

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the Matter of the Application of the United States Of America for a Search and Seizure Warrant for 27 electronic devices seized on August 12, 2019 from Little Saint James in the Virgin Islands.

TO BE FILED UNDER SEAL

**Agent Affidavit in Support of
Application for Search and Seizure
Warrant**

SOUTHERN DISTRICT OF NEW YORK) ss.:

██████████, being duly sworn, deposes and says:

I. Introduction

A. Affiant

1. I have been a Task Force Officer with the Federal Bureau of Investigation (“FBI”) since 2017. As such, I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I am also a detective with the New York Police Department (“NYPD”) and have been employed by the NYPD for approximately thirteen years. I am currently assigned to investigate violations of criminal law relating to the sexual exploitation of children as part of an FBI Task Force. I have gained expertise in this area through classroom training and daily work related to these types of investigations. As part of my responsibilities, I have been involved in the investigation of sex trafficking cases, and have participated in the execution of search warrants for electronic devices and electronic storage media.

2. I make this Affidavit in support of an application pursuant to Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the electronic device specified below (the “Subject Device”) for the items and information described in Attachment A. This affidavit is based

upon my personal knowledge; my review of documents and other evidence; my conversations with other law enforcement personnel; and my training, experience and advice received concerning the use of computers in criminal activity and the forensic analysis of electronically stored information (“ESI”). Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

B. The Subject Devices

3. The Subject Devices were all recovered from a search of a private island in the U.S. Virgin Islands, known as Little Saint James, which is an approximately 75 acre island located approximately four miles off the southeast coast of St. Thomas Island (the “Virgin Islands Residence”) on or about August 12, 2019. The Virgin Islands Residence consists of multiple structures, including a main residence as well as several other smaller structures on the island, including a pool house, sheds, a beach house, an office, and multiple cabanas. However, as detailed below, JEFFREY EPSTEIN, who was a Target Subject of this Investigation until his death in August 2019, is the only known occupant of the Virgin Islands Residence. The Subject Devices are particularly described as follows:

- a. A gray Mac desktop computer labeled “kitchen mac,” which was recovered from a desk in the main residence on the island (“Subject Device-1”);
- b. A silver Mac laptop labeled “JE big laptop,” bearing serial number W89111772QT, which was recovered from a desk in the main residence on the island (“Subject Device-2”);
- c. A silver MacBook Pro bearing serial number c02qm0gugwdp, which was recovered from a desk in the main residence on the island (“Subject Device-3”);

- d. A silver iPad model A1567 bearing serial number dmpql25ng5ypy, which was recovered from a desk in the main residence (“Subject Device-4”);
- e. A silver iPad model A1567 bearing serial number dmpql1rmg5y, which was recovered from a desk in the main residence (“Subject Device-5”);
- f. A silver Mac desktop computer bearing serial number c02nm1m0fy14, which was recovered from a desk in the pool house on the island (“Subject Device-6”);
- g. A silver Mac desktop computer, which was recovered from a desk in a cabana on the island (“Subject Device-7”);
- h. A Toshiba Laptop, which was recovered from a box on the floor near a desk in a shed on the island (“Subject Device-8”);
- i. An HP laptop bearing serial number cnd81368v5, which was recovered from a desk in a shed on the island (“Subject Device-9”);
- j. A silver Mac desktop computer, which was recovered from a desk in a cabana on the island (“Subject Device-10”);
- k. A silver Macbook desktop computer, which was recovered from a desk in a cabana on the island (“Subject Device-11”);
- l. A Dell Inspiron Tower computer model D19M QCNFA335, which was recovered from a desk in the beach house on the island (“Subject Device-12”);
- m. A silver Mac desktop computer model A1311 bearing serial number W804736DDAS, which was recovered from a desk in the beach house on the island (“Subject Device-13”);
- n. A Unfi video bearing mac ID 1829f b4fbe426ea90, which was recovered from a server rack inside a shed on the island (“Subject Device-14”);

- o. A Unifi Server bearing mac ID 1735K 788A20463234-8uuu9f, which was recovered from a server rack inside a shed in on the island (“Subject Device-15”);
- p. An HP server with four 500 GB drives, bearing serial number MXQ3220187, which was recovered from a shed on the island (“Subject Device-16”);
- q. A Panasonic KX TDE100 computer bearing serial number KX-TDa0104 9LCCD005398, which was found on a server rack in a shed on the island (“Subject Device-17”);
- r. A 6 bay with 146 GB drives bearing serial number MXQ824A1R, which was found on a server rack in a shed on the island (“Subject Device-18”);
- s. A silver Mac desktop computer, which was recovered from a desk in a cabana on the island (“Subject Device-19”);
- t. An HP desktop tower model 260-A010, bearing serial number cnv7160050, which was recovered from the maintenance office on the island (“Subject Device-20”);
- u. An HP tower model 260-A010, bearing serial number cnv716004y, which was recovered from the maintenance office on the island (“Subject Device-21”);
- v. A Mac desktop computer model A1312, bearing serial number w89524czspj, which was recovered from the maintenance office on the island (“Subject Device-22”);
- w. A Lenovo tower machine type 90J0, bearing serial number mj07yg6u, which was recovered the maintenance office on the island (“Subject Device-23”);
- x. A Lenovo tower bearing serial number 153306g2umjxekgx, which was recovered the maintenance office on the island (“Subject Device-24”);
- y. An HP Tower bearing serial number CNV74213Ms 570-P056, which was recovered the maintenance office on the island (“Subject Device-25”);

- z. A Unifi cloudkey with FCCID: SWX-UCCK IC 6545A-UCCK and Mac ID 1843kb4fbe4d30c69-dcrgm9, which was found on a server rack in a shed on the island (“Subject Device-26”); and
 - aa. A red Nikon digital camera, which was recovered on a file cabinet next to a desk in a cabana on the island (“Subject Device-27”).
4. Subject Device-1 through Subject Device-25 are all computers and/or storage devices capable of storing electronic picture and message files.
5. Subject Device-26 is a device that identifies a user to a service over the Internet. It acts as a key that allows users to access other data on other devices, such as Subject Device-1 through Subject Device-25.
6. Subject Device-27 is a digital camera capable of taking and storing electronic picture files.
7. The Subject Devices have all been transported by the FBI from the Virgin Islands to FBI offices in the Southern District of New York. At this time, all of the Subject Devices are presently located in the Southern District of New York.

C. The Subject Offenses

8. For the reasons detailed below, I believe that there is probable cause to believe that the Subject Device contains evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Sections 1591 (sex trafficking of minors), and 371 (sex trafficking conspiracy) (the “Subject Offenses”). The Target Subjects of this investigation are known and unknown co-conspirators of JEFFREY EPSTEIN, including but not limited to [REDACTED] [REDACTED].

II. Probable Cause and the Initial Search Warrants

A. Probable Cause Regarding the Target Subjects' Commission of the Subject Offenses

9. On or about July 2, 2019, a grand jury in the Southern District of New York returned an Indictment charging JEFFREY EPSTEIN with violations of Title 18, United States Code, Section 1591 (sex trafficking of minors); and Title 18, United States Code, Section 371 (sex trafficking conspiracy). A copy of the Indictment is attached hereto as Exhibit A and is incorporated by reference. EPSTEIN was arrested pursuant to the Indictment on or about July 6, 2019, and had been detained pending trial at the Metropolitan Correctional Center ("MCC") in New York, New York.

10. On or about August 10, 2019, the Bureau of Prisons confirmed that JEFFREY EPSTEIN had been found unresponsive in his cell at the MCC that morning, and was pronounced dead shortly thereafter.

11. Notwithstanding EPSTEIN's death, the sex trafficking investigation that led to his indictment remains ongoing. In particular, Count One of the Indictment alleged that EPSTEIN conspired with others to traffic minors, and further identified three individuals who worked for EPSTEIN (identified in Exhibit A as "Employee-1", "Employee-2," and "Employee-3") and facilitated EPSTEIN's abuse of minor girls by, among other things, arranging victims' encounters with EPSTEIN and paying victims after these encounters. The individual identified in Exhibit A as "Employee-2" is [REDACTED], a Target Subject of this investigation.

12. On or about November 28, 2018, the *Miami Herald* began publishing a series of articles relating to the defendant, his sexual misconduct with minors, and a previous investigation into his conduct in Florida from in or about 2005 through 2008. The article included information about [REDACTED] role in EPSTEIN's sexual abuse of minors. Based on my participation

in this investigation, I have learned that bank records obtained by the Government appear to show that just days later, on or about December 3, 2018, the defendant wired \$250,000 from a trust account to [REDACTED]. This course of action, and in particular its timing, suggests that EPSTEIN was attempting to influence [REDACTED], who might have been able to provide information against him in light of the recently re-emerging allegations.

13. As set forth in Exhibit A, from at least in or about 2002, up to and including at least in or about 2005, JEFFREY EPSTEIN sexually abused multiple minor girls in Manhattan, New York; West Palm Beach, Florida; and elsewhere. During that time and continuing to the present, EPSTEIN possessed and controlled a residence, which is described in Exhibit A as “the New York Residence.”

14. As further set forth in paragraphs 8 through 10 of Exhibit A, from at least in or about 2002, up to and including at least in or about 2005, EPSTEIN sexually abused numerous minor victims at the New York Residence. In particular, and as alleged in the Indictment, when a victim arrived at the New York Residence, she would be escorted to a room inside the New York Residence with a massage table, where she would perform a massage on EPSTEIN. The victims, who were as young as 14 years of age, were told by EPSTEIN or other individuals to partially or fully undress before beginning the “massage.” During the encounter, EPSTEIN would escalate the nature and scope of physical contact with his victim to include, among other things, sex acts such as groping and direct and indirect contact with the victims’ genitals. EPSTEIN typically would also masturbate during these sexualized encounters, ask victims to touch him while he masturbated, and touch victims’ genitals with his hands or with sex toys. Following each encounter, EPSTEIN or one of his employees or associates paid the victim in cash.

15. As set forth in paragraphs 12 through 13 of Exhibit A, to further facilitate his ability to abuse minor girls in New York, JEFFREY EPSTEIN asked and enticed certain of his victims to recruit additional minor girls to perform “massages” and similarly engage in sex acts with EPSTEIN. When a victim would recruit another minor girl for EPSTEIN, he paid both the victim-recruiter and the new victim hundreds of dollars in cash. EPSTEIN knew that his victims were underage, including because certain victims told him their age.

16. One of the victims identified in paragraph 22 of Exhibit A is Victim-1. As part of the FBI’s investigation of EPSTEIN, I have participated in interviews with Victim-1, along with other law enforcement officers.¹ Based on my participation in those interviews and my conversations with other law enforcement officers, I know that Victim-1 has provided the following information, in substance and in part:

a. Between approximately 2002 and 2005, EPSTEIN sexually abused Victim-1 on multiple occasions in the New York Residence. This sexual abuse all occurred when Victim-1 was under the age of 18.

b. During that same period, Victim-1 observed multiple floors of the New York Residence and numerous individual rooms within the New York Residence. Victim-1 has provided detailed descriptions of certain aspects of the interior of the New York Residence, including Victim-1’s memory of specific details regarding the layout, furnishings, decorations, and

¹ In meetings with the Government, Victim-1 has disclosed that, approximately a decade ago, she committed marriage fraud in order to obtain a green card and, subsequently, U.S. citizenship. She has also disclosed personal substance abuse, primarily involving the abuse of prescription drugs, during various periods between the early 2000s and 2019. Victim-1 has also disclosed having worked for approximately a year at a “happy-ending” massage parlor, performing paid sex acts. Victim-1 is currently pursuing a civil damages claim against EPSTEIN for his sexual abuse of her. Information provided by Victim-1 has proven reliable and has been corroborated by independent evidence, including documents and records obtained during the investigation and the accounts of other victims whom Victim-1 has never met.

floor pattern of various areas within the New York Residence. Among other details, Victim-1 recalled that EPSTEIN typically abused her in a room she described as a “massage room,” (the “Massage Room”), which contained a massage table, and was decorated with artwork depicting naked women, hung on walls that appeared to be adorned with fabric. In describing the sexual abuse that occurred in the Massage Room, Victim-1 has stated that EPSTEIN would often touch her genital area with a vibrating sex toy during these abusive encounters.

The Search of the New York Residence

17. On or about July 6, 2019, the Honorable Barbara Moses, United States Magistrate Judge, signed a search warrant authorizing a search of the New York Residence. The search warrant is attached as Exhibit B and incorporated by reference herein.

18. At approximately 6 p.m. on or about July 6, 2019, law enforcement officers (the “Search Team”) commenced executing the search warrant at the New York Residence. JEFFREY EPSTEIN had been arrested on the charges contained in the Indictment shortly before the execution of the search warrant. Based on the Search Team’s observations during an initial search of the New York Residence, at approximately 7 p.m., the Search Team stopped the search and froze the scene in order to seek a new search warrant. On or about July 7, 2019, the Honorable Barbara Moses, United States Magistrate Judge, signed a search warrant authorizing a search of the New York Residence (the “Second Warrant”). The Second Warrant is attached as Exhibit C, and incorporated by reference herein. At approximately 2:30 a.m., the Search Team resumed the search, and commenced searching pursuant to the Second Warrant. Later on July 7, 2019, the Honorable Barbara Moses, United States Magistrate Judge, signed a third search warrant to search and seize certain electronic media stored on discs seized during the execution of the Second

Warrant (the “Compact Disc Search Warrant”). The Compact Disc Search Warrant is attached as Exhibit D, and incorporated by reference herein.

19. During the execution of the warrants described above in the New York Residence, the Search Team located evidence of the Subject Offenses. In particular, the Search Team located the following, among other things, the following:

a. Inside the New York Residence, the Search Team observed a room that, based on my participation in interviews of Victim-1, appears to be consistent with Victim-1’s descriptions of the Massage Room. The room contained a table covered with a sheet, and appeared to be a massage table. The room also contained several vibrating sex toys. The walls appeared to be covered in a type of felt-like tapestry fabric. I further observed two paintings and three photographs hanging on the walls of the Massage Room. The paintings and photographs depict nude females. One of the photographs appears to depict a nude girl. Thus, it appears that the Massage Room was in substantially the same condition as Victim-1 observed the room more than 18 years ago.

b. Inside a safe in a closet on the third floor, the Search team discovered and seized, among other items, several binders containing sleeves of compact discs, most of which are labeled with handwriting. In total, the binders contain dozens of compact discs. Some discs contain the word “Zorro” or “LSJ.” Based on my conversations with law enforcement agents who have participated in this investigation, I believe the name “Zorro” refers to Zorro Ranch, EPSTEIN’s property in New Mexico, and the name LSJ refers to Little Saint James, *i.e.*, the Virgin Islands Residence. The majority of the discs contain titles that include female names. Some of the discs in the binders seized by the Search Team have titles that appear to refer to trips or vacations.

c. In the drawer of a dresser in a room on the Fifth floor of the New York Residence, the Search team discovered and seized, among other items, a shoebox (the "Shoebox") containing numerous compact discs. The majority of the discs are labeled, in handwriting, with female names. One disc is marked "Thai Massage." Another disc is marked "Blonde Girl Photo Shoot." Yet another disc is marked "Misc. Girls Nude/Dinner--Scientists." The discs in the Shoebox were seized by the Search Team. In another drawer of that same dresser, the Search Team discovered loose polaroid photographs depicting young, nude females who, based on the training and experience of law enforcement officers who observed them, appear to be teenagers.

d. In a closet on the Fifth Floor of the Manhattan Residence, the Search Team discovered, among other items, a box marked "women/old photos." The box contained, among other items, approximately seven compact discs, which are labeled with hand-written titles. One disc is marked "nudes 00-24." Another is labeled "Photographer--[REDACTED] '03" The remaining discs contain titles that include female names. All of the foregoing discs were seized by the Search Team.

e. In that same closet, the Search Team discovered numerous black binders containing what appear to be print outs of digital photographs (with file names underneath) and compact discs. The binders appeared to contain, among other photographs, photographs of nude or partially nude young girls, some of which are in sexually suggestive poses. Based on the training and experience of law enforcement officers who observed them, some of the young girls appear to be teenagers, some of whom appear to be under the age of 18.

The Virgin Islands Residence

20. Based on my review of property records, I believe that JEFFREY EPSTEIN has been the owner of the Virgin Islands Residence since at least in or about 1998. In particular, it

appears that an entity named “L.S.J., LLC” held title to the Virgin Islands Residence from in or about 1998. In or about 2011, L.S.J., LLC transferred title to the Virgin Islands Residence to an entity named “Nautilus, Inc.,” for \$10. On the transfer paperwork, EPSTEIN signed as the “sole member” of L.S.J., LLC and as the “president and sole beneficial owner” of Nautilus, Inc.

21. In addition, I believe that up until his arrest, the Virgin Islands Residence was JEFFREY EPSTEIN’s principal residence. In particular, I have reviewed sex offender registration data, and have learned that, on or about June 17, 2019, EPSTEIN listed the Virgin Islands Residence as his primary residence. At the time of EPSTEIN’s arrest on or about July 6, 2019, I and other law enforcement officers conducted an inventory search of EPSTEIN’s personal effects, and observed that EPSTEIN was carrying a driver’s license that listed the Virgin Islands Residence as EPSTEIN’s home address.

22. Based on my participation in this investigation, I have reason to believe that EPSTEIN and his co-conspirators committed the Subject Offences in and around the Virgin Islands Residence. Some of the evidence of that conduct was recovered from the New York Residence. In particular, based on my conversations with law enforcement agents who have conducted an initial review (the “Reviewing Agents”) of the compact discs seized at the New York Residence as described in paragraphs 15(b)-(e) above (the “Seized Discs”), I have learned that the discs contain approximately thousands of nude or partially nude photographs of girls or young women, many of which are in sexually suggestive poses. Based on my conversations with the Reviewing Agents, who have particular training and experience relating to child erotica and visual depictions of children in child exploitation cases, I have learned that the Reviewing Agents believe that many of the nude or partially nude images they have reviewed appear to depict girls under the age of 18. Certain of these images appear to have been taken at a tropical location, and/or were labeled “LSJ”

either in the image file name, or on the compact disc that contained the image. Based on the foregoing, I believe that a portion of the foregoing photographs appear to have been taken at the Virgin Islands Residence. In addition, I have learned that some of the file names are marked "SK" which are the initials of [REDACTED] [REDACTED]. As set forth below, I have interviewed an individual who has reported that [REDACTED] [REDACTED] photographed her at the Virgin Islands Residence. Accordingly, I believe that a portion of these photos may have been taken by [REDACTED] [REDACTED].

23. Further, based on my conversations with law enforcement agents who have conducted an initial review of the Seized Discs, I have learned the following:

a. Many of the photographs appear to be labeled with file names that include "LSJ," which I believe stands for Little St. James, which is the name of the Virgin Islands Residence.

b. As discussed above, photographs seized from the New York Residence appear to depict nude or partially nude young girls, and a portion of those photos appear to have been taken at the Virgin Islands Residence, based on the fact that (i) some of the photos appear to have been taken in a tropical location, and (ii) some of the file names of the photographs and/or the labels on the discs containing the files of nude or partially nude young girls in a tropical location are marked "LSJ," *i.e.*, the Virgin Islands Residence.

c. Among the photographs seized from the New York Residence, the Reviewing Agents identified partially-nude photographs of a young girl, labeled with the name of a particular individual ("Individual-1"). The photographs appear to depict Individual-1 on a beach in what appears to be a tropical location similar to the landscape of the Virgin Islands Residence.

24. In or about August 2019, I participated in an interview of Individual-1, with her counsel present. Based on my personal observations, I believe that the photographs described in Paragraph 21(c) depict Individual-1. I have also spoken with another law enforcement agent who

interviewed Individual-1 on a separate occasion in or about July 2019, with her counsel present. During the course of these interviews, Individual-1 stated, in sum a substance that she met EPSTEIN in 2003 when she was approximately 17, and that she travelled to several of EPSTEIN's properties, including properties in New Mexico, Florida, and the U.S. Virgin Islands, *i.e.*, the Virgin Islands Residence, before she turned 18. EPSTEIN paid for the trips, and would give Individual-1 money and gifts while she traveled with him. During these trips, EPSTEIN sexually abused and assaulted Individual-1 on approximately four different occasions, all of which occurred before she turned 18. Individual-1 reported that EPSTEIN raped her during two of these incidents. Individual-1 recalled that one or more of these instances of sexual abuse occurred on the Virgin Islands Residence. Individual-1 further reported that, when she was approximately 17, ██████████ ██████████ asked to photograph her, and did in fact photograph Individual-1 at the Virgin Islands Residence.

25. In or about August 2019, I and another law enforcement officer interviewed an individual ("Individual-2") who regularly performed work for JEFFREY EPSTEIN as a contractor at the Virgin Islands Residence from approximately 1999 to 2005 or 2006. Individual-2 reported that, on several occasions, Individual-2 observed photographs of what appeared to be nude or partially nude young girls in several locations throughout the main residence of the Virgin Islands Residence. Individual-2 recalled a photograph depicting ██████████ ██████████ and two girls, all of three whom were topless; Individual-2 estimated that the two girls in the photograph appeared to be approximately 15 or 16 years old. Individual-2 knew ██████████ to be EPSTEIN's assistant at that time.

26. Based on my review of flight logs from a private jet owned by JEFFREY EPSTEIN, I have learned that ██████████ ██████████ traveled to the U.S. Virgin Islands at least approximately

once a month between October 2001 and November of 2005. These records do not include any travel [REDACTED] may have taken on commercial airlines.

27. For all of these reasons, I am aware that [REDACTED] [REDACTED] has spent significant time at the Virgin Islands Residence and that evidence of her involvement, and potentially the involvement of other co-conspirators, may be located at the Virgin Islands Residence. In particular, flight logs from EPSTEIN's private jet reflect that the individual identified in the Indictment as "Employee-3" traveled to the U.S. Virgin Islands on approximately nine separate occasions. These records do not include any travel Employee-3 may have taken on commercial airlines. As set forth in the Indictment, Employee-3 scheduled victims' encounters with EPSTEIN.

The Search of the Virgin Islands Residence

28. On or about August 11, 2019, United States Magistrate Judge Ruth Miller of the District of the Virgin Islands signed a warrant authorizing the search of the Virgin Islands Residence (the "Virgin Islands Warrant"). The Virgin Islands Warrant is attached as Exhibit E, and incorporated by reference herein. The next day, other law enforcement agents and I executed the Virgin Islands Warrant at the Virgin Islands Residence.

29. Based on my personal participation in the August 12, 2019 search of the Virgin Islands Residence, as well as my conversations with other law enforcement agents who participated in that same search, and my review of documents prepared by other law enforcement agents who participated in that same search, I have learned that during the August 12, 2019 search of the Virgin Islands Residence:

- a. Subject Device-1 was recovered from a desk in the main residence on the island.
- b. Subject Device-2 was recovered from a desk in the main residence on the island.
- c. Subject Device-3 was recovered from a desk in the main residence on the island.

- d. Subject Device-4 was recovered from a desk in the main residence on the island.
- e. Subject Device-5 was recovered from a desk in the main residence on the island.
- f. Subject Device-6 was recovered from a desk in the pool house on the island.
- g. Subject Device-7 was recovered from a desk in a cabana on the island.
- h. Subject Device-8 was recovered from a box on the floor near a desk in a shed on the island.
- i. Subject Device-9 was recovered from a desk in a shed on the island.
- j. Subject Device-10 was recovered from a desk in a cabana on the island.
- k. Subject Device-11 was recovered from a desk in a cabana on the island.
- l. Subject Device-12 was recovered from a desk in the beach house on the island.
- m. Subject Device-13 was recovered from a desk in the beach house on the island.
- n. Subject Device-14 was recovered from a server rack inside a shed on the island.
- o. Subject Device-15 was recovered from a server rack inside a shed in on the island.
- p. Subject Device-16 was recovered from a shed on the island.
- q. Subject Device-17 was found on a server rack in a shed on the island.
- r. Subject Device-18 was found on a server rack in a shed on the island.
- s. Subject Device-19 was recovered from a desk in a cabana on the island.
- t. Subject Device-20 was recovered from the maintenance office on the island.
- u. Subject Device-21 was recovered from the maintenance office on the island.
- v. Subject Device-22 was recovered from the maintenance office on the island.
- w. Subject Device-23 was recovered the maintenance office on the island.
- x. Subject Device-24 was recovered the maintenance office on the island.
- y. Subject Device-25 was recovered the maintenance office on the island.

- z. Subject Device-26 was found on a server rack in a shed on the island.
- aa. Subject Device-27 was recovered on a file cabinet next to a desk in a cabana on the island.

B. Probable Cause Justifying Search of the Subject Devices

30. Based on my training, experience, and participation in this investigation, I believe that there is probable cause that evidence of the Subject Offenses, such as photographs of EPSTEIN's victims and co-conspirators, will be found on the Subject Devices. In particular, information provided by Individual-1, with whom EPSTEIN engaged in sex acts at the Virgin Islands Residence while Individual-1 was a minor, confirms that EPSTEIN engaged in conduct relevant to the Subject Offenses at the Virgin Islands Residence. In addition, photographs on the Seized Discs recovered during the search of the New York Residence depict other young and partially nude girls photographed at the Virgin Islands Residence, which suggests that EPSTEIN brought those girls to the Virgin Islands Residence and that, consistent with the accounts provided by Individual-1, Victim-1 and other victims identified in the Indictment, EPSTEIN likely sexually abused them at the Virgin Islands Residence and maintained evidence of that abuse there on the Subject Devices. Moreover, evidence of co-conspirators' presence at the Virgin Islands Residence at times when victims were abused, including photographs, may also be found on the Subject Devices. Indeed, as noted above, Individual-2 has observed a photograph of [REDACTED] partially-nude young girls at the Virgin Islands Residence, suggesting that similar photographs may have been saved on the Subject Devices. Similarly, there is probable cause to believe that evidence of victims' and/or co-conspirators' travel arrangements, contact information, and communications will be located on the Subject Devices.

31. Moreover, though the sexual abuse described above occurred principally between approximately 2002 and 2005, as evidence recovered from the New York Residence including the

Seized Discs makes clear, EPSTEIN continued to maintain substantial evidence of the Subject Offenses up until the time he was arrested in 2019. Indeed, as described above, in addition to the Seized Discs, Epstein continued to maintain a “massage room” complete with a massage table and various sex toys that remained similar in makeup and appearance to descriptions of the same room provided by Victim-1 based on Victim-1’s encounters with EPSTEIN in 2004. Accordingly, there is probable cause to believe that the Subject Devices, which were seized from a residence where EPSTEIN and his co-conspirators committed the Subject Offenses, will similarly contain evidence of the Subject Offenses.

32. In addition, I believe that evidence of the Subject Offenses, including but not limited to photographs/evidence created at the Virgin Islands Residence, may be located on the Subject Devices because (i) the Virgin Islands Residence was the location of multiple photo shoots of young girls; (ii) the Virgin Islands Residence appears to have been, for the last several years and up until the time of his arrest, EPSTEIN’s primary residence; and (iii) given its location, the Virgin Islands Residence is JEFFREY EPSTEIN’s most private residence. Therefore, given that EPSTEIN has maintained evidence of the Subject Offenses in the New York Residence, he is likely to have similarly maintained some of that evidence in the Subject Devices maintained at the Virgin Islands Residence. Moreover, given that there is probable cause to believe that JEFFREY EPSTEIN and others, including ██████████ ██████████, conspired to commit the Subject Offenses, evidence of EPSTEIN’s involvement in trafficking minors would also be relevant to the investigation of, and any future charges against, other members of the conspiracy, such as ██████████.

33. According to international flight records that I have reviewed, a private jet owned and utilized by Epstein has traveled to or from the U.S. Virgin Islands at least on or about April

14, 2019; May 5, 2019; May 18, 2019; and June 11, 2019. Accordingly, there is probable cause to believe that EPSTEIN was present at the Virgin Islands Residence a short time before the recovery of the Subject Devices.

34. Based on my training and experience in investigating individuals who engage in sex trafficking of minors, and who sexually exploit minors, such individuals often maintain photographs of their victims, and/or other erotic images of minors, at their residences. Individuals who engage in such offenses often hoard such images in the privacy of their residences. In particular, data related to their illegal activity is often stored on their computers.

35. In my training and experience, individuals who store nude and/or sexually suggestive photographs of minors on compact discs or other external storage devices typically access those images from computers and other electronic devices in order to view those images, and individuals who store such materials on compact discs typically store similar files on other computing devices and storage devices.

36. Like individuals engaged in any other kind of activity, individuals who engage in sex trafficking of minors store records relating to their illegal activity and to persons involved with them in that activity on electronic devices such as the Subject Device. Such records can include, for example, logs of online communications with co-conspirators; email correspondence; contact information of co-conspirators, including telephone numbers, email addresses, and identifiers for instant messaging and social medial accounts; travel records for victims and/or co-conspirators; payment records for victims and/or co-conspirators; and/or photographs of victims and/or co-conspirators. Individuals engaged in criminal activity often store such records in order to, among other things, (1) keep track of co-conspirator's contact information; (2) keep a record of illegal transactions for future reference; (3) remain in contact with co-conspirators and victims; (4) enable

payment of co-conspirators and victims; and (4) store exploitative photographs for future sexual gratification.

37. Computer files or remnants of such files can be recovered months or even years after they have been created or saved on an electronic device such as the Subject Devices. Even when such files have been deleted, they can often be recovered, depending on how the hard drive has subsequently been used, months or years later with forensics tools. Thus, the ability to retrieve information from the Subject Devices depends less on when the information was first created or saved than on a particular user's device configuration, storage capacity, and computer habits.

38. Based on the foregoing, I respectfully submit there is probable cause to believe that evidence of the Target Subjects' commission of the Subject Offenses is likely to be found on the Subject Devices.

III. Procedures for Searching ESI

A. Review of ESI

39. Law enforcement personnel (who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, agency personnel assisting the government in this investigation, and outside technical experts under government control) will review the ESI contained on the Subject Device for information responsive to the warrant.

40. In conducting this review, law enforcement may use various techniques to determine which files or other ESI contain evidence or fruits of the Subject Offenses. Such techniques may include, for example:

- surveying directories or folders and the individual files they contain (analogous to looking at the outside of a file cabinet for the markings it contains and opening a drawer believed to contain pertinent files);

- conducting a file-by-file review by “opening” or reading the first few “pages” of such files in order to determine their precise contents (analogous to performing a cursory examination of each document in a file cabinet to determine its relevance);
- “scanning” storage areas to discover and possibly recover recently deleted data; scanning storage areas for deliberately hidden files; and
- performing electronic keyword searches through all electronic storage areas to determine the existence and location of search terms related to the subject matter of the investigation. (Keyword searches alone are typically inadequate to detect all information subject to seizure. For one thing, keyword searches work only for text data, yet many types of files, such as images and videos, do not store data as searchable text. Moreover, even as to text data, there may be information properly subject to seizure but that is not captured by a keyword search because the information does not contain the keywords being searched.)

41. Law enforcement personnel will make reasonable efforts to restrict their search to data falling within the categories of evidence specified in the warrant. Depending on the circumstances, however, law enforcement may need to conduct a complete review of all the ESI from the Subject Device to locate all data responsive to the warrant.

B. Return of the Subject Device

42. If the Government determines that the Subject Device is no longer necessary to retrieve and preserve the data on the device, and that the Subject Device is not subject to seizure pursuant to Federal Rule of Criminal Procedure 41(c), the Government will return the Subject Device, upon request. Computer data that is encrypted or unreadable will not be returned unless law enforcement personnel have determined that the data is not (i) an instrumentality of the offense, (ii) a fruit of the criminal activity, (iii) contraband, (iv) otherwise unlawfully possessed, or (v) evidence of the Subject Offenses.

IV. Conclusion and Ancillary Provisions

43. Based on the foregoing, I respectfully request the court to issue a warrant to seize the items and information specified in Attachment A to this affidavit and to the Search and Seizure Warrant.

44. In light of the confidential nature of the continuing investigation, I respectfully request that this affidavit and all papers submitted herewith be maintained under seal until the Court orders otherwise.

Task Force Officer
Federal Bureau of Investigation

Sworn to before me on
September __, 2019

HON. JAMES L. COTT
UNITED STATES MAGISTRATE JUDGE

Attachment A

I. Devices Subject to Search and Seizure

The devices that are the subject of this search and seizure warrant (the “Subject Devices”) are described as follows:

The Subject Devices were all recovered from a search of a private island in the U.S. Virgin Islands, known as Little Saint James, which is an approximately 75 acre island located approximately four miles off the southeast coast of St. Thomas Island (the “Virgin Islands Residence”) on or about August 12, 2019. The Virgin Islands Residence consists of multiple structures, including a main residence as well as several other smaller structures on the island, including a pool house, sheds, a beach house, an office, and multiple cabanas. The Subject Devices are particularly described as follows:

- a. A gray Mac desktop computer labeled “kitchen mac,” which was recovered from a desk in the main residence on the island (“Subject Device-1”);
- b. A silver Mac laptop labeled “JE big laptop,” bearing serial number W89111772QT, which was recovered from a desk in the main residence on the island (“Subject Device-2”);
- c. A silver MacBook Pro bearing serial number c02qm0gugwdp, which was recovered from a desk in the main residence on the island (“Subject Device-3”);
- d. A silver iPad model A1567 bearing serial number dmpql25ng5ypy, which was recovered from a desk in the main residence (“Subject Device-4”);
- e. A silver iPad model A1567 bearing serial number dmpql1rmg5y, which was recovered from a desk in the main residence (“Subject Device-5”);
- f. A silver Mac desktop computer bearing serial number c02nm1m0fy14, which was recovered from a desk in the pool house on the island (“Subject Device-6”);
- g. A silver Mac desktop computer, which was recovered from a desk in a cabana on the island (“Subject Device-7”);
- h. A Toshiba Laptop, which was recovered from a box on the floor near a desk in a shed on the island (“Subject Device-8”);
- i. An HP laptop bearing serial number cnd81368v5, which was recovered from a desk in a shed on the island (“Subject Device-9”);
- j. A silver Mac desktop computer, which was recovered from a desk in a cabana on the island (“Subject Device-10”);

- k. A silver Macbook desktop computer, which was recovered from a desk in a cabana on the island (“Subject Device-11”);
- l. A Dell Inspiron Tower computer model D19M QCNFA335, which was recovered from a desk in the beach house on the island (“Subject Device-12”);
- m. A silver Mac desktop computer model A1311 bearing serial number W804736DDAS, which was recovered from a desk in the beach house on the island (“Subject Device-13”);
- n. A Unifi video bearing mac ID 1829f b4fbe426ea90, which was recovered from a server rack inside a shed on the island (“Subject Device-14”);
- o. A Unifi Server bearing mac ID 1735K 788A20463234-8uuu9f, which was recovered from a server rack inside a shed in on the island (“Subject Device-15”);
- p. An HP server with four 500 GB drives, bearing serial number MXQ3220187, which was recovered from a shed on the island (“Subject Device-16”);
- q. A Panasonic KX TDE100 computer bearing serial number KX-TDa0104 9LCCD005398, which was found on a server rack in a shed on the island (“Subject Device-17”);
- r. A 6 bay with 146 GB drives bearing serial number MXQ824A1R, which was found on a server rack in a shed on the island (“Subject Device-18”);
- s. A silver Mac desktop computer, which was recovered from a desk in a cabana on the island (“Subject Device-19”);
- t. An HP desktop tower model 260-A010, bearing serial number cnv7160050, which was recovered from the maintenance office on the island (“Subject Device-20”);
- u. An HP tower model 260-A010, bearing serial number cnv716004y, which was recovered from the maintenance office on the island (“Subject Device-21”);
- v. A Mac desktop computer model A1312, bearing serial number w89524czspj, which was recovered from the maintenance office on the island (“Subject Device-22”);
- w. A Lenovo tower machine type 90J0, bearing serial number mj07yg6u, which was recovered the maintenance office on the island (“Subject Device-23”);
- x. A Lenovo tower bearing serial number 153306g2umjxekgx, which was recovered the maintenance office on the island (“Subject Device-24”);
- y. An HP Tower bearing serial number CNV74213Ms 570-P056, which was recovered the maintenance office on the island (“Subject Device-25”);

- z. A Unifi cloudkey with FCCID: SWX-UCCK IC 6545A-UCCK and Mac ID 1843kb4fbe4d30c69-dcrgm9, which was found on a server rack in a shed on the island (“Subject Device-26”); and
- aa. A red Nikon digital camera, which was recovered on a file cabinet next to a desk in a cabana on the island (“Subject Device-27”).

II. Review of ESI on the Subject Devices

Law enforcement personnel (who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, agency personnel assisting the government in this investigation, and outside technical experts under government control) are authorized to review the ESI contained on the Subject Device for evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Sections 1591 (sex trafficking of minors), and 371 (sex trafficking conspiracy) (the “Subject Offenses”) described as follows:

1. Evidence concerning the identity or location of the owner(s) or user(s) of the Subject Devices
2. Evidence concerning the identity or location of, and communications with, co-conspirators of Jeffrey Epstein, including [REDACTED] [REDACTED]
3. Any documents or communications with or regarding victims or potential victims of the Subject Offenses;
4. Documents or records reflecting payments to victims and/or co-conspirators including but not limited to bank and financial records, spreadsheets, ledgers, account listings, check and wire records, and documents reflecting cash withdrawals.
5. Any photographs of victims or potential victims of the Subject Offenses.
6. Any nude, partially nude, or sexually suggestive photographs of individuals who appear to be teenage girls, or younger.
7. Records or other items that evidence ownership, control, or use of, or access to devices, storage media, and related electronic equipment used to access, transmit, or store information relating to the Subject Offenses, including, but not limited to, sales receipts, warranties, bills for Internet access, handwritten notes, registry entries, configuration files, saved usernames and passwords, user profiles, e-mail contacts, and photographs.
8. Any child erotica, defined as suggestive visual depictions of nude minors that do not constitute child pornography as defined by 18 U.S.C. § 2256(8).

If the Government determines that any of the Subject Devices is no longer necessary to retrieve and preserve the data on the device, and that any of the Subject Devices is not subject to seizure pursuant to Federal Rule of Criminal Procedure 41(c), the Government will return any such Subject Device, upon request.