

4/29/08

Core 4-10, 12
~~7, 9~~

14-17, 7, 8

GRAND JURY PRESENTATION
OPERATION LEAP YEAR

I. INTRODUCTION

A. New Indictment

- 1. Summarize Changes
- 2. Summarize Current Charges
- 3. Review Law/Instructions
- 4. Go through legal allegations in introduction

B. Summarize How the Evidence Will Be Presented

- 1. Chart
- 2. Break Overt Acts into Two Categories:
 - a. Meetings/Sexual Activity – Grouped by victim – Testimony re Interviews with the Girls
 - b. Flights – Manifests

C. Take Questions

D. Call Special Agent Kuyrkendall

II. RETURN DOCUMENTS RECEIVED IN RESPONSE TO SUBPOENAS ISSUED SINCE THE LAST DOCUMENT RETURN.

- A. Have additional subpoenas been issued on behalf of this grand jury regarding Operation Leap Year? And have documents been received in response to those subpoenas? What subpoenas were issued and what items were received? Did you bring those records with you today?

III. KUYRKENDALL SUBSTANTIVE TESTIMONY

A. Hand out summary chart

- 1. Review renumbering of Jane Does
 - a. S/A Kuyrkendall: Can you explain to the grand jury how the Jane Does have been renumbered? (They were numbered to try to appear in a more chronological order depending on their

- first known contact with Mr. Epstein)
- b. S/A Kuyrkendall: Which of these girls has the grand jury already heard testimony about?
2. Go over how chart is organized
 - a. S/A Kuyrkendall: What does each column refer to?
 3. Generally review references to transcript pages
 - a. S/A Kuyrkendall: What does the list of transcript pages refer to? How was that list created?
- B. Go through the allegations in the Introductory Section of the Indictment. Summarize evidence that hasn't already been presented (I think just the high school allegations)
- C. Hand out flight chart
1. What does this chart refer to? What does each column mean?
 2. Flip to a few overt acts and read the text aloud. What is the evidence in support of these allegations? (Flight manifests)
 3. Remind the grand jury how the flight manifests were obtained.
 4. So, for each flight referenced in the overt acts, what evidence was relied upon? And did you bring those flight manifests with you? Let's mark those manifests as Composite Grand Jury Exhibit Number JE-1.
 5. There are several dozen manifests contained within Exhibit JE-1. Have you marked in any way the manifests related to the flights referenced in the indictment? And in reviewing those manifests, what information will the grand jurors find? [Airplane used. Date. Departure airport. Arrival airport. Arrival time. Passenger names.]
- D. Discuss telephone records
1. Flip to a few overt acts and read the text aloud. What is the evidence in support of these allegations? (Telephone records)

2. Remind the grand jury how the telephone records were obtained and whose telephone records were obtained. Were there any records that you tried to obtain that you couldn't?
3. Have you pulled the telephone records that contain the telephone calls referred to in the indictment? And did you bring them with you? Have you marked in any way the telephone bills that reference the calls listed in the indictment? And in reviewing those billing records, what information will the grand juror's find? (Telephone number called. Time and date of call. Call length.)

**TAKE A BREAK
BEGIN TESTIMONY REGARDING THE GIRLS**

IV. JANE DOES 1 and 2

A. Who is Jane Doe #1?

1. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #1?
2. During what period of time did Jane Doe #1 have contact with JE?
3. How old was she during that time frame?
4. How did she meet JE?
5. And what sexual activity was she involved in with JE?
6. Did she recruit anyone to go to JE's home?

B. Who is Jane Doe #2?

1. Has she been interviewed? In addition to her statements, who else provided information regarding Jane Doe #2?
2. During what period of time did Jane Doe #2 have contact with JE?
3. How old was she during that time frame?

4. How did she meet JE?
5. And what sexual activity was she involved in with JE?
6. How much was she paid for performing sexual massages for JE?
7. Did she recruit any of the other Jane Does to go to JE's home?
8. Please take us through the evidence supporting the overt acts related to Jane Doe #2.
9. What did Jane Doe #2 say about whether JE knew her age?
10. Who would contact Jane Doe #2 to make appointments? How would she be contacted?
11. Does your testimony cover the evidence supporting the allegations in overt acts 1 through 18?
12. Let's refer to Count 2. Is the evidence you just summarized the basis for the allegation that JE and SK procured Jane Doe #2 to engage in commercial sex acts knowing that she was under 18?

■ **JANE DOE #3 (■■■■■■ W.)**

- A. Who is Jane Doe #3? Have you testified about her previously?
- B. Has she been interviewed?
- C. During what period of time did Jane Doe #3 have contact with JE?
- D. How old was she during that time frame?
- E. How did she meet JE?
- F. And what sexual activity was she involved in with JE?
- G. How much was she paid?
- H. Did she recruit anyone to go to JE's home? What did she tell you about

JE's recruiting requests? Were there girls whom Jane Doe #3 brought to Epstein's home whom he didn't like? Did he allow them to massage him?

- I. Did he ever become frustrated when JD#3 wasn't able to find a young girl for him?
- J. Does your testimony cover the evidence supporting the allegations in overt acts 19 through 31?
- K. Let's refer to Count 12. Is the evidence you just summarized the basis for the allegation that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #3 to engage in prostitution and in sexual activity for which a person can be charged with a criminal offense? [Florida violations – Jane Doe #3 was under the age of 16 when she was involved with Epstein, so he could be charged with lewd and lascivious molestation, lewd and lascivious conduct, and lewd and lascivious exhibition based upon his touching of Jane Doe #3's breasts and genitals, his solicitation of Jane Doe #3 to commit a lewd and lascivious act, and his masturbation and exposure of his genitals in her presence.]

VI. JANE DOES #4, 5, and 6 ([REDACTED] H., [REDACTED] C., and [REDACTED] P.)

- A. Who are Jane Does #4, 5, and 6? Have you testified about them previously?
- B. Have they been interviewed? In addition to their statements, who else provided information regarding Jane Does #4, 5, and 6?
- C. During what period of time did Jane Does #4, 5, and 6 have contact with JE?
- D. How old were they during that time frame?
- E. What sexual activity did Jane Does #4 and #5 engage in with JE?
- F. Did either of them take anyone else to JE's home?
- G. What sexual activity was Jane Doe #6 involved in with JE?
- H. Did she take anyone else to JE's home?

- I. Does your testimony cover the evidence supporting the allegations in overt acts 32-45?
- J. Let's refer to Count 3. Is the evidence you just summarized the basis for the allegation that JE and SK procured Jane Doe #4 to engage in commercial sex acts knowing that she was under 18?
- K. Let's refer to Count 13. Is the evidence you just summarized the basis for the allegation that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #4 to engage in prostitution?

VII. TESTIMONY REGARDING GIRLS ALREADY COVERED IN GRAND JURY – JANE DOES 9, 10, 14, 15, 16 (Alex, [REDACTED], [REDACTED], [REDACTED], and [REDACTED])

A. JANE DOE #9 (Alex H.)

- 1. Who is Jane Doe #9? Have you testified about her previously?
 - a. Is there anything that you want to clarify or add regarding your earlier testimony?
- 2. Please remind the grand jury, during what period of time did Jane Doe #9 have contact with JE?
- 3. How old was she during that time frame?
- 4. And please summarize the sexual activity that Jane Doe #9 was involved in with JE?
 - a. Was she involved in sexual activity with any of the other defendants?
- 5. Does your prior testimony and your testimony today cover the evidence supporting the allegations in overt acts 66-73, 75-77, 80-83, and 90?
- 6. Let's refer to Count 4. Is the evidence you just summarized the basis for the allegation that JE and SK procured Jane Doe #9 to engage in

commercial sex acts knowing that she was under 18?

7. Let's refer to Count 15. Is the evidence you just summarized the basis for the allegation that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #9 to engage in prostitution and in sexual activity for which a person can be charged with an offense? How many telephone calls have you been able to document between Jane Doe #9 and Kellen?
8. What was the activity for which a person could be charged with an offense [Vaginal intercourse between an adult over 24 and a 16 or 17 year old minor – violates Fl. Stat. 794.05]

B. JANE DOE #10 ([REDACTED] B.)

1. Who is Jane Doe #10? Have you testified about her previously?
 - a. Is there anything that you want to clarify or add regarding your earlier testimony?
2. Please remind the grand jury, during what period of time did Jane Doe #10 have contact with JE?
3. How old was she during that time frame?
4. Please summarize the sexual activity that Jane Doe #10 was involved in with JE?
5. Does your prior testimony and your testimony today cover the evidence supporting the allegations in overt acts 67, 74, 78-79, 81, 84-89, 147?
6. Let's refer to Count 5. Is the evidence you just summarized the basis for the allegation that JE and SK procured Jane Doe #10 to engage in commercial sex acts knowing that she was under 18?
7. Let's refer to Count 16. Is the evidence you just summarized the basis for the allegation that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #10 to engage in prostitution? How many telephone calls have you been able to

document between Jane Doe #10 and Kellen?

VIII. OTHER BACKGROUND INFO

- A. Background re defendants and intro section – February 6, 2007 NK Transcript and May 8, 2007 NK Transcript pp. 17-end.
 - B. **ASK ABOUT ITEMS TO BE BROUGHT FOR FINAL PRESENTATION – MASSAGE BEDS!!!**
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C. JANE DOE #14 (██████ E.)

- 1. Who is Jane Doe #14? Have you testified about her previously?
 - a. Is there anything that you want to clarify or add regarding your earlier testimony?
- 2. Please remind the grand jury, during what period of time did Jane Doe #14 have contact with JE?
- 3. How old was she during that time frame?
- 4. Please summarize the sexual activity that Jane Doe #14 was involved in with JE?
- 5. Does your prior testimony and your testimony today cover the evidence supporting the allegations in overt acts 112-131?
- 6. Let's refer to Count 8. Is the evidence you just summarized the basis for the allegation that JE and SK procured Jane Doe #14 to engage in commercial sex acts knowing that she was under 18?
- 7. Let's refer to Count 19. Is the evidence you just summarized the basis for the allegation that JE and SK used a facility of interstate commerce to persuade, induce, and entice Jane Doe #14 to engage in prostitution and in sexual activity for which a person can be charged with an offense? How many telephone calls have you been able to document between Jane Doe #~~9~~ and Kellen?

- a. How old was Jane Doe #14 during this period? And what is the sexual activity that she and JE engaged in that also violated Fl. Stat. 794.05? [Sexual intercourse btwn adult over 24 and a minor.]

D. JANE DOE #15 (██████████ Z.)

1. Who is Jane Doe #15? Have you testified about her previously?
 - a. Is there anything that you want to clarify or add regarding your earlier testimony?
2. Please remind the grand jury, during what period of time did Jane Doe #15 have contact with JE?
3. How old was she during that time frame?
4. Please summarize the sexual activity that she was involved in with JE?
5. Does your prior testimony and testimony here today cover the evidence supporting the allegations in overt acts 132-148, 175?
6. Let's refer to Count 9. Is the evidence you just summarized the basis for the allegation that JE, SK, and **Adriana Ross** procured Jane Doe #15 to engage in commercial sex acts knowing that she was under 18?
7. Let's refer to Count 20. Is the evidence you just summarized the basis for the allegation that JE, SK, and **Adriana Ross** used a facility of interstate commerce to persuade, induce, and entice Jane Doe #15 to engage in prostitution? How many telephone calls have you been able to document between Jane Doe #15 and Kellen? And how many telephone calls between Jane Doe #15 and Ross?

E. JANE DOE #16 (██████████ D.)

1. Who is Jane Doe #16? Have you testified about her previously?

- a. Is there anything that you want to clarify or add regarding your earlier testimony?
2. Please remind the grand jury, during what period of time did Jane Doe #16 have contact with JE?
3. How old was she during that time frame?
4. Please summarize the sexual activity that Jane Doe #16 was involved in with JE?
5. Does your prior testimony and your testimony today cover the evidence supporting the allegations in overt acts 90, 149-151, and 156-181?
6. Let's refer to Count 10. Is the evidence you just summarized the basis for the allegation that JE, SK, **Adriana Ross, and Nadia Marcinkova** procured Jane Doe #16 to engage in commercial sex acts knowing that she was under 18?
7. Let's refer to Count 21. Is the evidence you just summarized the basis for the allegation that JE, SK, **Adriana Ross, and Nadia Marcinkova** used a facility of interstate commerce to persuade, induce, and entice Jane Doe #16 to engage in prostitution and in sexual activity for which a person can be charged with an offense?
 - a. How many telephone calls have you been able to document between Jane Doe #16 and Kellen? Between Jane Doe #16 and Ross? And between Jane Doe #16 and Marcinkova?
8. What was the sexual activity that Jane Doe #16 and JE engaged in that also violated Fl. Stat. 794.05? [Sexual intercourse between an adult over 24 and a minor]

IX. PRIOR DRUG USE/MENTAL HEALTH ISSUES

- A. Today we have discussed 11 victims – Jane Does 1 through 6, 9, 10, and 14 through 16. Are you aware of whether any of them have used illicit drugs or have had mental health issues? Please summarize.

B. Now, with respect to each of those girls, can you summarize for the grand jury your efforts to independently corroborate their statements? What physical evidence corroborates their statements to law enforcement?

E. JANE DOE # 16 (██████ D.) and JANE DOE # 17 (██████ D.)

1. Who is Jane Doe # 16? Have you testified about her previously?
 - a. Is there anything that you want to clarify or add regarding your earlier testimony?
2. Please remind the grand jury, during what period of time did Jane Doe # 16 have contact with JE?
3. How old was she during that time frame?
4. Please summarize the sexual activity that Jane Doe # 16 was involved in with JE?
5. Did Jane Doe # 16 recruit anyone to go to JE's home?

JANE DOE # 17 (██████ D.)

6. Who is Jane Doe # 17? Have you testified about her previously?
7. Has she been interviewed?
8. During what period of time did Jane Doe # 17 have contact with JE?
9. How old was she during that time frame?
10. How did she meet JE?
11. And what sexual activity was she involved in with JE?
12. How much was she paid?
13. Did she recruit anyone to go to JE's home?

JANE DOE # 16 (██████ D.) and JANE DOE # 17 (██████ D.)

14. Does your prior testimony and your testimony today cover the evidence supporting the allegations and overt acts 90, 149-151 and 156-181?
15. Let's refer to Count 10. Is the evidence you just summarized the basis for the allegation that JE, SK, AR and NM procured Jane Doe # 16 to engage in commercial sex acts knowing that she was under 18?
16. Let's refer to Count 21. Is the evidence you just summarized the basis for the allegation that JE, SK, AR and NM used a facility of interstate commerce to

persuade, induce and entice Jane Doe # 16 to engage in prostitution and in sexual activity for which a person can be charged with an offense?

- a. How many telephone calls have you been able to document between Jane Doe # 16 and Kellen? Between Jane Doe # 16 and Ross? And between Jane Doe # 16 and Marcinkova?
17. What was the sexual activity that Jane Doe # 16 and JE engaged in that also violated Fl. Stat. 794.05? (Sexual intercourse between an adult over 24 and a minor)
18. Does your prior testimony and your testimony today cover the evidence supporting the allegations and overt acts 150-155?
19. Let's refer to Count 22. Is the evidence you just summarized the basis for the allegation that JE and SK used a facility of interstate commerce to persuade, induce and entice Jane Doe # 17 to engage in prostitution and in sexual activity for which a person can be charged with an offense?

F. JANE DOE # 7 [REDACTED] L.)

1. Who is Jane Doe # 7? Have you testified about her previously?
2. Has she been interviewed?
3. During what period of time did Jane Doe # 7 have contact with JE?
4. How old was she during that time frame?
5. How did she meet JE?
6. And what sexual activity was she involved in with JE?
7. How much was she paid?
8. Did she recruit anyone to go to JE's home?
9. Does your testimony cover the evidence supporting the allegations in overt acts 46, 47, 54, 57, 59-64?
10. Let's refer to Count ¹³~~14~~. Is the evidence you just summarized the basis for the allegation that JE and SK used a facility of interstate commerce to persuade, induce and entice Jane Doe # 7 to engage in prostitution and in sexual activity for which a person can be charged with an offense? How many telephone calls have you been able to document between Jane Doe # 7 and Kellen?
11. Did Tatum Miller recruit anyone else

G. JANE DOE # 8 (██████ E.)

1. Who is Jane Doe # 8? Have you testified about her previously?
2. Has she been interviewed?
3. During what period of time did Jane Doe # 8 have contact with JE?
4. How old was she during that time frame?
5. How did she meet JE?
6. And what sexual activity was she involved in with JE?
7. How much was she paid?
8. Did she recruit anyone to go to JE's home?
9. Does your testimony cover the evidence supporting the allegations in overt acts 49-53, 55, 65?

CT 14

9 calls btwn SK + JANE # 8

H. JANE DOE # 12 (██████████, S.)

1. Who is Jane Doe # 12? Have you testified about her previously?
2. Has she been interviewed?
3. During what period of time did Jane Doe # 12 have contact with JE?
4. How old was she during that time frame?
5. How did she meet JE?
6. And what sexual activity was she involved in with JE?
7. How much was she paid?
8. Did she recruit anyone to go to JE's home?
9. Does your testimony cover the evidence supporting the allegations in overt acts 96, 98-104?
10. Let's refer to Count 06. Is the evidence you just summarized the basis for the allegation that JE, and SK procured Jane Doe # 12 to engage in commercial sex acts knowing that she was under 18?
11. Let's refer to Count 17. Is the evidence you just summarized the basis for the allegation that JE, and SK used a facility of interstate commerce to persuade, induce and entice Jane Doe # 12 to engage in prostitution and in sexual activity for which a person can be charged with an offense?
 - a. How many telephone calls have you been able to document between Jane Doe # 12 and Kellen?

I. JANE DOE # 13 ([REDACTED] N.)

1. Who is Jane Doe # 13? Have you testified about her previously?
2. Has she been interviewed?
3. During what period of time did Jane Doe # 13 have contact with JE?
4. How old was she during that time frame?
5. How did she meet JE?
6. And what sexual activity was she involved in with JE?
7. How much was she paid?
8. Did she recruit anyone to go to JE's home?
9. Does your testimony cover the evidence supporting the allegations in overt acts 96, 97, 104-111?
10. Let's refer to Count 07. Is the evidence you just summarized the basis for the allegation that JE, and SK procured Jane Doe # 13 to engage in commercial sex acts knowing that she was under 18?
11. Let's refer to Count 18. Is the evidence you just summarized the basis for the allegation that JE, and SK used a facility of interstate commerce to persuade, induce and entice Jane Doe # 13 to engage in prostitution and in sexual activity for which a person can be charged with an offense?
 - a. How many telephone calls have you been able to document between Jane Doe # 13 and Kellen?

J. JANE DOE # 18 [REDACTED] (A.)

1. Who is Jane Doe # 18? Have you testified about her previously?
2. Has she been interviewed?
3. During what period of time did Jane Doe # 18 have contact with JE?
4. How old was she during that time frame?
5. How did she meet JE?
6. And what sexual activity was she involved in with JE?
7. How much was she paid?
8. Did she recruit anyone to go to JE's home?
9. Does your testimony cover the evidence supporting the allegations in overt acts 182-188, 190?
10. Let's refer to Count 23. Is the evidence you just summarized the basis for the allegation that JE, and SK used a facility of interstate commerce to persuade, induce and entice Jane Doe # 18 to engage in prostitution and in sexual activity for which a person can be charged with an offense?
 - a. How many telephone calls have you been able to document between Jane Doe # 18 and Kellen?

K. JANE DOE # 19 [REDACTED] H.)

1. Who is Jane Doe # 19? Have you testified about her previously?
2. Has she been interviewed?
3. During what period of time did Jane Doe # 19 have contact with JE?
4. How old was she during that time frame?
5. How did she meet JE?
6. And what sexual activity was she involved in with JE?
7. How much was she paid?
8. Did she recruit anyone to go to JE's home?
9. Does your testimony cover the evidence supporting the allegations in overt acts 189-190?

4/29/08

OPERATION LEAP YEAR
REVISED INDICTMENT SUMMARY CHART (by victim)

New Jane Doe #	Old Jane Doe #	DOB	Range of activity dates	Overt Acts	Substantive Counts	GJ Transcript Pages
1	n/a	August 1983	1998 - 2003	1	n/a	
2	n/a	January 1987	2001 to 2003	1-18	2	5/8/07 NK Transcript pp. 6-7
3	n/a	October 1987	2003	19-31	12	
4	n/a	August 1986	2004	32-38, 41	3	
5	n/a	October 1986	2004	32, 34, 39	n/a	
6	n/a	June 1987	2004	40-45	n/a	
7	12	April 1988	7/04	46, 47, 54, 57, 59-64	13, 26	
8	n/a	November 1986	7/04 - 11/04	49-53, 55, 65	14, 26	
9	6	December 1986	7/04 - 12/04	66-73, 75-77, 80-83, 90	4, 15, 26	5/22/07 NK Transcript pp. 16-27
10	7	February 1987	7/04 - 11/05	67, 74, 78-79, 81, 84-89, 147	5, 16, 26	5/22/07 NK Transcript pp. 25-37
11	n/a	October 1986	2004-2005	91-95	n/a	
12	14	April 1987	8/04 - 2/05	96, 98-104	6, 17	

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New Jane Doe #	Old Jane Doe #	DOB	Range of activity dates	Overt Acts	Substantive Counts	GJ Transcript Pages
13	13	May 1987	8/04 - 5/05	96, 97, 104-111	7, 18	
14	5	June 1987	11/04 - 3/05	112-131	8, 19, 27	5/22/07 NK Transcript pp. 4-13
15	3	June 1987	12/04 - 6/5/05	132-148, 175	9, 20, 27	3/20/07 NK Transcript pp. 4-22 5/15/07 NK Transcript pp. 3-17 ██████ Transcript pp. 23-25, 27-28
16	8	October 1987	2/05 - 10/05	90, 149-151, 156-181	10, 21, 27, 28, 29	5/22/07 NK Transcript pp. 39-47
17	9	April 1988	2/05 - 3/05	150-155	22	
18	n/a	February 1986	8/03 - 3/04	182-188, 190	23	
19	n/a	May 1986	3/04	189-190	n/a	
T.M.	n/a	July 1988	2003-2005	48, 52, 56, 58, 59	n/a	5/8/07 NK Transcript pp. 3-12
A.F.	n/a	n/a	n/a	182	n/a	██████ Transcript pp. 5-13, 27 5/8/07 NK Transcript pp. 24-25

4/29/08

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No: _____

- 18 U.S.C. § 371
- 18 U.S.C. § 1591(a)(1)
- 18 U.S.C. § 1591(a)(2)
- 18 U.S.C. § 2422(b)
- 18 U.S.C. § 2423(e)
- 18 U.S.C. § 2423(d)
- 18 U.S.C. § 2423(b)

UNITED STATES OF AMERICA

vs.

JEFFREY EPSTEIN,
SARAH KELLEN,
ADRIANA ROSS, a/k/a "Adriana Mucinska,"
and NADIA MARCINKOVA,

Defendants.

INDICTMENT

The Grand Jury charges that:

BACKGROUND

At all times relevant to this Indictment:

1. Defendant JEFFREY EPSTEIN employed defendants SARAH KELLEN,
ADRIANA ROSS, a/k/a "Adriana Mucinska," and NADIA MARCINKOVA to perform,
among other things, services as personal assistants.

2. Defendant JEFFREY EPSTEIN employed I.G. to perform, among other

things, services as a personal assistant.

3. Defendants JEFFREY EPSTEIN and SARAH KELLEN paid T.M., H.R., and

A.F. to perform, among other things, recruiting services.

4. Defendant JEFFREY EPSTEIN owned a property located at 358 El Brillio Way,

Palm Beach, Florida, in the Southern District of Florida (hereinafter referred to as "358 El

Brillio Way").

5. Defendant JEFFREY EPSTEIN owned a property located at 9 East 71st Street,

New York, New York (hereinafter referred to as "the New York residence").

6. Defendant JEFFREY EPSTEIN was the principal owner of JEGE, INC., a

Delaware corporation. JEGE, INC.'s sole business activities related to the operation and

ownership of a Boeing 727-31 aircraft bearing tail number N908JE.

7. Defendant JEFFREY EPSTEIN served as president, sole director, and sole

shareholder of JEGE, INC., and had the power to direct all of its operations.

8. Defendant JEFFREY EPSTEIN was the principal owner of Hyperion Air, Inc.,

a Delaware corporation. Hyperion Air, Inc.'s sole business activities related to the operation

and ownership of a Gulfstream G-1159B aircraft bearing tail number N909JE.

9. Defendant JEFFREY EPSTEIN served as president, sole director, and sole

shareholder of Hyperion Air, Inc., and had the power to direct all of its operations.

10. Pursuant to Florida Statutes Section 794.05, a "person 24 years of age or older

who engages in sexual activity with a person 16 or 17 years of age commits a felony of the second degree." For purposes of "this section, 'sexual activity' means oral, anal, or vaginal

penetration by, or union with, the sexual organ of another; however, sexual activity does not include an act done for a bona fide medical purpose." Florida Statutes Section 794.021 states

that "ignorance of the age [of the victim] is no defense," and that neither "misrepresentation of age by [the victim] nor a bona fide belief that such person is over the specified age [shall]

be a defense."

11. Pursuant to Florida Statutes Sections 800.04(5)(a) and 800.04(5)(c)(2), an adult

"who intentionally touches in a lewd or lascivious manner the breasts, genital area, or buttocks, or the clothing covering them, of a person less than 16 years of age, or forces or

entices a person under 16 years of age to so touch the perpetrator, commits lewd or lascivious molestation," which is a felony of the second degree if the victim is 12 years of age or older

but less than 16 years of age.

12. Pursuant to Florida Statutes Sections 800.04(6)(a) and 800.04(6)(b), an adult

"who [i]ntentionally touches a person under 16 years of age in a lewd or lascivious manner or [s]olicits a person under 16 years of age to commit a lewd or lascivious act commits lewd

or lascivious conduct," which is a felony of the second degree.

13. Pursuant to Florida Statutes Sections 800.04(7)(a) and 800.04(7)(c), an adult

“who: (1) [i]ntentionally masturbates; (2) [i]ntentionally exposes the genitals in a lewd or lascivious manner; or (3) [i]ntentionally commits any other sexual act that does not involve actual physical or sexual contact with the victim, including, but not limited to . . . the simulation of any act involving sexual activity in the presence of a victim who is less than 16 years of age, commits lewd or lascivious exhibition,” which is a felony of the second degree.

14. Pursuant to Florida Statutes Section 800.04(2), “[n]either the victim’s lack of

chastity nor the victim’s consent is a defense to the crimes proscribed by [Section 800.04].”

15. Pursuant to Florida Statutes Section 800.04(3), “[t]he perpetrator’s ignorance of the victim’s age, the victim’s misrepresentation of his or her age, or the perpetrator’s bona fide belief of the victim’s age cannot be raised as a defense in a prosecution under [Section

800.04].”

16. Pursuant to Florida Statutes Section 800.02, a “person who commits any unnatural and lascivious act with another person commits a misdemeanor of the second degree.”

17. Defendant JEFFREY EPSTEIN was over the age of 24 and did not have any medical license.

18. During the period of her involvement with the Defendants, Jane Doe #4

attended Wellington High School and Palm Beach Central High School in Palm Beach

County.

19. During the period of her involvement with the Defendants, Jane Doe #5

attended Wellington High School in Palm Beach County.

20. During the period of their involvement with the Defendants, Jane Does # 6, 8

and 12 attended Palm Beach Central High School in Palm Beach County.

21. During the period of her involvement with the Defendants, Jane Doe #7

attended William T. Dwyer High School in Palm Beach County.

22. During the periods of their involvement with the Defendants, Jane Does # 9,

14, 15, 16, 17, 18, and 19 attended Royal Palm Beach High School in Palm Beach County.

23. During the period of her involvement with the Defendants, Jane Doe #10

attended Lake Worth High School in Palm Beach County.

24. During the period of her involvement with the Defendants, Jane Doe #11

attended the Professional Performing Arts School, a public high school, located in New

York, New York.

25. During the period of her involvement with the Defendants, Jane Doe #13

attended John I. Leonard High School in Palm Beach County.

28. It was the purpose and object of the conspiracy to procure females under the age of 18 to travel to 358 El Brillio Way and the New York residence so that JEFFREY EPSTEIN could, in exchange for money, engage in lewd conduct with those minor females in order to satisfy JEFFREY EPSTEIN's prurient interests.

Purpose and Object of the Conspiracy

did knowingly and willfully combine, conspire, confederate and agree with each other and with others known and unknown to commit an offense against the United States, that is, to use a facility or means of interstate or foreign commerce to knowingly persuade, induce, and entice individuals who had not attained the age of 18 years to engage in prostitution, in violation of Title 18, United States Code, Section 2422(b).

JEFFREY EPSTEIN,
 SARAH KELLEN,
 ADRIANA ROSS, a/k/a "Adriana Mucinska,"
 and
 NADIA MARCINKOVA,

Florida, and elsewhere, the Defendants, through in or around October 2005, in Palm Beach County, in the Southern District of

27. From at least as early as 2001, the exact date being unknown to the Grand Jury,

reference as though fully set forth herein.

26. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by

COUNT 1
 (Conspiracy: 18 U.S.C. § 371)

Manner and Means

29. The manner and means by which the Defendants and other participants sought to accomplish the purpose and object of the conspiracy included the following:

(a) It was part of the conspiracy that Defendants SARAH KELLEN, ADRIANA ROSS, a/k/a "Adriana Mucinska," NADIA MARCINKOVA, and other participants would contact minor females via the use of cellular and other telephones to arrange appointments for minor females to travel to 358 El Brillio Way and the New York residence to allow Defendant JEFFREY EPSTEIN to engage in lewd conduct with them.

(b) It was further a part of the conspiracy that Defendants JEFFREY EPSTEIN, SARAH KELLEN, and ADRIANA ROSS, a/k/a "Adriana Mucinska," NADIA MARCINKOVA, and other participants would make payments to, or cause payments to be made to, minor females in exchange for engaging in lewd conduct.

(c) It was further a part of the conspiracy that Defendants JEFFREY EPSTEIN, SARAH KELLEN, ADRIANA ROSS, a/k/a "Adriana Mucinska," and other participants would ask females to recruit other minor females to engage in lewd conduct with Defendant JEFFREY EPSTEIN.

(d) It was further a part of the conspiracy that Defendants JEFFREY EPSTEIN, SARAH KELLEN, ADRIANA ROSS, a/k/a "Adriana Mucinska," and other participants would make payments to, or cause payments to be made to, the recruiters for

bringing additional minor females to 358 El Brillo Way and the New York residence to

engage in lewd conduct with Defendant JEFFREY EPSTEIN.

(c) It was further a part of the conspiracy that Defendant JEFFREY

EPSTEIN would pay minor females to engage in lewd conduct with Defendant NADIA MARCINKOVA to satisfy Defendant JEFFREY EPSTEIN's prurient interests.

Overt Acts

30. In furtherance of this conspiracy and to effect the objects thereof, there was

committed by at least one of the co-conspirators herein, at least one of the following overt

acts, among others, in the Southern District of Florida, and elsewhere:

Jane Does #1 and #2

(1) In or around the beginning of 2001, Defendant JEFFREY EPSTEIN

engaged in sexual activity with Jane Doe #1, who was then a seventeen-year-old girl,

in the presence of Jane Doe #2, who was then a fourteen-year-old girl.

(2) In or around 2001, Defendant SARAH KELLEN led Jane Doe #2 from the

kitchen of 358 El Brillo Way upstairs to Defendant JEFFREY EPSTEIN's bedroom at 358

El Brillo Way.

(3) In or around 2001, Defendant JEFFREY EPSTEIN masturbated in the

presence of Jane Doe #2, who was then a fourteen-year-old girl.

(4) In or around 2001, Defendant JEFFREY EPSTEIN asked Jane Doe #2,

who was then fourteen years' old, to pinch his nipples while he masturbated.

(5) In or around 2001, Defendant JEFFREY EPSTEIN made a payment of

\$300 to Jane Doe #2.

(6) In or around 2001, Defendant SARAH KILLEN placed a telephone call

to a telephone used by Jane Doe #2 to make an appointment for Jane Doe #2 to travel

to 358 El Brillo Way.

(7) In or around 2001, JEFFREY EPSTEIN engaged in sexual intercourse

with an unidentified female in the presence of Jane Doe #2, who was then a fourteen-

year-old girl.

(8) In or around 2001, Defendant JEFFREY EPSTEIN paid \$300 to Jane

Doe #2, who was then a fourteen-year-old girl, for allowing an unidentified female

to perform oral sex on Jane Doe #2 in EPSTEIN's presence.

(9) On or about March 11, 2003, an employee of Defendant JEFFREY

EPSTEIN prepared a written telephone message for Defendant JEFFREY EPSTEIN's

review regarding a telephone call received from Jane Doe #2.

(10) In or around 2003, Defendant JEFFREY EPSTEIN asked Jane Doe #2

if she had any younger friends who would be interested in engaging in similar

activities with him.

(11) In or around 2003, Defendant SARAH KILLEN took nude photographs

of Jane Doe #2, who was then a sixteen-year-old girl.

(12) In or around 2003, Defendant SARAH KELLEN made a payment of

\$500 to Jane Doe #2 in exchange for posing for nude photographs.

(13) In or around 2003, Defendant SARAH KELLEN told Jane Doe #2 that

Defendant JEFFREY EPSTEIN had asked KELLEN to take nude photographs of Jane

Doe #2.

(14) In or around 2003, Defendant JEFFREY EPSTEIN masturbated in the

presence of Jane Doe #2, who was then a sixteen-year-old girl.

(15) In or around 2003, Defendant JEFFREY EPSTEIN made a payment of

\$200 to Jane Doe #2, who was then a sixteen-year-old girl.

(16) In or around 2003, Defendant SARAH KELLEN placed a telephone call

to a telephone used by Jane Doe #2 to make an appointment for Jane Doe #2 to travel

to 358 El Brillo Way.

(17) On or about April 23, 2004, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #2.

(18) On or about May 2, 2004, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #2.

Jane Doe #3

(19) In or around 2003, Defendant JEFFREY EPSTEIN masturbated in the

presence of Jane Doe #3, who was then a fifteen-year-old girl.

(20) In or around 2003, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #3.

(21) On or about October 26, 2004, Defendant SARAH KILLIN placed a telephone call to a telephone used by Jane Doe #3.

(22) On or about October 30, 2004, Defendant SARAH KILLIN placed a telephone call to a telephone used by Jane Doe #3.

(23) In or around 2004, Defendant JEFFREY EPSTEIN directed Jane Doe #3, who was then a sixteen- or seventeen-year-old girl, to straddle an adult female and

to touch the adult female's breasts.

(24) In or around 2004, Defendant JEFFREY EPSTEIN placed a massaging device on the vagina of an adult female in the presence of Jane Doe #3, who was then

a sixteen- or seventeen-year-old girl.

(25) In or around 2004, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #3.

(26) In or around 2004, Defendant JEFFREY EPSTEIN instructed Jane Doe #3 to rub his nipples.

(27) In or around 2004, Defendant JEFFREY EPSTEIN placed a massaging device on the vagina of Jane Doe #3, who was then a sixteen- or seventeen-year-old

girl.

(28) In or around 2004, Defendant JEFFREY EPSTEIN asked Jane Doe #3

to recruit additional females to come to 358 El Brillo Way.

(29) On or about November 8, 2004, one of Defendant JEFFREY

EPSTEIN's employees prepared a written telephone message for Defendant JEFFREY EPSTEIN's review regarding a telephone call received from Jane Doe #3 that read: "I have a female for him."

(30) On or about January 14, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #3.

(31) On or about January 29, 2005, one of Defendant JEFFREY EPSTEIN's

employees prepared a written telephone message for Defendant JEFFREY EPSTEIN's review regarding a telephone call received from Jane Doe #3 that read:

"I have a female for him."

Jane Does #4, #5, and #6

(32) In or around the first half of 2004, Defendant SARAH KELLEN led

Jane Doe #4 and Jane Doe #5 to Defendant JEFFREY EPSTEIN's bedroom at 358 El Brillo Way.

(33) In or around the first half of 2004, Defendant JEFFREY EPSTEIN

asked Jane Doe #4 about her age, and Jane Doe #4 responded with her true age.

(34) In or around the first half of 2004, Defendant JEFFREY EPSTEIN

masturbated in the presence of Jane Doe #4, who was then a seventeen-year-old-girl, and Jane Doe #5, who was then a seventeen-year-old girl.

(35) In or around the first half of 2004, Defendant JEFFREY EPSTEIN

instructed Jane Doe #4, who was then a seventeen-year-old girl, to play with his nipples.

(36) In or around the first half of 2004, Defendant JEFFREY EPSTEIN

instructed Jane Doe #4, who was then a seventeen-year-old girl, to remove her clothing.

(37) In or around the first half of 2004, Defendant JEFFREY EPSTEIN

stroked the vagina of Jane Doe #4, who was then a seventeen-year-old girl.

(38) In or around the first half of 2004, Defendant JEFFREY EPSTEIN paid

\$200 to Jane Doe #4.

(39) In or around the first half of 2004, Defendant JEFFREY EPSTEIN paid

\$200 to Jane Doe #5.

(40) In or around the first half of 2004, Defendant JEFFREY EPSTEIN

asked Jane Doe #6 what high school she attended.

(41) In or around the first half of 2004, Defendant JEFFREY EPSTEIN

instructed Jane Doe #4 to leave so that Jane Doe #6 could massage him alone.

(42) In or around the first half of 2004, Defendant JEFFREY EPSTEIN

masturbated in the presence of Jane Doe #6, who was then a sixteen-year-old girl.

(43) In or around the first half of 2004, Defendant JEFFREY EPSTEIN

digitally penetrated Jane Doe #6, who was then a sixteen-year-old girl.

(44) In or around the first half of 2004, Defendant JEFFREY EPSTEIN

placed a large vibrating massager on the vagina of Jane Doe #6, who was then a

sixteen-year-old girl.

(45) In or around the first half of 2004, Defendant JEFFREY EPSTEIN

caused a payment of \$200 to be paid to Jane Doe #6.

Jane Does #7 and #8

(46) In or around July 2004, Defendant JEFFREY EPSTEIN led T.M., who

was then a fifteen-year-old girl, and Jane Doe #7, who was then a sixteen-years-old

girl, from the kitchen of 358 El Brillo Way upstairs to Defendant JEFFREY

EPSTEIN's bedroom at 358 El Brillo Way.

(47) On or about July 4, 2004, Defendant SARAH KELLEN made one or

more telephone calls to a telephone used by Jane Doe #7.

(48) On or about July 5, 2004, Defendant SARAH KELLEN placed a

telephone call to a telephone used by T.M.

(49) In or around July 2004, Defendant JEFFREY EPSTEIN masturbated in

the presence of Jane Doe #8, who was then a seventeen-year-old girl.

(50) In or around July 2004, Defendant JEFFREY EPSTEIN stroked the

vagina of Jane Doe #8, who was then a seventeen-year-old girl.

(51) In or around July 2004, Defendant JEFFREY EPSTEIN paid

approximately \$200 to Jane Doe #8.

(52) In or around July 2004, Defendant JEFFREY EPSTEIN paid \$200 to

T.M. for recruiting Jane Doe #8 to travel to 358 El Brillio Way.

(53) In or around July 2004, Defendant SARAH KILLEN told Jane Doe #8

that Defendant JEFFREY EPSTEIN would pay Jane Doe #8 if she returned with a

friend.

(54) On or about July 15, 2004, Defendant SARAH KILLEN placed one or

more telephone calls to a telephone used by Jane Doe #7.

(55) On or about July 15, 2004, Defendant SARAH KILLEN placed a

telephone call to a telephone used by Jane Doe #8.

(56) On or about July 15, 2004, Defendant SARAH KILLEN placed a

telephone call to a telephone used by T.M.

(57) On or about July 16, 2004, Defendant SARAH KILLEN placed one or

more telephone calls to a telephone used by Jane Doe #7.

(58) On or about July 16, 2004, Defendant SARAH KELLEN placed a

telephone call to a telephone used by T.M.

(59) On or about July 17, 2004, one of Defendant JEFFREY EPSTEIN's

employees prepared a written telephone message for Defendant JEFFREY

EPSTEIN's review regarding a telephone call received from T.M. that read: "Me &

[Jane Doe #7] can come tomorrow any time or [T.M.] alone".

(60) In or around July 2004, Defendant JEFFREY EPSTEIN masturbated in

the presence of Jane Doe #7, who was then a sixteen-year-old girl.

(61) In or around July 2004, Defendant JEFFREY EPSTEIN instructed Jane

Doe #7, who was then a sixteen-year-old girl, to rub his nipples.

(62) In or around July 2004, Defendant JEFFREY EPSTEIN stroked the

vagina of Jane Doe #7, who was then a sixteen-year-old girl.

(63) In or around July 2004, Defendant JEFFREY EPSTEIN made a

payment of \$200 to Jane Doe #7.

(64) In or around July 2004, Defendant JEFFREY EPSTEIN told Jane Doe

#7 that if she reported to anyone what had occurred at Defendant JEFFREY

EPSTEIN's home, bad things could happen to her.

(65) On or about July 24, 2004, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #8.

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telephone call to a telephone used by Jane Doe #10.

(74) On or about July 22, 2004, Defendant SARAH KELLEN placed a

payment of \$200 to Jane Doe #9.

(73) In or around July 2004, Defendant JEFFREY EPSTEIN made a

the presence of Jane Doe #9, who was then a seventeen-year-old girl.

(72) In or around July 2004, Defendant JEFFREY EPSTEIN masturbated in

breasts of Jane Doe #9, who was then a seventeen-year-old girl.

(71) In or around July 2004, Defendant JEFFREY EPSTEIN fondled the

telephone call to a telephone used by Jane Doe #9.

(70) On or about July 22, 2004, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #9.

(69) On or about July 18, 2004, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #9.

(68) On or about July 17, 2004, Defendant SARAH KELLEN placed a

Doe #9 to make one or more telephone calls to a telephone used by Jane Doe #10.

(67) On or about July 16, 2004, Defendant SARAH KELLEN caused Jane

more telephone calls to a telephone used by Jane Doe #9.

(66) On or about July 15, 2004, Defendant SARAH KELLEN placed one or

Jane Does #9 and #10

(75) In or around the last half of 2004, Defendants JEFFREY EPSTEIN and

NADIA MARCINKOVA engaged in oral sex and sexual intercourse in the presence of Jane Doe #9, who was then a seventeen-year-old girl.

(76) In or around the last half of 2004, Defendant JEFFREY EPSTEIN

forcibly inserted his penis into the vagina of Jane Doe #9, who was then a seventeen-year-old girl.

(77) In or around the last half of 2004, Defendant JEFFREY EPSTEIN made

a payment of \$300 to Jane Doe #9.

(78) In or around the last half of 2004, Defendant JEFFREY EPSTEIN

rubbed the vagina of Jane Doe #10, who was then a seventeen-year-old girl.

(79) In or around the last half of 2004, Defendant JEFFREY EPSTEIN made

a payment of \$200 to Jane Doe #10.

(80) On or about November 28, 2004, Defendant JEFFREY EPSTEIN

arranged for one of his employees to provide an envelope filled with cash to Jane Doe

#9.

(81) On or about December 4, 2004, Defendant SARAH KILLEN provided

a written message to Defendant JEFFREY EPSTEIN regarding Jane Does # 9 and 10, stating: "[Jane Doe #10] would like to work @ 4:00 pm if possible. [[Jane Doe #9]

is scheduled for 5:00 today.] the movie is @ 7:30".

(82) On or about December 29, 2004, Defendant SARAH KILLEN placed

a telephone call to a telephone used by Jane Doe #9.

(83) On or about December 30, 2004, Defendants JEFFREY EPSTEIN and SARAH KLEIN caused the purchase of Broadway tickets as an eighteenth birthday

gift for Jane Doe #9.

(84) In or around the last half of 2004 or January 2005, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #10, who was then a seventeen-

year-old girl.

(85) In or around the last half of 2004 or January 2005, Defendant JEFFREY EPSTEIN fondled the breasts of Jane Doe #10, who was then a seventeen-year-old

girl.

(86) On or about January 14, 2005, Defendant SARAH KLEIN placed one or more telephone calls to a telephone used by Jane Doe #10.

(87) On or about January 27, 2005, Defendant ADRIANA ROSS, a/k/a "Adriana Mucinska," placed one or more telephone calls to a telephone used by Jane Doe #10.

(88) On or about January 28, 2005, Defendant SARAH KLEIN placed one or more telephone calls to a telephone used by Jane Doe #10.

(89) On or about February 1, 2005, Defendant NADIA MARCINKOVA placed one or more telephone calls to a telephone used by Jane Doe #10.

(90) In or around February 2005, Defendant JEFFREY EPSTEIN caused a payment of \$200 to be made to Jane Doe #9 for recruiting Jane Doe #16 to travel to

358 El Brillo Way.

Jane Doe #11

(91) In or around 2004, Defendant JEFFREY EPSTEIN told Jane Doe #11

that he would pay her to find and bring him more girls.

(92) In or around 2004, Defendant JEFFREY EPSTEIN paid \$200 to Jane

Doe #11 for recruiting a minor female to travel to his New York home.

(93) In or around 2004, Defendant JEFFREY EPSTEIN asked Jane Doe #11

when she would be getting more girls.

(94) On or about April 5, 2005, one of Defendant JEFFREY EPSTEIN's

employees prepared a written message for Defendant JEFFREY EPSTEIN's review

regarding a telephone call received from Jane Doe #11 that read: "Re does she have

any new friends you can meet - I was away over the weekend so I have not spoken

to anyone new. But, [unidentified Jane Doe] will be around later today and I know

she really wants to work. The others should be back around Thursday. Let me know

about [unidentified Jane Doe]."

(95) On or about June 22, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #11.

Jane Does #12 and #13

(96) On or about August 2, 2004, an employee of Defendant JEFFREY

EPSTEIN prepared a written telephone message for Defendant JEFFREY EPSTEIN's

review regarding a telephone call received from T.M. and Jane Doe #12 that stated:

"They are available all weekend and maybe [Jane Doe #13] too".

(97) On or about August 21, 2004, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #13.

(98) In or around the last half of 2004, Defendant JEFFREY EPSTEIN

masturbated in the presence of Jane Doe #12, who was then a seventeen-year-old girl.

(99) In or around the last half of 2004, Defendant JEFFREY EPSTEIN

digitally penetrated Jane Doe #12, who was then a seventeen-year-old girl.

(100) In or around the last half of 2004, Defendant JEFFREY EPSTEIN

attempted to place a massaging device on the vagina of Jane Doe #12, who was then

a seventeen-year-old girl.

(101) In or around the last half of 2004, Defendant JEFFREY EPSTEIN made

a payment of \$200 to Jane Doe #12.

(102) In or around the last half of 2004, Defendant JEFFREY EPSTEIN asked

Jane Doe #12, who was then a seventeen-year-old girl, about her age.

(103) In or around the last half of 2004, Defendant JEFFREY EPSTEIN told

Jane Doe #12 that he would take her to Los Angeles when she turned eighteen.

(104) In or around the last half of 2004, Defendants JEFFREY EPSTEIN and

SARAH KELLEN caused Jane Doe #12 to recruit Jane Doe #13 to travel to 358 El

Brillo Way.

(105) In or around the last half of 2004, Defendant JEFFREY EPSTEIN

masturbated in the presence of Jane Doe #13, who was then a seventeen-year-old girl.

(106) In or around the end of 2004, Defendant JEFFREY EPSTEIN placed

a massaging device on the vagina of Jane Doe #13, who was then a seventeen-year-

old girl.

(107) In or around the last half of 2004, Defendant JEFFREY EPSTEIN made

a payment of \$200 to Jane Doe #13.

(108) In or around the last half of 2004, Defendant JEFFREY EPSTEIN

digitally penetrated Jane Doe #13, who was then a seventeen-year-old girl.

(109) In or around the last half of 2004, Defendant JEFFREY EPSTEIN asked

Jane Doe #13, who was then a seventeen-year-old girl, about her age.

(110) In or around the last half of 2004, Defendant JEFFREY EPSTEIN told

Jane Doe #13 that he wanted to take her to Paris but he could not because Jane Doe

#13 was not yet eighteen years old.

(111) In or around the last half of 2004, Defendant JEFFREY EPSTEIN asked

Jane Doe #13 to bring her friends to his home, especially "girls who looked like [Jane

Doe #13]."

Jane Doe #14

(112) In or around the last half of 2004, Defendant SARAH KELLEN led

Jane Doe #14 from the kitchen of 358 El Brillio Way upstairs to Defendant JEFFREY

EPSTEIN's bedroom at 358 El Brillio Way.

(113) In or around the last half of 2004, Defendant JEFFREY EPSTEIN asked

Jane Doe #14 to provide her telephone number.

(114) In or around the last half of 2004, Defendant JEFFREY EPSTEIN

instructed Jane Doe #14, who was then a seventeen-year-old girl, to pinch his nipples.

(115) In or around the last half of 2004, Defendant JEFFREY EPSTEIN

masturbated in the presence of Jane Doe #14, who was then a seventeen-year old girl.

(116) In or around the last half of 2004, Defendant JEFFREY EPSTEIN made

a payment of \$300 to Jane Doe #14.

(117) In or around the end of 2004 and the beginning of 2005, Defendant

JEFFREY EPSTEIN digitally penetrated Jane Doe #14, who was then a seventeen-

year-old girl.

(118) In or around the end of 2004 and the beginning of 2005, Defendant

JEFFREY EPSTEIN asked Jane Doe #14, who was then a seventeen-year-old girl,

whether she had any plans for her eighteenth birthday and acknowledged that she had

not yet turned eighteen.

(119) On or about December 23, 2004, Defendant JEFFREY EPSTEIN

caused a Western Union wire transfer order to be sent to Jane Doe #14.

(120) In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN

placed a massaging device on the vagina of Jane Doe #14, who was then a seventeen-

year-old girl.

(121) In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN

engaged in sexual intercourse with Jane Doe #14, who was then a seventeen-year-old

girl.

(122) In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN

performed oral sex on Jane Doe #14, who was then a seventeen-year-old girl.

(123) In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN

made a payment of \$600 to Jane Doe #14.

(124) On or about January 8, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #14.

(125) On or about January 9, 2005, Defendant ADRIANA ROSS, a/k/a

"Adriana Mucinska," placed a telephone call to a telephone used by Jane Doe #14.

(126) On or about January 26, 2005, one of Defendant JEFFREY EPSTEIN's

employees prepared a written telephone message for Defendant ADRIANA ROSS's

review regarding a call received from Jane Doe #14 that read: "She is confirming for

5:30".

(127) On or about January 26, 2005, Defendant ADRIANA ROSS, a/k/a

"Adriana Mucinska," placed a telephone call to a telephone used by Jane Doe #14.

(128) On or about February 1, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #14.

(129) On or about March 1, 2005, Defendant ADRIANA ROSS, a/k/a

"Adriana Mucinska," placed a telephone call to a telephone used by Jane Doe #14.

(130) On or about March 21, 2005, Defendant ADRIANA ROSS, a/k/a

"Adriana Mucinska," placed a telephone calls to a telephone used by Jane Doe #14.

(131) On or about March 29, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #14.

Jane Doe #15

(132) On or about December 6, 2004, Defendant SARAH KELLEN placed

a telephone call to a telephone used by Jane Doe #15.

(133) On or about December 14, 2004, Defendant SARAH KELLEN placed

a telephone call to a telephone used by Jane Doe #15.

(134) In or around the first half of 2005, Defendant SARAH KELLEN led

Jane Doe #15 from the kitchen of 358 El Brillio Way upstairs to Defendant JEFFREY

EPSTEIN's bedroom at 358 El Brillio Way.

(135) In or around the first half of 2005, Defendant JEFFREY EPSTEIN

instructed Jane Doe #15, who was then a seventeen-year-old girl, to pinch his nipples

while he masturbated.

(136) In or around the first half of 2005, Defendant JEFFREY EPSTEIN

fondled the breasts of Jane Doe #15.

(137) In or around the first half of 2005, Defendant JEFFREY EPSTEIN

made a payment of \$200 to Jane Doe #15.

(138) On or about January 7, 2005, Defendant ADRIANA ROSS, a/k/a

"ADRIANA MUCINSKA," placed a telephone call to a telephone used by Jane Doe

#15.

(139) On or about February 4, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #15.

(140) On or about February 10, 2005, Defendant SARAH KELLEN placed

a telephone call to a telephone used by Jane Doe #15.

(141) On or about February 21, 2005, Defendant SARAH KELLEN placed

a telephone call to a telephone used by Jane Doe #15.

(142) On or about February 24, 2005, Defendant SARAH KELLEN placed

a telephone call to a telephone used by Jane Doe #15.

(143) On or about March 17, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #15.

(144) On or about March 30, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #15.

(145) On or about March 31, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #15.

(146) On or about March 31, 2005, Defendant ADRIANA ROSS, a/k/a

“Adriana Mucinska,” placed a telephone call to a telephone used by Jane Doe #15.

(147) On or about April 1, 2005, one of Defendant JEFFREY EPSTEIN’s

employees prepared a note for Defendant JEFFREY EPSTEIN’s review that read:

“10:30 [Jane Doe #15]/[Jane Doe #10] on Fri around 2’Oclock”.

(148) In or around June 2005, Defendant JEFFREY EPSTEIN provided Jane

Doe #15 with a gift of [REDACTED] Secret lingerie for her eighteenth birthday.

J

made a payment of \$200 to Jane Doe #17, who was then a sixteen-year-old girl.

(155) In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN

year-old girl.

F

placed a massaging device on the vagina of Jane Doe #17, who was then a sixteen-

(154) In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN

clothing.

instructed Jane Doe #17, who was then a sixteen-year-old girl, to remove all of her

A

(153) In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN

masturbated in the presence of Jane Doe #17, who was then a sixteen-year-old girl.

(152) In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN

to 358 El Brillo Way.

caused a payment to be made to Jane Doe #16 for recruiting Jane Doe #17 to travel

R

(151) In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN

to ask her to travel to 358 El Brillo Way.

and SARAH KEILIN caused Jane Doe #16 to place a telephone call to Jane Doe #17

(150) In or around the first quarter of 2005, Defendants JEFFREY EPSTEIN

masturbated in the presence of Jane Doe #16, who was then a seventeen-year-old girl.

D

(149) In or around February 2005, Defendant JEFFREY EPSTEIN

Jane Does #16 & #17

(156) In or around the first nine months of 2005, Defendant JEFFREY

EPSTEIN placed a massaging device on the vagina of Jane Doe #16, who was then

a seventeen-year-old girl.

(157) In or around the first nine months of 2005, Defendant JEFFREY

EPSTEIN asked Jane Doe #16, who was then a seventeen-year-old girl, how old she

was, and she responded that she was seventeen years old.

(158) In or around the first nine months of 2005, Defendant JEFFREY

EPSTEIN engaged in sexual activity with Defendant NADIA MARCINKOVA in the

presence of Jane Doe #16, who was then a seventeen-year-old girl.

(159) In or around the first nine months of 2005, Defendant JEFFREY

EPSTEIN asked Jane Doe #16, who was then a seventeen-year-old girl, to touch the

breast of Defendant NADIA MARCINKOVA.

(160) On or about April 11, 2005, Defendant ADRIANA ROSS, a/k/a

“Adriana Mucinska,” placed a telephone call to a telephone used by Jane Doe #16.

(161) On or about April 11, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #16.

(162) On or about April 11, 2005, Defendant SARAH KELLEN left a

message for Defendant JEFFREY EPSTEIN stating: “[Jane Doe #16] can work

tomorrow at 4pm.”

(163) On or about May 19, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #16.

(164) On or about June 30, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #16.

(165) On or about July 2, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #16.

(166) On or about July 22, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #16.

(167) On or about August 18, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #16.

(168) On or about August 19, 2005, Defendant ADRIANA ROSS, a/k/a

“Adriana Mucinska,” placed a telephone call to a telephone used by Jane Doe #16.

(169) On or about August 21, 2005, Defendant NADIA MARGINKOVA

placed a telephone call to a telephone used by Jane Doe #16.

(170) On or about September 3, 2005, Defendant ADRIANA ROSS, a/k/a

“Adriana Mucinska,” placed a telephone call to a telephone used by Jane Doe #16.

(171) On or about September 18, 2005, Defendant SARAH KELLEN placed

a telephone call to a telephone used by Jane Doe #16.

(172) On or about September 19, 2005, Defendant SARAH KELLEN sent a

text message to a telephone used by Jane Doe #16.

(173) On or about September 29, 2005, Defendant SARAH KELLEN placed

a telephone call to a telephone used by Jane Doe #16.

(174) On or about September 30, 2005, Defendant ADRIANA ROSS, a/k/a

“Adriana Mucinska,” placed a telephone call to a telephone used by Jane Doe #16.

(175) On or about October 1, 2005, Defendant SARAH KELLEN left a

telephone message for Defendant JEFFREY EPSTEIN stating: “[Jane Doe #15]

confirmed at 11 AM and [Jane Doe #16] – 4PM”.

(176) On or about October 2, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #16.

(177) On or about October 3, 2005, Defendant SARAH KELLEN placed a

telephone call to a telephone used by Jane Doe #16.

(178) On or about October 3, 2005, Defendant SARAH KELLEN left a

telephone message for Defendant JEFFREY EPSTEIN stating: “[Jane Doe #16] will

be ½ hour late”.

(179) In or around the first week of October, 2005, Defendant JEFFREY

EPSTEIN engaged in sexual intercourse with Jane Doe #16, who was then a

seventeen-year-old girl.

(180) In or around the first week of October, 2005, Defendant JEFFREY

EPSTEIN made a payment of \$350.00 to Jane Doe #16, who was then a seventeen-

year-old girl.

(181) In or around the first week of October, 2005, Defendant JEFFREY

EPSTEIN provided a gift of [REDACTED] Secret lingerie to Jane Doe #16 for her

eighteenth birthday.

Jane Does #18 and #19

(182) In or around the last half of 2003, Jane Doe #18 was approached by A.F. and was asked whether she would be willing to provide a massage to Defendant JEFFREY EPSTEIN in exchange for \$200.

(183) In or around the last half of 2003, Defendant JEFFREY EPSTEIN asked Jane Doe #18 to provide her telephone number.

(184) On or around August 27, 2003, Defendant SARAH KELLEN placed a telephone call to a telephone used by Jane Doe #18.

(185) In or around the last half of 2003, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #18, who was then a seventeen-year-old-girl.

(186) On or around November 16, 2003, Defendant SARAH KELLEN placed a telephone call to a telephone used by Jane Doe #18.

(187) In or around the last half of 2003, Defendant JEFFREY EPSTEIN digitally penetrated Jane Doe #18, who was then a seventeen-year-old-girl.

(188) In or around the last half of 2003, Defendant JEFFREY EPSTEIN asked Jane Doe #18 to recruit other females to travel to 358 El Brillio Way.

(189) On or about March 5, 2004, Defendant JEFFREY EPSTEIN asked Jane Doe #19, who was then a seventeen-year-old girl, to leave when she refused to remove her shirt.

(190) On or about March 5, 2004, Defendant JEFFREY EPSTEIN verbally

reprimanded Jane Doe #18 for bringing Jane Doe #19 to 358 El Brillio Way when she

was not willing to undress for him.

The Defendants' Travel

(191) On or about March 11, 2004, Defendants JEFFREY EPSTEIN, SARAH

KELEN, and NADIA MARCINKOVA traveled from Teterboro, New Jersey, to

Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air,

Inc.

(192) On or about May 1, 2004, Defendants JEFFREY EPSTEIN, SARAH

KELEN, and NADIA MARCINKOVA traveled from New York, New York to Palm

Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.

(193) On or about May 14, 2004, Defendants JEFFREY EPSTEIN, SARAH

KELEN, and NADIA MARCINKOVA traveled from Canada to Palm Beach

County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.

(194) On or about June 11, 2004, Defendants JEFFREY EPSTEIN and

SARAH KELEN traveled from Chicago, Illinois to Palm Beach County, Florida

aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

(195) On or about June 20, 2004, Defendants JEFFREY EPSTEIN and

NADIA MARCINKOVA traveled from the U.S. Virgin Islands to Palm Beach

County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.

(201) On or about October 2, 2004, Defendants JEFFREY EPSTEIN, SARAH KILLEN, and NADIA MARCINKOVA traveled from the U.S. Virgin Islands to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.

(200) On or about August 25, 2004, Defendants JEFFREY EPSTEIN, SARAH KILLEN, and NADIA MARCINKOVA traveled from Ecuador to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.

(199) On or about August 19, 2004, Defendants JEFFREY EPSTEIN and NADIA MARCINKOVA traveled from Van Nuys, California to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.

(198) On or about July 22, 2004, Defendants JEFFREY EPSTEIN, SARAH KILLEN, and NADIA MARCINKOVA traveled from the U.S. Virgin Islands to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.

(197) On or about July 16, 2004, Defendants JEFFREY EPSTEIN, SARAH KILLEN, and NADIA MARCINKOVA traveled from Teeterboro, New Jersey to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

(196) On or about July 4, 2004, Defendants JEFFREY EPSTEIN, SARAH KILLEN, and NADIA MARCINKOVA traveled from Aspen, Colorado to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

(202) On or about October 29, 2004, Defendants JEFFREY EPSTEIN and

NADIA MARCINKOVA traveled from Teterboro, New Jersey to Palm Beach

County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

(203) On or about November 10, 2004, Defendants JEFFREY EPSTEIN and

SARAH KELLEN traveled from Teterboro, New Jersey to Palm Beach County,

Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

(204) On or about November 18, 2004, Defendants JEFFREY EPSTEIN,

SARAH KELLEN, ADRIANA ROSS, a/k/a "Adriana Mucinska," and NADIA

MARCINKOVA traveled from Teterboro, New Jersey to Palm Beach County, Florida

aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

(205) On or about December 3, 2004, Defendants JEFFREY EPSTEIN,

SARAH KELLEN, and ADRIANA ROSS, a/k/a "Adriana Mucinska," traveled from

New York, New York to Palm Beach County, Florida aboard the Boeing 727 aircraft

owned by JEGE, INC.

(206) On or about December 13, 2004, Defendant JEFFREY EPSTEIN

traveled from the U.S. Virgin Islands to Palm Beach County, Florida, aboard the

Gulfstream aircraft owned by Hyperion Air, Inc.

(207) On or about December 17, 2004, Defendants JEFFREY EPSTEIN and

NADIA MARCINKOVA traveled from Teterboro, New Jersey to Palm Beach

County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

(208) On or about January 1, 2005, Defendants JEFFREY EPSTEIN, SARAH

KELLEN, and NADIA MARCINKOVA traveled from Anguilla, British West Indies

to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hypertion

Air, Inc.

(209) On or about January 6, 2005, Defendant JEFFREY EPSTEIN traveled

from Teterboro, New Jersey to Palm Beach County, Florida, aboard the Gulfstream

aircraft owned by Hypertion Air, Inc.

(210) On or about January 14, 2005, Defendants JEFFREY EPSTEIN,

SARAH KELLEN, ADRIANA ROSS, a/k/a "Adriana Mucinska," and NADIA

MARCINKOVA traveled from the U.S. Virgin Islands to Palm Beach County,

Florida, aboard the Boeing 727 aircraft owned by JEGE, INC.

(211) On or about January 19, 2005, Defendants JEFFREY EPSTEIN,

SARAH KELLEN, ADRIANA ROSS, a/k/a "Adriana Mucinska," and NADIA

MARCINKOVA traveled from New York, New York to Palm Beach County, Florida

aboard the Boeing 727 aircraft owned by JEGE, INC.

() On or about February 3, 2005, Defendants JEFFREY EPSTEIN,

SARAH KELLEN, and NADIA MARCINKOVA traveled from Columbus, Ohio, to

Palm Beach County, Florida, aboard the Boeing 727 aircraft owned by JEGE, INC.

(213) On or about February 10, 2005, Defendants JEFFREY EPSTEIN,

SARAH KELLEN, ADRIANA ROSS, a/k/a "Adriana Mucinska," and NADIA

MARCINKOVA traveled from New York, New York to Palm Beach County, Florida, aboard the Boeing 727 aircraft owned by JEGE, INC.

(214) On or about February 21, 2005, Defendants JEFFREY EPSTEIN, SARAH KELLEN, and NADIA MARCINKOVA traveled from the U.S. Virgin Islands to Palm Beach County, Florida, aboard the Boeing 727 aircraft owned by JEGE, INC.

(215) On or about February 24, 2005, Defendants JEFFREY EPSTEIN, SARAH KELLEN, and NADIA MARCINKOVA traveled from Teterboro, New Jersey to Palm Beach County, Florida, aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

(216) On or about March 4, 2005, Defendants JEFFREY EPSTEIN, ADRIANA ROSS, a/k/a "Adriana Mucinska," and NADIA MARCINKOVA traveled from New York, New York to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.

(217) On or about March 18, 2005, Defendant JEFFREY EPSTEIN traveled from New York, New York to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.

(218) On or about March 31, 2005, Defendant JEFFREY EPSTEIN traveled from New York, New York to Palm Beach County, Florida, aboard the Boeing 727 aircraft owned by JEGE, INC.

(219) On or about May 19, 2005, Defendants JEFFREY EPSTEIN, SARAH

KELLEN, and ADRIANA ROSS, a/k/a "Adriana Mucinska," traveled from

Teterboro, New Jersey to Palm Beach County, Florida, aboard the Gulfstream aircraft

owned by Hyperion Air, Inc.

(220) On or about June 30, 2005, Defendants JEFFREY EPSTEIN and

SARAH KELLEN traveled from Teterboro, New Jersey to Palm Beach County,

Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

(221) On or about July 22, 2005, Defendants JEFFREY EPSTEIN and

SARAH KELLEN traveled from Teterboro, New Jersey to Palm Beach County,

Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

(222) On or about August 18, 2005, Defendants JEFFREY EPSTEIN,

ADRIANA ROSS, a/k/a "Adriana Mucinska," and NADIA MARCINKOVA traveled

from Teterboro, New Jersey to Palm Beach County, Florida aboard the Gulfstream

aircraft owned by Hyperion Air, Inc.

(223) On or about September 3, 2005, Defendants JEFFREY EPSTEIN and

ADRIANA ROSS, a/k/a "Adriana Mucinska," traveled from the U.S. Virgin Islands

to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion

Air, Inc.

(224) On or about September 18, 2005, Defendants JEFFREY EPSTEIN,

SARAH KELLEN, and ADRIANA ROSS, a/k/a "Adriana Mucinska," traveled from

Westchester County, New York to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

(225) On or about September 29, 2005, Defendants JEFFREY EPSTEIN, ADRIANA ROSS, a/k/a "Adriana Mucinska," and NADIA MARCINKOVA traveled from Teterboro, New Jersey to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

All in violation of Title 18, United States Code, Section 371.

COUNTS 2 THROUGH 10
(Sex Trafficking: 18 U.S.C. § 1591(a)(1))

31. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by

reference as though fully set forth herein.

32. On or about the dates enumerated as to each count listed below, the exact dates

being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the Defendants listed below did knowingly, in and affecting interstate and foreign commerce, recruit, entice, provide, and obtain by any means a person, that is, the person in each count listed below, knowing that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act as defined in 18 U.S.C. §

1591(c)(1):

Count	Date(s)	Minor Involved	Defendant(s)
2	2001 - 2004	Jane Doe #2	JEFFREY EPSTEIN SARAH KELLEN

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 2.

Count	Date(s)	Minor Involved	Defendant(s)
3	January 2004 through July 2004	Jane Doe #4	JEFFREY EPSTEIN SARAH KELLEN
4	July 2004 through December 29, 2004	Jane Doe #9	JEFFREY EPSTEIN SARAH KELLEN
5	July 2004 through January 31, 2005	Jane Doe #10	JEFFREY EPSTEIN SARAH KELLEN
6	Mid-2004 through April 22, 2005	Jane Doe #12	JEFFREY EPSTEIN SARAH KELLEN
7	August 2004 through May 27, 2005	Jane Doe #13	JEFFREY EPSTEIN SARAH KELLEN
8	November 2004 through March 2005	Jane Doe #14	JEFFREY EPSTEIN SARAH KELLEN ADRIANA ROSS, a/k/a "Adriana Mucinska"
9	December 2004 through June 5, 2005	Jane Doe #15	JEFFREY EPSTEIN SARAH KELLEN ADRIANA ROSS, a/k/a "Adriana Mucinska"
10	February 2005 through first week of October 2005	Jane Doe #16	JEFFREY EPSTEIN SARAH KELLEN ADRIANA ROSS, a/k/a "Adriana Mucinska" NADIA MARCINKOVA

33. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

COUNT II
(Sex Trafficking: 18 U.S.C. § 1591(a)(2))

34. From at least as early as in or about 2001 through in or about October 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

SARAH KEILEN,
ADRIANA ROSS, a/k/a "Adriana Mucinska,"
and
NADIA MARCINKOVA,

did knowingly benefit, financially or by receiving anything of value, from participation in a venture, as defined in 18 U.S.C. § 1591(c)(3), which had engaged in an act described in violation of 18 U.S.C. § 1591(a)(1), that is, the recruiting, enticing, providing, and obtaining by any means a person, in or affecting interstate commerce, knowing that the person or persons had not attained the age of 18 years and would be caused to engage in a commercial sex act as defined in 18 U.S.C. § 1591(c)(1); in violation of Title 18, United States Code, Sections 1591(a)(2), 1591(b)(2), and 2.

COUNT 12

(Enticement of a Minor: 18 U.S.C. § 2422(b))

35. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

36. From in or around the spring of 2003 through on or about October 2, 2005, the

exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District

of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN
and
SARAH KELLEN,

did use a facility or means of interstate commerce, that is, the telephone, to knowingly

persuade, induce and entice Jane Doe #3, who was a person who had not attained the age of

18 years, to engage in prostitution and in a sexual activity for which a person can be charged

with a criminal offense, that is violations of Florida Statutes Sections 800.04(5)(a),

800.04(6)(a), and 800.04(7)(a); in violation of Title 18, United States Code, Sections 2422(b)

and 2.

△
COUNT 13
(Enticement of a Minor: 18 U.S.C. § 2422(b))

37. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by

reference as though fully set forth herein.

38. In or around July 2004, the exact dates being unknown to the Grand Jury, in

Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN
and
SARAH KELLEN,

did use a facility or means of interstate commerce, that is, the telephone, to knowingly

persuade, induce and entice Jane Doe #7, who was a person who had not attained the age of

18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections

2422(b) and 2.

COUNT 14
(Enforcement of a Minor: 18 U.S.C. § 2422(b))

39. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by

reference as though fully set forth herein.

40. From in or around July 2004 through in or around October 2004, the exact

dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of

Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN
and
SARAH KELLEN,

did use a facility or means of interstate commerce, that is, the telephone, to knowingly

persuade, induce and entice Jane Doe #8, who was a person who had not attained the age of

18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections

2422(b) and 2.

COUNT 15
(Enforcement of a Minor: 18 U.S.C. § 2422(b))

41. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by

reference as though fully set forth herein.

42. From in or around July 2004 through on or around December 29, 2004, the

exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District

of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN
and
SARAH KELLEN,

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce and entice Jane Doe #9, who was a person who had not attained the age of 18 years, to engage in prostitution and in a sexual activity for which a person can be charged with a criminal offense, that is a violation of Florida Statutes Section 794.05; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 16

(Enticement of a Minor: 18 U.S.C. § 2422(b))

43. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

44. From in or around July 2004 through on or about January 31, 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN
and
SARAH KELLEN,

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce and entice Jane Doe #10, who was a person who had not attained the age of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections 2422(b) and 2.

J

JEFFREY EPSTEIN
and
SARAH KELLEN,

Florida, and elsewhere, the defendants,
dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of

48. From in or around August 2004 through on or about May 27, 2005, the exact
reference as though fully set forth herein.

47. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by

COUNT 18
(Enticement of a Minor: 18 U.S.C. § 2422(b))

2422(b) and 2.

A

of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections
persuade, induce and entice Jane Doe #12, who was a person who had not attained the age
did use a facility or means of interstate commerce, that is, the telephone, to knowingly

JEFFREY EPSTEIN
and
SARAH KELLEN,

R

of Florida, and elsewhere, the defendants,
exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District

46. From in or around the middle of 2004 through on or about April 22, 2005, the
reference as though fully set forth herein.

45. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by

COUNT 17
(Enticement of a Minor: 18 U.S.C. § 2422(b))

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce and entice Jane Doe #13, who was a person who had not attained the age of 18 years, to engage in prostitution, in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 19
(Enticement of a Minor: 18 U.S.C. § 2422(b))

49. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

50. From in or around November 2004 through in or around March 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JERRY EPSTEIN,
SARAH KELLEN,
and **ADRIANA ROSS, a/k/a "Adriana Mucinska,"**

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce and entice Jane Doe #14, who was a person who had not attained the age of 18 years, to engage in prostitution and in a sexual activity for which a person can be charged with a criminal offense, that is a violation of Florida Statutes Section 794.05, in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 20
(Enticement of a Minor: 18 U.S.C. § 2422(b))

51. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

52. From in or around December 2004 through on or about June 5, 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

**JEFFREY EPSTEIN,
SARAH KELLEN, and
ADRIANA ROSS, a/k/a "Adriana Mucinska,"**

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce and entice Jane Doe #15, who was a person who had not attained the age of 18 years, to engage in prostitution in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 21
(Enticement of a Minor: 18 U.S.C. § 2422(b))

53. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

54. From in or around February 2005 through in or around the first week of October 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

J

F

R

D

JEFFREY EPSTEIN,
 SARAH KELLEN,
 ADRIANA ROSS, a/k/a "Adriana Mucinska,"
 and NADIA MARCINKOVA,

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce or entice Jane Doe #16, who was a person who had not attained the age of 18 years, to engage in prostitution and in a sexual activity for which a person can be charged with a criminal offense, that is a violation of Florida Statutes Section 794.05; in violation of Title 18, United States Code, Sections 2422(b) and 2.

COUNT 22
(Enticement of a Minor: 18 U.S.C. § 2422(b))

55. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

56. From in or around February 2005 through in or around April 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

JEFFREY EPSTEIN,
 SARAH KELLEN, and
 ADRIANA ROSS, a/k/a "Adriana Mucinska,"

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce and entice Jane Doe #17, who was a person who had not attained the age of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections 2422(b) and 2.

J
NADIA MARCINKOVA,
and
ADRIANA ROSS, a/k/a "Adriana Mucinska,"
SARAH KELLEN,
JEFFREY EPSTEIN,

dates being unknown to the Grand Jury, the Defendants,

60. From at least as early as 2001 through in or around October 2005, the exact

reference as fully set for the herein.

59. Paragraphs 1 through 25 of this indictment are re-alleged and incorporated by

(Conspiracy to Travel: 18 U.S.C. § 2423(e))

COUNT 24

2422(b) and 2.

A
of 18 years, to engage in prostitution; in violation of Title 18, United States Code, Sections
persuade, induce and entice Jane Doe #18, who was a person who had not attained the age
did use a facility or means of interstate commerce, that is, the telephone, to knowingly

SARAH KELLEN,
and
JEFFREY EPSTEIN,

R
Florida, and elsewhere, the defendants,

dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of

58. From in or around August 2003 through in or around February 2004, the exact

reference as though fully set forth herein.

57. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by

(Enticement of a Minor: 18 U.S.C. § 2422(b))

COUNT 23

did knowingly and willfully conspire with each other and with others known and unknown to travel in interstate commerce for the purpose of engaging in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), with another person, in violation of Title 18, United States Code, Section 2423(b); all in violation of Title 18, United States Code, Section 2423(e).

COUNT 25
(Facilitation of Unlawful Travel of Another: 18 U.S.C. § 2423(d))

61. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

62. From at least as early as in or about 2001 through in or around October 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the Defendant,

SARAH KEILBN,

did, for the purpose of commercial advantage or private financial gain, arrange and facilitate the travel of a person, that is Defendant Jeffrey Epstein, knowing that such person was traveling in interstate commerce for the purpose of engaging in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f); in violation of Title 18, United States Code, Section 2423(d).

COUNTS 26 THROUGH 29
(Travel to Engage in Illicit Sexual Conduct: 18 U.S.C. § 2423(b))

63. Paragraphs 1 through 25 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

64. On or about the dates enumerated as to each count listed below, from a place outside the Southern District of Florida to a place inside the Southern District of Florida, the

Defendant(s) listed below traveled in interstate commerce for the purpose of engaging in illicit sexual conduct as defined in 18 U.S.C. § 2423(f), with a person under 18 years of age, that is, the person(s) listed in each count below:

Count	Date(s)	Minor(s) Involved	Defendant(s)
26	7/16/2004	Jane Doe #7 Jane Doe #8 Jane Doe #9 Jane Doe #10	JEFFREY EPSTEIN SARAH KELLEN NADIA MARCINKOVA
27	3/31/2005	Jane Doe #14 Jane Doe #15 Jane Doe #16	JEFFREY EPSTEIN SARAH KELLEN ADRIANA ROSS, a/k/a "Adriana Mucinska"
28	9/18/2005	Jane Doe #16	JEFFREY EPSTEIN SARAH KELLEN ADRIANA ROSS, a/k/a "Adriana Mucinska"
29	9/29/05	Jane Doe #16	JEFFREY EPSTEIN SARAH KELLEN ADRIANA ROSS, a/k/a "Adriana Mucinska" NADIA MARCINKOVA

All in violation of Title 18, United States Code, Sections 2423(b) and 2.

FORFEITURE 1

Upon conviction of the violation alleged in Count 1 of this indictment, the defendants, JEFFREY EPSTEIN, SARAH KELLEN, ADRIANA ROSS, a/k/a "Adriana Mucinska," and NADIA MARCINKOVA, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

Pursuant to Title 28, United States Code, Section 2461; Title 18, United States Code,

Section 981(a)(1)(C); and Title 21, United States Code, Section 853.

If the property described above as being subject to forfeiture, as a result of any act or omission of the defendants, JEFFREY EPSTEIN, SARAH KELLEN, ADRIANA ROSS, a/k/a "Adriana Mucinska," and NADIA MARCINKOVA,

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without

difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above

forfeitable property.

All pursuant to Title 28 United States Code, Section 2461; Title 18, United States

Code, Section 981(a)(1)(C); and Title 21 United States Code, Section 853.

FORFEITURE 2

Upon conviction of any of the violations alleged in Counts 12-29 of this indictment,

the defendants, JEFFREY EPSTEIN, SARAH KELLEN, ADRIANA ROSS, a/k/a "Adriana

Mucinska," and NADIA MARCINKOVA, shall forfeit to the United States any property, real

or personal, constituting or traceable to gross profits or other proceeds obtained from such

offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including but not limited to the following:

a. A parcel of land located at 358 El Brillio Way, Palm Beach, Florida 33480, including all buildings, improvements, fixtures, attachments, and easements found

therein or thereon, and more particularly described as:

Being all of Lot 40 and the West 24.3 feet of Lot 39, El Bravo Park, as recorded in Plat Book 9, Page 9, in the records of Palm Beach County, Florida and

BEING that portion lying West of Lot 40, El Bravo Park, in Section 27, Township 43 South, Range 43 East, as recorded in Plat Book 9, Page 9, Public Records of Palm Beach County, Florida, being bounded on the West by the West side of an existing concrete seawall and the northerly extension thereof as shown on the Adair & Brady, Inc., drawing IS-1298, dated March 25, 1981, and bounded on the East by the shoreline as shown on the plat of El Bravo Park, and bounded on the North and South by the Westerly extensions of the North and South lines respectively of Lot 40, containing 0.07 acres, more or less.

Pursuant to Title 18, United States Code, Section 2253.

If any of the forfeitable property described in the forfeiture section of this indictment,

as a result of any act or omission of the defendants JEFFREY EPSTEIN, SARAH KELLEN,

ADRIANA ROSS, a/k/a "Adriana Mucinska," and NADIA MARCINKOVA,

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(o), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

Pursuant to Title 18, United States Code, Section 2253.

FORFEITURE 3

Upon conviction of any of the violations alleged in Counts 2-11 of this indictment,

the defendants, JEFFREY EPSTEIN, SARAH KELLEN, ADRIANA ROSS, a/k/a "Adriana

Mucinska," and NADIA MARCINKOVA, shall forfeit to the United States any property, real

or personal, that was used or intended to be used to commit or to facilitate the commission

of such violation; and any property, real or personal, constituting or derived from any

proceeds that such person obtained, directly or indirectly, as a result of such violation,

including but not limited to the following:

a. A parcel of land located at 358 El Brillio Way, Palm Beach, Florida

33480, including all buildings, improvements, fixtures, attachments, and easements found therein or thereon, and more particularly described as:

Being all of Lot 40 and the West 24.3 feet of Lot 39, El Bravo Park, as recorded in Plat Book 9, Page 9, in the records of Palm Beach County, Florida and

BRING that portion lying West of Lot 40, El Bravo Park, in Section 27, Township 43 South, Range 43 East, as recorded in Plat Book 9, Page 9, Public Records of Palm Beach County, Florida, being bounded on the West by the

West side of an existing concrete seawall and the northerly extension thereof as shown on the Adair & Brady, Inc., drawing IS-1298, dated March 25, 1981, and bounded on the East by the shoreline as shown on the plat of El Bravo Park, and bounded on the North and South by the Westerly extensions of the North and South lines respectively of Lot 40, containing 0.07 acres, more or less.

Pursuant to Title 18, United States Code, Section 1594(b).

A TRUE BILL.

R

FOREPERSON

R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

A
A. MARIE VILLAFANA
ASSISTANT UNITED STATES ATTORNEY

F

T

As you know, Rothstein's firm represents [REDACTED] and [REDACTED], [REDACTED], [REDACTED], [REDACTED] and [REDACTED] Wilde, three of the plaintiffs who have brought civil actions against Mr. Epstein. The Rothstein firm was a criminal enterprise that used the litigation against Mr. Epstein to lure investors into its billion-dollar ponzi scheme. We believe that Rothstein and his co-conspirators used the government's criminal investigation as a means to perpetrate and further their fraud. For example:

You emailed me a letter on November 2, asking whether Jeffrey Epstein's place of employment remained constant. It has. I reviewed a Google map to confirm that the distance between that place of employment and the location where he was stopped by Palm Beach Police is less than 3 miles (and that the location where he was walking was on a direct route to his place of work).

It has taken us a while to respond to your letter because other matters have consumed our time and effort. Over the past five weeks, the massive billion-dollar conspiracy created and run by Scott Rothstein has been exposed. On Monday, Mr. Epstein filed a state civil RICO lawsuit charging Rothstein, his partner Brad Edwards, and others with tortious and fraudulent abuses of process that resulted in serious injury to Mr. Epstein. A copy of the Complaint is enclosed with this letter.

Dear Marie:

RE: Jeffrey Epstein

A. Marie Villafana, Esq.
Assistant United States Attorney
United States Attorney's Office
Southern District of Florida
500 South Australian Avenue
Suite 400
West Palm Beach, Florida 33401

December 9, 2009

E-Mail: RBlack@RoyBlack.com

JESSICA FONSECA-NADER
KATHLEEN P. PHILLIPS
AARON ANTHON
MARCOS BEATON, JR.
MATTHEW P. O'BRIEN
JENIFER J. SOULIKIAS
NOAH FOX



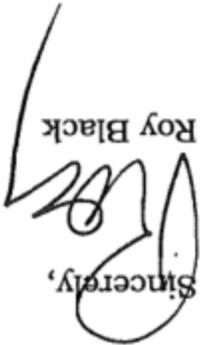
ROY BLACK
HOWARD M. SREBNICK
SCOTT A. KORNSPAN
LARRY A. STUMPF
MARIA NEYRA
JACKIE PERCZEK
MARK A.J. SHAPIRO
JARED [REDACTED]

A. Marie Villalana, Esq.
December 9, 2009
Page 3

our part would constitute a breach of the NPA. So the Rothstein lawyers, once again, are using the power of the federal government to perpetrate and further their fraud. And the expense of litigating these cases has been extreme. For example, Bob Josefsberg, who I do not believe was aware of the Rothstein crimes, is now demanding over \$2 million in legal fees.

As a lawsuit brought by some of the investors' claims, Rothstein and his partner Edwards used Jeffrey Epstein as bait. The litigation strategy, media pronouncements, and investigatory initiatives of Rothstein and Edwards were calculated to support Rothstein's deceptions rather than to advance the position of his clients. I bring these facts to your attention so that if you had contact with Edwards or those associated with him in the past concerning Mr. Epstein, you consider not continuing communications with any of them in the future.

I would like a short conference with you in person to talk about Mr. Epstein's progress through the state criminal justice system, to discuss several outstanding issues that I want to make sure you have accurate information about, and, from my perspective, most importantly, so that I can provide Mr. Epstein with proper counsel going forward. If you email me some dates when you are available this month, we can schedule a short meeting in your office hopefully before the year ends:

Sincerely,

Roy Black

RB/wg

Enclosure

Black, Srebnick, Kornspan & Stumpf, P.A.