



**U.S. Department of Justice**

*Criminal Division*

VAA:WHG:TNB:AF:ss  
DOJ No. CRM-182-76636

*Office of International Affairs*

*Washington, D.C.*

FROM: The Central Authority of the United States  
TO: The Central Authority of France  
SUBJECT: Request for Assistance in the Prosecution of Ghislaine Maxwell  
DATE: January 13, 2021

**INTRODUCTION**

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



**TIME CONSTRAINTS**

A trial date of July 12, 2021, has been set in United States v. Ghislaine Maxwell in the United States District Court for the Southern District of New York. In light of the upcoming trial date, the U.S. authorities would like to interview the witness as soon as possible.

**REQUEST FOR CONFIDENTIALITY**

This request is sensitive in that it recounts specifics and evidentiary detail that may not be known, the exposure of which could impede the prosecution of Maxwell and the U.S. authorities' ongoing investigation with regard to the integrity of evidence and witness accounts. Premature notification of this request could seriously jeopardize the

investigation or compromise the trial of Maxwell, by prompting a witness to alter or prepare his/her answers to specific questions, by prompting others to destroy or tamper with evidence; change patterns of behavior; intimidate potential witnesses; or alert others who could do the same.

Accordingly, pursuant to Article 14 of the Treaty, please keep this request confidential in all respects, and do not share its contents, its subject matter, or the fact that the request has been made with any private persons (including the subject(s) of the investigation), or any government officials whose knowledge is not absolutely necessary for purposes of executing this request. In addition, please advise all who must be made aware of this request for assistance that the request, its contents and its subject matter are to be kept confidential and should not be shared except as described above.

In order to avoid disclosure to third parties (including *parties civiles*), if a related criminal investigation exists in France, please ensure that this mutual legal assistance request is NOT placed in the French criminal dossier without the express authorization of the United States; instead, we ask that this request for assistance be placed in a separate mutual legal assistance dossier. If this request cannot be executed without breaching confidentiality, please notify [REDACTED]

[REDACTED] or the United States, whose contact information is listed below.

### **THE FACTS**

U.S. citizen Jeffrey Epstein is alleged to have engaged in the sexual abuse of minor girls during the period of approximately 1994 through 2005. On or about July 2, 2019, a grand jury in the Southern District of New York returned an indictment charging Epstein

with violations of U.S. criminal laws in connection with his sexual abuse of minors, including with engaging in a conspiracy to sexually traffic in minors. Epstein was arrested pursuant to the indictment on or about July 6, 2019, and had been detained pending trial in New York. On or about August 10, 2019, Epstein committed suicide in his cell. Notwithstanding Epstein's death, the investigation that led to his indictment remains ongoing. That investigation has revealed evidence of additional criminal conduct by Epstein and his associates, including Ghislaine Maxwell.

On or about June 29, 2020, a grand jury in the Southern District of New York returned an Indictment charging Maxwell with violations of U.S. criminal laws in connection with her role in assisting, facilitating, and contributing to Epstein's sexual abuse of minors by, among other things, helping Epstein to recruit, groom, and ultimately abuse victims known to Maxwell and Epstein to be under the age of 18. The Indictment alleges that from at least in or about 1994, up to and including at least in or about 1997, Maxwell enticed and conspired with Epstein to entice and cause minor victims to travel to New York, which Maxwell knew and intended would result in their grooming and subjection to sexual abuse by Epstein. Finally, the Indictment also alleges that Maxwell provided false and perjurious statements, under oath, regarding, among other subjects, her role in facilitating the abuse of minor victims by Epstein. Maxwell was arrested pursuant to the Indictment on or about July 2, 2020, and has been detained pending trial in New York since that date.



## THE OFFENSES

### Title 18, United States Code, Section 371      **Conspiracy**

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

### Title 18, United States Code, Section 2423      **Transportation of Minors**

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

### 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.<sup>2</sup>

### Title 18, United States Code, Section 1623      **Perjury**

- (a) Whoever under oath (or in any declaration, certificate, verification, or statement under penalty of perjury as permitted under section 1746 of title 28, United States Code) in any proceeding before or ancillary to any court or grand jury of the United

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<sup>1</sup> 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.

<sup>2</sup> 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.

States knowingly makes any false material declaration or makes or uses any other information, including any book, paper, document, record, recording, or other material, knowing the same to contain any false material declaration, shall be fined under this title or imprisoned not more than five years, or both.

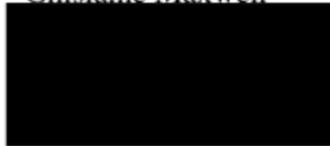
**RELEVANT ENTITIES AND INDIVIDUALS**

Name:  
Date of birth:  
Place of birth:  
Citizenship:

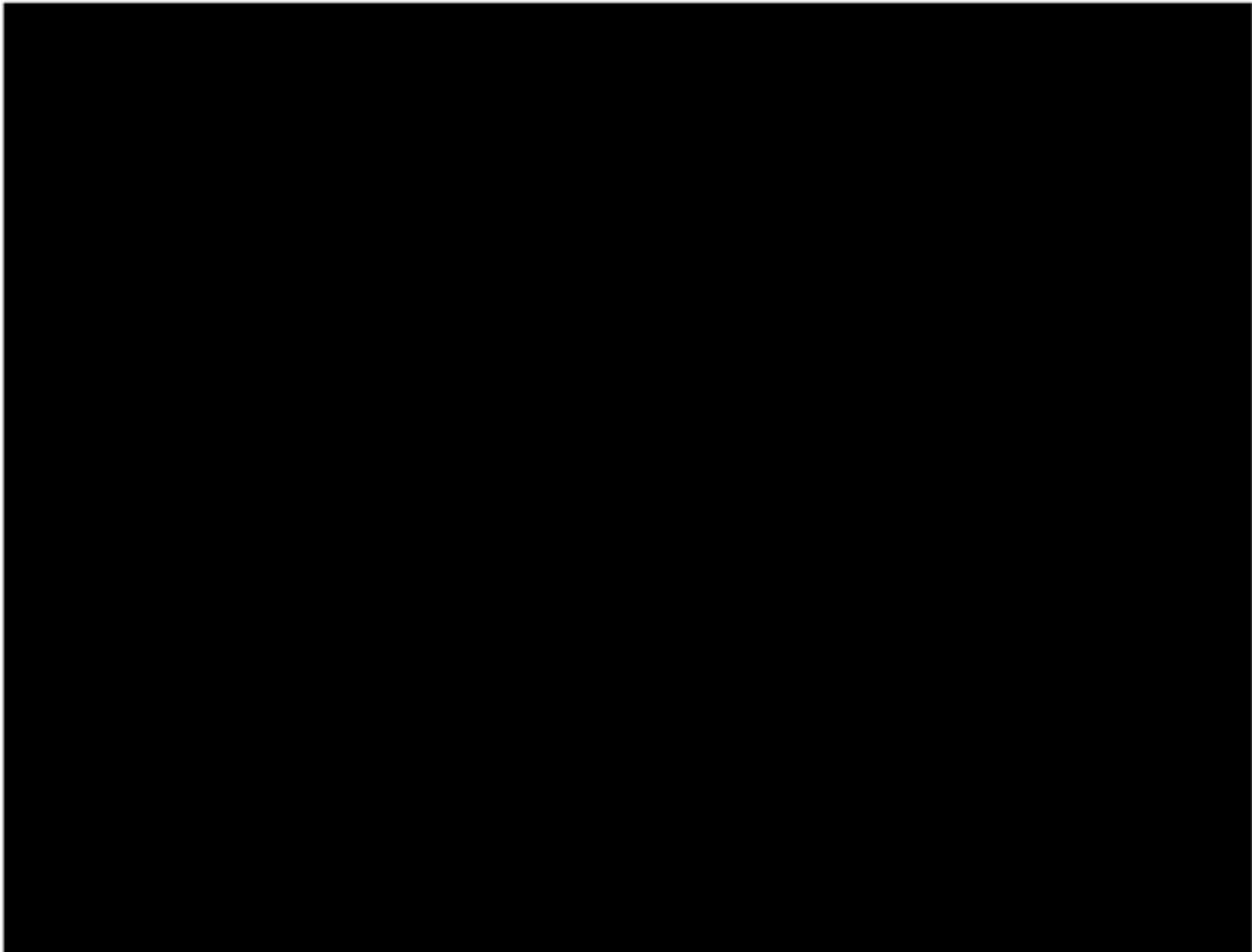


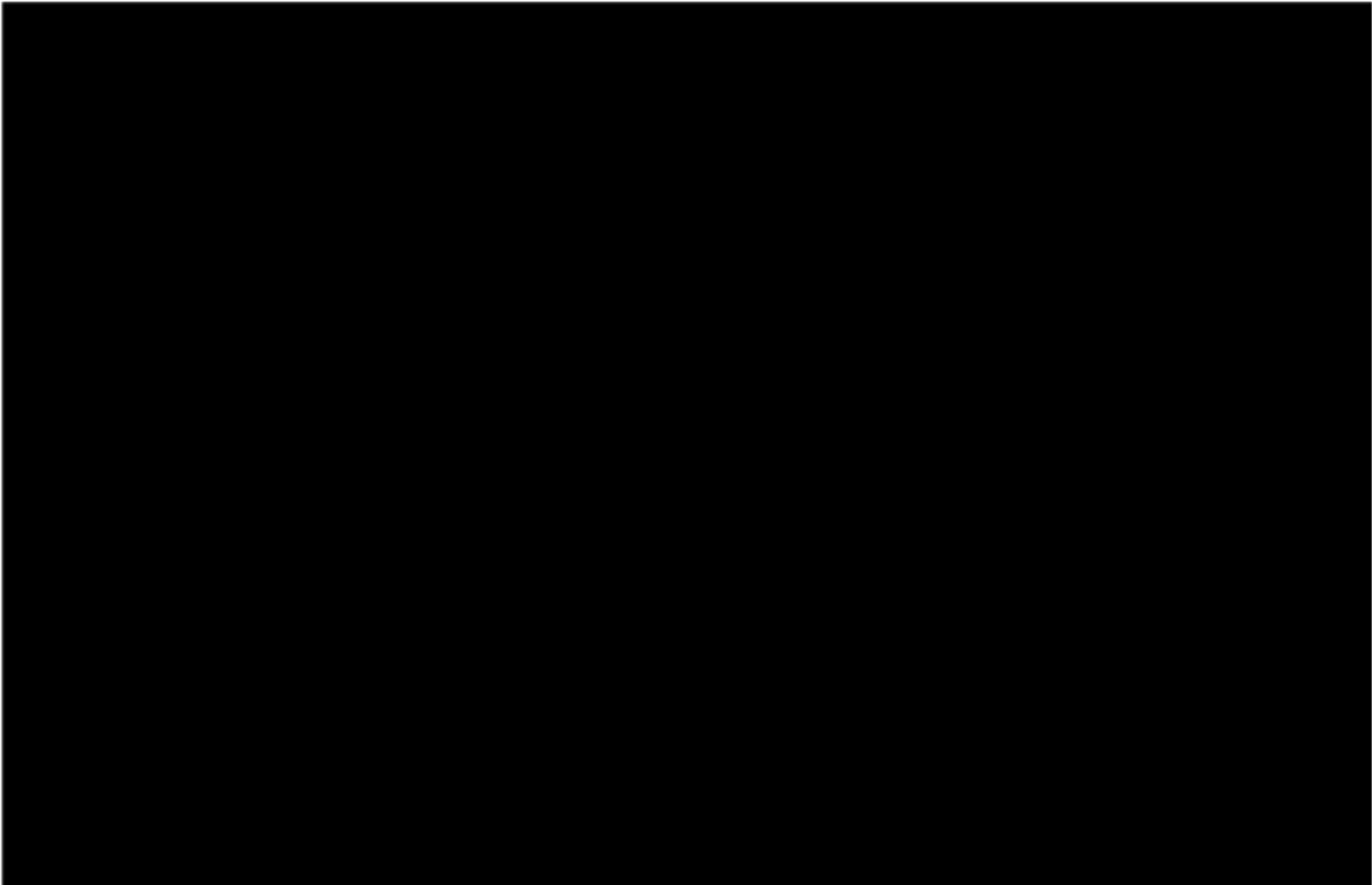
Name:  
Date of Birth:  
Place of Birth:  
Citizenship:

Ghislaine Maxwell



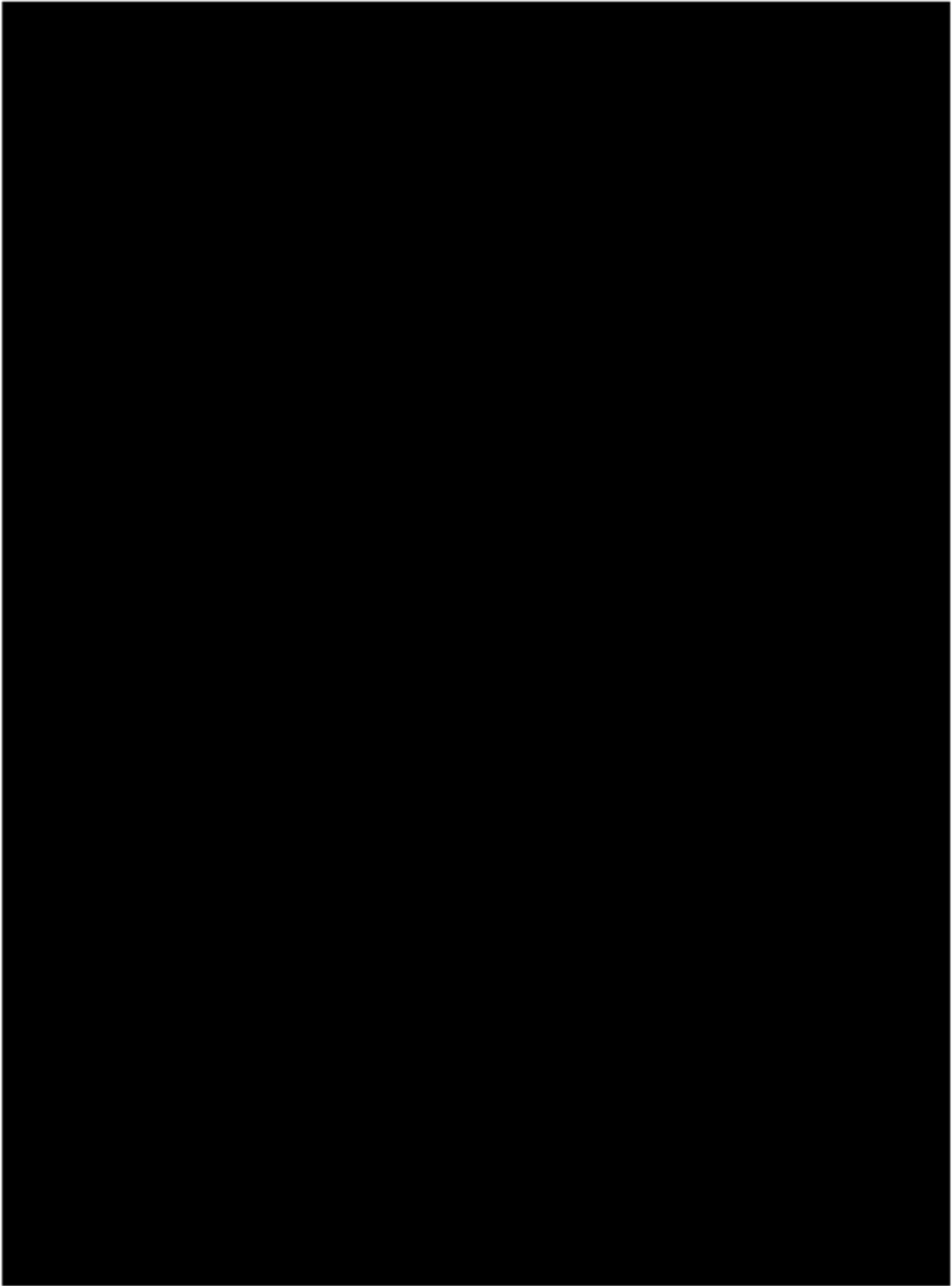
**ASSISTANCE NEEDED**

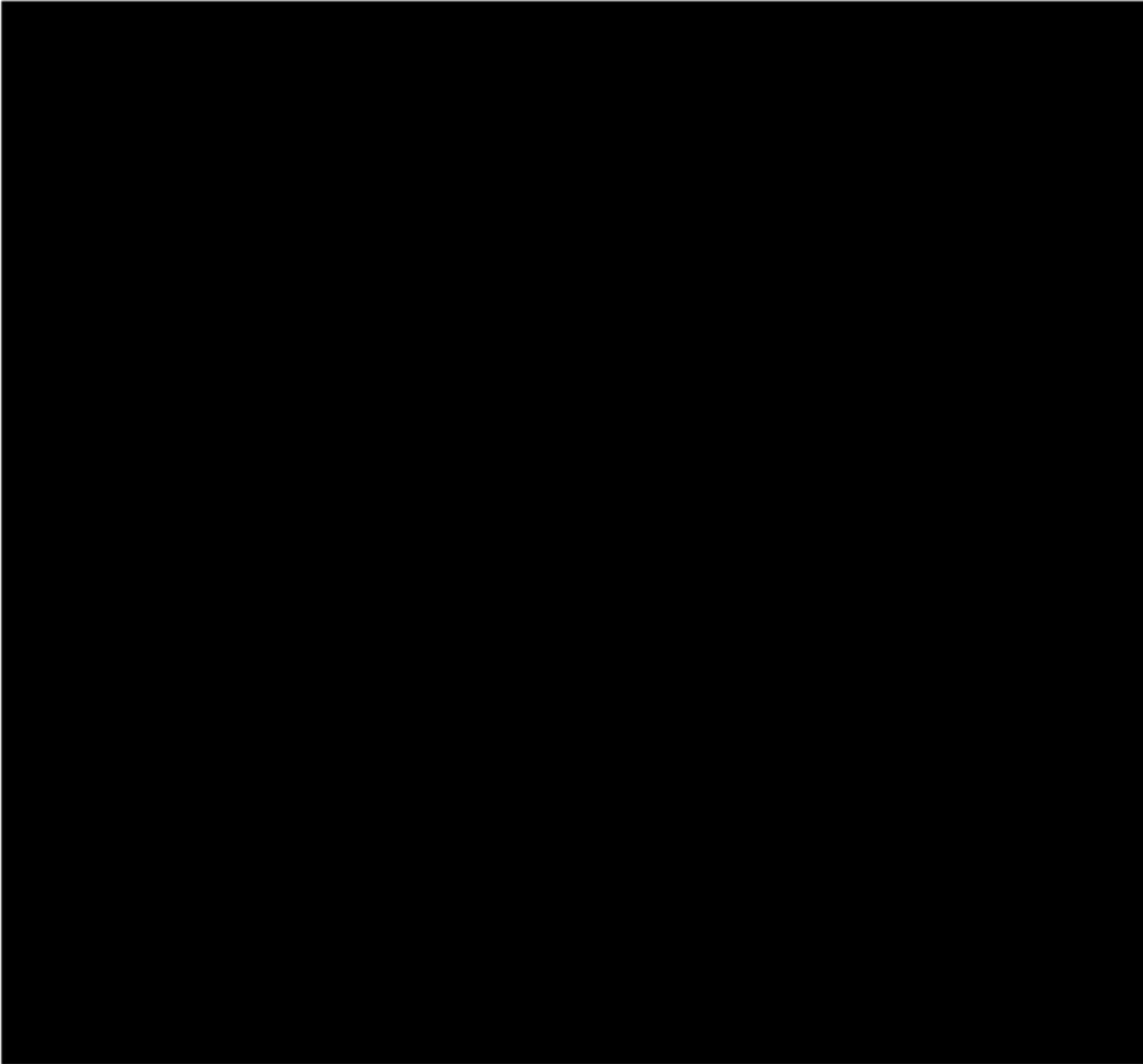




**PROCEDURES TO BE FOLLOWED**







**COORDINATION WITH U.S. LIAISON MAGISTRATE IN FRANCE**

Please coordinate the general execution of this request for assistance with 



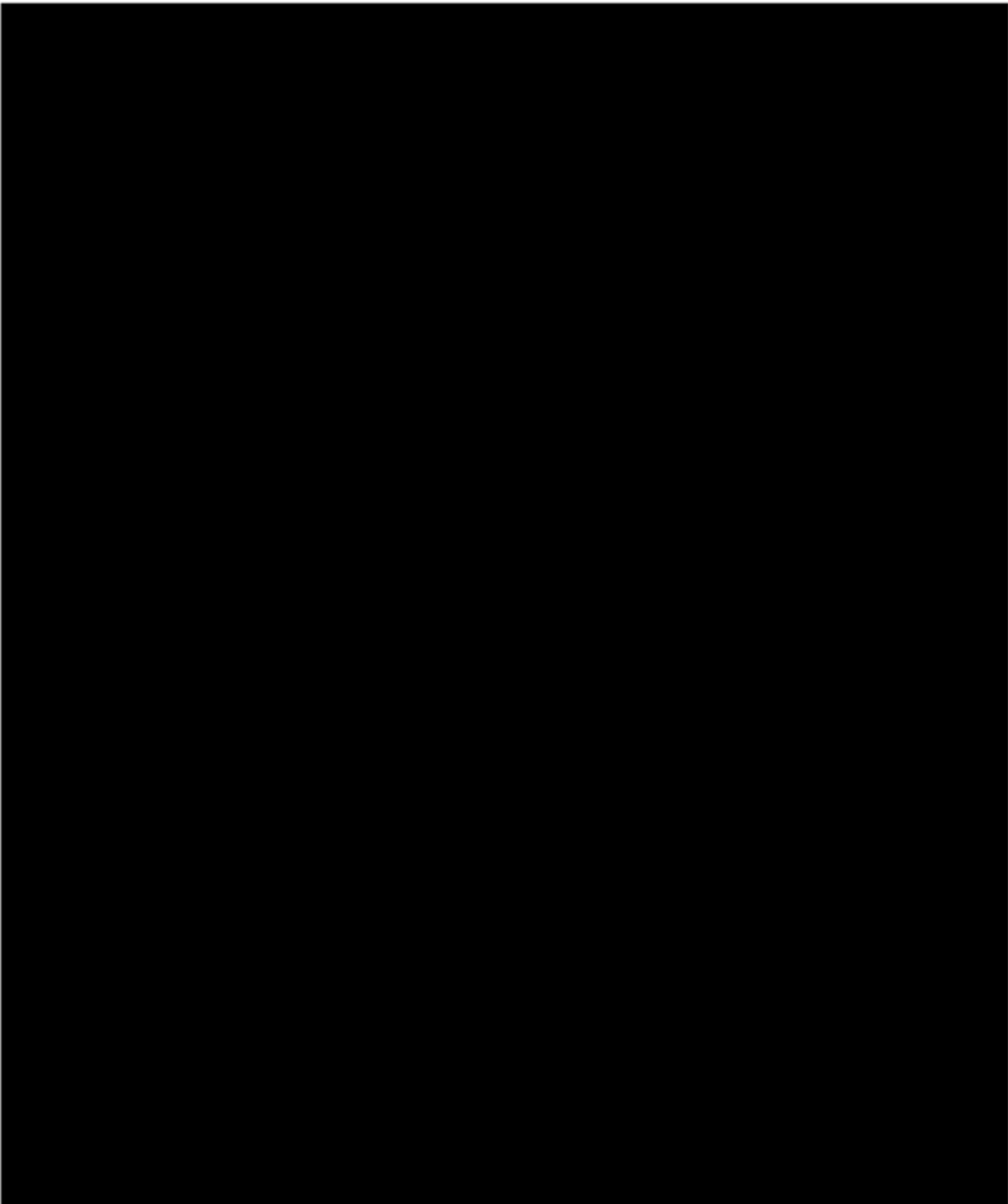
**CONCLUSION**

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

January 13, 2021  
Date



Associate Director  
Office of International Affairs  
Criminal Division



ATTESTATION OF AUTHENTICITY OF OFFICIAL RECORDS

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

documents attached hereto and described below:

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

Description of Documents:

\_\_\_\_\_  
(Signature)

(Official Seal)

\_\_\_\_\_  
(Date)