

1. Jeffrey Epstein and Alan Dershowitz have been friends for years. The two met in July, 1996, when Mr. Epstein was introduced to Mr. Dershowitz by a mutual friend and flew on his private jet to Martha's Vineyard to spend the day with Mr. Dershowitz.
2. Mr. Epstein, had grown up in Coney Island. He did not graduate from college.
3. Mr. Epstein was wealthy and owned luxurious houses and private planes and was sometimes accompanied by beautiful women. He had many intellectuals as friends.
4. Mr. Epstein and Mr. Dershowitz quickly found common interests. Mr. Dershowitz has said they talked about science, academia, and Harvard.
5. In August, 1996, Mr. Epstein invited Mr. Dershowitz to meet Leslie Wexner, whom Mr. Epstein described as his mentor. Mr. Epstein and Mr. Dershowitz took Mr. Epstein's private jet to New Albany, Ohio, where Mr. Wexner had an estate, to attend a party for Mr. Wexner's fifty-ninth birthday. Mr. Dershowitz later said that he was Mr. Epstein's intellectual gift to Mr. Wexner.
6. In the seventies, Mr. Epstein had been a trader and a wealth manager at Bear, Stearns, before leaving in 1981 to start a small firm, J. Epstein & Co.
7. In 1987, Mr. Wexner hired Mr. Epstein as his financial adviser. Mr. Epstein has said that he re- fused to accept clients with less than a billion dollars in assets. The only client that he has ever named publicly is Mr. Wexner. When asked in a deposition whether Mr. Wexner was his only client, Mr. Epstein took the Fifth.
8. In 1989, Mr. Wexner bought a seven-story Manhattan mansion, overlooking the Frick Museum. The mansion was among the largest private residences in the city. Mr. Wexner is reported to have sold it to Mr. Epstein for one dollar. In 1996, Mr. Epstein told the Times that he owned the mansion.
9. In 1997, Mr. Epstein invested thirty million dollars in Boston Provident. Orin Kramer, the founder of the hedge fund, understood that the money came from Mr. Wexner. Later in 1997, Mr. Epstein called Mr. Kramer and asked him to stop by his office. Mr. Dershowitz also attended the meeting. At the meeting, Mr. Epstein asked Mr. Kramer to accept an investment of about half a million dollars from Mr. Dershowitz. Mr. Kramer accepted as a favor to Mr. Epstein. Mr. Dershowitz signed standard papers acknowledging that his money was at significant risk.
10. In 1998, the fund sustained enormous losses. Mr. Epstein told Mr. Kramer that one of the two of them would have to reimburse Mr. Dershowitz. Mr. Epstein said that if he were to have to reimburse Mr. Dershowitz, Mr. Kramer would regret it. Mr. Kramer agreed to restore Mr. Dershowitz's losses, if Mr. Epstein would leave the remainder of the money he controlled in the fund.

11. Mr. Epstein threw parties at his house in New York. He would often invite scientists, whose company he enjoyed.
12. Mr. Epstein also had an interest in Harvard. In 1990, he and Mr. Wexner had helped to fund the construction of a new building at Harvard Hillel, named after Henry Rosovsky, then the Dean of the Faculty of Arts and Sciences.
13. Mr. Dershowitz began introducing Mr. Epstein around the college. Mr. Epstein subsequently began funding research into psychology and the history of science, and he became a member of the advisory board of the Harvard Society of Mind, Brain, and Behavior, and a Harvard fellow. Mr. Epstein also established an office in Brattle Square, where he held seminars on contemporary academic ideas, in which Mr. Dershowitz sometimes participated.
14. In an article in the Harvard Crimson, Mr. Dershowitz said that he would debate mathematics, genetics, law, and psychology with Mr. Epstein and professor Steven Kosslyn, and that in these discussions, they would all cut each other off all the time “because we just get it.”
15. Mr. Epstein would evaluate drafts of Mr. Dershowitz’s books. Mr. Dershowitz has said that Mr. Epstein was the only person outside his family whom he trusted to do this.
16. After Lawrence Summers became president of Harvard in 2001, he flew to Palm Beach on Mr. Epstein’s plane and stayed at his mansion. In 2003, Mr. Epstein pledged thirty million dollars to Harvard to create the Epstein Program for Mathematical Biology and Evolutionary Dynamics. To lead it, he recruited Martin Nowak, a biologist from Princeton University. Mr. Dershowitz became a Faculty Affiliate of the program.
17. In January 2007, the evolutionary biologist Robert Trivers was scheduled to receive the Crafoord Prize in biosciences. Mr. Nowak invited him to give a talk at the Epstein Center, followed by dinner. That April, Mr. Trivers sent Mr. Dershowitz a letter that criticized him for what Mr. Trivers viewed as an attack on Norman Finkelstein, and also said that Mr. Dershowitz was a Nazi or Nazi-apologist for his stance on the Israeli-Palestinian conflict.
18. On May 25, the day of his talk, Mr. Nowak, having arrived at Harvard, told Mr. Trivers that he was cancelling the talk a planned celebration, under orders from someone he would not identify. The reason given was that Mr. Trivers had called a Harvard professor a Nazi. Mr. Trivers said that he later learned that the order came from Mr. Epstein, under pressure from Mr. Dershowitz. (Mr. Dershowitz has denied this.) Mr. Trivers said that Mr. Epstein later apologized for having stopped the talk, using the word “apology,” and Mr. Trivers now described them as friendly.
19. In the summer of 2000, according to a deposition by Juan Alessi, who managed Mr. Epstein’s house in Palm Beach, Alessi was driving Ghislaine Maxwell, Mr. Epstein’s

girlfriend, to Donald Trump's Mar-a-Lago resort, when they saw a girl walking from the main lobby toward the spa. Ms. Maxwell approached the girl, a sixteen year old named [REDACTED] who was reading a book on anatomy and massage therapy. Ms. Maxwell informed her that she knew somebody who was looking for a travelling masseuse. This person was Mr. Epstein.

20. When Ms. [REDACTED] was dropped off at the house, there was a big hall table with pictures of young nude girls, mixed in with those of celebrities and politicians.
21. Ms. Maxwell led Ms. [REDACTED] upstairs to a suite where Mr. Epstein was lying, nude, and showed Ms. [REDACTED] how to massage him. Ms. Maxwell then took off her clothing, and instructed Ms. [REDACTED] to remove her clothing. Ms. Maxwell told Ms. [REDACTED] that it was cute that she was wearing children's underwear. Ms. Maxwell then told Ms. [REDACTED] to straddle Mr. Epstein, and Ms. [REDACTED] and Mr. Epstein had sex. Afterward, Mr. Epstein told Ms. [REDACTED] that she "did a really good job," and gave her two hundred dollars.
22. Ms. [REDACTED] returned the next day, at Ms. Maxwell's invitation, and she became a regular presence at the home. She was informed that she was to have sex with Mr. Epstein several times a day, often along with Ms. Maxwell and other girls. She was subsequently told that Mr. Epstein would also be lending her to other men. Ms. Maxwell told her that she was expected to please these men in whatever way they wanted.
23. Mr. Epstein told Ms. [REDACTED] to report back to him about what the men liked. In his New York mansion, Mr. Epstein had also installed a video system that taped every room in the house, which could allow Mr. Epstein to accumulate information to use as leverage against the men.
24. Mr. Epstein used the girls under his control to bring in more girls. He preferred young girls from difficult backgrounds who would be in need of money. The women around Mr. Epstein were discouraged from speaking with one another.
25. Mr. Epstein owned nearly a dozen apartments in New York in a building on the Upper East Side, where he kept what were called "semi-permanent" girls.
26. In Ms. [REDACTED] case, Mr. Epstein paid her, paid for her apartment, and took her to New York, London, Paris, Tangiers, and his private island. He told Ms. [REDACTED] that he was powerful, that he owned the police department, and that he had friends who owed him favors. Mr. Epstein was a donor to the Palm Beach Police Department for years.
27. In 2002, soon after Ms. [REDACTED] turned nineteen, Mr. Epstein and Ms. Maxwell sent her to Thailand for a three-week course in massage, and arranged for her to bring back a young girl for Mr. Epstein.
28. In March 2005, a fourteen-year-old girl in Palm Beach described to the police that Mr. Epstein had paid her three-hundred dollars for a massage, told her to take off her clothes, and masturbated.

29. The police soon began investigating Mr. Epstein for sexually abusing underage girls. The case against Mr. Epstein would involve the testimony of dozens of young girls. Press coverage included a list of famous men who travelled on Mr. Epstein's plane, the so-called Lolita Express, to Little St. James, an island that Mr. Epstein owned in the Caribbean.
30. When Mr. Epstein learned about the investigation, in the fall of 2005, he immediately called Mr. Dershowitz, who established himself in the lead of a team of prominent attorneys from New York, Boston, Washington, D.C., and Miami.
31. Mr. Epstein once likened his offense to that of "a person who steals a bagel."

*[Much of the following seven queries involve actions that Mr. Dershowitz performed while representing Mr. Epstein. Can you confirm that they are accurate?]*

32. Mr. Dershowitz prepared a dossier featuring entries from Web sites like MySpace, in which Mr. Epstein's alleged victims recounted experiences with alcohol or marijuana and wrote about sex.
33. Florida State Attorney Barry Krischer helped Mr. Dershowitz arrange a meeting with Joseph Recarey, the lead investigator in the case. Mr. Dershowitz presented the dossier as evidence that the girls were not of high moral quality.
34. Mr. Dershowitz also raised questions about the police. He made a public-records request to the police department for any paper bearing the name of Michael Reiter, the Palm Beach police chief name, and began had private investigators perform background investigations on Mr. Reiter.
35. For months, Mr. Reiter and Mr. Recarey were under constant surveillance, in which cars followed them, their trash was searched, and investigators contacted Mr. Reiter's ex-wife. Mr. Epstein has denied his involvement in this. In 2010, when Mr. Reiter testified about the surveillance, in 2010, Mr. Epstein turned to his lawyer and said, "That wasn't us!"
36. At one point, Mr. Recarey told Mr. Dershowitz that at least one of the investigators had tried to misrepresent himself to one of the alleged victims as a police officer. Mr. Dershowitz surmised that the woman was someone identified as ██████ in depositions.
37. ██████ had alleged that he Mr. Epstein had forcibly penetrated her when she was a minor. She told detectives that in 2003, when she was sixteen, a friend introduced her to Mr. Epstein. The friend told her that in exchange for a massage she could earn enough money ██████ said that she returned to Mr. Epstein's house hundreds of times, becoming his Mr. Epstein's favorite. She said that she sometimes had non-penetrative sex with Mr. Epstein and one of his "semi-permanent" girls, ██████ whom Mr. Epstein was said to have bought from her parents in



45. In May 2009, Ms. ██████ sued Mr. Epstein, as Jane Doe No. 3. In her complaint, Ms. ██████ stated that she had been sexually abused by Mr. Epstein and also was “required to be sexually exploited by Mr. Epstein’s friends, including royalty, politicians, academicians, businessmen.
46. Mr. Epstein eventually settled her suit, and those of many other victims.
47. In December, 2014, Ms. ██████ filed a motion to join a suit attempting to overturn the non-prosecution agreement. She claimed that Mr. Epstein had abused her, and had trafficked her to powerful friends as a way of gaining influence over them. In her motion, she named three men: Jean Luc Brunel; Prince Andrew, the Duke of York; and Mr. Dershowitz. She said that she had sex with Mr. Dershowitz at least six times, in Mr. Epstein’s various residences, on his private island, in a car, and on his plane. Ms. ██████ has also said that Mr. Epstein trafficked other girls.
48. A British-South African woman named ██████ ██████ has also accused Mr. Epstein in a lawsuit of involving her in a sex-trafficking ring.
49. Ms. ██████ said that in September, 2006, when ██████ and recently arrived in New York, a new friend introduced her to Mr. Epstein, describing him as a philanthropist who used his wealth and connections to help poor young women in exchange for massages. Ms. ██████ said that Mr. Epstein paid the friend five-thousand dollars in exchange for bringing Ms. ██████ to him.
50. After the massages turned sexual, Ms. ██████ was allowed to live in a large apartment in Mr. Epstein’s building on the Upper East Side. She was also given a cell phone, car service, and money for living expenses. Mr. Epstein invited her to fly to his island, which she did several times in late 2006 and early 2007. Mr. Epstein and Ms. Maxwell told Ms. ██████ they could help arrange her admission ██████ where she dreamed of studying.
51. Ms. ██████ was told that if she refused to have sex with Mr. Epstein and his associates, her apartment would be taken away, and Mr. Epstein would make sure that she couldn’t go to college or get a job. Mr. Epstein told Ms. ██████, who weighed about ██████ ██████ that he wanted her to weigh 114. One night on Little St. James, Mr. Epstein took away Ms. ██████ food and announced to other guests that if she didn’t lose weight, she would have to move out.
52. In an affidavit, Ms. ██████ said she spent significant time with Mr. Epstein in New York and that Mr. Epstein lent her out to friends and associates, including Mr. Dershowitz, at Mr. Epstein’s townhouse. Ms. ██████ described visiting Little St. James repeatedly, in order to have sex with Mr. Epstein, Ms. ██████, and other girls and guests.

53. Last December, Ms. [REDACTED] suit was settled in her favor. Mr. Epstein paid her an undisclosed sum.
54. As part of the court proceedings, a lawyer for Ms. Maxwell mentioned that Mr. Dershowitz was one of several people Ms. [REDACTED] alleged Mr. Epstein had directed her to have sex with.

*[The remainder of the queries involve allegations concerning Mr. Dershowitz but that also involve Mr. Epstein, that I would therefore like to verify with Mr. Epstein.]*

55. Ms. [REDACTED] met Mr. Dershowitz in a brief encounter at Mr. Epstein's mansion in New York. After that, Mr. Dershowitz was seen with Mr. Epstein often. After some time, Mr. Epstein let Mr. Dershowitz use his bedroom, something that Mr. Epstein rarely, if ever, did for another man. Once, after Ms. [REDACTED] had sex with Mr. Epstein, Mr. Epstein walked out of his bedroom and Mr. Dershowitz entered and had sex with Ms. [REDACTED]. Can Mr. Epstein verify that this description is accurate?
56. Mr. Dershowitz visited Mr. Epstein's Palm Beach home four or five times a year, and typically stayed for two or three days. On one occasion, several girls, who were nude, were having lunch at the pool, and Mr. Dershowitz was also present. Ms. [REDACTED] said that she was made to give Mr. Dershowitz a massage and to tend to him. Ms. [REDACTED] also gave Mr. Dershowitz a massage on the beach at Little St. James and then went with him to one of the beach bungalows, which were just large enough to hold a bed, where she was made to have sex with him. Can Mr. Epstein verify that this description is accurate?
57. Mr. Dershowitz has said that he received a massage at Mr. Epstein's house in Palm Beach—though he has said that Ms. [REDACTED] wasn't the masseuse and he kept his underwear on. Can Mr. Epstein verify that this account is accurate?
58. Several months after meeting Mr. Epstein, Ms. [REDACTED] went to Miami for the weekend. When she returned, she told Mr. Epstein that she had met a man, who, with a friend, had attempted to rape her. Mr. Epstein told her that he would introduce her to one of his best lawyers, and he later introduced her to Mr. Dershowitz. Mr. Epstein and Mr. Dershowitz argued, successfully, against her going to the police, and Mr. Dershowitz told her that he would represent her. Ms. [REDACTED] did not know of the investigation into Mr. Epstein, or that Mr. Dershowitz was representing him.
59. Shortly afterward, Ms. [REDACTED] had dinner with Mr. Epstein and Mr. Dershowitz to talk about her case. When Ms. [REDACTED] asked how the case was proceeding, Mr. Dershowitz said little. Can Mr. Epstein verify that this description is accurate?
60. Several weeks after the dinner, [REDACTED] was called to Mr. Epstein's mansion early one evening. Mr. Epstein, Mr. Dershowitz, and Ms. [REDACTED] were present. There Ms. [REDACTED] took Ms. [REDACTED] upstairs. In the room, Ms. [REDACTED] undressed Ms. [REDACTED]. Mr. Dershowitz then walked in, undressed, and the three engaged in a sexual encounter, in

which Mr. Dershowitz didn't penetrate Ms. [REDACTED], but she was forced to perform oral sex on him and masturbate him. Can Mr. Epstein verify that this description is accurate?

61. Can you confirm that Mr. Dershowitz has been Mr. Epstein's lawyer, without interruption, since the police investigation began in 2005?
62. Mr. Dershowitz has said that Mr. Epstein and Ms. Maxwell had a joint defense agreement in this case, which would mean that Mr. Dershowitz's conversations with Ms. Maxwell are subject to attorney-client privilege. Does this description look accurate?
63. When Mr. Dershowitz was asked if he was still in touch with Mr. Epstein, he said that he doesn't represent Mr. Epstein, and then said that one never stops being someone's lawyer, and that he'd always take Mr. Epstein's call. Can Mr. Epstein confirm?