in Santa Fe, New Mexico
2. For any dates provided for Question 1, please provide the following information:
 - a. Length of visit;
 - b. The names of any other individuals who were part of the visit, including family members and security detail;
 - c. The names of any other individuals who were present at the property at the time;
 - d. Any related itineraries or schedules; and
 - e. Whether Prince Andrew observed any females who appeared to be, or stated that they were, under the age of 18 years old, the names of any of those females, any other observations Prince Andrew made of those females or conversations Prince Andrew had or witnessed involving those females, and whether Prince Andrew himself engaged in any sexual contact involving any of those females.
3. Please describe the history and nature of Prince Andrew's relationship with Ghislaine Maxwell, including but not limited to how they met, how frequently they were in contact during the general time period 1994-2005, how they communicated, and when they most recently communicated.
4. Please describe the history and nature of Prince Andrew's relationship with Jeffrey Epstein, including but not limited to how they met, how frequently they were in contact during the general time period 1994-2005, how they communicated, and when they most recently communicated.
5. Please describe the history and nature of Prince Andrew's relationship with [REDACTED], including but not limited to any sexual interactions between Prince Andrew and [REDACTED], as well as the history and nature of any relationship between [REDACTED] and Maxwell, or [REDACTED] and Epstein.
6. Please identify the approximate date(s) of any oral or written communications between Ghislaine Maxwell or any other individual acting as an agent, intermediary, and/or representative for Ghislaine Maxwell and any agent, intermediary, and/or representative for Prince Andrew at any time, regarding any of the following topics:
 - a. Females associated with Ghislaine Maxwell;
 - b. Females Ghislaine Maxwell or her representative arranged for Prince Andrew to meet;

- c. Females Ghislaine Maxwell or her representative arranged for other adult men to meet;
 - d. [REDACTED];
 - e. The nature of Ghislaine Maxwell's relationship with Jeffrey Epstein;
 - f. Massage, massages, and/or masseuses.
 - g. Any investigation into Epstein or his associates, including but not limited to any prosecutions brought by the U.S. authorities against Epstein.
 - h. Any civil lawsuits threatened or brought against Prince Andrew, Maxwell, and/or their associates.
 - i. Any attempts to destroy evidence, obstruct or impede ongoing investigations, or otherwise cover up criminal activity by Epstein, Maxwell, or their associates.
 - j. Any payments Maxwell received or expected to receive from Epstein for attorneys' fees or otherwise.
7. For any communications identified in response to Question 6, please provide the following information:
- a. Contact information, including phone numbers and email addresses for Ghislaine Maxwell and/or any other individual acting as an agent, intermediary, and/or representative for Ghislaine Maxwell;
 - b. Contact information, including phone numbers and email addresses for any individual acting as an agent, intermediary, and/or representative for Prince Andrew; and
 - c. Subject matter of the communications. Please be as detailed as possible. In particular, please describe any communications regarding the following topics:
 - i. Females associated with Ghislaine Maxwell;
 - ii. Females Ghislaine Maxwell or her representative arranged for Prince Andrew to meet;
 - iii. Females Ghislaine Maxwell or her representative arranged for other adult men to meet;
 - iv. [REDACTED];
 - v. The nature of Ghislaine Maxwell's relationship with Jeffrey Epstein;
 - vi. Massage, massages, and/or masseuses.
 - vii. Any investigation into Epstein or his associates, including but not limited to any prosecutions brought by the U.S. authorities against Epstein.
 - viii. Any civil lawsuits threatened or brought against Prince Andrew, Maxwell, and/or their associates.
 - ix. Any attempts to destroy evidence, obstruct or impede ongoing investigations, or otherwise cover up criminal activity by Epstein, Maxwell, or their associates.
 - x. Any payments Maxwell received or expected to receive from Epstein for attorneys' fees or otherwise.
8. Please identify the approximate date(s) of any oral or written communications between Jeffrey Epstein or any other individual acting as an agent, intermediary, and/or representative for Jeffrey Epstein and any agent, intermediary, and/or representative for Prince Andrew at any time, regarding any of the following topics:

- a. Females associated with Jeffrey Epstein;
 - b. Females Jeffrey Epstein or his representative arranged for Prince Andrew to meet;
 - c. Females Jeffrey Epstein or his representative arranged for other adult men to meet;
 - d. [REDACTED];
 - e. The nature of Ghislaine Maxwell's relationship with Jeffrey Epstein;
 - f. Massage, massages, and/or masseuses.
 - g. Any investigation into Epstein or his associates, including but not limited to any prosecutions brought by the U.S. authorities against Epstein.
 - h. Any civil lawsuits threatened or brought against Epstein and/or his associates.
 - i. Any attempts to destroy evidence, obstruct or impede ongoing investigations, or otherwise cover up criminal activity by Epstein, Maxwell, or their associates.
 - j. Any payments Epstein made or intended to make to Maxwell for attorneys' fees or otherwise.
9. For any communications identified in response to Question 8, please provide the following information:
- a. Contact information, including phone numbers and email addresses for Jeffrey Epstein and/or any other individual acting as an agent, intermediary, and/or representative for Jeffrey Epstein;
 - b. Contact information, including phone numbers and email addresses for any individual acting as an agent, intermediary, and/or representative for Prince Andrew; and
 - c. Subject matter of the communications. Please be as detailed as possible. In particular, please describe any communications regarding the following topics:
 - i. Females associated with Jeffrey Epstein;
 - ii. Females Jeffrey Epstein or his representative arranged for Prince Andrew to meet;
 - iii. Females Jeffrey Epstein or his representative arranged for other adult men to meet;
 - iv. [REDACTED];
 - v. The nature of Ghislaine Maxwell's relationship with Jeffrey Epstein;
 - vi. Massage, massages, and/or masseuses.
 - vii. Any investigation into Epstein or his associates, including but not limited to any prosecutions brought by the U.S. authorities against Epstein.
 - viii. Any civil lawsuits threatened or brought against Epstein and/or his associates.
 - ix. Any attempts to destroy evidence, obstruct or impede ongoing investigations, or otherwise cover up criminal activity by Epstein, Maxwell, or their associates.
 - x. Any payments Epstein made or intended to make to Maxwell for attorneys' fees or otherwise.
10. Please identify the approximate date(s) of any oral or written communications between [REDACTED] or any other individual acting as an agent, intermediary, and/or

representative for [REDACTED] and any agent, intermediary, and/or representative for Prince Andrew

11. For any communications identified in response to Question 10, please provide the following information:
 - a. Contact information, including phone numbers and email addresses for [REDACTED] and/or any other individual acting as an agent, intermediary, and/or representative for [REDACTED];
 - b. Contact information, including phone numbers and email addresses for any individual acting as an agent, intermediary, and/or representative for Prince Andrew; and
 - c. Subject matter of the communications.
 - d. Nature of Prince Andrew's interactions with [REDACTED].
12. Please identify the approximately date(s) and locations of any meetings or other interactions with [REDACTED], including the nature and/or purpose of the meeting, the approximate duration of the meeting, the name(s) of any other persons present for the meeting, and a detailed account of what occurred at the meeting.
13. Please identify any payments made, in any form including by cash or in kind, to Prince Andrew by Ghislaine Maxwell or any other individual acting as an agent, intermediary, and/or representative for Ghislaine Maxwell. Please include travel, lodging, or other expenses paid in connection with any trip to visit Ghislaine Maxwell.
14. Please identify any payments made, in any form including by cash or in kind, to Ghislaine Maxwell or any other individual acting as an agent, intermediary, and/or representative for Ghislaine Maxwell from or on behalf of Prince Andrew.
15. Please identify any payments made, in any form including by cash or in kind, to Prince Andrew by Jeffrey Epstein or any other individual acting as an agent, intermediary, and/or representative for Jeffrey Epstein. Please include travel, lodging, or other expenses paid in connection with any trip to visit Jeffrey Epstein.
16. Please identify any payments made, in any form including by cash or in kind, to Jeffrey Epstein or any other individual acting as an agent, intermediary, and/or representative for Jeffrey Epstein well from or on behalf of Prince Andrew.
17. Please identify any payments made, in any form including by cash or in kind, to [REDACTED] or any other individual acting as an agent, intermediary, and/or representative for [REDACTED] well from or on behalf of Prince Andrew.
18. Please identify any payments made, in any form including by cash or in kind, to any female Prince Andrew met through Ghislaine Maxwell and/or Jeffrey Epstein, or any other individual acting as an agent, intermediary, and/or representative for any such female from or on behalf of Prince Andrew.

19. Please identify any sexual encounters and/or romantic relationships involving Prince Andrew and any female he met through Maxwell and/or Epstein. In particular, please describe how Prince Andrew met any such female and detail any communications Prince Andrew had regarding any such female with Maxwell, Epstein, and/or any associates of Maxwell and/or Epstein.
20. Please provide any information, based on, among other things, any of the interactions or communications responsive to any question above, about the involvement of Jeffrey Epstein and/or any associate of Epstein's in recruiting, enticing, transporting or trafficking minors for the purpose of engaging in unlawful sexual contact.

The Peter Nygard Investigation

1. Please provide a list of all dates of travel or visits to any of the following locations:
 - a. Nygard Cay, Bahamas
 - b. Lyford Cay, Bahamas
 - c. 1 Yawl Street, Marina Del Rey, CA
 - d. 17 Yawl Street, Marina Del Rey, CA
 - e. 1435 Broadway, New York, New York
2. For any dates provided for Question 1, please provide the following information:
 - a. Length of visit;
 - b. The names of any other individuals in party, including family members and security detail;
 - c. The names of any other individuals who were present at the property at the time;
 - d. Any related itineraries or schedules; and
 - e. Whether Prince Andrew observed any females who appeared to be, or stated that they were, under the age of 18 years old, and the names of any of those females.
3. Please identify the approximate date(s) of any oral or written communications between Peter Nygard or any other individual acting as an agent, intermediary, and/or representative for Peter Nygard and any agent, intermediary, and/or representative for Prince Andrew.
4. For any communications identified in response to Question 3, please provide the following information:
 - a. Contact information, including phone numbers and email addresses for Peter Nygard and/or any other individual acting as an agent, intermediary, and/or representative for Peter Nygard;
 - b. Contact information, including phone numbers and email addresses for any individual acting as an agent, intermediary, and/or representative for Prince Andrew; and
 - c. Subject matter of the communications. Please be as detailed as possible.
5. Please identify any payments made, in any form including by cash or in kind, to Prince Andrew by Peter Nygard or any other individual acting as an agent, intermediary, and/or

representative for Peter Nygard. Please include travel, lodging, or other expenses paid in connection with any visit to Nygard Cay, Bahamas.

6. Please identify any payments made, in any form including by cash or in kind, to Peter Nygard or any other individual acting as an agent, intermediary, and/or representative for Peter Nygard from or on behalf of Prince Andrew.