



- (U) This document is classified UNCLASSIFIED//FOR OFFICIAL USE ONLY.
- (U) This document is only for FBI internal use. Do not externally disseminate this product.
- (U) Intelligence Note template approved for fiscal year 2022, as of 1 October 2021.

(U//FOUO) Wealthy, Influential Individuals Involved in Sex Trafficking Likely Rely Primarily on Referrals and Career Enhancement Promises to Entice Victims, Representing an Expansion of Traditional Sex Trafficking Techniques

(U) Executive Summary

(U//FOUO) FBI New York assesses wealthy, influential individuals involved in sex trafficking likely^a rely primarily on referrals and career enhancement promises to entice victims, representing an expansion of traditional sex trafficking techniques. This assessment is made with medium confidence,^b based on information from five victims with direct access, one victim's court testimony, two individuals with direct access, and open source reporting.

(U//FOUO) FBI New York bases this assessment on the key assumption victims are interested in career opportunities and luxuries that influential individuals can offer them. FBI New York assesses within the next year using wealth and influence to recruit victims and facilitate sex trafficking will likely decrease due to ongoing high profile investigations into sexual misconduct of prominent celebrities. If reports detailing affluent individuals directly solicit victims for the purpose of sexual exploitation, rather than luring young females with lavish parties, expensive trips and career opportunities, FBI New York would adjust its likelihood statement and confidence level in this intelligence note (IN). This IN identifies an emerging recruitment tactic used to solicit victims for sex trafficking which addresses the FBI New York's fiscal year (FY) 2022 Human Trafficking Priority Collection Gap. This IN addresses FBI New York's FY 2022 Criminal Division Band III threat - Human Trafficking.

^a (U) See Appendix A: Expressions of Likelihood.

^b (U) See Appendix B: Confidence in Assessments and Judgments Based on a Body of Information.

UNCLASSIFIED//FOR OFFICIAL USE ONLY

(U) Source Summary Statement

(U//FOUO) Reporting in this IN was derived primarily from two witnesses and five victims with direct access whose information has been corroborated through FBI investigative activity, one victim's court testimony with unknown corroboration as detailed in a news article from USA Today, and a Department of Justice press release. Reporting from the witness and victim interviews were critical to the assessment in this IN as they provided firsthand knowledge of the sex trafficking operations.

(U) The reporting in the perspective was primarily derived from information from The National Labor Organization, Polaris, and The National Prevention Tool Kit, BBC News, NPR, New York Times, and NBC News. These reports provided context to the overall assessment.

(U) This collection occurred between 17 July 2019 and 27 September 2021. The reporting was current as of 18 February 2022.

(U//FOUO) Wealthy, Influential Individuals Involved in Sex Trafficking Likely Rely Primarily on Referrals and Career Enhancement Promises to Entice Victims, Representing an Expansion of Traditional Sex Trafficking Techniques

(U//FOUO) FBI New York assesses wealthy, influential individuals involved in sex trafficking likely rely primarily on referrals and career enhancement promises to entice victims, representing an expansion of traditional sex trafficking techniques. FBI New York based this assessment on reports detailing individuals using their wealth and influence to build a framework for sex trafficking by luring victims to private islands, large estates, private planes, and luxurious parties. FBI New York also based this assessment on reporting the wealthy influential traffickers are establishing networks through victim chain referrals and promises of moneymaking opportunities or future career advancement.

- (U//FOUO) As of February 2020, according to an individual with direct access, Peter Nygard^c directed the witness to recruit young females to come to his pamper parties^d at his estate in the Bahamas by telling them he would help with their modeling careers.¹ According to another individual with direct access, as of March 2020, Nygard sent his girlfriends to solicit young females at malls in California and stores in Time Square New York to lure them to the pamper parties.² According to a victim with direct access, as of June 2020, Nygard singled out females at these pamper parties to meet with him to discuss their careers, but would sexually assault them.³ Additionally, as of March

^c (U) *Analyst Note:* Peter Nygard is a Finish-Canadian fashion executive and founder of Nygard International, a women's apparel company. Nygard International has major warehouses and offices in New York City.

^d (U//FOUO) Pamper parties were hosted by Nygard at his home in Los Angeles and the Bahamans. The parties were invite only and guests were provided massages, pedicures, manicures, food, drinks, pool time, and volleyball. Upon arrival guests had their photos taken and signed a Non-Disclosure Agreement. (Source: (U//FOUO) FBI | FD-302 | 50D-NY-3184048, serial 106 | 20 May 2020 | 19 May 2020 | "(U) Interview of Natasha Codner" | UNCLASSIFIED | UNCLASSIFIED.)

2020, according to an individual with direct access, Nygard served punch with crushed pills, such as Ecstasy and sleeping pills, and gave it to the females he was interested in at the pamper parties and sexually assaulted them.⁴

- (U//FOUO) As of November 2020, according to a victim with direct access, USPER Jeffery Epstein lured young females with the promise of modeling careers stating he had connections with Victoria's Secret. Epstein recruited the victim claiming he wanted to see her modeling portfolio. When she met with him, Epstein forced the victim to massage him and then sexually assaulted her.⁵ Additionally, as of October 2019, according to another victim with direct access, Epstein threatened she would never work in modeling since she would not go further with him when he tried to sexually assault her.⁶
- (U//FOUO) As of July 2019, according to a different victim with direct access, Epstein recruited the victim through her older sister and flew both young women to his private island, along with to other young women. Epstein brought the victim to his room for a massage and sexually assaulted her.⁷ As of September 2019, according to another victim with direct access and also recruited by Epstein through her older sister, Epstein flew the sisters to his private ranch in New Mexico on his private plane. Epstein sexually assaulted the victim when she provided him a massage and then talked about the victim's future, paying her \$5000 for college.⁸
- (U//FOUO) On 27 September 2021, according to a Department of Justice press release, USPER R. Kelly^e was found guilty of racketeering based on criminal conduct including: sexual exploitation of children, forced labor, sex trafficking involving the coercion, and transportation of girls to engage in illegal sexual activity. Kelly used his concerts to recruit young women he was interested in and held them in his homes against their will.⁹ As of September 2021, according to a USA Today news article recounting a victim's testimony in the R. Kelly trial, the victim claimed she was an aspiring musician who auditioned for Kelly. He pressured her into having sex before the audition and then moved her in with him. Kelly forced her to conduct sexual acts for several years and in one instance forced her to have sex with another man while he recorded it.¹⁰

(U) Perspective

(U//FOUO) Human trafficking is one of the world's fastest growing criminal enterprises with an estimated 20 million victims trafficked worldwide, according to the International Labor Organization as of 2017.¹¹ In 2019 according to Polaris, 805 victims and 173 traffickers were identified within the New York area of responsibility.¹² Traditionally a wide range of criminal enterprises, including pimps, gangs, and international organized criminals are known to conduct trafficking operations.¹³ However, with the rise of the Me Too^f movement, high profile sexual exploitation cases came to light, including Kelly, Epstein, Nygard, USPER Harvey Weinstein,

^e (U) *Analyst Note:* R. Kelly, born Robert Kelly, is an American singer and record producer.

^f (U) *Analyst Note:* The Me Too movement is a social movement against sexual exploitation, sex abuse, and other sex crimes.

UNCLASSIFIED//FOR OFFICIAL USE ONLY
FBI INTERNAL USE ONLY – DO NOT DISSEMINATE EXTERNALLY

USPER Bill Cosby, and USPER Allison Mack.⁸ Their affluence and connections provided new leverage to recruit victims due to their ability to act on promises of luxuries and career connections. Weinstein was sentenced in New York to 23 years in prison for rape and sexual assault of young aspiring actresses.¹⁴ According to one victim, Weinstein lured her to his office for what she thought would be a casting meeting and instead was forced to perform sexual acts.¹⁵ Allison Mack used her role on *Smallville* to lure women into joining DOS, a secret society which was convicted of being a sex trafficking cult. Mack was sentenced in New York to three years in prison for using her celebrity status to recruitment and groom women for sex trafficking.¹⁶ Bill Cosby was accused by 60 women for a variety of sexual abuse offenses. According to one victim, she was lured to his house to discuss her career where he then drugged and sexually assaulted her.¹⁷ The Me Too movement continues to expose wealthy, influential individuals for their use of power to sexually exploit females and has increased scrutiny and media attention of people in positions of powers. These cases exposed a new network of trafficking, traffickers, activity sites, and tactics not traditionally seen.

(U//FOUO) This IN expands on a FBI New York IN from 22 January 2021 titled, “(U//FOUO) Commercial Sex Traffickers Use of Facebook to Recruit Victims.” The IN assessed how social networks are used to conduct sex trafficking which expanded on traditional recruitment methods. This IN further builds on the previous assessment by examining another method used to recruit victims for sex trafficking. Rather than using social media, the sex traffickers use their wealth and influence to lure the victim with promises of career enhancements and luxuries. There are no United States Intelligence Community products addressing wealthy and influential individuals involved in sex trafficking.

(U//FOUO) This IN identifies an emerging recruitment tactic used to solicit victims for sex trafficking which addresses the FBI’s New York FY22 Human Trafficking Priority Collection Gap, “(U//FOUO) *How do commercial sex traffickers recruit victims in the New York AOR?*”

(U) Analysis of Alternatives

(U//FOUO) FBI New York considered the alternative hypothesis wealthy and influential individuals likely made genuine career enhancement promises to young women with the intent of bringing those promises to fruition, instead of luring them into sexual abuse situations. FBI New York deemed this hypothesis less plausible due to firsthand reporting from victims detailing the wealthy traffickers rescinded their career opportunities when the victim refused to comply with sexual demands. Increased reporting indicating these wealthy, influential individuals delivered on their career enhancement promises without accusations of sexual abuse, would increase the likelihood of this alternative.

(U) Outlook

(U//FOUO) FBI New York assesses within the next year, using wealth and influence to recruit victims and facilitate sex trafficking will likely decrease due to ongoing high profile

⁸ (U) *Analyst Note:* Allison Mack is an American actress known for her role on the show *Smallville*. She was arrested in 2018 for her involvement in a sex trafficking cult.

UNCLASSIFIED//FOR OFFICIAL USE ONLY
FBI INTERNAL USE ONLY – DO NOT DISSEMINATE EXTERNALLY

investigations into sexual misconduct of prominent celebrities. The uptick in public scrutiny on human trafficking and the media attention to hold people in power accountable, inhibits traffickers' ability to use status to engage in sex trafficking and recruit victims. However, FBI New York assesses wealthy influential traffickers will likely resume their predatory behavior in the next two to three years, as these high profile investigations cease and media coverage lessens. Indicators corroborating this assessment include increased complaints to the National Human Trafficking Resource Center Hotline, police reports, and human source reporting citing sexual exploitation from affluent influential people within society. FBI New York has the opportunity to identify some of these indicators by continuing to collaborate with local law enforcement and the National Human Trafficking Center Tip line, as well as, querying human sources who likely have access to sex trafficking networks to identify non-traditional recruitment tactics that wealthy individuals are using to entice victims. Similarly, further coordination between the FBI New York Human Trafficking threat team and other Human Trafficking threat teams bureau-wide may identify emerging trends and provide further insight regarding wealthy individuals using their influence to recruit victims for sex trafficking.

(U) Approval:

A/SIA [REDACTED]
IPC/SSIA [REDACTED]

(U) FBI New York Field Office prepared this Intelligence Note. Please direct comments and queries to the FBI New York Intelligence Division at [REDACTED]

(U) Appendix A: Expressions of Likelihood

(U) Phrases such as “the FBI judges” and “the FBI assesses,” and terms such as “likely” and “probably” convey analytical judgments and assessments. The chart below approximates how expressions of likelihood and probability correlate with percentages of chance. Only terms of likelihood should appear in FBI products; the chart includes terms of probability strictly for comparison, as they sometimes appear in reporting of other government agencies. Furthermore, the FBI does not arrive at judgments through statistical analysis and will not use terms of probability to convey uncertainty in FBI external intelligence products.

UNCLASSIFIED

Terms of Likelihood	Almost No Chance	Very Unlikely	Unlikely	Roughly Even Chance	Likely	Very Likely	Almost Certain(ly)
Terms of Probability	Remote	Highly Improbable	Improbable (Improbably)	Roughly Even Odds	Probable (Probably)	Highly Probable	Nearly Certain
Percentages of Chance	1-5%	5-20%	20-45%	45-55%	55-80%	80-95%	95-99%

(U) Table showing terms of likelihood aligned with terms of probability and percentages of chance.

(U) Appendix B: Confidence in Assessments and Judgments Based on a Body of Information

(U) Confidence levels reflect the quality and quantity of the source information supporting a judgment. Consequently, the FBI ascribes high, medium, or low levels of confidence to assessments, as follows:

(U) **High confidence** generally indicates the FBI's judgments are based on high quality information from multiple sources. High confidence in a judgment does not imply the assessment is a fact or a certainty; such judgments might be wrong. While additional reporting and information sources may change analytical judgments, such changes are most likely to be refinements and not substantial in nature.

(U) **Medium confidence** generally means the information is credibly sourced and plausible but not of sufficient quality or corroborated sufficiently to warrant a higher level of confidence. Additional reporting or information sources have the potential to increase the FBI's confidence levels or substantively change analytical judgments.

(U) **Low confidence** generally means the information's credibility or plausibility is uncertain, the information is too fragmented or poorly corroborated to make solid analytic inferences, or the reliability of the sources is questionable. Absent additional reporting or information sources, analytical judgments should be considered preliminary in nature.

(U) Endnotes

¹ (U//FOUO) FBI | FD-302 | 50D-NY-3184048, serial 54 | 24 March 2020 | 27 February 2020 | “(U) Interview of [REDACTED]” | UNCLASSIFIED//FOR OFFICIAL USE ONLY | UNCLASSIFIED//FOR OFFICIAL USE ONLY.

² (U//FOUO) FBI | FD-302 | 50D-NY-3184048, serial 62 | 9 April 2020 | 9 March 2020 | “(U) Interview of [REDACTED] on 3/9/2020” | UNCLASSIFIED//FOR OFFICIAL USE ONLY | UNCLASSIFIED//FOR OFFICIAL USE ONLY.

³ (U//FOUO) FBI | FD-302 | 50D-NY-3184048, serial 125 | 6 July 2020 | 16 June 2020 | “(U) Interview [Protect Identity]” | UNCLASSIFIED//FOR OFFICIAL USE ONLY | UNCLASSIFIED//FOR OFFICIAL USE ONLY.

⁴ (U//FOUO) FBI | FD-302 | 50D-NY-3184048, serial 62 | 9 April 2020 | 9 March 2020 | “(U) Interview of [REDACTED] on 3/9/2020” | UNCLASSIFIED//FOR OFFICIAL USE ONLY | UNCLASSIFIED//FOR OFFICIAL USE ONLY.

⁵ (U//FOUO) FBI | FD-302 | 50D-NY-3027571, serial 555 | 13 January 2021 | 4 November 2020 | “(U) Interview of [Protect Identity]” | UNCLASSIFIED//FOR OFFICIAL USE ONLY | UNCLASSIFIED//FOR OFFICIAL USE ONLY.

⁶ (U//FOUO) FBI | FD-302 | 50D-NY-3027571, serial 394 | 23 April 2020 | 23 October 2019 | “(U) Interview of [Protect Identity]” | UNCLASSIFIED//FOR OFFICIAL USE ONLY | UNCLASSIFIED//FOR OFFICIAL USE ONLY.

⁷ (U//FOUO) FBI | FD-302 | 50D-NY-3027571, serial 171 | 23 July 2019 | 17 July 2019 | “(U) Interview of [Protect Identity]” | UNCLASSIFIED//FOR OFFICIAL USE ONLY | UNCLASSIFIED//FOR OFFICIAL USE ONLY.

⁸ (U//FOUO) FBI | FD-302 | 50D-NY-3027571, serial 349 | 14 January 2020 | 18 September 2019 | “(U) Interview of [Protect Identity]” | UNCLASSIFIED//FOR OFFICIAL USE ONLY | UNCLASSIFIED//FOR OFFICIAL USE ONLY.

⁹ (U) Press Release | Department of Justice | “R. Kelly Convicted of All Counts by a Federal Jury in Brooklyn” | 27 September 2021 | <https://www.justice.gov/usao-edny/pr/r-kelly-convicted-all-counts-federal-jury-brooklyn> | accessed on 28 September 2021.

¹⁰ (U) Website | USA Today | “R. Kelly’s Sex- Trafficking Trial: Here’s Everything That’s Happened So Far” | 7 September 2021 | <https://www.usatoday.com/story/entertainment/celebrities/2021/09/07/r-kelly-sex-trafficking-trial-everything-happened-so-far/5708619001/> | accessed 21 September 2021.

¹¹ (U) Website | International Labor Organization | “Global Estimate of Modern Slavery” | https://ilo.org/wcmsp5/groups/public/dgreports/dcomm/documents/publication/wcms_575479 | accessed on 19 August 2021.

¹² (U) Website | Polaris | “New York Spotlight-2019 U.S. National Human Trafficking Hotline Statistics” | 30 July 2020 | <https://polarisproject.org/wp-content/uploads/2020/11/2019-New-York-State-Report> | accessed on 19 August 2021.

¹³ (U) Website | National Human Trafficking Hotline | “The Traffickers” | <https://humantraffickinghotline.org/what-human-trafficking/human-trafficking/traffickers> | accessed on 17 August 2021.

¹⁴ (U) News Article | *NPR* | “Harvey Weinstein Sentenced to 23 Years In Prison For Rape and Sexual Abuse” | 11 March 2020 | <https://www.npr.org/2020/03/11/814051801/harvey-weinstein-sentenced-to-23-years-in-prison> | accessed on 17 February 2022.

¹⁵ (U) News Article | *BBC News* | “Harvey Weinstein Scandal: Who has Accused Him of What?” | 10 January 2019 | <https://www.bbc.com/news/entertainment-arts-41580010> | accessed on 17 February 2022.

¹⁶ (U) News Article | *The New York Times* | “Actress who Recruited Women for NIXVM Sentenced to 3 Years in Prisons” | 30 June 2021 | <https://www.nytimes.com/2021/06/30/nyregion/allison-mack-nxivm-sentencing.html> | accessed on 17 February 2022.

¹⁷ (U) News Article | *NBC News* | “60 women Accused Bill Cosby. His Conviction Had Been Considered a Big Win For #MeToo” | 01 July 2021 | <https://www.nbcnews.com/news/us-news/60-women-accused-bill-cosby-his-conviction-had-been-considered-n1272864> | accessed on 17 February 2022.