

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

January 29, 2021

[REDACTED]

Assistant United States Attorneys  
United States Attorney's Office  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: [REDACTED]

Dear [REDACTED]:

We write with respect to our client [REDACTED]. We believe strongly, based in no small part on our discussions over the past few months, that the appropriate disposition in this case is a deferred prosecution agreement between the government and [REDACTED], predicated on her cooperation with the government in its investigation and other litigations that may benefit other Epstein victims, including the administration of the Epstein Trust by the U.S. Virgin Islands and related civil litigation.

We believe such a resolution would be just for the following reasons:

First, this disposition would appropriately recognize that (a) [REDACTED]

[REDACTED]

This disposition would recognize that [REDACTED]. A prosecution in this case would fail to recognize the power sexually abusive men like Epstein have over their victims, and how they silence and control those victims. In this regard, it is critical to note that [REDACTED] did not profit or gain in any way from Epstein's sex trafficking.

Second, this disposition would allow the government to gather additional evidence from [REDACTED], both through her memory and materials in her possession as to the scope of Epstein's misconduct and those individuals who benefited from it and have evaded consequence. As we have told you, we believe that [REDACTED] has relevant and important information about Maxwell's perjury, which would assist the government in its prosecution of Maxwell.

Third, this disposition would be faithful to the significant limitations on the government's proof, both given the *Brady* material in its possession and the inherent unreliability of [REDACTED] memories on which any prosecution would necessarily rely. It would likewise avoid the unfairness of bringing to trial a defendant who will be hamstrung in her ability to defend herself due to the passage of time and resulting unavailability of key witnesses and evidence.

We understand that the government does not credit [REDACTED] consistent position that she did not know that some of Epstein's victims were underage. Should the government agree that a deferred prosecution is the appropriate disposition, the parties will have to agree to disagree on this point about [REDACTED] knowledge and craft an appropriate immunity provision in any agreement to reflect this disagreement. Such an agreement will allow [REDACTED] to provide potentially valuable information to the government, both in its ongoing prosecution as well as its broader objective of understanding the operation of Epstein's world. [REDACTED] can aid the government and the victims and is poised and eager to do so.

We are available to discuss the matters raised above as needed.

Respectfully Submitted,

/s/

[REDACTED]  
[REDACTED]