



U.S. Department of Justice

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Southern District of Florida*

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DELIVERY BY FEDERAL EXPRESS

June 3, 2008

Honorable Mark Filip
Office of the Deputy Attorney General
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

Re: Jeffrey Epstein

Dear Judge Filip,

Jeffrey Epstein was a part-time resident of Palm Beach County, Florida.¹ In 2006, the Federal Bureau of Investigation began investigating allegations that, over a two-year period, Epstein paid approximately 28 minor females [REDACTED] to come to his house for sexual favors.² In July 2006, the matter was presented to AUSA [REDACTED] of our West Palm Beach branch office to pursue a formal criminal investigation. That investigation resulted in the discovery of approximately one dozen additional minor victims. Over the last several months, approximately six more minor victims have been identified.

AUSA [REDACTED] has been ready to present an indictment to a West Palm Beach federal grand jury since May 2007. The prosecution memorandum and proposed indictment have been extensively reviewed and re-reviewed by Southern District of Florida (SDFL) Deputy Chief of the Criminal

¹ Epstein has not resided in Palm Beach since he learned of the instant investigation.

² Epstein's sexual conduct with the victims included: instructing them to massage and pinch his nipples, masturbating in their presence, digitally penetrating them, using a vibrator on their vaginas, engaging in oral sex with them, having the victims perform oral sex on Epstein's adult girlfriend, and engaging in sexual intercourse, all in exchange for money, ranging from \$200 to \$1,000 per session.

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EXHIBIT B-123

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Division [REDACTED], Chief of the Criminal Division [REDACTED], First Assistant United States Attorney [REDACTED]⁴, United States Attorney R. Alexander Acosta as well as various members of the Child Exploitation and Obscenity Section (CEOS) at the Department of Justice including, but not limited to its Chief, [REDACTED]. Many of these legal and factual issues have been discussed and approved by Deputy Assistant Attorney General for the Criminal Division (DAAG) [REDACTED] and the Assistant Attorney General for the Criminal Division (AAG) Alice S. Fisher, as well as the Criminal Division's Appellate Section and the Office of Enforcement Operations regarding the petit policy.

By May 2007, AUSA [REDACTED] began seeking approval from her supervisors to indict Epstein. Her immediate supervisor was [REDACTED]. Mr. [REDACTED] had served as the Chief of the Public Integrity Section at DOJ as well as in several supervisory positions in the SDFL. By mid-2006, he had returned to his position as the Deputy Chief of the Criminal Division in West Palm Beach (head of the West Palm Beach branch office), after serving as the interim Chief of the Public Integrity Section at DOJ at the request of AAG Fisher. By October 2007, Mr. [REDACTED] would leave the SDFL to become AAG Fisher's Chief of Staff.⁵ Above Mr. [REDACTED] in the SDFL's chain of command were [REDACTED], Criminal Division Chief, First Assistant USA [REDACTED] and finally, U.S. Attorney Acosta.

Prior to seeking approval to return an indictment, Epstein's legal team had been actively working to convince this Office that such action was not warranted. For example, at the end of 2006, former SDFL U.S. Attorney and EOUSA Executive Director Guy Lewis contacted former colleagues AUSA [REDACTED] and, later Deputy Criminal Chief [REDACTED], when he learned that they were handling or involved in supervising the federal investigation of Epstein. In December, former SDFL AUSA Lilly Ann Sanchez and Gerald Lefcourt also contacted AUSA [REDACTED] to set a meeting. In advance of that meeting, AUSA [REDACTED] requested documents but that request was refused. Ms. Sanchez then contacted AUSA [REDACTED], who agreed to meet with Ms. Sanchez and Mr. Lefcourt. On February 1, 2007, Ms. Sanchez and Mr. Lefcourt met with AUSAs [REDACTED] and [REDACTED], as well as a member of the FBI, and presented defense counsel's view of the case and promised a willingness to assist in the investigation. The SDFL was unpersuaded by their presentation and the investigation continued.

By the late Spring and early Summer, the focus of the investigation shifted from investigating the facts of the victims' claims to Epstein's background, his asserted defenses, co-conspirators, and possible witnesses who could corroborate the victims' statements. The investigation also began to look into financial aspects of the case, requiring the issuance of several subpoenas. At the time, Mr. Lefcourt began leveling accusations of improprieties with the investigation and sought a meeting

³Mr. [REDACTED] resigned for private practice on August 3, 2007 and was replaced by [REDACTED].

⁴Although I, [REDACTED], am writing this letter, I will continue to refer to myself as "First Assistant USA [REDACTED]" or "FAUSA [REDACTED]" to help reduce any confusion.

[REDACTED] replaced Mr. [REDACTED] as the Deputy Chief of the Criminal Division.

with Criminal Division Chief [REDACTED]. By that time, the proposed initial indictment package had been reviewed and approved by Mr. [REDACTED] in West Palm Beach and by attorneys with CEOs; however, it awaited review by Mr. [REDACTED] and FAUSA [REDACTED]. The SDFL deferred presenting the indictment to the grand jury to accommodate the Epstein legal team's request for a meeting. We also agreed to wait several weeks for that meeting to occur to allow four of Epstein's attorneys to be present and also provided counsel with a list of the statutes that were the subject of the investigation.

On June 26, 2007, Mr. [REDACTED], Mr. [REDACTED], AUSA [REDACTED], and FAUSA [REDACTED], and two FBI agents met with Alan Dershowitz, Roy Black, Gerald Lefcourt, and Lilly Ann Sanchez. During that meeting, Professor Dershowitz and other members of the defense team presented legal and factual arguments against a federal indictment. Counsel for the defense also requested the opportunity to present written arguments, which was granted. The arguments and written materials provided by the defense were examined by the SDFL and rejected.

On July 31, 2007, Mr. [REDACTED], Mr. [REDACTED], AUSA [REDACTED], and FAUSA [REDACTED], and two FBI agents met with Roy Black, Gerald Lefcourt, and Lilly Ann Sanchez. On that date, the SDFL presented a written sheet of terms that would satisfy the SDFL's federal interest in the case and discussed the substance of those terms. *See* Tab A. One of those terms was:

Epstein agrees that, if any of the victims identified in the federal investigation file suit pursuant to 18 U.S.C. § 2255, Epstein will not contest the jurisdiction of the U.S. District Court for the Southern District of Florida over his person and the subject matter. Epstein will not contest that the identified victims are persons who, while minors, were victims of violations of Title 18, United States Code, §§ 2422 and/or 2423.

During that meeting, the focus was on Mr. Epstein's unwillingness to spend time in prison, and various suggestions were raised by defense counsel, including the proposal that he could serve a sentence of home confinement or probation. This was repeatedly mentioned by counsel for Epstein as being equivalent to a term of imprisonment in a state or federal prison. Epstein's counsel mentioned their concerns about his safety in prison, and the SDFL offered to explore a plea to a federal charge to allow Epstein to serve his time in a federal facility. Counsel were also presented with a conservative estimate of the sentence that Epstein would face if he were convicted: an advisory guideline range of 188 - 235 months' incarceration with a five-year mandatory minimum prison term, to be followed by lifetime supervised release. Counsel was told that Epstein had two weeks to accept or reject the proposal.

It is critical to note that Ms. Sanchez, one of Epstein's local lawyers, seized upon this method of restitution as a condition of deferring federal prosecution. In referring to the 18 U.S.C. § 2255 method of compensation, Ms. Sanchez stated:

[t]his would allow the victims to be able to promptly put this behind them and go forward with their lives. If given the opportunity to opine as to the appropriateness

of Mr. Epstein's proposal, in my extensive experience in these types of cases, the victims prefer a quick resolution with compensation for damages and will always support any disposition that eliminates the need for trial.

See attached Tab B, August 2, 2007 letter from Lilly Ann Sanchez to SDFL Criminal Division Chief [REDACTED], p.2, fn 1. Ironically, it is Epstein's "national" attorneys who are now representing to the Deputy Attorney General of the United States in their May 19, 2008 letter that:

Perhaps most troubling, the USAO in Miami, as a condition of deferring prosecution, required a commingling of substantive federal criminal law with a proposed civil remedy engineered in a way that appears intended to profit particular lawyers in private practice in South Florida with personal relationships to some of the prosecutors involved.

Not only did Epstein's lawyers like the idea of using 18 U.S.C. § 2255 to compensate the victims but, they also sought to make their non-incarcerative state proposal even more attractive by offering payments to "a charitable organization benefitting victims of sexual assault," "law enforcement investigative costs" and "Court and probationary costs." *Id.* at p. 2.

Epstein's counsel, still dissatisfied with the Office's review of the case, demanded to meet with U.S. Attorney Acosta and to have the opportunity to meet with someone in Washington, D.C. To accommodate Roy Black, the meeting was put off until September 7, 2007, despite the fact that the indictment was ready for presentation to the grand jury. In the interim, AUSA [REDACTED] and the investigators met with CEOS Chief [REDACTED], to review, yet again, the evidence and legal theories of prosecution. Chief [REDACTED] strongly supported the proposed indictment and even offered to join the trial team and provide additional support from CEOS.

On September 7, 2007, U.S. Attorney Acosta met with Kirkland & Ellis partners Jay Lefkowitz and former Solicitor General Ken Starr and Ms. Sanchez, along with Chief [REDACTED] and AUSAs [REDACTED], [REDACTED], and FAUSA [REDACTED].⁶ Messrs. Starr and Lefkowitz presented arguments regarding the sufficiency of the federal interest in the case and other legal and factual issues. We discussed those legal arguments and the unanimous opinion of all of the attorneys present was in favor of prosecution. During that meeting, Mr. Lefkowitz also offered a plea resolution. His offer, in essence, was that Epstein be subjected to home confinement at his Palm Beach home, using private security officers who would serve as his "wardens," if necessary. Mr. Lefkowitz expressed the belief that such a sentence would be particularly appropriate because, as a wealthy white man, he may be the subject of violence or extortion in prison. Finally, Messrs. Starr and Lefkowitz expressed the belief that Epstein's extensive philanthropy should be considered in our prosecution decision. U.S. Attorney Acosta summarily rejected these proposals, and indicated that the 24-month offer presented previously by the SDFL stood.

⁶Roy Black did not attend.

The issue of the inclusion of a restitution-type remedy for the victims pursuant to 18 U.S.C. § 2255 was specifically raised and discussed at the September 7th meeting, and Mr. Starr thanked AUSA [REDACTED] for bringing it to his attention as a novel approach to allowing the victims to receive essentially federal restitution while allowing a plea to a state charge. After considering everything said and written by Epstein's legal team, and after conferring with Chief [REDACTED], U.S. Attorney Acosta informed Epstein's counsel that the SDFL still intended to proceed to indictment. Since counsel indicated a desire to appeal the matter to the Attorney General, the Deputy Attorney General, or the Assistant Attorney General for the Criminal Division, U.S. Attorney Acosta agreed to delay the presentation of the indictment for two weeks to allow them to speak with someone in Washington, D.C., if they so chose.

Instead, Mr. Epstein elected to negotiate the Non-Prosecution Agreement, and on September 12, 2007, counsel for the SDFL (AUSAs [REDACTED], [REDACTED], and [REDACTED]) and counsel for Epstein (Messrs. Lefcourt, Lefkowitz, and Goldberger) met with Palm Beach County State Attorney Barry Krisher and Assistant State Attorney [REDACTED] to discuss a plea to an Information in the state court that would satisfy the federal interest in the case. As noted on the term sheet of July 31st (Tab A), one of those essential terms was a guilty plea to a charge requiring sex offender registration. During that meeting, the issue of sex offender registration was raised, and Mr. Goldberger told the federal prosecutors that there was no problem, Mr. Epstein would plead guilty to the charge of procurement of minors for prostitution (Fl. Stat. 796.03), which was one of the statutes listed on the original term sheet. Although the SDFL had wanted Epstein to plead guilty to three different offenses, we agreed to this compromise.⁷ Of course, the SDFL later learned that, at the time Mr. Goldberger made that statement, he incorrectly believed, based upon a statement from ASA [REDACTED], that Fl. Stat. § 796.03 did *not* require sex offender registration.

The parties then began working first on a plea agreement to a federal charge and, when it was clear that there was no guarantee that Epstein would serve his sentence in a minimum security prison camp, the discussion turned to a Non-Prosecution Agreement. Both the federal plea agreement and the Non-Prosecution Agreement included references to § 2255 because neither the contemplated federal charges nor the proposed state charges encompassed all of the identified victims. If Epstein had been prosecuted under the planned indictment, the identified victims would have been eligible for restitution *and* damages under § 2255. As explained above, one of our interests, which had to be satisfied by the Non-Prosecution Agreement, was providing appropriate compensation to the victims. This provision of the Agreement was heavily negotiated. As Mr. Lefkowitz wrote in his November 29th e-mail to FAUSA [REDACTED], Epstein "offered to provide a restitution fund for the alleged victims in this matter; however, that option was rejected by [our] Office." That option was rejected for several reasons. First, the SDFL does not serve as legal representatives to the victims and has no authority to bind victims, nor could it provide a monetary figure that would represent a "loss" amount for restitution purposes. Second, there would be no legal basis for federal restitution without

⁷ Another significant compromise reached at the meeting was a reduction in the amount of jail time - from 24 months down to 18 months, which would be served at the Palm Beach County Jail rather than a state prison facility.

a conviction for a federal offense. And, third, it was the U.S. Attorney's belief that the SDFL should not be put in the position of administering a restitution fund. Our § 2255 proposal put the victims in the same position that they would have been in if we had proceeded to trial and convicted Epstein of his crimes, with the exception that the victims were provided with counsel. The appointment of counsel was not such a benefit to the victims but, rather, was done, in part, to benefit Epstein by allowing him to try to privately negotiate a group resolution of all claims with one attorney. Epstein and his lawyers agreed with this alternative.

The negotiation of the Agreement was lengthy and difficult. Mr. Lefkowitz and AUSA [REDACTED] went through several drafts of both a federal plea agreement and a Non-Prosecution Agreement. Throughout these negotiations, when a member of the defense team was dissatisfied with the SDFL's position, it was repeatedly appealed throughout the Office. So several members of the defense team spoke with the chain of command regarding the terms of the Agreement, including the § 2255 provisions. At the eleventh hour, when Epstein's legal team realized that Fl. Stat. 796.03 *would* require him to register as a sex offender, they sought to change the most essential term of the agreement - a term that Messrs. Goldberger, Lefkowitz, and Lefcourt had specifically agreed to at the September 12th meeting with the State Attorney's Office - asking to allow Epstein to plead to a charge that would not require registration. When this was rejected, several members of the defense team appealed directly to U.S. Attorney Acosta which also failed. When that failed, according to press reports, apparently Mr. Lefcourt "leaked" a letter intended for the U.S. Attorney to the press containing the reasons why he/Lefcourt did not believe Epstein should have to register. *See* October 9, 2007 New York Post article attached at Tab C.

Prior to signing the Non-Prosecution Agreement, Mr. Epstein's defense team included Ken Starr, Jay Lefkowitz, Lilly Ann Sanchez, Alan Dershowitz, Gerald Lefcourt, Roy Black, Guy Lewis, Martin Weinberg, Jack Goldberger, Stephanie Thacker⁸, and the associates at Kirkland & Ellis who conducted research on discrete issues. This impressive legal team reviewed the Agreement and counseled Epstein. Based upon that counsel, Epstein decided that it was in his best interest to execute the Non-Prosecution Agreement which was signed on September 24, 2007 by Mr. Lefcourt, Ms. Sanchez and Epstein. A copy of which is attached hereto as Tab D. The core principles of the Agreement are incarceration, registration as a sex offender and a method of compensation.⁹ Furthermore, and significantly, Epstein agreed that he had the burden of ensuring compliance of the

⁸Ms. Thacker had recently resigned from CEOS as a Trial Attorney and entered private practice.

⁹ Specifically, the Agreement mandates, *inter alia*, (1) a guilty plea in Palm Beach County Circuit Court to solicitation of prostitution (Fl. Stat. § 796.07) and procurement of minors to engage in prostitution (Fl. Stat. § 796.03) (an offense that requires him to register as a sex offender); (2) a 30-month sentence including 18 months' incarceration in county jail; (3) a methodology to compensate the victims identified by the United States utilizing 18 U.S.C. Section 2255 such that they would be placed in the same position as if Epstein had been convicted of one of the enumerated offenses set forth in Title 18, United States Code, § 2255; (4) entry of the guilty plea and sentence no later than October 26, 2007; and (5) the start of the above-mentioned sentence no later than January 4, 2008.

Agreement with the Palm Beach County State Attorney's Office and the Judge of the 15th Judicial Circuit and "that the failure to do so will be a breach of the agreement" (emphasis added). To this day, the SDFL has never divulged its evidence to Epstein's lawyers.

Within a week of the execution of the Agreement, the SDFL unilaterally proposed to divest its right to select the attorney representative for the victims. Contrary to Messrs. Starr and Whitley's recent assertion that this was "engineered in a way that appears intended to profit particular lawyers in private practice in South Florida with personal relationships to some of the prosecutors involved," it was done to avoid even the appearance of favoritism in the selection of the attorney representative. As a result, the parties executed an addendum which documented the SDFL's right to assign the selection of an attorney representative to an independent third-party. A copy of the October 29, 2007 Addendum is attached hereto as Tab E. The parties subsequently agreed that retired Federal District Court Judge Edward B. [REDACTED] should be that independent third-party/special master. Ultimately, Judge [REDACTED] selected Robert C. Josefsberg of the law firm of Podhurst, Orseck, Josefsberg, *et al.*¹⁰ During this same time frame, Epstein lawyer Jay Lefkowitz sought to delay the entry of his guilty plea and sentence. After the SDFL accommodated his request (from October 26th to November 20th), Mr. Starr began taking issue with the methodology of compensation, notification to the victims, and the issues that had been previously considered and rejected during negotiations, *i.e.*, that the conduct does not require registration and the contemplated state and federal statutes have no applicability to the instant matter.

In response to Mr. Starr's protests, the SDFL offered numerous and various reasonable modifications and accommodations which ultimately resulted in U.S. Attorney Acosta's December 19, 2007 letter to Lilly Ann Sanchez. *See* attached Tab F. In that letter, U.S. Attorney Acosta tried to eliminate *all* concerns which, quite frankly, the SDFL was not obligated to address, let alone consider. In consultation with DAAG [REDACTED], Mr. Acosta proposed the following language regarding the 2255 provision:

"Any person, who while a minor, was a victim of a violation of an offense enumerated in Title 18, United States Code, § 2255, will have the same rights to proceed under § 2255 as she would have had, if Mr. Epstein been tried federally and convicted of an enumerated offense. For purposes of implementing this paragraph, the United States shall provide Mr. Epstein's attorneys with a list of individuals whom it was prepared to name in an Indictment as victims of an enumerated offense by Mr. Epstein. Any judicial authority interpreting this provision, including any authority determining which evidentiary burdens if any a plaintiff must meet, shall consider that it is the intent of the parties to place these identified victims in the same position as they would have been had Mr. Epstein been convicted at trial. No more; no less."

¹⁰ Due to the subsequent objections raised by Epstein's counsel, Mr. Josefsberg was never given the opportunity to become the attorney representative.

Mr. Starr also objected to the SDFL's intention to notify the victims pursuant to 18 U.S.C. § 3771. In response to Mr. Starr's concerns, USA Acosta again consulted with DAAG [REDACTED] who advised him to make the following proposal: "[w]e will defer to the discretion of the State Attorney regarding whether he wishes to provide victims with notice of the state proceedings, although we will provide him with the information necessary to do so if he wishes." These proposals were immediately rejected by Epstein in Mr. Lefkowitz's December 26, 2007 correspondence to USA Acosta.

At our December 14, 2007 meeting at the U.S. Attorney's Office in Miami, counsel for Epstein articulated that it was a "profound injustice" to require Epstein to register as a sex offender and reiterated that no federal crime, especially 18 U.S.C. § 2422(b), had been committed since the statute is only violated if a telephone or means of interstate commerce is used to do the persuading or inducing. This particular attack on this statute had been previously raised and thoroughly considered and rejected by the SDFL and CEOS prior to the execution of the Agreement. Epstein's lawyers also argued that the facts were inapplicable to the contemplated state statutes and that he should not have been allowed to have been induced into the Agreement because the facts were not what he understood them to be. To reiterate, the SDFL has never divulged its evidence to anyone on the Epstein legal team. Once counsel for Epstein failed to persuade us that federal involvement was inappropriate, they mounted an aggressive campaign to defer federal prosecution. When we refused to compromise on anything except the length of incarceration, they finally executed the Non-Prosecution Agreement.

Subsequent to the December 14, 2007 meeting, the SDFL received three letters from Mr. Lefkowitz and/or Mr. Starr which expanded on some of the themes announced in the December 14th meeting. Essentially, trying to portray the SDFL as trying to coerce a plea to unknown allegations and incoherent theories. In his December 17, 2007 correspondence, Mr. Lefkowitz decreed that Epstein's conduct did not meet the requirements of one of the state statutes Epstein agreed to plead guilty to - procurement of minors to engage in prostitution (Fl. Stat. § 796.03); that Epstein's conduct does not require registration under Florida law in contravention of the September 24th Agreement; and the State Attorney's Office does not believe the conduct is registrable. On December 21, 2007, Mr. Lefkowitz rejected the U.S. Attorney's proposed resolution of the 2255 provision because they "strongly believe that the provable conduct of Mr. Epstein with respect to these individuals fails to satisfy the requisite elements of either 18 U.S.C. Section[s] 2422(b) ... or ... 2423(b)." In his December 26, 2007 correspondence, he stated that "we have reiterated in previous submissions that Mr. Epstein does not believe he is guilty of the federal charges enumerated under section 2255" and requiring "Mr. Epstein to in essence admit guilt, though he believes he did not commit the requisite offense."

The SDFL reiterated time and time again that it had never wanted nor expected Epstein to plead guilty to a charge he did not believe he committed and repeatedly offered to dissolve the agreement to allow Epstein to contest the charges in the court system. As a result, the SDFL obliged his request for an independent *de novo* review of the investigation and facilitated such a review at the highest levels of the Department of Justice. As you know, on May 15, 2008, after months of considering the matter, the Criminal Division considered whether there is a legitimate basis for the

SDFL to proceed with a federal prosecution of Mr. Epstein. CEOS Section Chief ██████████ concluded that "federal prosecution would not be improper or inappropriate." See attached May 15, 2008 letter from CEOS Section Chief ██████████ to Jay Lefkowitz. On May 19, 2008, I notified Mr. Lefkowitz that the SDFL would give Epstein a full two weeks (close of business on Monday, June 2, 2008) to comply with the terms and conditions of the Non-Prosecution Agreement, as modified by the USA's December 19th letter to Ms. Sanchez.¹¹ Therefore, despite the fact that the investigation has identified several more victims, the SDFL is still offering Epstein the opportunity to comply with the terms and conditions of the Non-Prosecution Agreement.

The SDFL was recently notified that the Office of the Deputy Attorney General has agreed to consider additional allegations not considered by CEOS which were recently raised in correspondence by two former high-ranking members of the Department of Justice - Ken Starr and Joe Whitley. On May 28, 2008, I notified Mr. Lefkowitz by e-mail that the SDFL has postponed the June 2, 2008 deadline until the DAG's Office has completed its review of this matter. Their correspondence to the DAG alleges that the SDFL's investigation lacks integrity because it has leaked "highly confidential aspects" of the investigation and negotiations to the New York Times and that FAUSA ██████████ directed some of the victims to my former law firm. They also claim that the "unprecedented extension of federal law" by the SDFL suggests that this is politically motivated because Epstein is a prominent figure with "close ties to former President Clinton." Messrs. Starr and Whitley go on to claim that FAUSA ██████████ unilaterally, arbitrarily and unnecessarily imposed a June 2, 2008 deadline in order to prevent Epstein from seeking your Office's review and that "the unnecessary deadline is even more problematic because Mr. Epstein's effort to reconcile the state charge and sentence with the terms of the Agreement requires an unusual and unprecedented threatened application of federal law."

1. *The Alleged "Leak" to the New York Times.*

AUSA ██████████ became involved in this matter in his capacity as back up for the District's Public Information Officer (PIO). While the District's PIO was on annual leave, he was the acting PIO during the first week of January 2008. The entirety of his conduct in connection with the Epstein matter began on January 2, 2008 and ended on January 7, 2008.¹² Specifically, his contact involved five telephone conversations with Landon Thomas, a reporter for the New York Times. These conversations occurred on 1) the morning of January 2, 2008, 2) the afternoon of January 2, 2008, 3) the afternoon of January 3, 2008, 4) the afternoon of January 4, 2008, and 5) the afternoon of January 7, 2008.

¹¹ Mr. Lefkowitz was placed on notice on February 25, 2008, that in the event that CEOS disagreed with Epstein's position, Epstein would have one week to comply with the terms and conditions of the Agreement, as modified by the USA's December 19th letter to Ms. Sanchez.

¹² AUSA ██████████ has self-reported to the Office of Professional Responsibility.

A. *The Morning of January 2, 2008.*

AUSA ██████ began his conversation with Mr. Thomas by explaining that he was the acting PIO for the week and that he had received Mr. Thomas's December 31, 2007 e-mail requesting an interview and asking for comments on the following five statements.¹³ First, "that in the summer of 2005 the palm beach police department referred the Epstein case to you." Second, "that the case is being overseen by ██████, and above him, R. Alexander Acosta." Third, "that Mr. Acosta has made child pornography a focus are [sic] for your office." Fourth, "that this summer your office gave Mr. Epstein an ultimatum: plead guilty to a charge that would require him to register as a sex offender, or the government would release a 52 page indictment, charging him with crimes that could include procuring sex for a third party or engaging in sexual tourism. Both of these charges carry jail sentences of as much as 15 years." Fifth, "that your office told Mr. Epstein and his lawyers: we are ready to pull the trigger." Sixth, "I also wanted to ask Mr. ██████ about his role in a case involving Jonathan Zirulnikoff and his daughter earlier this year."

At the outset, ██████ said that he could not comment on any specific pending matters and that he would do his best to answer some of his questions. Thomas said that his questions were based, in part, upon conversations that he had already had with members of Mr. Epstein's defense team, prior published reports of a pending State case against Mr. Epstein and public information available through the State Court system.

██████ refused to answer the first question. As to the second question, ██████ told him that any matter arising out of conduct in Palm Beach County, was prosecuted by our West Palm Beach branch office. He also told him that as First Assistant, the FAUSA had supervisory authority over all AUSAs throughout the District. In turn, the FAUSA answered directly to the U.S. Attorney.

In response to the third question, ██████ discussed the difference between child exploitation and child pornography. ██████ said that federal crimes involving child exploitation were one of several focus points of our Office. He further explained that in addition to traditional federal areas of prosecution the other focus points included health care fraud and gang prosecutions.

██████ refused to answer the fourth and fifth topics but did discuss the general nature of pre-trial proceedings in federal court. He said that the SDFL does not offer ultimatums, nor are we in the business of issuing ultimatums. He explained that in cases where a party wants to plead guilty prior to indictment, we will discuss the parameters of guilty pleas and that people always have the right to proceed to trial if they choose to do so and that we do not favor one resolution over the other. ██████ told Mr. Thomas that he would not discuss his specific question about Mr. Epstein's lawyer's statement that someone from our Office told them that "we are ready to pull the trigger."

¹³After reviewing his e-mail, AUSA ██████ discussed the matter with U.S. Attorney Acosta. Pursuant to USAM 1-7.530 and the Media Relations Guide, Section III D2, after consultation with and prior approval from the US Attorney, he called Mr. Thomas on the morning of January 2nd.

Nor would he discuss anything about who might or might not be representing Mr. Epstein. ██████ told Mr. Thomas that he should not allow himself to be spun one way or the other in response to statements Mr. Thomas said he had received from attorneys who said that they represented Mr. Epstein. ██████ ended the conversation by telling Mr. Thomas that he would check further into his sixth and final topic and get back to him later in the day.

B. *Afternoon of January 2, 2008.*

██████ informed Mr. Thomas that in regard to his sixth topic, the SDFL had no reason to question FAUSA ██████ judgment or integrity. He also said that this particular subject matter was a private matter that FAUSA ██████ did not want to discuss with him.¹⁴ Mr. Thomas told him that if he had any further questions, he would call back.

C. *Afternoon of January 3, 2008.*

This call was in response to a voice mail message that Mr. Thomas had left regarding legal issues involving specific state and federal statutes. Specifically, Mr. Thomas had some questions about the burden of proof and strict liability in some state and federal statutes that governed illegal sexual activity. Again, ██████ told him that he would not discuss any specific cases, but that he would assist him in understanding the statutes about which he had some questions. ██████ explained that some statutes contained defenses that must be proven by a defendant, while there were other statutes that did not require a defendant to affirmatively prove a defense. The discussion centered around Title 18, United States Code, § 2423(g). Once again, Mr. Thomas told ██████ that if he had any further questions, he would call back.

D. *Afternoon of January 4, 2008.*

This was another call in response to a voice mail message that Mr. Thomas had left regarding some additional questions. ██████ prefaced the conversation by saying that he would not discuss any specific cases. The conversation centered around three specific statutes, 18 United States Code, § 2422(b), 18 United States Code, § 1591, and 18 United States Code, § 2423(b) as well as the

¹⁴ The case involving "Jonathan Zirulnikoff" involved a March 7, 2007 early morning attempted break-in of my/██████ house. Zirulnikoff, age 19 at the time, confessed and said that he wanted to "talk" to my daughter who was then 16. He also confessed to a prior unrelated break in which Zirulnikoff caressed the inner thigh of a 15 year old female. Zirulnikoff who had graduated from my daughter's high school in June 2006, dated my daughter's friend and had little if any contact with my daughter for over one year. Zirulnikoff negotiated a plea deal, over my objection, with the Miami-Dade State Attorney's Office to a misdemeanor trespass. That conviction resulted in a sentence of two years probation and a withhold of adjudication upon successful completion of his probationary period. Since this information was completely irrelevant to the facts and issues in the instant Epstein matter, I refused to allow Mr. ██████ to comment about this matter to Mr. Thomas. Furthermore, none of this information had been publicized and, upon information and belief, only one member of Epstein's legal team knew anything about this matter, my former colleague, Lilly Ann Sanchez.

burden of proof and the applicability of affirmative defenses. They discussed the difference between an attempt and a substantive charge pursuant to § 2422(b) and how that affected the government's burden of proof *vis-a-vis* the age of a child. They also discussed the fact that a charge pursuant to § 1591 required the government to prove that the defendant had actual knowledge of the age of the victim. Finally, they discussed the fact that if the government was charging a defendant with traveling to engage in prostitution, pursuant to § 2423(b), there was an affirmative defense available to the defendant regarding the reasonable belief of the defendant about the age of the victim.

E. *Afternoon of January 7, 2008.*

This final call was made after the U.S. Attorney and FAUSA [REDACTED] had received a call from a member of Mr. Epstein's defense team alleging that the SDFL had provided case specific information to the media. [REDACTED] called Mr. Thomas who acknowledged that both before and after each of the above-mentioned conversations, he had also called attorneys who were representing Mr. Epstein on his pending State charges. Mr. Thomas also acknowledged that all of our prior conversations had been about general legal issues and that [REDACTED] never spoke about any specific case. Since the January 7, 2008 conversation, [REDACTED] has not had any further contact with Mr. Thomas.

2. [REDACTED] (May 5, 2001 - October 1, 2001).

Seven years ago, I resigned from the SDFL for private practice. Less than five months later, I resigned from the law firm and returned to the SDFL. Public records reflect the following: on May 8, 2001, articles of amendment were filed with the Florida Division of Corporations to reflect that the firm name of "[REDACTED]" was changed to "[REDACTED]" on May 7, 2001. I joined the firm at that time and remained a non-equity partner until on or about October 1, 2001. At that time, I resigned from the firm and returned to the SDFL. Since I never had an equity interest in the firm, I never retained an interest in the firm. That was over six and one half years ago.

Unbeknownst to FAUSA [REDACTED], on July 2, 2002, articles of amendment were filed with the Florida Division of Corporations to reflect that the firm name of "[REDACTED]" was changed back to "[REDACTED]." The article of amendment indicates the amendment was adopted on July 1, 2002, without shareholder action. Although the filing was not immediate upon my departure from the law firm, it pre-dated for years any dealings with the subject case now under consideration by the SDFL. Recently, I learned that there is a reference to the law firm of "[REDACTED]" on the Florida Bar website, under a section called "Find A Lawyer." This reference appears when Stuart Mermelstein's name and information is accessed. To reiterate, since October 2001, I have had no relationship with that law firm, financial or otherwise, and no input or control over the firm's filings with the Florida Division of Corporations and/or the Florida Bar.

On Friday, January 18, 2008, at approximately 1:15 pm, I received a call from Jeffrey Herman of [REDACTED]. Herman said that he was planning to file a civil lawsuit the next

week against Jeffrey Epstein. He said that his clients were frustrated with the lack of progress of the state's investigation and wanted to know whether the SDFL could file criminal charges even though the state was looking into the matter. I told Herman that I would not answer any question related to Epstein – hypothetical or otherwise. I asked him how his clients retained him and he said that it was through another lawyer. I then specifically asked him whether the referral was the result of anyone in law enforcement contacting him and/or the other lawyer. He said “no.” At the conclusion of the conversation, I reiterated and confirmed with him that I had refused to answer any questions he asked of me. I immediately documented this conversation and informed the U.S. Attorney who informed [REDACTED] Litigation Counsel and Ethics Advisor [REDACTED]. AUSA [REDACTED] opined that he did not see a conflict. As soon as I became aware of these allegations, I reported myself to the Office of Professional Regulation on or about April 21, 2008.

3. *The Alleged Unprecedented Extension of Federal Law and the Allegations of Political Motivation for the Prosecution.*

It is my hope that this letter has sufficiently explained how thoroughly this matter has been reviewed, how seriously the issues have been considered, and how additional delays may adversely affect the case going forward and, more importantly, the victims. I have attached the proposed draft indictment for you to consider the nature and gravity of the crimes. *See* Tab G. You are invited to evaluate whether I, along with U.S. Attorney Acosta, Criminal Division Chiefs [REDACTED] and, later [REDACTED], Deputy Criminal Division Chiefs [REDACTED], followed by [REDACTED], and AUSA [REDACTED] have somehow steered this investigation toward “an unprecedented extension of federal law” despite being simultaneously and/or subsequently reviewed by CEOS, DAAG [REDACTED], and AAG Fisher. I also hope that the reputations of the above-mentioned professional prosecutors combined with the documented layers of methodical and thorough review of all issues raised by Epstein are enough to summarily dismiss the idea that this matter is politically motivated. It seems incomprehensible how Messrs. Starr and Whitley could expect *further* review when the due process rights of their client have been considered and reconsidered to the point of absurdity.

With respect to the other allegations of misconduct leveled against investigators and prosecutors, similarly false allegations were made against the local police detective who first investigated the case. Those false allegations apparently were accepted as true and were not investigated or challenged by the State Attorney's Office and, when coupled with the immense pressure brought to bear upon the State Attorney by some of these same lawyers who represent Epstein today, resulted in a single felony charge related to only two of the more than 20 victims identified in the state investigation. Contrary to the claims of Epstein's attorneys, the SDFL is *not* trying to prosecute Epstein more harshly because of his political friends or his financial status; rather, the SDFL is attempting to follow Department policy by treating Epstein like all other criminal defendants – charging him with the most serious readily provable offenses. The SDFL has even continued to allow Epstein the opportunity to perform his obligations under the Non-Prosecution Agreement despite his numerous breaches of and attacks on the terms to which he already agreed.

Without attempting to address each and every allegation, I would like to highlight some of the misstatements contained in counsels' letter, to provide some sense of counsels' conduct

throughout this case, particularly after their attempts at legal persuasion failed. Throughout the case, counsel have misrepresented the facts of the case to our Office, CEOS, and the press. For example, Epstein's counsel reference to this case as "precedent-shattering," suggests that all of the victims were at least 16 years old, and that the conduct "was purely local in nature." The SDFL has prosecuted several "sex tourism" cases where the "john" communicated via telephone with an undercover "pimp" in the SDFL to meet minor females to engage in prostitution. All were charged and convicted of violating 18 U.S.C. § 1591. The SDFL has charged and convicted a 21-year-old man of violating 18 U.S.C. § 2423 when he traveled to Florida to meet his 14-year-old girlfriend and later digitally penetrated her. The SDFL has prosecuted numerous violations of 18 U.S.C. § 2422 where the "facility of interstate commerce" – generally the internet and telephones – are used by a defendant and an undercover pretending to be the parent of a minor, to arrange for a meeting that the defendant hopes will result in sexual activity. There is nothing extraordinary about Epstein's case except the large number of victims involved.

Epstein's counsel neglected to inform you that the age range of the victims includes girls as young as 14, and glosses over the fact that Epstein did not simply engage in "solo self-pleasuring" in front of the victims. Instead, with each visit, he pressured the victims to allow him to engage in more and more sexual activity – fondling breasts and vaginas, digital penetration, use of a vibrator on their vaginas, performing oral sex on them, having them perform oral sex on his adult girlfriend, and engaging in sexual intercourse. Counsel also neglected to inform you that many girls did affirmatively tell Epstein their true ages and he told several that he "did not care about age."

Epstein's conduct was not "purely local." He and his assistants called and sent text messages to victims in Palm Beach County from other states to arrange "appointments" for his upcoming visits to Palm Beach. And, while in Palm Beach, Epstein and his assistants called victims in New York to arrange "appointments" for his return to New York. Epstein wired money to some victims and sent gifts through the mails. This case falls squarely within federal jurisdiction.

Epstein also falsely claims that certain facts related to the resolution of the case were hidden and later discovered by his lawyers. For example, they complain about the proposed use of a guardian ad litem, stating that "Mr. Epstein's counsel later established that all but one of these individuals were adults, not minors." It was AUSA [REDACTED] who told Epstein's counsel that all of the victims but one had already reached the age of majority, which was one reason why the guardian ad litem procedure proposed by Epstein's counsel would not work. Likewise, AUSA [REDACTED] disclosed to Epstein's counsel that one of the five attorney-representatives that she recommended for consideration by Epstein's counsel was a "good friend" of a "good friend." Despite the disclosure of this relationship, Epstein's counsel selected that person, before the SDFL, on its own, decided to use an independent Special Master to make the selection.

Epstein's counsel states that the "USAO eventually asserted that it could not vouch for the veracity of any of the claims that these women might make," but neglects to disclose that the SDFL made that statement *at Epstein's request* to avoid the suggestion that the SDFL was involving itself in the outcome of civil litigation.

Epstein's counsel have repeatedly attacked the SDFL and the FBI for classifying the victims as "victims." As you know, all Justice Department employees have the obligation to identify victims and to notify them of their rights. "Victims" are defined by law, not by self-selection. The girls whom have been identified by the FBI and the SDFL fall within the legal definition – they were all minors who engaged in illicit sexual activity with Jeffrey Epstein, at his request, in exchange for money. From interviewing them, the FBI Special Agents, the FBI Victim-Witness Coordinator, and AUSA [REDACTED] all feel confident that they suffered harm, in a multitude of ways, by their interaction with Epstein.

Finally, in contrast to Epstein's counsel allegation that my June 2, 2008 deadline was "arbitrary, unfair, and unprecedented," please consider that Mr. Lefkowitz has known since February that in the event that CEOS disagreed with his position, Epstein would be given one-week to comply with the Non-Prosecution Agreement. Subsequent to the receipt of CEOS Section Chief [REDACTED] May 15, 2008 letter, I notified Mr. Lefkowitz that Epstein would have a full two-weeks to comply with the Non-Prosecution Agreement as modified by the December 19th letter to Ms. Sanchez. We believe it is finally time to shift the focus from Epstein's due process rights to treating him like all other similarly situated criminal defendants and perhaps, most importantly, to consider the rights of his victims. Continued delays adversely effect the case and the victims in the following ways:

- (1) at the time of the offenses, the victims ranged in age from 14 to 17 years old. The change in physical appearance of many of the victims since then has been dramatic. Epstein has been claiming that he did not know they were minors. Obviously, the older they look when the case is at issue, the harder it will be to overcome that defense;
- (2) it allows Epstein's lawyers to conduct depositions of the victims in the pending state criminal case and allows his private investigators to further harass and intimidate the victims;
- (3) more victims will seek the services of civil lawyers to file lawsuits thus allowing Epstein to make more powerful arguments demeaning the credibility of the victims;
- (4) the prosecutors and agents may retire, transfer and/or leave the Department for other opportunities thus affecting the potential outcome and prosecutorial resources. Additionally, several of the victims have relocated thus increasing the likelihood that crucial witnesses will be lost;
- (5) the SDFL has afforded more consideration to Epstein's arguments than any other defendant in my years of being the FAUSA and, before that, the Chief of the Criminal Division (January 1, 2004 to the present). I believe that we have been disproportionally fair to Epstein at the expense of other matters; and
- (6) prolonged delay may adversely affect the statute of limitations for some of the victims.

On behalf of the SDFL and the victims in this case, please expedite the review and decision of the issues under consideration.

Sincerely,

R. Alexander Acosta
United States Attorney

By:

[REDACTED]
[REDACTED]
First Assistant United States Attorney

Encls.

cc: [REDACTED], Chief
Criminal Division
[REDACTED]
Assistant U.S. Attorney
[REDACTED]
Assistant U.S. Attorney

CONFIDENTIAL PLEA NEGOTIATIONS

TERMS OF EPSTEIN NON-PROSECUTION AGREEMENT

- Epstein pleads guilty (not nolo contendere) to an Information filed by the Palm Beach County State Attorney's Office charging him with:
 - (a) lewd and lascivious battery on a child, in violation of Fl. Stat. 800.04(4);
 - (b) solicitation of minors to engage in prostitution, in violation of Fl. Stat. 796.03; and
 - (c) engaging in sexual activity with minors at least sixteen years of age, in violation of Fl. Stat. 794.05.

- Epstein and the State Attorney's Office make a joint, binding recommendation that Epstein serve at least two years in prison, without any opportunity for withholding adjudication or sentencing; and without probation or community control in lieu of imprisonment.

- Epstein agrees to waive all challenges to the information filed by the State and the right to appeal.

- Epstein agrees that, if any of the victims identified in the federal investigation file suit pursuant to 18 U.S.C. § 2255, Epstein will not contest the jurisdiction of the U.S. District Court for the Southern District of Florida over his person and the subject matter. Epstein will not contest that the identified victims are persons who, while minors, were victims of violations of Title 18, United States Code, Sections(s) 2422 and/or 2423.

- After Epstein enters his state court plea and is sentenced, the FBI and the U.S. Attorney's Office will close their investigations.

FOWLERWHITE
ATTORNEYS AT LAW
BURNETT

MIAMI • FORT LAUDERDALE • WEST PALM BEACH • ST. PETERSBURG

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LILLY ANN SANCHEZ
DIRECT PHONE NO.: [REDACTED]
DIRECT FACSIMILE NO.: [REDACTED]

August 2, 2007

Mr. [REDACTED]
Chief, Criminal Division
United States Attorney's Office
Southern District of Florida
99 NE 4 Street
Miami, Florida 33132

Re: Jeffrey Epstein

Dear [REDACTED]:

As we discussed at Tuesday's meeting, and consistent with our view that no federal prosecution should lie in this matter, Mr. Epstein is prepared to resolve this matter via a state forum. We are in receipt of your memo regarding same and as the dynamics of the meeting did not allow for us to fully detail our proposal, we do so now. We believe that our respective positions are not very far apart and that a mutually agreeable resolution can be reached that will accomplish the interests of the United States Attorney's Office as well as those of the community.

We welcomed your recognition that a state prison sentence is neither appropriate for, nor acceptable to, Mr. Epstein, as the dangers of the state prison system pose risks that are clearly untenable. We acknowledge that your suggestion of a plea to two federal misdemeanors was an attempt to resolve this dilemma. Our proposal is significantly punitive, and if implemented, would, we believe, leave little doubt that the federal interest was demonstrably vindicated.

The Florida state judicial system, unlike the federal system, provides for numerous types of onerous sanctions after a defendant is remanded to the custody of the state. The sentence is tailored to the needs of the local community and the risk posed by a specific defendant. After a great deal of thought, our proposal consists of both a severe supervised custody, with an assurance that any violation would result in the immediate implementation of the two year period of incarceration. We must keep in mind that Jeffrey Epstein is a 54-year old man who has never been arrested before. He has lived an otherwise exemplary life, characterized by both many charitable contributions and philanthropic acts. His reputation has suffered significantly as a result of his poor judgment in these matters. He is well aware of the ramifications of his past behavior and, accordingly, there is no concern, whatsoever, that he will re-offend.

FOWLER WHITE BURNETT P.A.

EFTA00224653

The following proposal is offered as an assurance to the community that the goals of appropriate punishment and rehabilitation are attained.

We will agree to a sentence of two years in state prison pursuant to Florida Statute 948.012(2) which permits a split sentence whereby Mr. Epstein will be sentenced to a term of supervised custody, followed by a period of incarceration. Supervised custody in the state system includes potential daily surveillance, administered by officers with restricted case loads. Supervised custody is an individualized program in which the freedom of Mr. Epstein is limited to the confines of his residence with specific sanctions imposed and enforced. *See Florida Statute 948.001(2)*. Should Mr. Epstein successfully complete the terms and conditions of his custody, the Judge will eliminate the incarcerative portion of the sentence. If Mr. Epstein, however, fails to comply with the conditions of his supervised custody. The period of incarceration will be immediately implemented.

We, therefore, propose the following:

Two years supervised custody with the following mandatory and special conditions:

- o Confinement to home
- o Report to a community control officer at least once a week or more often as directed by the officer
- o Permit a community control officer to visit him unannounced at home at any time, day or night
- o Obtain psychological counseling
- o No unsupervised contact with all the victims in the instant case
- o Perform community service
- o Payment of Restitution
- o Application of 18 U.S.C. § 2255¹
- o Payment of a contribution of a defined amount to a charitable organization benefitting victims of sexual assault
- o Payment of Court and probationary costs
- o Payment of law enforcement investigative costs
- o Submit to random drug testing
- o Refrain from associating with persons engaged in criminal activities
- o Refrain from committing any new law offenses
- o Any other specific conditions that the Office may deem necessary

Two additional years of reporting probation:

¹ 18 U.S.C. 2255 provides that any minor who suffers injury as a result of the commission of certain offenses shall recover actual damages and the cost of any suit. It is important to note that Mr. Epstein is prepared to fully fund the identified group of victims which are the focus of the Office – that is, the 12 individuals noted at the meeting on July 31, 2007. This would allow the victims to be able to promptly put this behind them and go forward with their lives. If given the opportunity to opine as to the appropriateness of Mr. Epstein's proposal, in my extensive experience in these types of cases, the victims prefer a quick resolution with compensation for damages and will always support any disposition that eliminates the need for trial.

- o Mandatory conditions as provided in Florida Statute § 948.03
- o Special conditions as stated above

If the terms of supervised custody and probation are successfully completed, then the two years of state prison is eliminated.

This proposal provides for the two year imposition of the state prison sentence if any violation of the supervised custody or probation occurs. Accordingly, the Office's position that Mr. Epstein agree to a resolution that includes jail time is satisfied by this proposal. It would immediately bring closure to a matter that has been pending for over two years, allows Mr. Epstein to commence with his sentence, and, most significantly, allow the victims to move forward with their lives. We are in process of scheduling a meeting with R. Alexander Acosta, United States Attorney, to further discuss this matter.

Sincerely,



Lilly Ann Sanchez

cc. R. Alexander Acosta
Gerald Lefcourt
Roy Black

NEW YORK POST

EPSTEIN EYES SEX-RAP RELIEF

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October 9, 2007 -- LAWYERS for Jeffrey Epstein - the billionaire Manhattan investment manager who's agreed to plead guilty to soliciting underage prostitutes at his Palm Beach mansion in exchange for just 18 months in the slammer - are mulling asking federal prosecutors to drop their demand that he register as a sex offender. In a letter drafted, but not sent, to U.S. Attorney Alexander Costa and obtained by Page Six, Epstein's lawyer, Gerald Lefcourt, writes, "Doing so will have a profound impact [on Epstein] both immediately and forever after. Not only will he be restricted to a wholly inappropriate penal facility, but he will be required for the rest of his life to account for his whereabouts." Epstein, a former business partner of Daily News owner Mort Zuckerman, pleaded guilty to a state charge in exchange for the feds' dropping their probe into possible federal criminal violations. Lefcourt argues that only the feds have demanded that Epstein register, "despite the fact that the state was of the view that Mr. Epstein's conduct did not warrant registration." A rep for Epstein had no comment.

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**IN RE:
INVESTIGATION OF
JEFFREY EPSTEIN**

NON-PROSECUTION AGREEMENT

IT APPEARING that the City of Palm Beach Police Department and the State Attorney's Office for the 15th Judicial Circuit in and for Palm Beach County (hereinafter, the "State Attorney's Office") have conducted an investigation into the conduct of Jeffrey Epstein (hereinafter "Epstein");

IT APPEARING that the State Attorney's Office has charged Epstein by indictment with solicitation of prostitution, in violation of Florida Statutes Section 796.07;

IT APPEARING that the United States Attorney's Office and the Federal Bureau of Investigation have conducted their own investigation into Epstein's background and any offenses that may have been committed by Epstein against the United States from in or around 2001 through in or around September 2007, including:

- (1) knowingly and willfully conspiring 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, or entice minor females to engage in prostitution, in violation of Title 18, United States Code, Section 2422(b); all in violation of Title 18, United States Code, Section 371;
- (2) knowingly and willfully conspiring 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 minor females, in violation of Title 18, United States Code, Section 2423(b); all in violation of Title 18, United States Code, Section 2423(e);
- (3) using a facility or means of interstate or foreign commerce to knowingly persuade, induce, or entice minor females to engage in prostitution; in violation of Title 18, United States Code, Sections 2422(b) and 2;
- (4) traveling in interstate commerce for the purpose of engaging in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f), with minor females; in violation

of Title 18, United States Code, Section 2423(b); and

- (5) knowingly, in and affecting interstate and foreign commerce, recruiting, enticing, and obtaining by any means a person, 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); in violation of Title 18, United States Code, Sections 1591(a)(1) and 2; and

IT APPEARING that Epstein seeks to resolve globally his state and federal criminal liability and Epstein understands and acknowledges that, in exchange for the benefits provided by this agreement, he agrees to comply with its terms, including undertaking certain actions with the State Attorney's Office;

IT APPEARING, after an investigation of the offenses and Epstein's background by both State and Federal law enforcement agencies, and after due consultation with the State Attorney's Office, that the interests of the United States, the State of Florida, and the Defendant will be served by the following procedure;

THEREFORE, on the authority of R. Alexander Acosta, United States Attorney for the Southern District of Florida, prosecution in this District for these offenses shall be deferred in favor of prosecution by the State of Florida, provided that Epstein abides by the following conditions and the requirements of this Agreement set forth below.

If the United States Attorney should determine, based on reliable evidence, that, during the period of the Agreement, Epstein willfully violated any of the conditions of this Agreement, then the United States Attorney may, within ninety (90) days following the expiration of the term of home confinement discussed below, provide Epstein with timely notice specifying the condition(s) of the Agreement that he has violated, and shall initiate its prosecution on any offense within sixty (60) days' of giving notice of the violation. Any notice provided to Epstein pursuant to this paragraph shall be provided within 60 days of the United States learning of facts which may provide a basis for a determination of a breach of the Agreement.

After timely fulfilling all the terms and conditions of the Agreement, no prosecution for the offenses set out on pages 1 and 2 of this Agreement, nor any other offenses that have been the subject of the joint investigation by the Federal Bureau of Investigation and the United States Attorney's Office, nor any offenses that arose from the Federal Grand Jury investigation will be instituted in this District, and the charges against Epstein if any, will be dismissed.

Terms of the Agreement:

1. Epstein shall plead guilty (not nolo contendere) to the Indictment as currently pending against him in the 15th Judicial Circuit in and for Palm Beach County (Case No. 2006-cf-009495AXXXMB) charging one (1) count of solicitation of prostitution, in violation of FL Stat. § 796.07. In addition, Epstein shall plead guilty to an Information filed by the State Attorney's Office charging Epstein with an offense that requires him to register as a sex offender, that is, the solicitation of minors to engage in prostitution, in violation of Florida Statutes Section 796.03;
2. Epstein shall make a binding recommendation that the Court impose a thirty (30) month sentence to be divided as follows:
 - (a) Epstein shall be sentenced to consecutive terms of twelve (12) months and six (6) months in county jail for all charges, without any opportunity for withholding adjudication or sentencing, and without probation or community control in lieu of imprisonment; and
 - (b) Epstein shall be sentenced to a term of twelve (12) months of community control consecutive to his two terms in county jail as described in Term 2(a), *supra*.
3. This agreement is contingent upon a Judge of the 15th Judicial Circuit accepting and executing the sentence agreed upon between the State Attorney's Office and Epstein, the details of which are set forth in this agreement.
4. The terms contained in paragraphs 1 and 2, *supra*, do not foreclose Epstein and the State Attorney's Office from agreeing to recommend any additional charge(s) or any additional term(s) of probation and/or incarceration.
5. Epstein shall waive all challenges to the Information filed by the State Attorney's Office and shall waive the right to appeal his conviction and sentence, except a sentence that exceeds what is set forth in paragraph (2), *supra*.
6. Epstein shall provide to the U.S. Attorney's Office copies of all

proposed agreements with the State Attorney's Office prior to entering into those agreements.

7. The United States shall provide Epstein's attorneys with a list of individuals whom it has identified as victims, as defined in 18 U.S.C. § 2255, after Epstein has signed this agreement and been sentenced. Upon the execution of this agreement, the United States, in consultation with and subject to the good faith approval of Epstein's counsel, shall select an attorney representative for these persons, who shall be paid for by Epstein. Epstein's counsel may contact the identified individuals through that representative.
8. If any of the individuals referred to in paragraph (7), *supra*, elects to file suit pursuant to 18 U.S.C. § 2255, Epstein will not contest the jurisdiction of the United States District Court for the Southern District of Florida over his person and/or the subject matter, and Epstein waives his right to contest liability and also waives his right to contest damages up to an amount as agreed to between the identified individual and Epstein, so long as the identified individual elects to proceed exclusively under 18 U.S.C. § 2255, and agrees to waive any other claim for damages, whether pursuant to state, federal, or common law. Notwithstanding this waiver, as to those individuals whose names appear on the list provided by the United States, Epstein's signature on this agreement, his waivers and failures to contest liability and such damages in any suit are not to be construed as an admission of any criminal or civil liability.
9. Epstein's signature on this agreement also is not to be construed as an admission of civil or criminal liability or a waiver of any jurisdictional or other defense as to any person whose name does not appear on the list provided by the United States.
10. Except as to those individuals who elect to proceed exclusively under 18 U.S.C. § 2255, as set forth in paragraph (8), *supra*, neither Epstein's signature on this agreement, nor its terms, nor any resulting waivers or settlements by Epstein are to be construed as admissions or evidence of civil or criminal liability or a waiver of any jurisdictional or other defense as to any person, whether or not her name appears on the list provided by the United States.
11. Epstein shall use his best efforts to enter his guilty plea and be

sentenced not later than October 26, 2007. The United States has no objection to Epstein self-reporting to begin serving his sentence not later than January 4, 2008.

12. Epstein agrees that he will not be afforded any benefits with respect to gain time, other than the rights, opportunities, and benefits as any other inmate, including but not limited to, eligibility for gain time credit based on standard rules and regulations that apply in the State of Florida. At the United States' request, Epstein agrees to provide an accounting of the gain time he earned during his period of incarceration.
13. The parties anticipate that this agreement will not be made part of any public record. If the United States receives a Freedom of Information Act request or any compulsory process commanding the disclosure of the agreement, it will provide notice to Epstein before making that disclosure.

Epstein understands that the United States Attorney has no authority to require the State Attorney's Office to abide by any terms of this agreement. Epstein understands that it is his obligation to undertake discussions with the State Attorney's Office and to use his best efforts to ensure compliance with these procedures, which compliance will be necessary to satisfy the United States' interest. Epstein also understands that it is his obligation to use his best efforts to convince the Judge of the 15th Judicial Circuit to accept Epstein's binding recommendation regarding the sentence to be imposed, and understands that the failure to do so will be a breach of the agreement.

In consideration of Epstein's agreement to plead guilty and to provide compensation in the manner described above, if Epstein successfully fulfills all of the terms and conditions of this agreement, the United States also agrees that it will not institute any criminal charges against any potential co-conspirators of Epstein, including but not limited to [REDACTED], [REDACTED], [REDACTED], or [REDACTED]. Further, upon execution of this agreement and a plea agreement with the State Attorney's Office, the federal Grand Jury investigation will be suspended, and all pending federal Grand Jury subpoenas will be held in abeyance unless and until the defendant violates any term of this agreement. The defendant likewise agrees to withdraw his pending motion to intervene and to quash certain grand jury subpoenas. Both parties agree to maintain their evidence, specifically evidence requested by or directly related to the grand jury subpoenas that have been issued, and including certain computer equipment, inviolate until all of the terms of this agreement have been satisfied. Upon the successful completion of the terms of this agreement, all outstanding grand jury subpoenas shall be deemed withdrawn.

By signing this agreement, Epstein asserts and certifies that each of these terms is material to this agreement and is supported by independent consideration and that a breach of any one of these conditions allows the United States to elect to terminate the agreement and to investigate and prosecute Epstein and any other individual or entity for any and all federal offenses.

By signing this agreement, Epstein asserts and certifies that he is aware of the fact that the Sixth Amendment to the Constitution of the United States provides that in all criminal prosecutions the accused shall enjoy the right to a speedy and public trial. Epstein further is aware that Rule 48(b) of the Federal Rules of Criminal Procedure provides that the Court may dismiss an indictment, information, or complaint for unnecessary delay in presenting a charge to the Grand Jury, filing an information, or in bringing a defendant to trial. Epstein hereby requests that the United States Attorney for the Southern District of Florida defer such prosecution. Epstein agrees and consents that any delay from the date of this Agreement to the date of initiation of prosecution, as provided for in the terms expressed herein, shall be deemed to be a necessary delay at his own request, and he hereby waives any defense to such prosecution on the ground that such delay operated to deny him rights under Rule 48(b) of the Federal Rules of Criminal Procedure and the Sixth Amendment to the Constitution of the United States to a speedy trial or to bar the prosecution by reason of the running of the statute of limitations for a period of months equal to the period between the signing of this agreement and the breach of this agreement as to those offenses that were the subject of the grand jury's investigation. Epstein further asserts and certifies that he understands that the Fifth Amendment and Rule 7(a) of the Federal Rules of Criminal Procedure provide that all felonies must be charged in an indictment presented to a grand jury. Epstein hereby agrees and consents that, if a prosecution against him is instituted for any offense that was the subject of the grand jury's investigation, it may be by way of an Information signed and filed by the United States Attorney, and hereby waives his right to be indicted by a grand jury as to any such offense.

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By signing this agreement, Epstein asserts and certifies that the above has been read and explained to him. Epstein hereby states that he understands the conditions of this Non-Prosecution Agreement and agrees to comply with them.

R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

Dated: _____

By: _____

ASSISTANT U.S. ATTORNEY

Dated: 9/24/07

JEFFREY EPSTEIN

Dated: _____

GERALD LEFCOURT, ESQ.
COUNSEL TO JEFFREY EPSTEIN

Dated: _____

LILLY ANN SANCHEZ, ESQ.
ATTORNEY FOR JEFFREY EPSTEIN

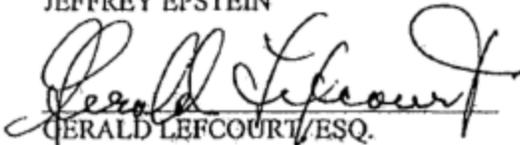
By signing this agreement, Epstein asserts and certifies that the above has been read and explained to him. Epstein hereby states that he understands the conditions of this Non-Prosecution Agreement and agrees to comply with them.

R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

Dated: _____

By: _____
ASSISTANT U.S. ATTORNEY

Dated: _____

JEFFREY EPSTEIN

GERALD LEFCOURT/ESQ.
COUNSEL TO JEFFREY EPSTEIN

Dated: 9/24/07

Dated: _____

LILLY ANN SANCHEZ, ESQ.
ATTORNEY FOR JEFFREY EPSTEIN

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R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

Dated: _____

By:

ASSISTANT U.S. ATTORNEY

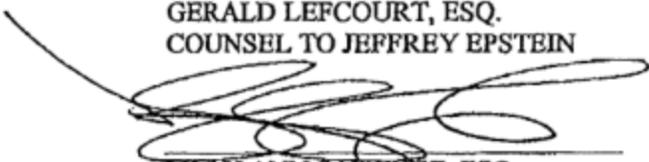
Dated: _____

JEFFREY EPSTEIN

Dated: _____

GERALD LEFCOURT, ESQ.
COUNSEL TO JEFFREY EPSTEIN

Dated: 9-24-07



LILLY ANN SANCHEZ, ESQ.
ATTORNEY FOR JEFFREY EPSTEIN

IN RE:
INVESTIGATION OF
JEFFREY EPSTEIN

ADDENDUM TO THE NON-PROSECUTION AGREEMENT

IT APPEARING that the parties seek to clarify certain provisions of page 4, paragraph 7 of the Non-Prosecution Agreement (hereinafter "paragraph 7"), that agreement is modified as follows:

- 7A. The United States has the right to assign to an independent third-party the responsibility for consulting with and, subject to the good faith approval of Epstein's counsel, selecting the attorney representative for the individuals identified under the Agreement. If the United States elects to assign this responsibility to an independent third-party, both the United States and Epstein retain the right to make good faith objections to the attorney representative suggested by the independent third-party prior to the final designation of the attorney representative.
- 7B. The parties will jointly prepare a short written submission to the independent third-party regarding the role of the attorney representative and regarding Epstein's Agreement to pay such attorney representative his or her regular customary hourly rate for representing such victims subject to the provisions of paragraph C, infra.
- 7C. Pursuant to additional paragraph 7A, Epstein has agreed to pay the fees of the attorney representative selected by the independent third party. This provision, however, shall not obligate Epstein to pay the fees and costs of contested litigation filed against him. Thus, if after consideration of potential settlements, an attorney representative elects to file a contested lawsuit pursuant to 18 U.S.C. s 2255 or elects to pursue any other contested remedy, the paragraph 7 obligation of the Agreement to pay the costs of the attorney representative, as opposed to any statutory or other obligations to pay reasonable attorneys fees and costs such as those contained in s 2255 to bear the costs of the attorney representative, shall cease.

By signing this Addendum, Epstein asserts and certifies that the above has been read and explained to him. Epstein hereby states that he understands the clarifications to the Non-Prosecution Agreement and agrees to comply with them.

R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

Dated: 10/30/07

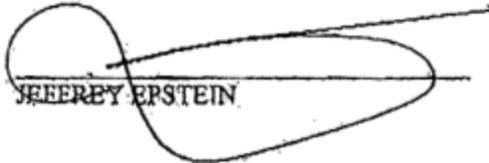
By:

[REDACTED]

FAUSA

ASSISTANT U.S. ATTORNEY

Dated: 10/29/07


JEFFREY EPSTEIN

Dated: _____

GERALD LEFCOURT, ESQ.
COUNSEL TO JEFFREY EPSTEIN

Dated: _____

LILLY ANN SANCHEZ, ESQ.
ATTORNEY FOR JEFFREY EPSTEIN

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R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

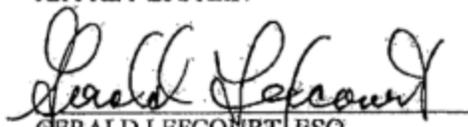
Dated: 10/30/07

By:  FAUSA
ASSISTANT U.S. ATTORNEY

Dated: _____

JEFFREY EPSTEIN

Dated: 10/29/07


GERALD LEFCOURT, ESQ.
COUNSEL TO JEFFREY EPSTEIN

Dated: _____

LILLY ANN SANCHEZ, ESQ.
ATTORNEY FOR JEFFREY EPSTEIN

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R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

Dated: 10/30/07

By:

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ASSISTANT U.S. ATTORNEY

FAUSA

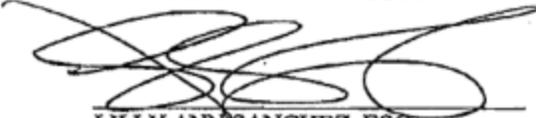
Dated: _____

JEFFREY EPSTEIN

Dated: _____

GERALD LEFCOURT, ESQ.
COUNSEL TO JEFFREY EPSTEIN

Dated: 10-29-07



LILLY ANN SANCHEZ, ESQ.
ATTORNEY FOR JEFFREY EPSTEIN



U.S. Department of Justice

United States Attorney
Southern District of Florida

R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

99 N.E. 4 Street
Miami, FL 33132
[REDACTED] - Telephone
[REDACTED] - Facsimile

December 19, 2007

DELIVERY BY FACSIMILE

Lilly Ann Sanchez
Fowler White Burnett, PA
1395 Brickell Ave, 14th Floor
Miami, FL 33131

Re: Jeffrey Epstein

Dear Ms. Sanchez:

I write to follow up on the December 14th meeting between defense counsel and the Epstein prosecutors, as well as our First Assistant, the Miami FBI Special Agent in Charge and myself.¹ I write to you because I am not certain who among the defense team is the appropriate recipient of this letter. I address issues raised by several members of the defense team, and would thus ask that you please provide a copy of this letter to all appropriate defense team members.

First, I would like to address the Section 2255 issue.² As I stated in my December 4th letter, my understanding is that the Non-Prosecution Agreement entered into between this Office and Mr. Epstein responds to Mr. Epstein's desire to reach a global resolution of his state and federal criminal liability. Under this Agreement, this District has agreed to defer prosecution for enumerated sections

¹ Over the past two weeks, we have received several hundred pages of arguments and exhibits from defense counsel. This is not the forum to respond to the several items raised, and our silence should not be interpreted as agreement; I would, however, like to address one issue. Your December 11th letter states that as a result of defense counsel objections to the appointment process, the USAO proposed an addendum to the Agreement to provide for the use of an independent third party selector. As I recall this matter, before I had any knowledge of defense counsel objections, I *sua sponte* proposed the Addendum to Mr. Lefkowitz at an October meeting in Palm Beach. I did this in an attempt to avoid what I foresaw would likely be a litigious selection process. It was only after I proposed this change that Mr. Lefkowitz raised with me his enumerated concerns.

² Section 2255 provides that: "[a]ny person who, while a minor, was a victim of a violation of [enumerated sections of Title 18] and who suffers personal injury as a result of such violation . . . may sue in any appropriate United States District Court and shall recover the actual damages such person sustains and the cost of the suit, including a reasonable attorney's fee."

of Title 18 in favor of prosecution by the State of Florida, provided that the Mr. Epstein satisfies three general federal interests: (1) that Mr. Epstein plead guilty to a "registerable" state offense; (2) that this state plea include a binding recommendation for a sufficient term of imprisonment; and (3) that the Agreement not harm the interests of his victims.

With this in mind, I have considered defense counsel arguments regarding the Section 2255 portions of the Agreement. As I previously observed, our intent has been to place the victims in the same position as they would have been had Mr. Epstein been convicted at trial. No more; no less. From our meeting, it appears that the defense agrees that this was the intent. During the course of negotiations that intent was reduced to writing in Paragraphs 7 and 8, which as I wrote previously, appear far from simple to understand. I would thus propose that we solve our disagreements over interpretations by saying precisely what we mean, in a simple fashion. I would replace Paragraphs 7 and 8 with the following language:

"Any person, who while a minor, was a victim of a violation of an offense enumerated in Title 18, United States Code, Section 2255, will have the same rights to proceed under Section 2255 as she would have had, if Mr. Epstein been tried federally and convicted of an enumerated offense. For purposes of implementing this paragraph, the United States shall provide Mr. Epstein's attorneys with a list of individuals whom it was prepared to name in an Indictment as victims of an enumerated offense by Mr. Epstein. Any judicial authority interpreting this provision, including any authority determining which evidentiary burdens if any a plaintiff must meet, shall consider that it is the intent of the parties to place these identified victims in the same position as they would have been had Mr. Epstein been convicted at trial. No more; no less."

Second, I would like to address the issue of victim's rights pursuant to Section 3771. I understand that the defense objects to the victims being given notice of time and place of Mr. Epstein's state court sentencing hearing. I have reviewed the proposed victim notification letter and the statute. I would note that the United States provided the draft letter to defense as a courtesy. In addition, First Assistant United States Attorney [REDACTED] already incorporated in the letter several edits that had been requested by defense counsel. I agree that Section 3771 applies to notice of proceedings and results of investigations of federal crimes as opposed to the state crime. We intend to provide victims with notice of the federal resolution, as required by law. We will defer to the discretion of the State Attorney regarding whether he wishes to provide victims with notice of the state proceedings, although we will provide him with the information necessary to do so if he wishes.

Third, I would like to address the issue raised regarding Florida Statute Section 796.03. At our meeting, Professor Dershowitz took the position that Mr. Epstein believes that his conduct does not satisfy the elements of this offense. His assertion raises for me substantial concerns. This Office will not, and cannot, be a party to an agreement in which Mr. Epstein pleads guilty to an offense that he believes he did not commit. We are considering how best to proceed.

Finally, I would like to address a more general point. Our Agreement was first signed on September 24th, 2007. Pursuant to paragraph 11, Mr. Epstein was to use his best efforts to enter his guilty plea and be sentenced no later than October 26, 2007. As outlined in correspondence between our prosecutors and defense counsel, this deadline came and went. Our prosecutors reiterated to defense counsel several times their concerns regarding delays, and in fact, asked me several weeks ago to declare the Agreement in breach because of those delays. I resisted that invitation. I share this fact because it is background to my frustration with what appears to be an 11th hour appeal, weeks before the now scheduled January 4th plea date.

This said, the issues raised are important and must be fully vetted irrespective of timeliness concerns. We hope to preserve the January 4th date. I understand that defense counsel shares our desire not to move that appearance and will work with our office to expedite this process over the next several days. With this in mind, and in the event that defense counsel may wish to seek review of our determinations in Washington D.C., I spoke this past Monday with the Assistant Attorney General Fisher, to inform her of a possible appeal, to ask her to grant the potential request for review, and to in fact review this case in an expedited manner to attempt to preserve the January 4th plea date.

I want to again reiterate that it is not the intention of this Office ever to force the hand of a defendant to enter into an agreement against his wishes. Your client has the right to proceed to trial, and he should do so if he believes that he did not commit the elements of the charged offense.

I will respond to the pending issues shortly. In the interim, I would ask that you communicate your position with respect to the sections 2255 and 3371 issues as quickly as possible.

Sincerely,



R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

cc: Alice Fisher, Assistant Attorney General
[REDACTED], First Assistant U.S. Attorney
AUSA [REDACTED]

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,

[REDACTED],
a/k/a "[REDACTED]"
and [REDACTED],

Defendants.

INDICTMENT

The Grand Jury charges that:

BACKGROUND

At all times relevant to this Indictment:

1. Defendant JEFFREY EPSTEIN employed defendants [REDACTED], [REDACTED], a/k/a "[REDACTED]" and [REDACTED] to perform, among other things, services as personal assistants.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

D

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,

[REDACTED],
[REDACTED], a/k/a "[REDACTED]"
and [REDACTED],

Defendants.

A

INDICTMENT

The Grand Jury charges that:

BACKGROUND

At all times relevant to this Indictment:

1. Defendant JEFFREY EPSTEIN employed defendants [REDACTED],
[REDACTED], a/k/a "[REDACTED]" and [REDACTED] to perform,
among other things, services as personal assistants.

T

2. Defendant JEFFREY EPSTEIN employed L.G. to perform, among other things, services as a personal assistant.

3. Defendants JEFFREY EPSTEIN and [REDACTED] paid [REDACTED] L., [REDACTED], and [REDACTED] to perform, among other things, recruiting services.

4. Defendant JEFFREY EPSTEIN owned a property located at 358 El Brillo Way, Palm Beach, Florida, in the Southern District of Florida (hereinafter referred to as "358 El Brillo 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, genitals, 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 [REDACTED] and [REDACTED] in Palm Beach County.

19. During the period of her involvement with the Defendants, Jane Doe #5 attended [REDACTED] in Palm Beach County.

20. During the period of their involvement with the Defendants, Jane Does # 6, 8 and 12 attended [REDACTED] in Palm Beach County.

21. During the period of her involvement with the Defendants, Jane Doe #7 attended [REDACTED] 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 [REDACTED] in Palm Beach County.

23. During the period of her involvement with the Defendants, Jane Doe #10 attended [REDACTED] in Palm Beach County.

24. During the period of her involvement with the Defendants, Jane Doe #11 attended the [REDACTED], a public high school, located in New York, New York.

25. During the period of her involvement with the Defendants, Jane Doe #13 attended [REDACTED] in Palm Beach County.

T

COUNT 1
(Conspiracy: 18 U.S.C. § 371)

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

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

R
JEFFREY EPSTEIN,
[REDACTED],
[REDACTED], a/k/a [REDACTED],
and
[REDACTED],

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).

Purpose and Object of the Conspiracy

28. It was the purpose and object of the conspiracy to procure females under the age of 18 to travel to 358 El Brillo 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.

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 [REDACTED] [REDACTED] a/k/a "[REDACTED]" [REDACTED] 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 Brillo 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, [REDACTED] and [REDACTED] a/k/a "[REDACTED]" [REDACTED] 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, [REDACTED], [REDACTED] a/k/a "[REDACTED]" 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, [REDACTED], [REDACTED] a/k/a "[REDACTED]" 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.

D (e) It was further a part of the conspiracy that Defendant JEFFREY EPSTEIN would pay minor females to engage in lewd conduct with Defendant [REDACTED] [REDACTED] 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 [REDACTED] led Jane Doe #2 from the kitchen of 358 El Brillo Way upstairs to Defendant JEFFREY EPSTEIN's bedroom at 358 El Brillo Way.

F (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.

D (6) In or around 2001, Defendant [REDACTED] 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. R

(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. A

(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. F

(11) In or around 2003, Defendant [REDACTED] took nude photographs of Jane Doe #2, who was then a sixteen-year-old girl. T

(12) In or around 2003, Defendant ██████████ made a payment of \$500 to Jane Doe #2 in exchange for posing for nude photographs.

D (13) In or around 2003, Defendant ██████████ told Jane Doe #2 that Defendant JEFFREY EPSTEIN had asked ██████████ 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 ██████████ 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. A

(17) On or about April 23, 2004, Defendant ██████████ placed a telephone call to a telephone used by Jane Doe #2.

(18) On or about May 2, 2004, Defendant ██████████ 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.

D (21) On or about October 26, 2004, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #3.

(22) On or about October 30, 2004, Defendant [REDACTED] 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.

F (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 [REDACTED] 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 [REDACTED] 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.

D (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.

R (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 [REDACTED], who was then a fifteen-year-old girl, and Jane Doe #7, who was then a sixteen-year-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 [REDACTED] made one or more telephone calls to a telephone used by Jane Doe #7. a tel
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(48) On or about July 5, 2004, Defendant [REDACTED] placed a telephone call to a telephone used by [REDACTED].

(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.

D (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 [REDACTED] for recruiting Jane Doe #8 to travel to 358 El Brillo Way.

(53) In or around July 2004, Defendant [REDACTED] 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 [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #7.

(55) On or about July 15, 2004, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #8.

(56) On or about July 15, 2004, Defendant [REDACTED] placed a telephone call to a telephone used by [REDACTED].

(57) On or about July 16, 2004, Defendant [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #7.

(58) On or about July 16, 2004, Defendant [REDACTED] placed a telephone call to a telephone used by [REDACTED].

D (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 [REDACTED]. that read: "Me & [Jane Doe #7] can come tomorrow any time or [REDACTED].] 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 [REDACTED] placed a telephone call to a telephone used by Jane Doe #8.

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Jane Does #9 and #10

(66) On or about July 15, 2004, Defendant [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #9.

(67) On or about July 16, 2004, Defendant [REDACTED] caused Jane Doe #9 to make one or more telephone calls to a telephone used by Jane Doe #10.

(68) On or about July 17, 2004, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #9.

(69) On or about July 18, 2004, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #9.

(70) On or about July 22, 2004, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #9.

(71) In or around July 2004, Defendant JEFFREY EPSTEIN fondled the breasts of Jane Doe #9, who was then a seventeen-year-old girl.

(72) In or around July 2004, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #9, who was then a seventeen-year-old girl.

(73) In or around July 2004, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #9.

(74) On or about July 22, 2004, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #10.

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(75) In or around the last half of 2004, Defendants JEFFREY EPSTEIN and [REDACTED] 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 [REDACTED] 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 [REDACTED] placed a telephone call to a telephone used by Jane Doe #9.

(83) On or about December 30, 2004, Defendants JEFFREY EPSTEIN and [REDACTED] 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 [REDACTED] placed one or more telephone calls to a telephone used by Jane Doe #10.

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

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

(89) On or about February 1, 2005, Defendant [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 § placed a telephone call to a telephone used by Jane Doe #13.

D (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 § 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 [REDACTED] led Jane Doe #14 from the kitchen of 358 El Brillo Way upstairs to Defendant JEFFREY EPSTEIN's bedroom at 358 El Brillo 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.

D (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 [REDACTED] placed a telephone call to a telephone used by Jane Doe #14.

(125) On or about January 9, 2005, Defendant [REDACTED] 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 [REDACTED] review regarding a call received from Jane Doe #14 that read: "She is confirming for 5:30".

A (127) On or about January 26, 2005, Defendant [REDACTED] a/k/a "[REDACTED]" placed a telephone call to a telephone used by Jane Doe #14.

(128) On or about February 1, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #14.

F (129) On or about March 1, 2005, Defendant [REDACTED] a/k/a "[REDACTED]" placed a telephone call to a telephone used by Jane Doe #14.

(130) On or about March 21, 2005, Defendant [REDACTED] a/k/a "[REDACTED]" placed a telephone calls to a telephone used by Jane Doe #14.

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(131) On or about March 29, 2005, Defendant ██████████ placed a telephone call to a telephone used by Jane Doe #14.

Jane Doe #15

(132) On or about December 6, 2004, Defendant ██████████ placed a telephone call to a telephone used by Jane Doe #15.

(133) On or about December 14, 2004, Defendant ██████████ placed a telephone call to a telephone used by Jane Doe #15.

(134) In or around the first half of 2005, Defendant ██████████ led Jane Doe #15 from the kitchen of 358 El Brillo Way upstairs to Defendant JEFFREY EPSTEIN's bedroom at 358 El Brillo 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 ██████████, a/k/a "██████████" placed a telephone call to a telephone used by Jane Doe #15.

(139) On or about February 4, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #15.

(140) On or about February 10, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #15.

(141) On or about February 21, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #15.

(142) On or about February 24, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #15.

(143) On or about March 17, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #15.

(144) On or about March 30, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #15.

(145) On or about March 31, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #15.

(146) On or about March 31, 2005, Defendant [REDACTED], a/k/a [REDACTED], 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.

Jane Does #16 & #17

(149) In or around February 2005, Defendant JEFFREY EPSTEIN masturbated in the presence of Jane Doe #16, who was then a seventeen-year-old girl.

(150) In or around the first quarter of 2005, Defendants JEFFREY EPSTEIN and [REDACTED] caused Jane Doe #16 to place a telephone call to Jane Doe #17 to ask her to travel to 358 El Brillo Way.

(151) In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN caused a payment to be made to Jane Doe #16 for recruiting Jane Doe #17 to travel to 358 El Brillo Way.

(152) 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.

(153) In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN instructed Jane Doe #17, who was then a sixteen-year-old girl, to remove all of her clothing.

(154) In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN placed a massaging device on the vagina of Jane Doe #17, who was then a sixteen-year-old girl.

(155) In or around the first quarter of 2005, Defendant JEFFREY EPSTEIN made a payment of \$200 to Jane Doe #17, who was then a sixteen-year-old girl.

(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 [REDACTED] 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 [REDACTED].

(160) On or about April 11, 2005, Defendant [REDACTED], a/k/a [REDACTED], placed a telephone call to a telephone used by Jane Doe #16.

(161) On or about April 11, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #16.

(162) On or about April 11, 2005, Defendant [REDACTED] left a message for Defendant JEFFREY EPSTEIN stating: "[Jane Doe #16] can work tomorrow at 4pm."

(163) On or about May 19, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #16.

Jane Does #18 and #19

(182) In or around the last half of 2003, Jane Doe #18 was approached by [REDACTED] 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 [REDACTED] 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 [REDACTED] 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 Brillo 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.

(164) On or about June 30, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #16.

(165) On or about July 2, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #16.

(166) On or about July 22, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #16.

(167) On or about August 18, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #16.

(168) On or about August 19, 2005, Defendant [REDACTED], a/k/a [REDACTED], placed a telephone call to a telephone used by Jane Doe #16.

(169) On or about August 21, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #16.

(170) On or about September 3, 2005, Defendant [REDACTED], a/k/a [REDACTED], placed a telephone call to a telephone used by Jane Doe #16.

(171) On or about September 18, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #16.

(172) On or about September 19, 2005, Defendant [REDACTED] sent a text message to a telephone used by Jane Doe #16.

(173) On or about September 29, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #16.

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(174) On or about September 30, 2005, Defendant [REDACTED], a/k/a [REDACTED], placed a telephone call to a telephone used by Jane Doe #16.

D (175) On or about October 1, 2005, Defendant [REDACTED] 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 [REDACTED] placed a telephone call to a telephone used by Jane Doe #16.

R (177) On or about October 3, 2005, Defendant [REDACTED] placed a telephone call to a telephone used by Jane Doe #16.

(178) On or about October 3, 2005, Defendant [REDACTED] left a telephone message for Defendant JEFFREY EPSTEIN stating: “[Jane Doe #16] will be ½ hour late”.

A (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.

(190) On or about March 5, 2004, Defendant JEFFREY EPSTEIN verbally reprimanded Jane Doe #18 for bringing Jane Doe #19 to 358 El Brillo Way when she was not willing to undress for him.

The Defendants' Travel

(191) On or about March 11, 2004, Defendants JEFFREY EPSTEIN, [REDACTED], [REDACTED], and [REDACTED] 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, [REDACTED], [REDACTED], and [REDACTED] 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, [REDACTED], [REDACTED], and [REDACTED] 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 [REDACTED] 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 [REDACTED] traveled from the U.S. Virgin Islands to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.

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

(197) On or about July 16, 2004, Defendants JEFFREY EPSTEIN, [REDACTED] [REDACTED] and [REDACTED] traveled from Teterboro, New Jersey to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion Air, Inc.

(198) On or about July 22, 2004, Defendants JEFFREY EPSTEIN, [REDACTED] [REDACTED] and [REDACTED] traveled from the U.S. Virgin Islands to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGER, INC.

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

(200) On or about August 25, 2004, Defendants JEFFREY EPSTEIN, [REDACTED] and [REDACTED] traveled from Ecuador to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGER, INC.

(201) On or about October 2, 2004, Defendants JEFFREY EPSTEIN, [REDACTED] [REDACTED] and [REDACTED] traveled from the U.S. Virgin Islands to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGER, INC.

(202) On or about October 29, 2004, Defendants JEFFREY EPSTEIN and [REDACTED] 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 [REDACTED] 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, [REDACTED], a/k/a "[REDACTED]," and [REDACTED] 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, [REDACTED], and [REDACTED], a/k/a "[REDACTED]," 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 [REDACTED] 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, [REDACTED], [REDACTED], and [REDACTED] traveled from Anguilla, British West Indies to Palm Beach County, Florida aboard the Gulfstream aircraft owned by Hyperion 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 Hyperion Air, Inc.

(210) On or about January 14, 2005, Defendants JEFFREY EPSTEIN, [REDACTED], [REDACTED], a/k/a "[REDACTED]," and [REDACTED] 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, [REDACTED], [REDACTED], a/k/a "[REDACTED]," and [REDACTED] traveled from New York, New York to Palm Beach County, Florida aboard the Boeing 727 aircraft owned by JEGE, INC.

(212) On or about February 3, 2005, Defendants JEFFREY EPSTEIN, [REDACTED], and [REDACTED] 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, [REDACTED], [REDACTED], a/k/a "[REDACTED]," and [REDACTED]

[REDACTED]

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

D (214) On or about February 21, 2005, Defendants JEFFREY EPSTEIN, ██████████, and ██████████ 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 ██████████ 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, ██████████, a/k/a "Adriana Mucinska," and ██████████ 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, [REDACTED] [REDACTED], and [REDACTED] [REDACTED], a/k/a "[REDACTED] [REDACTED]" 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 [REDACTED] [REDACTED] 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 [REDACTED] [REDACTED] 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, [REDACTED] [REDACTED], a/k/a "Adriana Mucinska," and [REDACTED] [REDACTED] 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 [REDACTED] [REDACTED], a/k/a "[REDACTED] [REDACTED]" 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, [REDACTED] [REDACTED], and [REDACTED] [REDACTED], a/k/a "[REDACTED] [REDACTED]" traveled from

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

D (225) On or about September 29, 2005, Defendants JEFFREY EPSTEIN, [REDACTED], a/k/a [REDACTED],” and [REDACTED] 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.

R
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 **A** 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 [REDACTED]

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

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

COUNT 11
(Sex Trafficking: 18 U.S.C. § 1591(a)(2))

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

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,

[REDACTED], a/k/a [REDACTED],
and
[REDACTED],

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

[REDACTED],

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

[REDACTED],

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
(Enticement 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

[REDACTED],

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
(Enticement 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
[REDACTED]

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
[REDACTED]

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.

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

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

46. From in or around the middle of 2004 through on or about April 22, 2005, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

R

JEFFREY EPSTEIN
and

[REDACTED],

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce and entice Jane Doe #12, 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.

A

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

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

48. From in or around August 2004 through on or about May 27, 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

[REDACTED],

T

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,

JEFFREY EPSTEIN,
SARAH [REDACTED],
and [REDACTED], a/k/a [REDACTED],”

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,

R
[REDACTED] JEFFREY EPSTEIN,
[REDACTED], and
[REDACTED], a/k/a [REDACTED],”

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,

JEFFREY EPSTEIN,

[REDACTED], a/k/a [REDACTED],”

and [REDACTED],

D
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.

A
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,

[REDACTED], and

[REDACTED], a/k/a [REDACTED],”

F
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.

T

COUNT 23

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

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

58. From in or around August 2003 through in or around February 2004, the exact dates being unknown to the Grand Jury, in Palm Beach County, in the Southern District of Florida, and elsewhere, the defendants,

R

JEFFREY EPSTEIN,
and

[REDACTED]

did use a facility or means of interstate commerce, that is, the telephone, to knowingly persuade, induce and entice Jane Doe #18, 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.

A

COUNT 24

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

59. Paragraphs 1 through 25 of this indictment are re-alleged and incorporated by reference as fully set for the herein.

60. From at least as early as 2001 through in or around October 2005, the exact dates being unknown to the Grand Jury, the Defendants,

F

JEFFREY EPSTEIN,

[REDACTED]

and

[REDACTED]

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,

[REDACTED]

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 [REDACTED]
27	3/31/2005	Jane Doe #14 Jane Doe #15 Jane Doe #16	JEFFREY EPSTEIN [REDACTED] a/k/a "[REDACTED]"
28	9/18/2005	Jane Doe #16	JEFFREY EPSTEIN [REDACTED] a/k/a "[REDACTED]"
29	9/29/05	Jane Doe #16	JEFFREY EPSTEIN [REDACTED] a/k/a "[REDACTED]"

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, [REDACTED], [REDACTED], a/k/a "[REDACTED]" and [REDACTED], 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, [REDACTED], [REDACTED], a/k/a "[REDACTED]" and [REDACTED],

- (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, [REDACTED], [REDACTED], a/k/a "[REDACTED]" and [REDACTED], 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:

D a. A parcel of land located at 358 El Brillo 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

B 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.

A 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, [REDACTED],

[REDACTED], a/k/a "[REDACTED]," and [REDACTED],

- (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, [REDACTED], [REDACTED], a/k/a [REDACTED], [REDACTED], and [REDACTED], 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 Brillo 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 1594(b).

A TRUE BILL.

R

FOREPERSON

R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY

_____ A _____
[REDACTED]
ASSISTANT UNITED STATES ATTORNEY

F

T