



JENNIFER FREEMAN, ESQ

[REDACTED]

New York, New York 10001

[REDACTED]

May 2, 2023

The Honorable Christopher Wray  
Director  
Federal Bureau of Investigation  
[REDACTED]  
Washington, D.C. 20535

Michael E. Horowitz  
Inspector General  
U.S. Department of Justice  
[REDACTED]  
Washington, D.C. 20530

The Honorable Merrick B. Garland  
Attorney General  
U.S. Department of Justice  
[REDACTED], NW  
Washington, D.C. 20530

*Via Email and U.S. Mail*

Dear Director Wray, Inspector General Horowitz, and Attorney General  
Garland:

As counsel to many survivors of the Jeffrey Epstein sex trafficking conspiracy, we write regarding the failure of the Federal Bureau of Investigation (FBI) to properly, adequately, or timely investigate the sex trafficking of hundreds of girls and young women. The FBI utterly failed to investigate serious allegations involving Epstein’s, and perhaps others’, child sex abuse materials (CSAM), significant additional criminality which, until recently, has been disregarded, disrespected, and essentially denied.

As detailed below, in August of 1996 one of our clients, [REDACTED] [REDACTED] reported to the FBI that Epstein and Ghislaine Maxwell had sexually abused her and that the two of them, together with others, were committing multiple, serious, sexual abuse crimes, including hands-on sexual abuse, against minors and

vulnerable young women. In addition, she reported to the FBI that Epstein, and perhaps others, appeared to be engaged in the production, possession, and distribution of sexually suggestive or exploitative images of children that could constitute CSAM. *See Exhibits (Exs.) 1, 2, and 3.*

In 2005, child erotica was found in Epstein's Palm Beach home. In approximately 2008, law enforcement "prematurely" truncated their investigation of Epstein's computer hard drives which had been suspiciously removed from his Palm Beach estate immediately before a police raid. *See infra* p. 7. In 2019, more child erotica was found displayed in Epstein's properties, with additional images located in his home safe. *See infra* p. 9. Recently, for the first time, Epstein's possible connection to CSAM has been acknowledged – in ongoing federal litigation in New York, the Epstein Estate alerted the parties and the court about the possible existence of CSAM among images the Estate just discovered. Exs. 4 and 5. Last week, it was revealed that Epstein maintained government contacts at the highest level, including William Burns, director of the Central Intelligence Agency, who had three meetings scheduled with Epstein in 2014. [Jeffrey Epstein's Private Calendar: CIA Director William Burns, Goldman Sachs's Top Lawyer, Noam Chomsky - WSJ.](#)

As detailed below, in response to Ms. [REDACTED] clear-eyed, prescient report, and despite subsequent repeated red flags that Epstein trafficked girls and collected sexualized images of children, the FBI appears, for years, to have **done little** to investigate and prosecute Epstein's sex trafficking, and, to date, **done nothing** regarding reports of possible CSAM.

In order to ensure the fair and equitable dispensation of justice and accountability, we call on the FBI, the Department of Justice, and the Attorney General to conduct a comprehensive investigation to determine **why** there was and remains such abject failure to timely investigate, expose, and prosecute this unprecedented, decades-long criminal conspiracy which included not only the sexual trafficking of young women and girls, but also the possession and likely production, distribution, transportation and distribution of possible CSAM as well.

## **Law Enforcement Ignored Ms. ██████ 1996 Report to the FBI of Epstein's Possible CSAM Crimes and Sex Trafficking Conspiracy - Why?**

In 1995, Ms. ██████ a struggling artist and recent graduate from ██████ ██████ took a job working for billionaire Epstein. After purchasing one of her paintings for several thousand dollars, Epstein told Ms. ██████ that he wanted her to be an "art scout" for his collection. This position expanded to clerical work in Epstein's mansion. Over the course of several months in 1996, Ms. ██████ witnessed young girls going in and out of Epstein's New York mansion, modeling agency representatives present at the house, and Ghislaine Maxwell "scouting" for new children who Epstein was purportedly also financially "helping." Ms. ██████ also witnessed images of what appeared to be children in what was described to her as a "modeling book" kept in Epstein's safe. At first, Ms. ██████ accepted what sounded like innocent justifications for these activities.

During the summer of 1996, at Epstein's behest, Ms. ██████ worked as an artist in residence at Epstein's home in Ohio. When Epstein and Maxwell visited Ms. ██████ in Ohio for a few days, they sexually abused her. Shocked and deeply shaken, she realized, when they left, that some photographs from her private collection, which were all numbered and in her possession in Ohio, were missing, including photographs of her partially dressed 11-year-old sister. She then became concerned that Epstein and Maxwell had other sexually inappropriate images, whether in Epstein's safe or elsewhere, and that they were engaged in other unlawful activities. Ms. ██████ left ██████ and when she returned to New York, confronted Epstein and Maxwell and demanded the return of her personal photographs. Epstein and Maxwell retaliated against her by threatening to physically harm her and set all of her artwork on fire.

Deathly afraid, on August 29, 1996, Ms. ██████ reported in detail Epstein's and Maxwell's criminality to her local police department, the NYPD ██████ ██████. The NYPD said that while they could address the local fire threats, they were unable to do anything about other possibly illegal activities

occurring outside their jurisdiction, such as the abuse and theft perpetrated in Ohio, and other illegal activities. They directed Ms. [REDACTED] to report these allegations to the FBI. See Ex. 1 (NYPD Police Report Complaint [REDACTED] dated 8/29/96) - “[REDACTED] states...[Epstein] did call her and stated he was going to burn victim’s painting and send her polaroids of the burnt paintings. [Epstein] has keys to victim’s apartment.”). Following the NYPD’s instructions, and at that time believing that the wrongdoing would be addressed, Ms. [REDACTED] immediately contacted the FBI to report her wider criminal complaint concerning Epstein and others.

Ms. [REDACTED] confirmed her reporting of the Epstein conspiracy to the FBI in a 1997 entry in her personal journal:

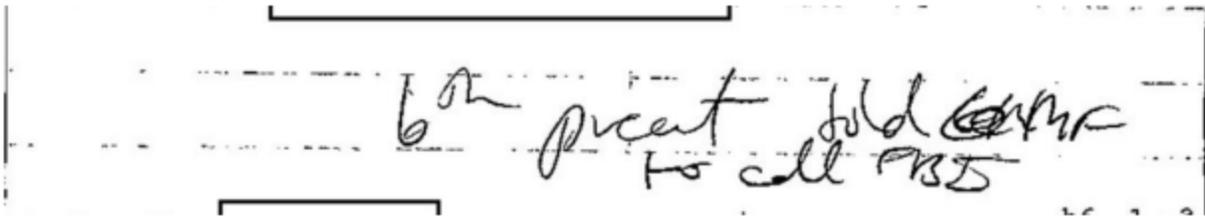
Handwritten journal entry in blue ink on lined paper. The text reads: "[REDACTED] (The evil [REDACTED] J. Epstein + Maxwell tried to ruin my life, [REDACTED] life, + Anne's as well!) They molested all of us in various ways + made us all feel debiled. [REDACTED]"

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Handwritten note in blue ink on lined paper. The text reads: "I had to turn them in to the FBI,"

Ex. 2 (Journal title page and excerpt).

Ms. [REDACTED] 1996 report of the Epstein sex trafficking conspiracy and CSAM allegations was confirmed by the FBI in field notes of a 2006 meeting between Ms. [REDACTED] and the agency, which was the first time she heard from the FBI after her original report. The FBI notes specifically stated that Ms. [REDACTED] had previously reported Epstein to the NYPD Sixth Precinct who advised her to contact the FBI.



Excerpt of hand-marked page 19 of FBI redacted notes of 11/14/06 meeting with Ms. ██████ regarding Epstein (“6<sup>th</sup> precinct told MF”) in Ex. 3 (FBI redacted notes in full).<sup>1</sup> The FBI agents acknowledged their awareness of Ms. ██████ 1996 report to the FBI about Epstein, stating that they tracked her down because of that earlier report.

Ms. ██████ report of Epstein’s sex trafficking and apparent CSAM crimes should have surprised no one who took the time to investigate. Indeed, it is commonplace for sexual abusers to use CSAM to normalize sexual conduct and groom victims. *See, e.g.,* [Understanding Grooming Tactics \(rehope.org\)](http://rehope.org).

Terrified and alone, and cognizant that the institutions that should have protected her failed to do so, Ms. ██████ moved out of New York City, and eventually out of the New York region, to escape Epstein’s and Maxwell’s abuse and threats.

**It Took a Decade for Federal Law Enforcement to Take Any Action Against Epstein Gifted Epstein the Deal of a Lifetime, and Conferred Free Reign on Epstein to Continue Sex Trafficking and Producing Sexually Suggestive Images of Girls and Young Women – Why?**

Ten years after Ms. ██████ initial report, federal authorities appeared to take a renewed interest in investigating Epstein which turned out to be nothing more than a paper tiger distraction.

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<sup>1</sup> Over the past several months, we have repeatedly sought unredacted copies of the FBI’s notes which presumably reveal more, and any prior notes from Ms. ██████ earlier report to the FBI. To date, no substantive response has been provided.

From 2005 to 2008, dozens of survivors, including Ms. ██████ presented substantial evidence to the FBI of Epstein's sex trafficking and sexually inappropriate images of children.

As noted above, on November 11, 2006, two FBI agents, without warning, knocked on the door of Ms. ██████ then-home in North Carolina and met with Ms. ██████ for hours. She again explained her deep, specific concerns about the ongoing Epstein sex trafficking conspiracy and CSAM allegations. *See* Ex. 3 (spanning over 20 pages of meeting notes).

When the Palm Beach police raided Epstein's home in 2005, they found "naked pictures of teenage girls." [VIDEO: Inside Jeffrey Epstein's Palm Beach home: What the victims saw \(palmbeachpost.com\)](#). At least one 14-year-old survivor told law enforcement that she had been photographed in the nude. *See* Report of the Department of Justice Office of Professional Responsibility (OPR Report). <https://www.washingtonpost.com/context/read-the-report-investigation-into-the-u-s-attorney-s-office-for-the-southern-district-of-florida-s-resolution-of-its-2006-2008-federal-criminal-investigation-of-jeffrey-epstein-and-its-interactions-with-victims-during-the-investigation/db9373e8-22f8-4712-b4a7-be844d162de0/>, p. iv.

As acknowledged in the OPR Report, law enforcement knew or had reason to believe that Epstein "had surveillance cameras stationed in and around his home" and "used hidden cameras in his New York residence to record his sexual encounters." OPR Report, pp. 175-79. It was known that Epstein's "computers might have contained child pornography" and, with his "multi-state lifestyle[,] it was reasonable to assume that [there was possible] interstate transmission of child pornography...that could have changed the entire complexion of the case against Epstein." OPR Report, p. 176.

Six computer hard drives were suspiciously missing from Epstein's Florida home just before a police raid--leaving dangling wires attached to monitors--which Epstein's attorneys refused to turn over. [FBI Used Saw to Open Jeffrey Epstein Safe With Hard Drives, Diamonds \(insider.com\)](#). Epstein's attorneys succeeded in delaying and then preventing the delivery of Epstein's hard

drives while law enforcement again turned a blind eye to allegations of possible CSAM crimes. *See* OPR Report, pp. iv, 45-47, 60-61, 70. As the OPR Report explained, the U.S. Attorney “resolved the federal investigation before significant investigative steps were taken,” and the investigation ended “prematurely.” OPR Report, p. x.

Instead, Epstein and his team of high paid lawyers and private investigators sought to shift blame onto the victims, gaslighting them as prostitutes, drug addicts, and liars. Amazingly, despite a plethora of evidence of a far-reaching conspiracy to traffic women, and numerous red flags concerning possible CSAM, federal law enforcement stood by silently and didn’t take action. OPR Report, pp. 11, 15, 147; *see also*

<https://www.palmbeachpost.com/story/news/2020/12/03/prosecutor-jeffrey-epsteins-victims-im-sorry-deal-labeled-you-prostitutes/3812499001/>

(AUSA told an appeals court that it was “unfortunate” that the non-prosecution agreement had the effect of “labeling teenage girls as prostitutes instead of victims of sexual assault.”); [FBI Records: The Vault — Jeffrey Epstein Part 17 of 22](#) (FBI file rife with what appear to be reams of victim “biographical information” and MySpace details). Meanwhile, consistent with well-known practices of sex traffickers, Epstein continued trafficking, raping, abusing, and collecting sexualized images of women and girls, including some of our clients. *See* OPR Report, p. 44.

In 2008, the federal government agreed to a secret, controversial non-prosecution agreement (NPA) with Epstein which only required him to plead to rather minor state-law crimes and purportedly “immunized” his known and unknown co-conspirators.

<https://www.documentcloud.org/documents/6184602-Jeffrey-Epstein-non-prosecution-agreement>. Epstein served only 13 months in a Palm Beach “country club” county jail with daily releases to his home-office. Nothing in the agreement obliged him to stop engaging in sex trafficking or any other illegal activity, and no consequences were imposed if he did. All the while he continued to disparage his minor victims. *See* NPA; OPR Report pp. ii, 70, 94-110. That many of his victims were minors was ignored.

Our client, [REDACTED] [REDACTED], along with other survivors were trafficked at the very same time that the FBI was purportedly investigating Epstein.

Although the Office of Professional Responsibility later examined actions of the Florida federal attorney-prosecutors during that time period, the actions of the FBI were not scrutinized.

It is not known who in or about this time period had access to and removed Epstein's hard drives from his Palm Beach home, where else those hard drives might have been located, what those hard drives contained, and where those hard drives are today.

### **The FBI Did Little or Nothing to Prosecute Epstein For an Additional Decade – Why?**

After the slap-on-the-wrist sentence, Epstein and others continued their criminal enterprise, while the FBI did little more for another decade. Further action against Epstein and his co-conspirators was taken only --

- after Ms. [REDACTED] and other survivors complained again to law enforcement and engaged in substantial efforts working with non-FBI law enforcement;
- after lengthy prosecution of federal civil litigation alleging the NPA violated the Crime Victims Rights Act guarantees and a federal court determination that the failure to notify victims and the NPA violated the Act; *E.g., Doe v. United States*, 359 F. Supp.3d 1201 (S.D. Fla. 2019);
- after numerous journalists kept reporting the story; and
- after numerous other private lawsuits and other efforts sought to bring this conspiracy to light and still do so. *E.g., Jane Doe v. Epstein*, (2009) (579 F. Supp.3d (S.D.N.Y. 2012)); [REDACTED] *v. Maxwell*, Case No. 1-15-cv-07433-LAP (S.D.N.Y. complaint filed 2015); *Jane Doe 1 v. Deutsche Bank et al.*, 22-cv-10018 (S.D.N.Y. 2022).

It was not until approximately 2019 that the federal government finally prosecuted first Epstein and then Maxwell regarding the sex trafficking conspiracy. **The FBI's repeated and continual failures, delays, and inaction**

**allowed Epstein and others to continue their sex trafficking conspiracy for nearly a quarter of a century.** See OPR Report, pp. 27 n.38, 33, 44.

Unfortunately, Ms. ██████ 1996 report regarding Epstein's sex trafficking and sexually concerning images proved to be spot on. In 2019 -- just as Ms. ██████ had reported to the FBI years decades earlier -- Epstein was charged with sex trafficking while sexually suggestive images of young girls were in fact found in a safe in Epstein's New York mansion. According to the SDNY prosecutors' memorandum seeking to deny Epstein bail, the 2019 search of Epstein's mansion unearthed a "vast trove of lewd photographs' of young-looking girls, including hundreds of meticulously labeled nude pictures locked in a safe." [Jeffrey Epstein: Inside billionaire's New York mansion \(usatoday.com\)](#). "CDs in the safe had hand-written labels, including "Young [Name] + [Name], 'Misc nudes 1,' and 'Girl pics nude,'" [Feds found 'vast trove' of nude photos in Jeffrey Epstein's safe \(nypost.com\)](#) See also [Evidence from Jeffrey Epstein's safe 'went missing' after FBI raid, court hears in Ghislaine Maxwell trial \(telegraph.co.uk\)](#); [Ghislaine Maxwell trial: Photos of underage girls in Jeffrey Epstein's home entered as evidence \(nbcnews.com\)](#).

Had law enforcement taken even minimal action to respond to Ms. ██████ and others' 2006, 2008, 2011, and other reports, more sex trafficking and likely CSAM crimes could have been avoided.

It is not known if at least some of the materials, such as the labeled nude photographs that were locked in Epstein's New York safe, were among those reported by Ms. ██████ in 1996.

### **Law Enforcement Gave Epstein a Hall Pass for What Appears to Be One of the Largest and Longest Sex Trafficking and Alleged CSAM Conspiracies in our Lifetime - Why?**

Curiously, Epstein was known and tied to federal authorities for decades, often in connection with suspicious and illegal activities. In 1981, Epstein reportedly left Bear Stearns abruptly after committing a possible Regulation D violation with rumors of him engaging in other illegal activities. See [The Talented Mr. Epstein - Vicky Ward](#). Epstein subsequently worked with Steven Hoffenberg at

Towers Financial who was prosecuted and imprisoned for bilking investors out of over \$450 million in a Ponzi scheme that was then the largest financial fraud in American history. Hoffenberg, Epstein's business partner, went to jail but not Epstein. Instead of prosecution, in 1992, the U.S. State Department rented Epstein a luxurious townhouse in New York City that had been seized from the Iranian government. [The State Department Once Rented A Townhouse Seized From Iran To Jeffrey Epstein — Then Sued Him For Subletting It \(buzzfeednews.com\)](#)

There has been rampant speculation for years that Epstein was a confidential informant. Only recently, a new “trove of papers” has revealed that “William Burns, [director of the Central Intelligence Agency](#) since 2021, had three meetings scheduled with Epstein in 2014 when he was deputy secretary of state...” [Jeffrey Epstein's Private Calendar: CIA Director William Burns, Goldman Sachs's Top Lawyer, Noam Chomsky - WSJ](#). Epstein told colleagues and friends that he was an intelligence asset. [Andrew's Fixer: She's the Daughter of Robert Maxwell and She's Manipulating His Jetset Lifestyle \(unlimitedhangout.com\)](#). Epstein has been connected with many high-level government and business elites who accompanied him on multiple trips on the “Lolita Express” to the island of “Little St. Jeffs” and elsewhere but these individuals have not been the subject of scrutiny. The FBI closed a forfeiture proceeding against Epstein, noting “Epstein... has provided information to the FBI as agreed upon.” [Jeffrey Epstein Part 06 of 08.pdf](#) (last page). There is strong circumstantial evidence in the public domain that Epstein's special relationship with the government explains the FBI's failure to investigate or prosecute Epstein in 1996, the special treatment he received from 2005 to 2008, and the failure to investigate the possible wrongdoing of important public officials and powerful businessmen.

### **The Epstein Estate Recently Alerted a Federal Court that CSAM May Exist in Recently Discovered Images and Videos**

Only weeks ago, for the first time, Epstein CSAM concerns have come under scrutiny, finally recognized by civil litigants otherwise facing possible prosecution themselves, as possible additional serious criminality by Epstein.

In a stipulated motion dated March 27, 2023, as part of a lawsuit brought by the Virgin Islands against JP MorganChase concerning the bank's financing of Epstein's activities, the parties advised the federal district court that the Epstein Estate had on March 14, 2023 discovered new videos and photographs (the Epstein Media). *Government of the United States Virgin Islands v. JPMorgan Chase Bank, N.A.*, Case No. 1:22:cv-10904-JSR, Stipulated Motion dated March 27, 2023, Ex. 4. The Epstein Estate expressly recognized the danger of serious criminal and civil liability attendant to possessing or distributing the Epstein Media which might contain CSAM.

The Estate...advised counsel for the Government and Jane Doe1 of its concern that some of the Epstein Media might contain child sex abuse imagery ("CSAM"). The knowing accessing, possession, or distribution or CSAM is forbidden by federal law. *See* 18 U.S.C. §§ 2252, 2252A. The Estate has expressed concern that its counsel's review of the Epstein Media could subject counsel to criminal investigation or charges or civil claims....

Ex. 4 (footnote omitted). The parties prepared a stipulated motion to "[p]rovide the Epstein Estate with an approved protocol for reviewing the Epstein Media for purposes of this litigation only without fear or criminal or civil liability...and [p]rotect against disclosure or dissemination of CSAM..." Ex. 4.

On April 5, 2023, the federal district court issued an Order establishing such a protocol, calling for the Estate to be on alert for CSAM.

If, during the course of that review [of images], the Estate sees a particular recording that appears to contain possible CSAM, it shall promptly stop further review of that recording and notify the Federal Bureau of Investigation ("FBI") or such other agency or entity as the FBI may direct of the recording's existence. No CSAM shall be copied or transmitted to another party, except as directed by the FBI or other government.

Ex. 5. (Order April 5, 2023). **It is telling that the Epstein Estate, the parties, and the Court believe it necessary to set up a CSAM protocol before Epstein media is reviewed.**

It is not known if at least some of the Epstein Media contains what Ms. ██████ reported in 1996. Much like the hard drives that went missing in Palm Beach or the nude photographs locked in Epstein's New York safe, it is not known who had access to the Epstein Media before the Court's Order, where else those materials might have been located, and what those materials contained. As to all three of these tranches of Epstein images, it is not known what the implications might be as to such access, possession, and location, by persons other than Epstein. *See United States v. Russell*, 639 F.Supp.2d 226 (D. Conn 2007) (attorney who took possession of laptop and destroyed hard drive containing CSAM indicted for obstruction of justice).

**The FBI Must be Held Accountable for Failures Regarding Epstein – Just as Was Done Regarding the Parkland Shooting, Nassar Sex Abuse, and Charleston Shooting**

In 1996, federal law enforcement failed to investigate Ms. ██████ 1996 reporting of the Epstein sex conspiracy. There should be no question that Ms. ██████ who had never gone to law enforcement before, was credible and at least deserved a modicum of attention. In 2008, the FBI cut off their investigation "prematurely." To date, law enforcement still has not seriously pursued possible CSAM crimes involving Epstein. Had law enforcement done their job, the Epstein trafficking and possible CSAM crimes could have been stopped. Had law enforcement taken even minimal action to respond to repeated reports, many girls would never have been trafficked and the taking, distribution or transportation of sexually exploitative images would have been substantially reduced.

The FBI's failure to seriously investigate Epstein and others is even more egregious than its documented failures in the investigation of the Parkland shooting, the Larry Nassar sex abuse of gymnasts, and the Charleston Church massacre. In the Parkland case, a federal investigation revealed that the FBI had received credible threats in the months before the shooting. *See [Summary](#)*

[and Timeline Related to Parkland Shooting Investigation — FBI](#) (House Judiciary Committee investigation). As the FBI explained regarding the Parkland shooting, “Under established protocols, the information provided by the caller should have been assessed as a potential threat to life. The information then should have been forwarded to the FBI Miami Field Office where appropriate investigative steps would have been taken.” [FBI Statement on the Shooting in Parkland, Florida — FBI](#). As a result of the investigation of FBI failures, FBI employees were disciplined and Parkland victims were compensated. [Justice Department to Pay About \\$130 Million to Parkland Shooting Victims - The New York Times \(nytimes.com\)](#).

In the Nassar case, a federal investigation found that two FBI agents in Indianapolis committed “fundamental errors” for not acting sooner on allegations of abuse. The Inspector General investigated and released a report concerning the FBI’s failure to respond to the allegations of abuse “with the utmost seriousness and urgency that they deserved and required” and violations of FBI policy. [DOJ OIG Releases Report of Investigation and Review of the FBI’s Handling of Allegations of Sexual Abuse by Former USA Gymnastics Physician Lawrence Gerard Nassar \(justice.gov\)](#); [Inspector General Says F.B.I. Botched Nassar Abuse Investigation - The New York Times \(nytimes.com\)](#). In response to claims filed against the government, additional review of FBI failures is underway.

As to the Charleston Church massacre, a federal investigation demonstrated that the FBI’s lapses in background checks allowed the perpetrator, a self-proclaimed white supremacist who wanted to start a “race-war,” to buy the semiautomatic weapon used in the shootings. In connection with the federal investigation, there have been changes in background check procedures, an appellate court ruled that the families of the survivors could seek redress from the federal government, and the government agreed to compensate the relatives of the deceased in order to “bring some modicum of justice to the victims of this heinous act of hate.” [Justice Department Announces Multi-Million Dollar Civil Settlement in Principle in Mother Emanuel Charleston Church Mass Shooting | OPA | Department of Justice](#).

Much like the Parkland, Nassar, and Charleston Church cases, government agencies have a responsibility to investigate and explain why the FBI failed -- for a quarter of a century -- to properly investigate Ms. [REDACTED] and others' repeated allegations of Epstein's abuse. Those failures allowed his sex trafficking to continue unabated for decades. It is imperative that the Epstein allegations similarly be accorded the "utmost seriousness and urgency that they deserved and required" and that the Epstein victims are also brought "some modicum of justice."

Questions abound. What did the FBI do and not do to investigate Epstein? Why was absolutely nothing done in response to Ms. [REDACTED] 1996 report of Epstein's and Maxwell's sex trafficking and CSAM concerns? Why were other repeated early complaints about Epstein to law enforcement ignored? Was law enforcement pressured to limit and truncate the Epstein investigation? Was law enforcement directed to cut Epstein loose to protect powerful public officials and businessmen who associated with Epstein or to protect Epstein's confidential informant status? Why did law enforcement give Epstein a pass on potential CSAM crimes by failing to obtain his computer equipment or by suspending investigation? Are any such images, perhaps produced by Epstein, currently traded and available on the internet? Why haven't the actions and inactions of the FBI regarding Epstein been investigated? Even the Florida Department of Law Enforcement investigated and reported on state law enforcement's handling of Epstein's wrongdoing ([Investigative Summary: Work Release | PDF | Prison | Criminal Record \(scribd.com\), but not the federal government.](#)) -- but to date federal law enforcement has utterly failed to do so.

For many years, the public has been asking for a reckoning by the FBI and the United States government for its clear dereliction of duty to serve and protect the American people against the Epstein sex trafficking conspiracy. The FBI is said to hold itself to the highest of standards and integrity, grounding its initials in its motto of "Fidelity, Bravery and Integrity," and serving as the "lead agency for enforcing civil rights laws, aggressively investigat[ing] ... human trafficking and involuntary servitude...." <https://www.fbi.gov/history/seal-motto>; <https://www.fbi.gov/investigate/civil-rights>. However, we are aware of

no investigation of the FBI and certainly no public disclosure or explanation. Epstein's and Maxwell's victims, and the public at large, are owed a full accounting of the FBI many failures and missed opportunities. The American people, the victims, and the survivors deserve the truth.

We hereby request that a full and fair investigation be promptly launched into the FBI's seriously bungled examination and mismanagement of the crimes committed by Epstein and others. We look forward to your timely response.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jennifer Freeman". The signature is written in black ink and is positioned to the left of a vertical line.

Jennifer Freeman

# EXHIBIT 1



# New York City Police Department

## OmniForm System - Complaints

Report Cmd: 006	Jurisdiction: N.Y. POLICE DEPT	ICAD#: [REDACTED]	Record Status: No Status	Complaint #: 1996-006-007241	No Other Legacy Blue Versions	No Other Complaint Revisions
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<b>Occurrence</b> Location: STREET Name Of Premise: Premises Type: COMMERCIAL BUILDING Location Within Premise: OFFICE AREA Visible By Patrol?: NO	<b>NYC Parks Dept, Property</b> Did this offense occur on NYC Parks Dept. Property? Command: NYC Parks Dept. Property Name:	Precinct: 006 Sector: H Beat: 11 Post: 32
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Occurrence From: 1996-07-11 12:00:00 THURSDAY Occurrence thru: 1996-07-17 00:00:00 Reported: 1996-08-29 18:20:09 Complaint Received: WALK-IN	Aided # Accident # O.C.C.B. #
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<b>Classification: AGG HARRASSMENT 2M</b> Attempted/Completed: COMPLETED Most Serious Offense Is: N/A PD Code: 639 AGGRAVATED HARASSMENT 2 PL Section: 24030 Keycode: 361 OFF, AGNST PUB ORD SENSBLTY &	<b>Case Status: CLOSED</b> Unit Referred To: PATROL Clearance Code: Log/Case #: 0 Clearance Arrest Id: Clearance AO Cmd: File #: Prints Requested? NO
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Is This Related To Stop And Frisk Report NO	SQF Number: 0000-000-00000	Was The Victim's Personal Information Taken Or Possessed?	Was The Victim's Personal Information Used To Commit A Crime?
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Gang Related?	Detective Borough Wheel Log #:	Name Of Gang:	Child Abuse Suspected?
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DIR Required? NO	Child In Common?	Intimate Relationship?	Officer Body Worn Camera:
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<b>If Burglary:</b> Forced Entry? Structure: Entry Method: Entry Location:	<b>Alarm:</b> Bypassed? Comp Responded?: Company Name/Phone: Crime Prevention Survey NO Requested?: Complaint/Reporter Present?:	<b>If Arson:</b> Structure: Occupied?: Damage by:	<b>Taxi Robbery:</b> Partition Present: Amber Stress Light Activated: Method of Conveyance: Location of Pickup:
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Supervisor On Scene - Rank / Name / Command:	Canvas Conducted:	Translator(if used):
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**NARRATIVE:**  
 WITNESS STATES @ TIPO THE ABOVE MENTIONED PERSON DID CALL HER AND STATED HE WAS GOING TO BURN VICTIM'S PAINTING AND SEND HER POLOROIDS OF THE BURNT PAINTINGS. THE ABOVE MENTIONED PERSON HAS KEYS TO VICTIM'S APARTMENT.

No NYC TRANSIT Data for Complaint # 1996-006-007241

Total Victims: 1	Total Witnesses: 1	Total Reporters: 0	Total Wanted: 1
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<b>VICTIM: # 1 of 1</b>	Name: [REDACTED]	Complaint#: 1996-006-007241
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Nick/AKA/Maiden: UMOS: Sex/Type: FEMALE Race: WHITE Age: 26 Date Of Birth: [REDACTED] Disabled? NO  Is this person not Proficient in English?: If Yes, Indicate Language: N.Y.C.H.A Resident? Is Victim fearful for their safety / life? Escalating violence / abuse by suspect? Were prior DIR's prepared for CV?	Gang/Crew Affiliation: Name: Identifiers:  Will View Photo: NO Will Prosecute: NO Notified Of Crime Victim Comp. Law: NO
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LOCATION	ADDRESS	CITY STATE/COUNTRY	ZIP	APT/ROOM
HOME-PERMANENT	[REDACTED] STREET NYC	NEW YORK	100140000	4B

Phone #: HOME: [REDACTED]	Actions Of Victim Prior To Incident:
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Victim Of Similar Incident:	If Yes, When And Where
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<b>WITNESS : # 1 of 1</b>	Name: [REDACTED]	Complaint #: 1996-006-007241
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Nick/AKA/Maiden: Sex/Type: FEMALE Race: WHITE Age: 025 Date Of Birth: [REDACTED] Is this person not Proficient in English?: NO	Gang/Crew Affiliation: NO Name: Identifiers:  Relationship To Victim:
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If Yes, Indicate Language:

Location Address City State/Country Zip Apt/Room  
HOME-PERMANENT [REDACTED] STREET NYC NEW YORK 100140000 3B

Phone #: HOME [REDACTED] BUSINESS [REDACTED]

**WANTED: # 1 of 1**

Name:  
**EPSTEIN, JEFFERY**

Complaint#: **1996-006-007241**

Arrested:

Nick/AKA/Maiden: Height: **6FT 0IN**  
Sex: **MALE** Weight: **200**  
Race: **WHITE** Eye Color: **BLUE**  
Age: **45** Hair Color: **GRAY**  
Date Of Birth: -- Hair Length: **SHORT**  
U.S. Citizen: Hair Style:  
Place Of Birth: Skin Tone:  
Is this person not Proficient in English?: Complexion:  
If Yes, Indicate Language: Accent: S.S. # .

Order Of Protection:  
Issuing Court:  
Docket #:  
Expiration Date:  
Order of Protection Violated?  
Does Suspect abuse Drugs / Alcohol?  
Suspect threatened /attempted suicide?  
Is the suspect Parole / Probation?  
Relation to Victim:  
Living together:  
Can be Identified:

Gang/Crew Affiliation:  
Name:  
Identifiers:

LOCATION ADDRESS CITY STATE/COUNTRY ZIP APT/ROOM HOW LONG? RES. PCT  
HOME-PERMANENT [REDACTED] NYC NEW YORK 0 0

Phone #:

N.Y.C.H.A. Resident: N.Y.C. Housing Employee: On Duty:  
Development: N.Y.C. Transit Employee:

Physical Force:

Used Transit System:  
Station Entered:  
Time Entered:  
Metro Card Type:  
Metro Card Used/Poses:  
Card #:

**CRIME DATA DETAILS**

CLOTHING ACCESSORIES - --UNKNOWN COLOR  
CLOTHING FOOTWEAR - --UNKNOWN COLOR  
CLOTHING HEADGEAR - --UNKNOWN COLOR  
CLOTHING OUTERWEAR - --UNKNOWN COLOR

**EVIDENCE:**

Complaint # **1996-006-007241**

Evidence Collected?: Evidence Collection Team/Crime Scene Requested?: ECT Responded?: ECT Run#: Crime Scene Responded?: Crime Scene Number:

Evidence Invoice #

**No IMEI Data for Complaint # 1996-006-007241**

Reporting/Investigating M.O.S. Name: <b>PO CHANDLER, DOLOE</b>	[REDACTED]	Command: <b>006 PCT</b>	Rep.Agency: <b>NYPD</b>
Supervisor Approving Name: <b>SGT ZULCH</b>	[REDACTED]	Command: <b>006 PCT</b>	Rep.Agency: <b>NYPD</b>
Complaint Report Entered By: <b>PAA MARSALA, MARGAR</b>	[REDACTED]	Command: <b>006 PCT</b>	Rep.Agency: <b>NYPD</b>
Signoff Supervisor Name: <b>[REDACTED]</b>	<b>000000</b>	Command:	Rep.Agency:

END OF COMPLAINT REPORT  
# 1996-006-007241

Print this Report

## EXHIBIT 2

1997 - 1998

[REDACTED]

[REDACTED] (The evil [REDACTED] J. Epstein + Maxwell  
tried to ruin my life, [REDACTED] life, +  
[REDACTED] as well!) They molested all of  
us in various ways + made us all feel  
degraded [REDACTED]

[REDACTED]  
+ I had to turn them in to the FBI.  
They stole tons of my art + called  
my best friend + threatened her that  
they were burning all my work. [REDACTED]

[REDACTED]

## **EXHIBIT 3**

FEDERAL BUREAU OF INVESTIGATION  
FOI/PA  
DELETED PAGE INFORMATION SHEET  
Civil Action# 17-cv-03956

Total Deleted Page(s) = 283

Page 6 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5;  
Page 10 ~ b3 - 1; b6 - 1,-3; b7C - 1,-3;  
Page 11 ~ b3 - 1; b6 - 1,-3; b7C - 1,-3;  
Page 14 ~ b3 - 1; b6 - 3; b7C - 3; b7E - 1;  
Page 15 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 16 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 17 ~ b3 - 1; b6 - 3; b7C - 3; b7E - 1;  
Page 18 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 19 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 20 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 21 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 22 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 48 ~ b3 - 1; b6 - 3; b7C - 3;  
Page 49 ~ b6 - 5; b7C - 5; b7E - 1;  
Page 50 ~ b6 - 5; b7C - 5; b7E - 1;  
Page 51 ~ b6 - 5; b7C - 5; b7E - 1;  
Page 52 ~ b6 - 5; b7C - 5; b7E - 1;  
Page 53 ~ b6 - 5; b7C - 5; b7E - 1;  
Page 54 ~ b6 - 5; b7C - 5; b7E - 1;  
Page 55 ~ b6 - 5; b7C - 5; b7E - 1;  
Page 56 ~ b6 - 5; b7C - 5; b7E - 1;  
Page 57 ~ b6 - 5; b7C - 5; b7E - 1;  
Page 58 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
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Page 60 ~ b6 - 5; b7C - 5; b7E - 1;  
Page 61 ~ b6 - 5; b7C - 5; b7E - 1;  
Page 66 ~ b3 - 1; b6 - 3; b7C - 3; b7E - 1;  
Page 67 ~ b3 - 1; b6 - 2,-3; b7C - 2,-3; b7E - 1;  
Page 68 ~ b3 - 1; b6 - 2,-3; b7C - 2,-3; b7E - 1;  
Page 69 ~ b3 - 1; b6 - 3; b7C - 3; b7E - 1;  
Page 70 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
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Page 72 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 73 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 74 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 75 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 76 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 77 ~ b3 - 1; b6 - 3; b7C - 3; b7E - 1;  
Page 81 ~ b3 - 1; b6 - 3; b7C - 3; b7E - 1;  
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Page 83 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
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Page 85 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 86 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 87 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 88 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 89 ~ b3 - 1; b6 - 3,-5; b7C - 3,-5; b7E - 1;  
Page 90 ~ b3 - 1; b6 - 3; b7C - 3; b7E - 1;

FD-340 (Rev. 4-11-03)

File Number 31E-MM-108062-1A109

Field Office Acquiring Evidence MM/PRCA

Serial # of Originating Document \_\_\_\_\_

Date Received Various

From \_\_\_\_\_  
(Name of Contributor/Interviewee)

\_\_\_\_\_  
(Address)

\_\_\_\_\_  
(City and State)

By SA

b6 -2  
b7C -2

To Be Returned  Yes  No

Receipt Given  Yes  No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)  
Federal Rules of Criminal Procedure

Yes  No

Federal Taxpayer Information (FTI)

Yes  No

Title:

Reference: \_\_\_\_\_  
(Communication Enclosing Material)

Description:  Original notes re interview of

Biographical File on

b6 -3  
b7C -3

03956-8880

EFTA00144367

[Redacted]

b6 -1,-3,-5  
b7C -1,-3,-5  
b3 -1

11/14/2006

[Redacted]

[Redacted]

[Redacted]

attraction  
privileges

and

1992

~~calls~~

buy table

[Redacted]

[Redacted]

had over for lunch

purchased tickets

[Redacted] introduced  
[Redacted]

worked for [Redacted]

JE called asked for interview  
JE asked [Redacted] to his office

across the street from United

[Redacted]

b6 -1,-3,-5  
b7C -1,-3,-5  
b3 -1

JE said

[Redacted]

is a real

[Redacted]

I could offer a number 03956-8901

(2)

better jobs

[Redacted]

b6 -3  
b7C -3  
b3 -1

not going to take up much of  
time  
trying to [Redacted]  
+ [Redacted]  
+ TE [Redacted]  
[Redacted]

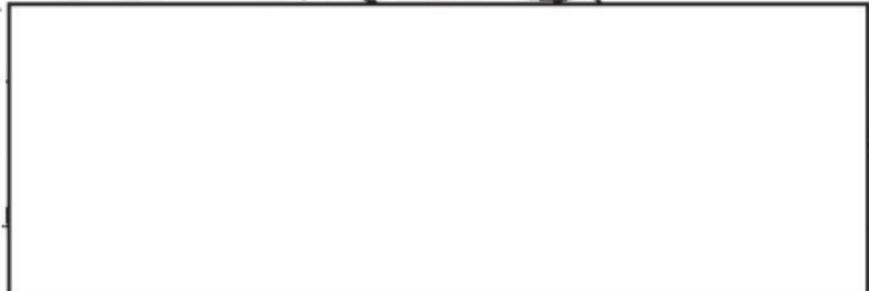
then it was  
+ not paying on time  
not getting what TE want  
so [Redacted] was going  
so quit  
unconfidant - ppl not getting paid  
&  
had with hostage  
city [Redacted]

03956-8902

3



~~because~~  
JE contacted



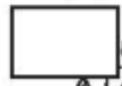
Door women - ~~water~~ construction

Residence "Door Women"  
she thought JE home but  
turned out to



office in residence  
getting 3 messages  
a day

asked chief



would be girls in sex

b6 -1,-3  
b7C -1,-3  
b3 -12

03956-8903

(4)

one day -

[redacted]

[redacted]



come over to house

b6 -1,-3,-5  
b7C -1,-3,-5  
b3 -1

[redacted]

made [redacted] side + told her  
to tell the 'sister' they were good to  
~~left for~~ [redacted] her

they wait me to

[redacted]

[redacted]

03956-8904

5

[Redacted]

~~coming~~

[Redacted]

b6 -1,-3  
b7C -1,-3  
b3 -1

year [Redacted] you

- bring her up  
[Redacted] said SE wants to  
~~SE~~ net

asked by get very drunk  
up SE had a surprise

got [Redacted]

after they went to one  
to her house

- was you're really beautiful

03956-8905

6

We would ask what  
help you [redacted]  
I find that

would you like to do a

[redacted]

[redacted]

She has <sup>LS</sup> [redacted]

[redacted]

[redacted]

at Sea type  
Program

You really shouldn't feel  
her [redacted] expected

b6 -3, -5  
b7C -3, -5  
b3 -1

~~to give~~

[redacted]

[redacted]

[redacted]

[redacted]

03956-8906

9

next day

[redacted]

surprised

b6 -1,-3,-5  
b7C -1,-3,-5  
b3 -1

JB

[redacted]

JB sat next to

[redacted]

[redacted]

[redacted]

didn't tell

[redacted]

~~last~~ just a visit

[redacted]

keeping telling

[redacted]

needed to get Manager

she asked if she could give

message

~~JB~~

03956-8907

8

Pressing to get a message

JE my friend said she would  
give you a message at  
her residence

Message  
said  
↑  
22-23  
How wonderful & amazing  
[redacted] JE  
~~to~~

b6 -1,-3  
b7C -1,-3  
b3 -1

[redacted]

[redacted]

very ~~of~~ venerable moments  
of mine

[redacted]

[redacted]

[redacted]

[redacted] family

03956-8908

[redacted]

(9)

[Redacted]

Studying

[Redacted]

[Redacted]

I will pay

b6 -1,-3,-5  
b7C -1,-3,-5  
b3 -1

for

[Redacted]

~~9~~

They Purchased a ticket to

[Redacted]

sale

[Redacted]

[Redacted]

03956-8909

[Redacted]

quarant' not say doctor

Dont

[Redacted]

b6 -3  
b7C -3  
b3 -1

[Redacted]

[Redacted]

b6 -1,-3,-5  
b7C -1,-3,-5  
b7E -1

JE had [Redacted]  
of [Redacted] in p  
[Redacted] looks to [Redacted]  
everything is there  
I know [Redacted]  
I [Redacted]

[Redacted] I really wish you would have

b6 -1,-3,-5  
b7C -1,-3,-5  
b7E -1

[Redacted] of [Redacted]  
made a/ [Redacted] on  
[Redacted] [Redacted] produced for  
[Redacted] [Redacted]

03956-8910

(11)

— Catalog them & put them  
in shoe box

— only ones

[redacted]

[redacted]

went to work in

b6 -1,-3,-5  
b7C -1,-3,-5  
b3 -1

looking through shoe box

[redacted]

[redacted]

spent 2 days looking further

living in

[redacted]

[redacted] JE

[redacted]

left here

Called JE Epstein's asst

[redacted]

I'm unhappy I want to quit

sent for [redacted]

[redacted]

03956-8911

[redacted]  
accused JB [redacted]

I have then inventory

asked a woman girl ~~to~~ to

u ramer is that JE is gay

~~girl~~ be careful what  
you say on the phone  
listen call me if [redacted]  
~~when find piece~~

JE where in the hell are these

JE put [redacted] on Duplex  
and it then

b6 -1,-3  
b7c -1,-3  
b3 -1

03956-8912

[redacted] [redacted]

3

A couple weeks later  
Someone ~~of the name~~ called  
& said in JTB Briefcase

He  
+

[Redacted]

[Redacted]

[Redacted]

b6 -3,-5  
b7C -3,-5  
b3 -1

back & met FVSG  
(2 months later)

[Redacted]

Upset

[Redacted]

[Redacted]

Sent [Redacted] out to [Redacted]  
to help [Redacted]

[Redacted]

03956-8913

14

asked if [redacted]  
could come stay w/ <sup>over</sup> summer

[redacted]

[redacted]

b6 -3, -5  
b7C -3, -5  
b3 1

— distance of sending letter to  
them  
there for <sup>about</sup> a month

[redacted]

is coming on weekends  
to help w/ [redacted]

~~did~~

[redacted]

not attend  
to come outside  
[redacted] paranoid

[redacted]

U.S. go. as 10 years

[redacted]

check  
03956-8914

(15)

2<sup>nd</sup> came to visit

[Redacted]

[Redacted]

can be very clear

b6 -1,-3,-5  
b7C -1,-3,-5  
b3 -1

if you start doubt JE

she covers & says  
he don't hear anything by  
it.

2<sup>nd</sup> visit totally inappropriate  
leucivous

looked door ~~at~~ at  
night

[Redacted]

both robe on

in here

[Redacted]

JE cons in wear <sup>03956-8915</sup>

(16)

JE room @ [redacted]

JE

15 JE

[redacted]

I'm feeling tired  
Dad he's silly

[redacted]

rabbit had sensed

I'm going to give a foot rub  
100

b6 -1,-3  
b7C -1,-3  
b3 -1

[redacted]

I about an hour it lasted  
how am I going to leave

watching

[redacted]

well I'm going to bed

got

[redacted]

locked door

03956-8916

[redacted]

stayed in the room

JE called I hope  
your not upset

~~Are you~~ Are you really kidding

[redacted]

thinks you're upset  
about b/c you could

b6 -1,-3,-5  
b7c -1,-3,-5  
b3 -1

[redacted]

tell [redacted] she  
can go to hell

~~He~~ called [redacted] got  
a Ryder truck  
can't gate  
wouldn't let in  
I'm not leaving

[redacted]

one did smelly hypos  
to [redacted]

03956-8917

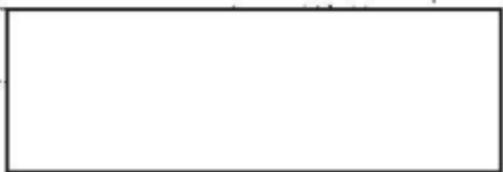
(18)

I loaded up truck

Went going to let  
his leave

but said he leaving  
left

Went



JE he was my patron

After left the [redacted] called

b6 -3, -5  
b7C -3, -5  
b3 -1



~~He~~

~~Not raped~~

angered took my  
class what for  
03956-8918

ly appear to

The passy not allowed to see back (19)

[Redacted]

Started his  
He called

[Redacted]

will

[Redacted]

[Redacted]

Told Mr  
all FBI

[Redacted]

- I just wrote you

b6 -1,-3  
b7C -1,-3  
b3 -1

[Redacted]

[Redacted]

Thays

[Redacted]

03956-8919

[Redacted]

caldy  
(20)

[Redacted]

come to

[Redacted]

b6 -1,-3,-5  
b7C -1,-3,-5  
b3 -1

see JTE cat bring  
[Redacted] here because  
that would be JTE

[Redacted]

[Redacted]

pr dr

[Redacted]

[Redacted]

JTE

[Redacted]

[Redacted]

ppd case & rest your work

[Redacted]

03956-8920

(21)

[Redacted]

[Redacted]

b6 -1,-3,-5  
b7C -1,-3,-5  
b3 -1

[Redacted]

[Redacted]

change for  
+ edit

[Redacted]

[Redacted]

[Redacted]

[Redacted]

fine ~~and~~

then screen to be correct  
disrupt

[Redacted]

calls better not say a word

03956-8921

*(Handwritten mark)*

[Redacted]

- they were very careful

b6 -1  
b7C -1

gft

[Redacted]

- patient

b6 -3  
b7C -3  
b3 -1

2 sleep spec

[Redacted]

[Redacted]

*(Handwritten mark)*

[Large Redacted Block]

Care

Insisted

go home see family  
asked about page  
of phone log

*(Vertical handwritten note)*

If you're going to keep  
you're into you're in

[Redacted]

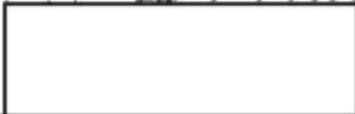
03956-8922

23



b6 -3,-5  
b7C -3,-5  
b3 -1

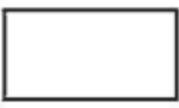
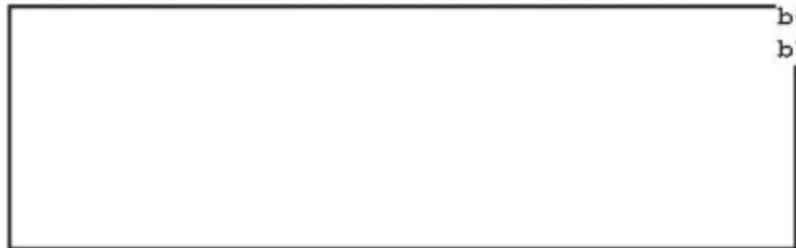
— Working w/



JR

03956-8923

FDC



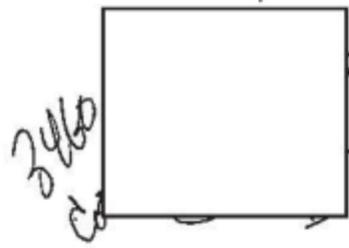
11:15 1:08  
2:05 2:49  
2:30 4:22

US

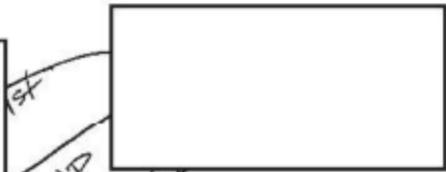
15 CONT 1255 4:48 H.  
ALAND

1/07

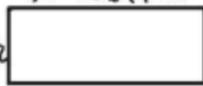
16 CONT 1252: 5:45



2460  
ca



WP  
11:15

leave no earlier than 11:00  
in by 5:00 to 

03956-8938  
31E-MM-108062-1A107

# EXHIBIT 4

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED )  
STATES VIRGIN ISLANDS )  
) )  
Plaintiff, )  
) )  
V. )  
) )  
JPMORGAN CHASE BANK, N.A. )  
) )  
Defendant/Third-Party Plaintiff. )  
\_\_\_\_\_) )  
) )  
JPMORGAN CHASE BANK, N.A. )  
) )  
Third-Party Plaintiff, )  
) )  
V. )  
) )  
JAMES EDWARD STALEY )  
) )  
Third-Party Defendant. )  
\_\_\_\_\_) )

Case Number: 1:22-cv-10904-JSR

**STIPULATED MOTION FOR APPROVAL OF PROTOCOL FOR REVIEW OF  
VIDEOMATERIALS AND PHOTOGRAPHS FOR THE PRESENCE OF POTENTIAL  
CHILD SEX ABUSE MATERIALS AND FOR DISCLOSURE OF THOSE MATERIALS**

Plaintiffs Jane Doe 1 and the Government of the United States Virgin Islands (“Government”), by their respective counsel, move pursuant to Federal Rules of Civil Procedure 26(c), and the authority of the Court to administer proceedings before it, for approval of an agreed-upon protocol authorizing counsel for the Estate of Jeffrey E. Epstein (the “Epstein Estate”) to review videorecorded materials and photographs in the possession, custody, or control of the Epstein Estate (the “Epstein Media”) in response to subpoenas previously issued by Jane Doe 1 and, to the extent responsive to those subpoenas, disclose relevant portions of the Epstein Media

(the “Responsive Media”) to Jane Doe 1’s counsel and to other parties in the litigations pending before the Court involving claims related to Jeffrey Epstein.

### **Factual Background**

The Court is aware of the general nature of this case from earlier proceedings. For purposes of this Motion, it is relevant to note that Jane Doe 1 has alleged that she was the victim of coerced commercial sex trafficking by Jeffrey Epstein and his co-conspirators. Jane Doe 1 has issued a subpoena to the Epstein Estate, seeking certain videorecorded materials and photographs within the Epstein Media, and the Estate has agreed to produce Responsive Media in the Estate’s possession to the extent that the production is not inconsistent with federal or state law, and to the extent that the videos or photographs were not downloaded or otherwise obtained at the time through publicly-available sources.<sup>1</sup>

On March 14, 2023, counsel for the Epstein Estate notified counsel for Jane Doe 1 that it had located materials within the Epstein Media that may be responsive to her subpoenas. The Estate also advised counsel for the Government and Jane Doe 1 of its concern that some of the Epstein Media might contain child sex abuse imagery (CSAM<sup>2</sup>). The knowing accessing, possession, or distribution of CSAM is forbidden by federal law. *See* 18 U.S.C. §§ 2252, 2252A. The Estate has expressed concern that its counsel’s review of the Epstein Media could subject counsel to criminal investigation or charges or civil claims in light of the possibility that the review

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<sup>1</sup> Videos or photographs that were not obtained at the time through publicly-available sources is meant to include Responsive Media that may consist of movies or You Tube videos, for example, but does not extend to Responsive Media relating to Epstein activities or properties that may have been publicly disclosed at any time.

<sup>2</sup> In this motion, the parties use the term “child sex abuse imagery” or CSAM as a synonym for the inappropriate term, “child pornography.” *See United States v. Larson*, No. 5:19-CR-50165-RAL, 2023 WL 196171, at \*1 (D.S.D. Jan. 17, 2023) (“Pornography connotes a certain aspect of consent that is impossible when the images or videos depict children.”).

of the Epstein Media could involve accessing CSAM. The Epstein Estate has advised that it does not have any specific knowledge that any of the Epstein Media does, in fact, contain CSAM, but wishes to put in place an appropriate procedure in case its counsel encounters such material.

#### **Proposed Review Protocol**

Against that backdrop, counsel for the Government and Jane Doe 1 and the Epstein Estate have conferred and have agreed that the Government and Jane Doe 1 would move the Court for the entry of an order approving the following protocol for the Epstein Estate's review of the Epstein Media for potential production to parties in the litigations pending before the Court:

1. The Epstein Estate shall review the Epstein Media to determine its responsiveness to the subpoenas that have been issued by Jane Doe 1 and other parties to the related litigations.
2. If, during the course of that review, the Epstein Estate sees a particular recording that appears to contain possible CSAM, it shall promptly stop further review of that recording and notify the Federal Bureau of Investigation ("FBI") or such other agency or entity as the FBI may direct of the recording's existence. No CSAM shall be copied or transmitted to another party, except as directed by the FBI or other government agency.
3. If no CSAM is observed during the review, the Responsive Media will be provided to counsel for Jane Doe 1 and the Government in response to the relevant subpoena. To the extent Responsive Media is identified prior to the identification of possible CSAM, such materials also will be produced to counsel. Counsel for Jane Doe 1 and any other recipient of Responsive Media may then use this material for the prosecution or defense of the above-captioned case and make such further disclosures as are required by civil discovery rules (e.g., appropriate disclosures to opposing counsel).

The attached proposed Order reflecting this protocol is intended to:

1. Provide the Epstein Estate with an approved protocol for reviewing the Epstein Media for purposes of this litigation only without fear of criminal or civil liability;
2. Provide Jane Doe 1 with Responsive Media that may be relevant to her case;
3. Protect against disclosure or dissemination of CSAM; and
4. Follow the directive of 18 U.S.C. 3509(m) against reproduction of CSAM.

### **Conclusion**

This Motion has been agreed to by the parties.

Date: March 27, 2023

Respectfully submitted,

/s/ Linda Singer

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# EXHIBIT 5

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED )  
STATES VIRGIN ISLANDS )  
) )  
Plaintiff, )  
) )  
V. )  
) )  
JPMORGAN CHASE BANK, N.A. )  
) )  
Defendant/Third-Party Plaintiff. )  
\_\_\_\_\_) )  
) )  
JPMORGAN CHASE BANK, N.A. )  
) )  
Third-Party Plaintiff, )  
) )  
V. )  
) )  
JAMES EDWARD STALEY )  
) )  
Third-Party Defendant. )  
\_\_\_\_\_) )

Case Number: 1:22-cv-10904-JSR

**ORDER REGARDING REVIEW OF VIDEOMATERIALS**

Pursuant to Federal Rules of Civil Procedure 26(c) and the authority of this Court to administer its proceedings, and finding good cause established in the stipulated motion filed by Jane Doe 1 and the Government of the United States Virgin Islands, the Court orders that:

1. The Epstein Estate shall review the Epstein Media to determine its responsiveness to the subpoenas that have been issued by Jane Doe 1 and other parties to the related litigations.
2. If, during the course of that review, the Estate sees a particular recording that appears to contain possible CSAM, it shall promptly stop further review of that recording and notify the Federal Bureau of Investigation (“FBI”) or such other agency or entity as the FBI may

direct of the recording's existence. No CSAM shall be copied or transmitted to another party, except as directed by the FBI or other government agency.

3. If no CSAM is observed during the review, the Responsive Media will be provided counsel for Jane Doe 1 and the Government in response to the relevant subpoena. To the extent Responsive Media is identified prior to the identification of possible CSAM, such materials also will be produced to counsel. Counsel for Jane Doe 1 and any other recipient of Responsive Media may then use this material for the prosecution or defense of the above-captioned case and make such further disclosures as are required by civil discovery rules (e.g., appropriate disclosures to opposing counsel).

**SO ORDERED.**

  
\_\_\_\_\_  
JED S. RAKOFF, U.S.D.J.

Dated: ~~March~~ 4/5, 2023  
New York, New York

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**STIPULATED AND AGREED TO BY:**

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