

UNITED STATES DISTRICT COURT

for the

Southern District of New York

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*

See Attached Affidavit and its Attachment A

Case No.

19MAG 6572

APPLICATION FOR A SEARCH AND SEIZURE WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

located in the Southern District of New York, there is now concealed *(identify the person or describe the property to be seized)*:

See Attached Affidavit and its Attachment A

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

evidence of a crime;
 contraband, fruits of crime, or other items illegally possessed;
 property designed for use, intended for use, or used in committing a crime;
 a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section(s)

Offense Description(s)

18 U.S.C. §§ 1591 and Sex trafficking of minors; sex trafficking conspiracy
371

The application is based on these facts:

See Attached Affidavit and its Attachment A

Continued on the attached sheet.

Delayed notice of days (give exact ending date if more than 30 days:) is requested
under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

[REDACTED]

Applicant's signature

Special Agent [REDACTED], FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 7/7/19

S/

Judge's signature

Hon. Barbara Moses, U.S. Magistrate Judge

Printed name and title

City and state: New York, NY

affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

B. The Subject Premises

3. The Subject Premises are particularly described as a multi-story, single-family residence located at [REDACTED], New York, New York, and include all locked and closed containers found therein. As detailed further herein, the Subject Premises is believed to be owned, possessed and controlled by JEFFREY EPSTEIN, a target subject of this investigation. A photograph of the front entrance to the Subject Premises is included below:



C. The Target Subject and the Subject Offenses

4. The Target Subject of this investigation is JEFFREY EPSTEIN.
5. For the reasons detailed below, I believe that there is probable cause to believe that the Subject Premises contain evidence, fruits, and instrumentalities of violations of Title 18, United

masturbate during these sexualized encounters, ask victims to touch him while he masturbated, and touch victims' genitals with his hands or with sex toys. Following each encounter, EPSTEIN or one of his employees or associates paid the victim in cash.

9. As set forth in paragraphs 12 through 13 of Exhibit A, to further facilitate his ability to abuse minor girls in New York, JEFFREY EPSTEIN asked and enticed certain of his victims to recruit additional minor girls to perform "massages" and similarly engage in sex acts with EPSTEIN. When a victim would recruit another minor girl for EPSTEIN, he paid both the victim-recruiter and the new victim hundreds of dollars in cash. EPSTEIN knew that his victims were underage, including because certain victims told him their age.

10. One of the victims identified in paragraph 22 of Exhibit A is Victim-1. As part of the FBI's investigation of EPSTEIN, other law enforcement officers have interviewed Victim-1.¹ I know from my conversations with other law enforcement officers who have interviewed Victim-1, that Victim-1 has provided the following information, in substance and in part:

- a. Between approximately 2002 and 2005, EPSTEIN sexually abused Victim-1 on multiple occasions in the Subject Premises. This sexual abuse all occurred when Victim-1 was under the age of 18.
- b. During that same period, Victim-1 observed multiple floors of the Subject Premises and numerous individual rooms within the Subject Premises. Victim-1 has provided detailed

¹ In meetings with the Government, Victim-1 has disclosed that, approximately a decade ago, she committed marriage fraud in order to obtain a green card and, subsequently, U.S. citizenship. She has also disclosed personal substance abuse, primarily involving the abuse of prescription drugs, during various periods between the early 2000s and 2019. Victim-1 has also disclosed having worked for approximately a year at a "happy-ending" massage parlor, performing paid sex acts. Victim-1 is currently pursuing a civil damages claim against EPSTEIN for his sexual abuse of her. Information provided by Victim-1 has proven reliable and has been corroborated by independent evidence, including documents and records obtained during the investigation and the accounts of other victims whom Victim-1 has never met.

from the ribcage to the clavicle (collectively, (the "Busts"). The Busts do not appear to be designed for use as sex toys, and appear instead to be artwork. Nevertheless, based on my conversations with law enforcement officers who have interviewed Victim-1, I have learned that the Busts appear to be generally consistent with Victim-1's description of observing the Torso in EPSTEIN's bathroom in the Subject Premises. Accordingly, there is probable cause to believe that the Busts are corroborating evidence of Victim-1's description of the Subject Premises.

b. Inside the Subject Premises, I observed a room that, based on my conversations with law enforcement officers who have interviewed Victim-1, appears to be consistent with Victim-1's descriptions of the Massage Room. The room contained a table covered with a sheet, and appears to be a massage table. The walls appear to be covered in a type of felt-like tapestry fabric. I further observed two paintings and three photographs hanging on the walls of the Massage Room. The paintings and photographs depict nude females. One of the photographs appears to depict a nude girl. Based on my training and experience investigating crimes involving the sexual exploitation of children, the girl appears to be approximately 15 to 20 years old.

c. Inside the Subject Premises, inside a closet adjacent to a bathroom, I observed a shelf that appears to contain several black binders, with labels on the spine of each binder. In particular, one of the binders is marked with a series of labels, one of which reads: "PB Girls." Given that the Indictment charges EPSTEIN with participating in a conspiracy to engage in sex trafficking of minor girls in both Palm Beach, Florida and New York, I believe that "PB Girls" may refer to minor victims in Palm Beach, Florida.

d. Inside the Subject Premises, in what appears to be EPSTEIN's office, on or about the second floor of the Subject Premises, I observed what appears to be a taxidermied dog (the "Dog"). Based on my conversations with law enforcement officers who have interviewed

10 p.m. In view of the foregoing circumstances, I respectfully submit that the present circumstances demonstrate good cause to execute the warrant after 10 p.m.

[REDACTED]
[REDACTED]
[REDACTED]

Special Agent
Federal Bureau of Investigation

Sworn to before me on
July 4, 2019

S/

THE HONORABLE BARBARA MOSES
UNITED STATES MAGISTRATE JUDGE

19MAG 6572

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x -----
UNITED STATES OF AMERICA : : SEALED
----- x -----

- v. -

----- x -----
INDICTMENT

----- x -----
19 Cr.

JEFFREY EPSTEIN,

Defendant.

19 CRIM 490

----- x -----
COUNT ONE
(Sex Trafficking Conspiracy)

The Grand Jury charges:

OVERVIEW

1. As set forth herein, over the course of many years, JEFFREY EPSTEIN, the defendant, sexually exploited and abused dozens of minor girls at his homes in Manhattan, New York, and Palm Beach, Florida, among other locations.

2. In particular, from at least in or about 2002, up to and including at least in or about 2005, JEFFREY EPSTEIN, the defendant, enticed and recruited, and caused to be enticed and recruited, minor girls to visit his mansion in Manhattan, New York (the "New York Residence") and his estate in Palm Beach, Florida (the "Palm Beach Residence") to engage in sex acts with him, after which he would give the victims hundreds of dollars in cash. Moreover, and in order to maintain and increase his supply of victims, EPSTEIN also paid certain of his victims to recruit additional girls to be similarly abused by EPSTEIN. In

recruited, dozens of minor girls to engage in sex acts with him, after which EPSTEIN paid the victims hundreds of dollars in cash, at the New York Residence and the Palm Beach Residence.

7. In both New York and Florida, JEFFREY EPSTEIN, the defendant, perpetuated this abuse in similar ways. Victims were initially recruited to provide "massages" to EPSTEIN, which would be performed nude or partially nude, would become increasingly sexual in nature, and would typically include one or more sex acts. EPSTEIN paid his victims hundreds of dollars in cash for each encounter. Moreover, EPSTEIN actively encouraged certain of his victims to recruit additional girls to be similarly sexually abused. EPSTEIN incentivized his victims to become recruiters by paying these victim-recruiters hundreds of dollars for each girl that they brought to EPSTEIN. In so doing, EPSTEIN maintained a steady supply of new victims to exploit.

The New York Residence

8. At all times relevant to this Indictment, JEFFREY EPSTEIN, the defendant, possessed and controlled a multi-story private residence on the Upper East Side of Manhattan, New York, i.e., the New York Residence. Between at least in or about 2002 and in or about 2005, EPSTEIN abused numerous minor victims at the New York Residence by causing these victims to be recruited to engage in paid sex acts with him.

employees and associates, including a New York-based employee ("Employee-1"), to communicate with victims via phone to arrange for these victims to return to the New York Residence for additional sexual encounters with EPSTEIN.

12. Additionally, and to further facilitate his ability to abuse minor girls in New York, JEFFREY EPSTEIN, the defendant, asked and enticed certain of his victims to recruit additional girls to perform "massages" and similarly engage in sex acts with EPSTEIN. When a victim would recruit another girl for EPSTEIN, he paid both the victim-recruiter and the new victim hundreds of dollars in cash. Through these victim-recruiters, EPSTEIN gained access to and was able to abuse dozens of additional minor girls.

13. In particular, certain recruiters brought dozens of additional minor girls to the New York Residence to give massages to and engage in sex acts with JEFFREY EPSTEIN, the defendant. EPSTEIN encouraged victims to recruit additional girls by offering to pay these victim-recruiters for every additional girl they brought to EPSTEIN. When a victim-recruiter accompanied a new minor victim to the New York Residence, both the victim-recruiter and the new minor victim were paid hundreds of dollars by EPSTEIN for each encounter. In addition, certain victim-recruiters routinely scheduled these

to touch him while he masturbated, and touch victims' genitals with his hands or with sex toys.

16. In connection with each sexual encounter, JEFFREY EPSTEIN, the defendant, or one of his employees or associates, paid the victim in cash. Victims typically were paid hundreds of dollars for each encounter.

17. JEFFREY EPSTEIN, the defendant, knew that certain of his victims were underage, including because certain victims told him their age. In addition, as with New York-based victims, many Florida victims, once recruited, were abused by JEFFREY EPSTEIN, the defendant, on multiple additional occasions.

18. JEFFREY EPSTEIN, the defendant, who during the relevant time period was frequently in New York, would arrange for Employee-2 or other employees to contact victims by phone in advance of EPSTEIN's travel to Florida to ensure appointments were scheduled for when he arrived. In particular, in certain instances, Employee-2 placed phone calls to minor victims in Florida to schedule encounters at the Palm Beach Residence. At the time of certain of those phone calls, EPSTEIN and Employee-2 were in New York, New York. Additionally, certain of the individuals victimized at the Palm Beach Residence were contacted by phone by Employee-3 to schedule these encounters.

commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and (b) (2).

Overt Acts

22. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about 2004, JEFFREY EPSTEIN, the defendant, enticed and recruited multiple minor victims, including minor victims identified herein as Minor Victim-1, Minor Victim-2, and Minor Victim-3, to engage in sex acts with EPSTEIN at his residences in Manhattan, New York, and Palm Beach, Florida, after which he provided them with hundreds of dollars in cash for each encounter.

b. In or about 2002, Minor Victim-1 was recruited to engage in sex acts with EPSTEIN and was repeatedly sexually abused by EPSTEIN at the New York Residence over a period of years and was paid hundreds of dollars for each encounter. EPSTEIN also encouraged and enticed Minor Victim-1 to recruit other girls to engage in paid sex acts, which she did. EPSTEIN asked Minor Victim-1 how old she was, and Minor Victim-1 answered truthfully.

c. In or about 2004, Employee-1, located in the Southern District of New York, and on behalf of EPSTEIN, placed

g. In or about 2005, Employee-2, located in the Southern District of New York, and on behalf of EPSTEIN, placed a telephone call to Minor Victim-3 in Florida in order to schedule an appointment for Minor Victim-3 to engage in paid sex acts with EPSTEIN.

h. In or about 2004, Employee-3 placed a telephone call to Minor Victim-3 in order to schedule an appointment for Minor Victim-3 to engage in paid sex acts with EPSTEIN.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Sex Trafficking)

The Grand Jury further charges:

23. The allegations contained in paragraphs 1 through 19 and 22 of this Indictment are repeated and realleged as if fully set forth within.

24. From at least in or about 2002, up to and including in or about 2005, in the Southern District of New York, JEFFREY EPSTEIN, the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, and obtain by any means a person, knowing that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, and did aid and abet the same, to wit, EPSTEIN recruited, enticed, harbored, transported, provided, and obtained numerous

Substitute Asset Provision

26. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1594; Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461.)

Geoffrey S. Berman
FOREPERSON

Geoffrey S. Berman
GEOFFREY S. BERMAN
United States Attorney

EXHIBIT B

ATTACHMENT A

I. Premises to be Searched—Subject Premises

1. The premises to be searched (the "Subject Premises") are described as a multi-story single-family residence located at [REDACTED], New York, New York, and include all locked and closed containers found therein. A photograph of the front entrance to the Subject Premises is included below:



II. Items to Be Seized

A. Evidence, Fruits, and Instrumentalities of the Subject Offenses

This warrant authorizes the seizure of certain evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Sections 1591 (sex trafficking of minors) and 371 (sex trafficking conspiracy) (the "Subject Offenses") described as follows:

- i. Any and all taxidermied dogs.
- ii. Any and all massage tables and massage paraphernalia.
- iii. Any and all busts or three-dimensional representations of female human torsos.
- iv. Any and all photos or representations depicting nude or partially nude women located in the Massage Room, as defined herein.
- v. Any and all sex toys and sex paraphernalia located in the Massage Room, as defined herein.