

I. MS. RICHARDSON'S COOPERATION AND ASSISTANCE

While incarcerated, Ms. Richardson, unsolicited, has provided important assistance to the Government on various investigations and prosecutions. Although she herself cannot file a motion for a sentencing reduction under Rule 35, all of the Assistant United States Attorneys with whom Ms. Richardson has met or to whom she has offered information welcomed her assistance, even where her testimony at trial was not ultimately required. Examples of Ms. Richardson's assistance are described below.

C. Ms. Richardson Provided Information to the Government Regarding Jeffrey Epstein's Death.

Given that Ms. Richardson has been a prisoner at the MCC since her arrest in 2016, she has relationships with guards and inmates who often share invaluable information concerning events at the MCC. When Jeffrey Epstein died in August 2019, Ms. Richardson heard helpful information concerning the circumstances surrounding his death and requested that counsel provide such details (such as the names of the guards on duty at his time of death, their actions in response to his hanging, and which cameras to check for potentially helpful footage) to the Government. The Government expressed appreciation for the information, followed up with Ms. Richardson through counsel to confirm additional details and, although it did not request her testimony or an in-person proffer, we note that many of the details Ms. Richardson provided were reflected in various charging documents.