

SITUATION

- It is anticipated that on July 2, 2019, Jeffrey Epstein will be indicted on two counts of 18 USC 1591, Sex Trafficking of Children and Conspiracy to engage in human trafficking.
- In conjunction with the arrest of Epstein, a lis pendens will be filed on Epstein's Manhattan residence (reportedly the largest private residence in Manhattan, spanning an entire city block) as the initial step toward seizure.

BACKGROUND

- In 2005, the West Palm Beach Police Department, and then the FBI, initiated an investigation of Jeffrey Epstein after parents of a victim reported to law enforcement that Epstein had abused their daughter between 2002 and 2005. Those investigations spanned approximately two years and included, among other things, interviews with approximately 35 victims; a search warrant executed on Epstein's Florida residence; and detailed analysis of various phone and flight records.
- In 2007, after attorneys representing Epstein met with Alex Acosta, United States Attorney for the Southern District of Florida, Epstein was offered a non-prosecution agreement which required Epstein to plead guilty in Florida state court to soliciting prostitution, which he did in 2008. He was sentenced to 18 months in jail, was permitted to serve his sentence in a facility where he was released during the day to work, and was released from his sentence after serving approximately 13 months.
- This non-prosecution agreement garnered significant media attention as Alex Acosta is currently serving as Secretary of Labor and the investigation was raised during his US Senate confirmation hearing.
- In December 2018, SDNY approached the FBI NY to open an investigation into Epstein regarding his conduct in New York.
- Epstein has had significant connections to New York City for many years. In addition to his residence, Epstein's professional career has been centered in part in New York. He was an investor in a modeling agency based in New York City, and during the relevant period spent significant time at his Manhattan mansion. As described by at least one individual ("██████████"), who was victimized and recruited dozens of other minor victims in New York City, Epstein reportedly victimized dozens of girls in New York, in addition to the dozens of girls he victimized in Florida. Epstein knew that ██████████ was under the age of 18, and he knew the other girls she was bringing were under 18. In particular, ██████████ recalls having truthfully told Epstein that she was 14 years old, and recalls Epstein being upset if she brought him girls who looked like they were 18 or older.
- Agents and SDNY AUSAs have traveled to Florida on multiple occasions to interview victims. The identified victims' ages ranged from approximately 14 to 17, with the majority having been approximately 15 or 16 when they were recruited to perform sex acts for and with Epstein. Epstein's conduct included masturbating in front of victims; fondling the breasts of victims; placing a vibrator on the genitals of victims; and directly touching the genitals of victims. Victims would have to perform these massages nude or partially nude. Victims were paid approximately \$200 to \$300 each time they went to Epstein's residence. Two of the victims ("██████████" and "██████████") were interviewed in Florida and both have reported the above listed conduct. Like ██████████, ██████████ estimated bringing dozens of girls to Epstein. Epstein's conduct reportedly occurred in locations including, but not limited to, New York City, Florida, the U.S. Virgin Islands, and New Mexico.
- Victims in New York and Florida usually were contacted via telephone by individuals who worked for Epstein to arrange his "massages." In New York, one of those individuals was ██████████; in Florida, the primary contact for the girls was ██████████. Additionally, and in order to maintain a steady stream of underage girls to perform sexual acts, Epstein and his co-conspirators also coerced others, including

some of his victims, to recruit other minor girls to engage in “massages” and sexual conduct with Epstein. The recruiters were paid by Epstein and co-conspirators for bringing additional minor girls to Epstein’s properties for those purposes.

STRATEGY

- The NYO is coordinating a robust plan to interview a significant number of co-conspirators and victims in the hours/days following the arrest of Epstein.
- Efforts are ongoing toward the seizure of Epstein’s residences in Manhattan and Palm Beach, Florida (total value of approximately \$100M).
- SDNY and NYO will coordinate a press conference during which a tip line will be announced to encourage other victims to report their encounters with Epstein.
- NYO will coordinate with VSD regarding the victim interviews.