



U.S. Department of Justice
United States Attorney
Southern District of New York

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USAO #: [REDACTED]	United States v. [REDACTED] 20 Cr. ____ ()	April 14, 2020
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This memorandum addresses the investigation into [REDACTED] who worked as an assistant to Jeffrey Epstein. In particular, this memorandum analyzes a potential prosecution against [REDACTED] for participating in a sex trafficking conspiracy with Epstein.

[REDACTED]

[REDACTED]

[REDACTED]

This memorandum incorporates the Prosecution Memo regarding Jeffrey Epstein, dated June 17, 2019 (the “Epstein Memo”), and the Investigation Update Memo dated December 19, 2019 (the “Update Memo”), but also includes a brief summary of the facts relevant here.

I. Overview of The Scheme

From at least 1994 through approximately 2005, Epstein engaged in a pattern of enticing minor girls to engage in illicit sex acts, including by engaging in paid sex acts between approximately 2002 and 2005. This conduct is roughly divided into two time periods and courses of conduct: First, starting approximately no later than 1994, Epstein and Ghislaine Maxwell, his romantic and business partner, groomed and ultimately abused a relatively small number of victims, including [REDACTED] in the course of longer-term abuse. This grooming and abuse included befriending [REDACTED] family and bestowing generalized financial benefits separate from payment for particular sex acts, as well as regular travel with [REDACTED]

Second, starting in approximately 2002, this pattern changed significantly, when a few of Epstein’s initial victims began to recruit local girls and women to provide Epstein with “massages” that would include sex acts. Epstein would pay both the participant and the recruiter on a per-session basis. At this time, which also was approximately when Maxwell became less involved in Epstein’s daily life, the girls who began to provide sexualized massages to Epstein themselves began to recruit friends and acquaintances, who recruited their own friends, leading to the “pyramid scheme” operation for which we charged Epstein with sex trafficking in 2019.

When victims visited Epstein’s residences, they usually were contacted via telephone by individuals who worked for Epstein to arrange additional massages. In New York, the primary scheduler was Leslie Groff, one of Epstein’s assistants, who worked at an office off-site from the Epstein’s mansion in New York (the “New York Residence”). In Florida, the primary contact was [REDACTED] who began working as Epstein’s traveling assistant in [REDACTED]; another contact for scheduling for certain Florida victims was [REDACTED] during her employment as another traveling assistant to Epstein [REDACTED]. Groff does not appear to have ever been present when victims arrived for massages in New York; [REDACTED] both were regularly present at Epstein’s Florida estate (the “Florida Residence”) when girls arrived, and they would sometimes escort the girls to Epstein’s massage room there.

In order to maintain a steady stream of underage girls to perform sexual acts, Epstein also directed many of his victims to recruit other girls to engage in massages, including as conveyed through his assistants. Some victims brought just one or two friends, while others become prolific recruiters, bringing Epstein dozens of other girls. Epstein typically paid the recruiters hundreds of dollars for each girl they brought to Epstein’s residences, and those payments also were sometimes made by employees including [REDACTED] and [REDACTED]

While our Office’s charges against Epstein principally focused on conduct occurring in New York or with connections to New York—and [REDACTED] did contact victims for scheduling purposes while she was physically present in Manhattan—the investigation as it related to [REDACTED] largely focuses on Florida. [REDACTED] was primarily responsible for scheduling at the Florida Residence, where she also sometimes met and/or paid certain minor victims.

II. Summary of [REDACTED] Personal Background and Employment with Epstein

We have learned about [REDACTED] background and employment with Epstein through our investigation, including from numerous interviews with victims and other Epstein employees; [REDACTED]; and two proffers with [REDACTED] herself. We do not have reason to dispute the below information, derived from those sources, unless otherwise specified.

1. Upbringing, marriage, and early employment

[REDACTED] was raised in a conservative [REDACTED] family and community, and her experiences as a child likely made her unusually susceptible to abuse and manipulation by Epstein. In particular, [REDACTED] credibly describes having been sexually abused well before meeting Epstein. [REDACTED]

[REDACTED] and marriage the following year, after which [REDACTED] moved [REDACTED] from [REDACTED].¹

[REDACTED] Afterward, she sought employment [REDACTED], working part-time jobs at [REDACTED]. She also pursued modeling jobs, which had been suggested to her by [REDACTED] and others since she was younger. In connection with those attempts, following [REDACTED] divorce she briefly lived with a much-older photographer who also sexually exploited her. [REDACTED] then moved to [REDACTED] to take a job at [REDACTED], during which time she was in debt and largely socially isolated. Shortly thereafter, a colleague [REDACTED] who knew Epstein suggested [REDACTED] to him as a prospective assistant in approximately 2001.

2. Initial Employment with Epstein

In fall 2001, Epstein flew [REDACTED] to his private island in the U.S. Virgin Islands (“USVI”) and then to New York for an introduction, and shortly thereafter brought her to Florida for an unpaid “training” period to be a traveling personal assistant to Epstein. Initially, [REDACTED] believed she would primarily be working for Maxwell, and her initial “training” was with Maxwell and [REDACTED], who was then Maxwell’s assistant and who returned to her native England shortly after [REDACTED] was hired. Although [REDACTED] initially answered to both Maxwell and Epstein, early in her interactions with them it became clear to her that she would work primarily for Epstein, though she also was expected to perform tasks assigned by Maxwell.

¹ [REDACTED]

Following her travel to the island, █████ worked as an unpaid assistant for several months, during which Epstein escalated sexual comments and behavior. This culminated with Epstein directing █████ to join him in a bath and telling her she had the job and “now [needed] to keep it.” In the initial months of █████ employment, among other tasks, she was instructed by Epstein and Maxwell that Epstein received regular massages, and it was █████ responsibility to schedule those massages in Florida. She did so by calling individuals whose names and phone numbers were maintained in a written and electronically-stored list. During this time, in 2001 and 2002, █████ reports that Maxwell became significantly less of a regular presence with Epstein, which is consistent with the accounts of other individuals who interacted with Epstein at that time, including numerous victims we have interviewed.² █████ describes having limited interactions with Maxwell, and being afraid of and intimidated by her. This is consistent with the accounts of victims from that period, most of whom regularly interacted with █████ but never met or even saw Maxwell.

In the subsequent months and years, █████ tasks as an assistant for Epstein were wide-ranging and largely menial, including but not limited to packing for Epstein’s trips; making his bed and doing laundry; purchasing, stocking, and preparing food; massaging Epstein’s feet and shoulders at his direction; organizing social events with academic and finance luminaries; purchasing and categorizing various household items for each of Epstein’s several properties; running errands and carrying purchases for Epstein and Maxwell; making personal appointments, including doctor, dentist, and personal trainer visits; and various household administrative tasks. █████ also scheduled many of the massages that gave rise to the indictment of Epstein for sex trafficking, including with numerous minor girls. All of these tasks occurred at whatever property Epstein traveled to; █████ was expected to travel with him at all times. When Epstein was in New York, █████ stayed in an apartment complex controlled by Epstein; when he was in the USVI, New Mexico, or Florida, she stayed in a room in the main residence at each of those respective locations.

According to █████ her salary was approximately \$25,000 per year when she first started working for Epstein, and that over her approximately ten years of employment her salary rose to a high of around \$100,000. This is generally consistent with the account of █████ who was hired a few years later at approximately \$36,000. Based on our interviews with other Epstein employees, we understand that █████ (and █████ were paid substantially less than other employees, including his permanent assistant based in New York, his pilots, his house managers, and certain other staff.

█████ duties were relatively consistent from when she was hired in 2002 through 2005, when the Florida investigations began and her responsibilities generally remained the same but the massage appointments ceased.

² This is principally why there is no material factual or witness overlap between a possible █████ prosecution and a possible Maxwell prosecution. In short, Maxwell was much more involved in longer-term abuse in the 1990s of a much smaller number of victims, many of whom traveled extensively with Epstein, whereas █████ was hired just as Epstein began to build a more localized—but much higher volume—system of abuse through massage appointments, beginning in approximately 2002.

3. Epstein's arrest and [REDACTED] subsequent employment

In 2005, Epstein's conduct became the subject of an investigation by the Palm Beach Police Department, and then the FBI, after the parents of a victim reported to law enforcement that Epstein had abused their daughter. Those investigations ultimately spanned approximately two years and included, among other things, interviews with approximately 35 victims, nearly all of whom were based in Florida. [REDACTED] describes learning that the police were investigating Epstein's sexual abuse of minors in the initial stages of the investigation. [REDACTED] admits that Epstein subsequently directed her to speak with certain victims and ask them to contact Epstein's investigators, as well as to convey the message that Epstein would financially provide for individuals who "helped" him. [REDACTED] also admits that she understood this as an effort to have the girls not cooperate with, and conceal information from, law enforcement.

[REDACTED] has described that Epstein initially denied to her the allegations against him, before ultimately admitting that at least one of the girls who came to the Florida mansion and with whom he engaged in sexual activity for money was a minor. She recalls that he minimized his conduct by describing it as involving a very limited number of girls, particularly as compared to the large number of women who were young but technically of age, and also claimed he was being "blackmailed" and that the accusations were, in effect, a shakedown. This is consistent with what Epstein also told Groff and [REDACTED] at the time, and Groff was similarly told by Darren Indyke, an attorney for Epstein, that Epstein was being blackmailed.³

Following Epstein's brief period of incarceration, [REDACTED] continued her employment as his assistant until marrying her current husband [REDACTED]. She has recounted that she still believed it was effectively impossible to leave him, and to find other employment or friendships, given her lack of family or network outside of Epstein's circle—and that once she found a person who was actually supportive (her current husband), she separated from Epstein. Additionally, [REDACTED] recounted observing that others around Epstein continued their associations with him, including significant figures in academia, finance, and social circles. [REDACTED] conveys that her continued association with Epstein was influenced by, among other things, his manipulation of her and her continuing desire to please him and to gain his approval despite his mistreatment of her; the fact that many other notable and respected individuals in finance, politics, and academia continued to associate with Epstein despite knowing about his convictions and seeing his interactions with young women and girls; and her concern about finding other employment, having never even graduated from high school and having no transferable skills. When [REDACTED] married her current husband [REDACTED], Epstein gave them \$100,000 as a wedding gift; [REDACTED] received no additional payments from Epstein between then and 2018, when he gave her \$250,000, as further discussed below.

[REDACTED] describes that she now deeply regrets remaining with Epstein, and that her decision to do so at the time was significantly influenced by Epstein's manipulation.

³ We discuss in detail below the issue of [REDACTED] knowledge at the time. In brief, [REDACTED] has denied specifically knowing that any of the girls whom she scheduled for massages were underage, and in particular that she did not pay attention to or focus on the ages of the girls.

4. Abuse by Epstein

█████ recounts, █████ that she was the victim of long-term sexual abuse by Epstein in various forms. █████ account of understanding that her employment was contingent upon acquiescence to unwanted sexual advances by Epstein is consistent with the what we have heard from another Epstein assistant, █████ who was similarly situated to (and worked with) █████ for approximately two years. █████ describes gradually-increasing unwanted physical contact, sexual references, and efforts to control her physical appearance, weight, and food consumption, all of which are consistent with the accounts of other individuals we have interviewed and found credible—in particular █████ and █████ who was not formally an assistant but whom Epstein maintained as a “sex slave” and putative girlfriend for several years in the 2000s, as well as █████ who traveled with Epstein extensively and was abused by him between the ages of 17 and 20.

█████ describes that over the course of years, these sexual overtures escalated from instructions that she massage his feet or shoulders, to requests that she sit on his lap, to him entering her room while she was lying down or sleeping and getting into her bed. He would refer to his later requirements that she join him nude in his bed as serving as his “hot-water bottle,” and eventually directed her to perform oral sex on him. Consistent with the accounts of other victims, █████ recounts that Epstein treated his escalating demands as unremarkable and normal for a man of his power and wealth, but also not to be discussed with others. Also consistent with the accounts of others, including █████ and █████ describes initially being terrified that Maxwell would discover that Epstein was engaging in sexual activity with her, before realizing that Maxwell knew about his conduct, and finally being instructed to engage in sexual activity with both Epstein and Maxwell simultaneously.

█████ has described that Epstein forcibly raped her on one occasion, under circumstances that are consistent with the accounts of other victims—specifically, that he appeared to have “snapped” or become suddenly aggressive, out of context of any other sexual activity. Despite this abuse, █████ has explained that she viewed Epstein as a father figure and confidant. █████ describes having felt dependent upon Epstein, who presented himself as extraordinarily wealthy, socially and politically connected, and sophisticated; he manipulated █████ into constantly seeking his approval for “nearly every aspect of her life.” This is consistent with the accounts of other Epstein victims, including other employees, such as █████ other individuals who were in his orbit as long-term victims, such as █████ and █████ and numerous victims who provided Epstein with sexualized massages relatively few times. Because █████ had been disfellowshipped from her church and effectively disowned by her family, she did not believe she had meaningful alternatives to remaining with Epstein—but even if she had, she recounts that she believed Epstein truly cared about her, despite the ongoing abuse. This traumatized understanding of her relationship with her abuser is consistent with the accounts of similarly-situated victims in this case and in others.

██

██

██

[REDACTED]

[REDACTED]

[REDACTED]

III. [REDACTED] Investigation

The following is a discussion of the evidence we have gathered in our investigation that relates to [REDACTED] in particular, including [REDACTED] conduct as well as the anticipated testimony of the witnesses at a potential trial.

1. Conduct relating to sex trafficking

[REDACTED]

As an assistant, [REDACTED] regularly called women and girls, including individuals who were under the age of 18, to schedule them to come to the Florida Residence for a massage. [REDACTED] also sometimes met victims when they arrived, walked them up to the massage room, and/or paid

them after the massage was complete. [REDACTED] also occasionally (though not routinely) did the same for massages at the New York Residence. [REDACTED]

[REDACTED] Regarding the relevant conversations, some victims recall having discussions with [REDACTED] about topics such as living with parents or not having a driver's license, as well as one individual, [REDACTED] whom [REDACTED] knew was studying for the SAT exam.⁴ However, none of the many dozens of victims we have interviewed described telling [REDACTED] how old they were, or discussing their age in reference to a birthday, year in school, etc.⁵

The evidence of [REDACTED] knowledge that Epstein was sexually abusing these girls through the guise of "massages" rests principally on the testimony of three victims, each of whom recalls [REDACTED] having seen them engage in sexual conduct or in a state of undress in connection with Epstein. As discussed below, [REDACTED] [REDACTED] recounts that [REDACTED] was present when Epstein touched her sexually in the context of a massage; [REDACTED] [REDACTED] recalls that [REDACTED] walked in on [REDACTED] while [REDACTED] was alone nude or partially nude in the massage room after a massage; and [REDACTED] [REDACTED] describes [REDACTED] having walked in on her performing oral sex on Epstein in a hallway in the New York Residence, unrelated to a massage.

[REDACTED] she does not deny these victim accounts, and she acknowledges that Epstein ultimately directed her to engage in sex acts and nude photo shoots with others. [REDACTED] [REDACTED] described that although Epstein touched her sexually when they were alone, eventually there was an incident in which Maxwell was present, and Maxwell touched [REDACTED] and instructed her how to touch Epstein while he masturbated. [REDACTED] also described two

⁴ [REDACTED] does not recall discussing the SATs with [REDACTED] [REDACTED] recalls [REDACTED] asking [REDACTED] to research SAT prep classes for [REDACTED] and [REDACTED] acknowledged in a proffer that she recalled Epstein asking her about SAT prep, but says she did not know at what age a person would take the SAT because she did not attend high school after her parents pulled her out in 10th grade. We note that [REDACTED] recalls believing [REDACTED] was at least 18 while involved with Epstein, including because [REDACTED] had an I.D. that she used to get into 18-and-older venues.

⁵ [REDACTED] the other primary Florida-based assistant and scheduler, would testify that at the time she did not know the ages of the individuals she scheduled for massages and did not realize any were under the age of 18. [REDACTED]

[REDACTED] who had sexual contact with underage victims, also [REDACTED] states that she did not realize that the victims were underage. Both [REDACTED] and [REDACTED] now say they believe they should have known that some of the girls were minors, given all the circumstances.

other incidents, on Epstein's island and at the New York Residence, respectively, in which Epstein directed her to engage in sexual activity with other individuals, neither of whom was one of the girls she scheduled for massages. Both of them were young women—but not minors, [REDACTED] believed and we have confirmed, based on their identities—and [REDACTED] understood them to be two of Epstein's regular girlfriends at the time. Regarding the incident involving [REDACTED] which was described in a publicly-filed complaint, [REDACTED] while she does not specifically recall that event, [REDACTED] does not dispute that it could have happened.⁶ [REDACTED] also said that as a general matter if Epstein had instructed her to be present during a massage, that she would have acquiesced, as she did in the other instances in which Epstein instructed her to be present for, or to participate in, sexual conduct with others.

[REDACTED] recounts being desperate for Epstein's approval, particularly because she viewed him as essentially God-like and because he effectively dominated her existence—financially but also mentally and emotionally. She acknowledges that she blindly followed his instructions and gave little thought to anything else—including how old the girls were or what Epstein was having them do. Regarding their ages in particular, [REDACTED] [REDACTED] was taught from a young age that sexual activity between an older man and a younger girl was common and normal, and that she therefore would not have been as attuned to whether a girl who appeared to be willingly meeting with Epstein was underage as she otherwise might have been. [REDACTED] also describes having been emotionally shut down due to her own abuse, effectively being incapable of considering what others might be experiencing with Epstein, particularly where she observed that the girls who provided massages did not leave crying or upset, and appeared to be willing participants—including regularly returning for additional massage appointments.

2. Concealment and obstructive conduct

[REDACTED] in particular relating to victim-witnesses. [REDACTED] recalls that after the Florida investigation became public, she called Epstein's house and [REDACTED] picked up the phone.

⁶ [REDACTED]

⁷ [REDACTED]

When [REDACTED] asked what was happening, [REDACTED] said, in sum and substance, that [REDACTED] shouldn't worry and that if she didn't say anything then she would be taken care of. [REDACTED] understood this to mean that Epstein would help her if she did not speak to law enforcement.

We also gathered evidence regarding incidents involving [REDACTED] collecting certain materials, including computers and paper directories with the names and phone numbers of "masseuses," around the time of the Florida investigation, prior to the search warrant executed on the Florida Residence. Specifically, [REDACTED] recalled that Epstein instructed [REDACTED] to remove computers and paper directories from the Florida Residence, and that [REDACTED] was present for those instructions. [REDACTED] also recalled that [REDACTED] subsequently gave [REDACTED] similar instructions to gather materials from Epstein's USVI residence, and to shred a copy of Epstein's directory. [REDACTED]

[REDACTED] The only thing [REDACTED] recalled being destroyed was an extra copy of Epstein's directories. [REDACTED] counsel advises that [REDACTED] believed that any hard copies were superfluous to electronic copies Epstein maintained, and we have confirmed that numerous copies of the directory were in fact maintained on his computers. [REDACTED]

[REDACTED] had directed [REDACTED] to dispose of certain sex toys and photographs in the New York residence, but because that incident occurred after Epstein's conviction, around when he was incarcerated in Florida, there would have been no active investigation at that time. [REDACTED]

Separately, and more recently, within a few days of the publication of the *Miami Herald* article series in 2018, Epstein made a one-time payment to [REDACTED] of \$250,000. [REDACTED] described the payment as having been made due to financial woes she had been having for a period of months, and that the payment had been discussed for some time and was not part of an exchange. [REDACTED]

[REDACTED] By comparison, [REDACTED] similarly received a large sum at the same time, \$100,000, and she has [REDACTED] advised us that the payment was related to Epstein's acknowledgement that critical press about him had negative effects on others—specifically, the ability to obtain employment and reputational damage for being associated with him. [REDACTED] understood the payment to be as compensation for those effects, rather than for any particular future action or inaction. [REDACTED]

Although there are many victims who interacted with [REDACTED] in connection with their victimization by Epstein, in particular through speaking with her on the phone and/or seeing her at the Florida Residence, the vast majority of those victims do not have significant evidence of [REDACTED] knowledge of age and/or sex acts. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

██████████ met with us several times, and informed us that she visited the Florida Residence dozens of times, including recruiting approximately 20 to 30 other women and girls ranging from 15 to 20 years of age. ██████████ primarily coordinated the appointments for herself and others through ██████████ though also through ██████████. ██████████ recalled that ██████████ would occasionally call from New York and ask if ██████████ could “work” when Epstein returned to Florida. ██████████ also recalled ██████████ occasionally taking her to the massage room and/or paying her following completion of the massage. ██████████ told Epstein that she was 18 years old, though ██████████ believes it would have been obvious based on her appearance that she was younger—approximately 15 years old when she first met ██████████. ██████████ does not recall any conversations with ██████████ about her age. ██████████ dropped out of school around the time she first met ██████████, and she does not recall ██████████ ever seeing, or participating in, any sex acts with Epstein. ██████████ advised us that when she was 16 and 17 years old, she began working at a strip club, where she pretended to be 18. When the Florida investigations became public, after ██████████ had stopped visiting Epstein, ██████████ recalls having a phone conversation with ██████████ in which ██████████ stated, in sum and substance, that ██████████ would be taken care of if she didn’t say anything.

██████████ met with us twice, and described having been recruited by a high school friend. ██████████ went to the Florida Residence several times and brought two additional friends for massages. ██████████ primarily coordinated the appointments for herself and others through ██████████ and she recalled that ██████████ would sometimes call from New York to schedule massages in Florida in advance. ██████████ recalled ██████████ occasionally taking her to the massage room. ██████████ recalls having told ██████████ that she was in high school and could not provide massages at certain times due to school conflicts. ██████████ does not recall any conversations with ██████████ specifically about her age, and does not recall ██████████ ever seeing, or participating in, any sex acts with Epstein.

██████████ met with us twice, and described having been introduced to Epstein in New York ██████████ at age 16. Over approximately two years, Epstein victimized ██████████ during massages at the New York Residence, including instances of oral sex and an instance of forcible rape. During part of that period, ██████████ lived in an apartment at Epstein’s 66th Street property. ██████████ recalled that ██████████ occasionally would schedule her massages with Epstein, and that ██████████ sent ██████████ money via Western Union on at least one occasion while ██████████ was traveling in Europe. ██████████ also recalled an incident when ██████████ walked in on ██████████ performing oral sex on Epstein at the New York Residence, apparently inadvertently; sometime after that incident, ██████████ recalled that Epstein referred to ██████████ as his “best little cocksucker” and “one of my girls” to ██████████.

██████████ met with us three times, and described having met Epstein through ██████████, who also worked for him as a “masseuse.” ██████████ primarily interacted with Epstein through traveling with him, including to New Mexico, Florida, New York, the USVI, and Paris. In particular, ██████████ recalls that when she was 17, she traveled to New Mexico, where Epstein asked

her to give him a massage while [REDACTED] was present. [REDACTED] recalls that Epstein initially asked [REDACTED] to remove [REDACTED] top, and that he fondled [REDACTED] and then touched [REDACTED] genitals in [REDACTED] presence. In an initial interview, [REDACTED] indicated that [REDACTED] had "participated" in the abuse, but she later stated that [REDACTED] had been present but that only Epstein had touched her. [REDACTED] does not recall any conversations with [REDACTED] about her age until [REDACTED] subsequent 19th and 20th birthdays, which she celebrated with Epstein and for which [REDACTED] was present.

[REDACTED]

[REDACTED]

[REDACTED] described having been recruited by a high school friend. Over approximately two years, [REDACTED] visited the Florida Residence dozens of times, and her abuse escalated to include instances of oral sex and rape, as well as sexual interactions with others, including [REDACTED] at Epstein's direction. [REDACTED] does not recall any conversations with [REDACTED] specifically about her age, but she does generally recall speaking with Epstein about taking the SAT and applying to college. [REDACTED] also recalled that [REDACTED] sometimes organized drivers to pick up [REDACTED] from her mother's house, where she lived. [REDACTED] recalled having been paid primarily by Epstein, but also sometimes by [REDACTED] and a former Epstein housekeeper. [REDACTED] does not recall any specific conversations she had with [REDACTED] about sexual activity with Epstein, but she recalled that [REDACTED] sometimes walked her to the massage room, and that on one occasion [REDACTED] walked in on [REDACTED] nude or partially nude in the massage room following a massage.

[REDACTED]

[REDACTED] described having been recruited by a friend at approximately age 13 or 14 to give massages to Epstein at the Florida residence. Over approximately two years, [REDACTED] visited dozens of times, and recruited dozens—and as many as 100—other girls. She became pregnant at age 15, after which Epstein no longer wanted to see her, but she continued to act as a paid recruiter. [REDACTED] primarily coordinated the appointments for herself and others through [REDACTED] and she recalled [REDACTED] occasionally taking her to the massage room and/or paying her afterward. [REDACTED] also recalled that [REDACTED] sometimes drove [REDACTED] to the Florida Residence. [REDACTED] also conveyed gifts from Epstein to [REDACTED] including a bikini and baby shower gifts when [REDACTED] was pregnant at age 15. [REDACTED] believed that [REDACTED] knew she was in high school, but she does not recall any specific conversations with [REDACTED] about her age or that she was in high school. [REDACTED] does not recall [REDACTED] ever seeing, or participating in, any sex acts with Epstein.

[REDACTED]

IV. Potential Charge and Legal Analysis

[REDACTED]

Sex trafficking conspiracy, 18 U.S.C. § 371 (to commit sex trafficking, 18 U.S.C. § 1591).

The crime of sex trafficking conspiracy has three elements: First, that two or more persons unlawfully agreed to violate § 1591; second, that the defendant knowingly and willfully became a member of the conspiracy; and third, that the defendant committed an act in furtherance of the conspiracy.¹¹ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹¹ The substantive crime of sex trafficking requires proof that the defendant knowingly recruited, enticed, harbored, transported, provided, or obtained by any means a person; in or effecting interstate commerce; knowing that the victim is under the age of 18 and would be involved in a commercial sex act.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] S.

[REDACTED]

[REDACTED]

[REDACTED]

V. Interests of Justice and Analysis

[REDACTED]

Precedent and balancing of equities

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

at the time, or at least consciously avoided knowing, that the massages were sexual in nature and

[REDACTED]

[REDACTED]

age [REDACTED] substantially overlaps with [REDACTED] in terms of role and conduct; she was hired at [REDACTED]

[REDACTED]

[REDACTED]

Views of victim-witnesses

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Views of the SDNY human trafficking coordinators

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Efficiencies in process and outcome

[REDACTED]

[REDACTED]

VI. Other Relevant Offenses and Recommendation

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
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