

U.S. Department of Justice

Request for Authorization to Apply for Compulsion Order
(18 U.S.C. 6001-6003; 28 CFR 0.175-0.178)

INSTRUCTIONS: Prepare and Submit Original and One Copy. Answer Each Question as Accurately and Completely as Possible.

TO: Witness Immunity Unit
Criminal Division, Rm. 1056
1001 G Street, N.W.
Washington, D.C. 20530
PHONE NO: [REDACTED]
TELEFAX NO: [REDACTED]

FROM: AUSA [REDACTED]
United States Attorney's Office
500 S. Australian Ave, Suite 400
West Palm Beach, Florida 33401
PHONE NO: [REDACTED]
TELEFAX NO: [REDACTED]

- (1) Name of Witness: [REDACTED] (2) District: **Southern District of Florida**
- (3) Nature of Proceeding:
() Trial
(X) Grand Jury
() Other
- (4) Name of Subject(s) or Defendant(s): **Jeffrey Epstein, [REDACTED], [REDACTED], [REDACTED], [REDACTED], Lesley Groff, [REDACTED]**
- (5) Date of Testimony (two weeks lead time required): **July 1, 2008**
- (6) Proffer of Anticipated Testimony:
(X) None Obtained () Proffer by Witness () Debriefing of Witness
() Proffer by Counsel () Pursuant to Plea Agreement () Statement in other proceeding
- (7) Summary of Case or Proceeding: **The grand jury investigation is related to interstate travel with intent to engage in illicit sexual conduct, use of a means of interstate commerce to induce or entice a minor to engage in prostitution and sexual activity, sex trafficking, and related offenses. In short, Epstein used his assistants-- [REDACTED], [REDACTED], and [REDACTED]-- to arrange "dates" with underage girls to come to his home to perform sexual acts.**
- (8) Witness' Background and Role in Case or Matter and Summary of Anticipated Testimony or Information:
[REDACTED] was a victim (she was paid to perform sexual acts when she was under 18) and also was paid

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to bring girls to Epstein, thus [REDACTED] could be classified both as a victim and as a co-conspirator. Her testimony will relate to how she was first introduced to Epstein; the type of sexual activity that he engaged in with the girls; the co-conspirators' knowledge of the ages of the victims and the sexual activity that was occurring with Epstein; and the method for arranging the "appointments" with the girls and the recruitment of additional girls.

- (9) Witness' Family Relationship, if any, to the Subject(s) or Defendant(s): **None**
- (10) Assurances or Promises, if any, to Witness in Return for this Testimony: **None**.
- (11) Acts of Witness Considered as a Waiver of Fifth Amendment Privilege: **None**.
- (12) Means Other than Immunity to Obtain this Testimony: [REDACTED] has been asked to appear before a grand jury or to attend a proffer session. [REDACTED] attorney has stated that [REDACTED] will not appear unless compelled to do so and will assert her Fifth Amendment privilege in response to questions.
- (13) Basis Other than Proffer for Summary of Anticipated Testimony: **Statements of other witnesses, telephone records, and items seized during search of Epstein's home.**
- (14) Relative Culpability of Witness Compared to Subject(s) or Defendant(s): [REDACTED] could be charged as a coconspirator or aider/abettor during the period when she was recruiting other girls; however, she also qualifies as a victim during the period when she was engaging in sexual activity and while she was a minor. We believe that [REDACTED] was a minor during the majority of the time she was involved with Epstein. In terms of her relative culpability, [REDACTED] is less culpable than the targets of the investigation. Epstein and his assistants paid the girls for their sexual activity and arranged his schedule of appointments.
- (15) Why Immunity is Necessary to the Public Interest: **State Facts. Epstein is believed to have engaged in sexual activity with at least 36 girls ranging in age from 14 to 18 years old. This activity occurred over a two-year period and some girls were contacted as many as 60 times. To prosecute successfully Epstein and his assistants, we must prove that Epstein and the assistants intended that Epstein engage in this sexual activity before he traveled to the Southern District of Florida or returned to New York, and, for certain charges, that he knew or reasonably should have known that the girls were under 18. [REDACTED], who was both a victim and a "recruiter," is in the best position to testify regarding those intentions.**

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(16) Basis for Belief that Witness Will Assert Fifth Amendment Privilege: **As explained above, the witness's attorney has informed the undersigned that she will assert her Fifth Amendment Privilege.**

(17) Likelihood that Witness Will Testify if Immunity is Granted: **High. The witness's attorney has stated that the witness will appear and answer questions if immunity is granted.**

(18) Prosecution of Witness in this Case or Matter:

Yes No Acquitted Convicted Plea

If not indicted, why not? If convicted, has the witness been sentenced? **Witness has not been indicted because she is more properly classified as a victim. As explained above, she could be charged as a co-conspirator during the period that she recruited girls, but it is believed that her testimony is more important than charging her with those offenses because she also is a victim of the offense.**

(19) Witness' Privilege Survives Because: **Witness' testimony will relate in part to her recruitment of underage girls to engage in sexual activity with Epstein.**

(20) Witness is Presently Incarcerated: Yes No

If yes, give details:

(21) Pending Federal or Local Charges against Witness:

Yes No If yes, give details:

(22) Federal and State Offenses by Witness that Her Testimony Could Disclose: **Conspiracy to travel in interstate commerce to engage in illicit sexual conduct; conspiracy to use a means of interstate commerce to induce a minor to engage in sexual activity.**

(23) Opposition, if any, to Granting Immunity by State or Local Prosecuting Officials: **None**

(24) Effect, if any, of Granting Immunity to the Witness Upon Any Other Federal District: **None**

(25) Conviction of Witness Possible on Evidence Other than His Own Testimony?

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() Yes () No If yes, give details: **Not applicable.**

(26) Violations (Statutes & Descriptions) by Subject(s) or Defendant(s): **For all targets: 18 U.S.C. § 2423(b) (travel with intent to engage in illicit sexual conduct); 18 U.S.C. § 371 (conspiracy); 18 U.S.C. § 2422(b) (use of a means of interstate commerce to entice a minor to engage in sexual activity); 18 U.S.C. § 1591(a) (sex trafficking).**

(27) Witness Previously Immunized? () Yes (X) No If yes, give details:

(28) Witnesses for whom Immunity has been Authorized in this Proceeding: [redacted] and [redacted] (two other girls who were both victims and recruiters).

(29) Date Investigation Began: **July 2006**

(30) Witness Subject to Electronic Surveillance? () Yes (X) No If yes, give details:

(31) Birth Date of Witness: [redacted] (32) FBI I.D. No.:
(33) Birthplace: **Brazil** (34) Social Security No.: **None**
(35) Alias: **Married name is** [redacted]
(36) Address of Witness: [redacted]

(37) If Requestor is Department Attorney, Has United States Attorney Been Notified? () Yes () No **Not applicable.**

[redacted]

Signature of Requestor

Robert K. Jerni

Signature of United States Attorney

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