

From: "██████████)" <██████████>
To: "██████████)" <██████████>
Cc: "██████████)" <██████████>

Subject: Re: Epstein investigation

Date: Sat, 22 Feb 2020 20:35:20 +0000

[REDACTED]

On Feb 22, 2020, at 2:17 PM, ██████████) <██████████> wrote:

[REDACTED]

[REDACTED]

Sent from my iPhone

Begin forwarded message:

From: Jill Greenfield <██████████>
Date: February 22, 2020 at 1:55:06 PM EST
To: "██████████)" <██████████>
Cc: Kyle Phillips <██████████>, Louise Scott <██████████>, "██████████)" <██████████>
Subject: RE: Epstein investigation

Hello ██████████

Apologies for the slight delay. My client is willing to help but asks the following:

- That there be a morning meeting at which introductions with a discussion as to the investigation and my clients involvement. I appreciate that you have explained this to me but I think further verbal clarification would assist.
- In the afternoon and after a break, my client would be willing to answer questions, in so far as she can.
- That a friend of hers be allowed to be present as well. However that friend is based in the US and would need to be flown over to London. He is a US lawyer.

Perhaps you could let me know if this is possible?

Kind regards,

Jill

Jill Greenfield

Partner

D: ██████████
M: ██████████

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From: [REDACTED] <[REDACTED]>

Sent: Saturday, February 15, 2020 7:08 PM

To: Jill Greenfield <[REDACTED]>

Cc: Kyle Phillips <[REDACTED]>; Louise Scott <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: RE: Epstein investigation

Understood – thanks very much.

[REDACTED].

From: Jill Greenfield <[REDACTED]>

Sent: Saturday, February 15, 2020 07:22

To: [REDACTED] <[REDACTED]>

Cc: Kyle Phillips <[REDACTED]>; Louise Scott <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: Re: Epstein investigation

Thanks [REDACTED]

This is helpful. I've gone back to my client with this. I will be back in touch shortly.

Regards

Jill

Jill Greenfield

Partner

D: [REDACTED]

M: [REDACTED]

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<image001.jpg>

Sent from my iPhone

On 14 Feb 2020, at 21:43, [REDACTED] <[REDACTED]> wrote:

Jill,

Following up on our phone call, thank you for talking with us again, and we wanted to get back to you regarding some of the additional follow-up questions you asked, and to describe in more detail for your client how we would expect to approach any discussion with your client if she were comfortable meeting with us.

The absolute most important thing is that any discussion would be entirely voluntary, and by that we mean the decision to meet with us but also as to any topic or question—your client would be absolutely free to determine what topics she felt comfortable discussing. There is absolutely no pressure on victim witnesses to address anything that would make them uncomfortable at any time, and even if your client was willing to meet with us, we would tell

her, as we do for any witness, that if any topic comes up that she wants to skip, or discuss with you privately, that is no problem at all.

In fact, if you and she would prefer, we would be happy to have a meeting where we simply introduced ourselves, explained the status of our investigation, talked about how a discussion would proceed if your client ended up being comfortable with that, and answered in person any questions she. We have done that previously, where we do the talking rather than asking questions in an initial meeting, and that would of course be without any requirement for anything additional if she preferred not to. As I mentioned on the phone, we have consistently found that we are able to reassure individuals when we have the opportunity to meet in person so they can see directly our interest in approaching these discussions with great sensitivity and care. As I also mentioned on the phone, even if your client were willing to speak with us, there would be absolutely no need or requirement for her to talk about any assault or victimization she experienced. We wrote in our first email that we would primarily be interested in talking about topics such as the general scope of her employment, directions she received from Epstein or Maxwell, etc., and as always we would be guided by her comfort level.

In terms of who would attend a meeting, we almost always work in pairs, so two prosecutors and two officers, and that's not to have extra people, but rather because it helps us to be as efficient as we can, and so witnesses can meet the people on the team. Our team is also majority female, and we always tell witnesses that if topics come up in a discussion that they would prefer to speak about just with women, that's fine and we can be flexible in the moment and are always guided by the comfort level of the victim. But I also want to stress that in terms of your client in particular, we don't expect to initially address issues of a very personal or sexual nature, and we certainly would tell you in advance if there came a time when we thought that might be important to address, and how we could facilitate that. Who exactly from our team would be at any meeting would depend on schedules, but we can assure you that every one of us has now spoken with dozens of victims in this case, and every one of us has extensive experience more generally working with victims and working on cases involving sex offenses. We are proud of how we have been able to work with victims in this case especially, given all of the circumstances, and we absolutely would take the same sensitive approach with your client as we have with the many other victims in this case who have spoken with us.

Again, if it would be helpful even for us to just come to the U.K. and introduce ourselves and explain in person how our process works, and answer any questions your client has in person, we would absolutely be happy to do that with no obligation at all from her. We also could do that with the possibility that if she felt comfortable, we could just address the general subject of her employment, for example. But no obligation and no pressure. We continue to appreciate your and her willingness to even broach the possibility of a discussion, and we hope this is helpful.

thank you very much,

[REDACTED]

[REDACTED]
Assistant U.S. Attorney
Southern District of New York
[REDACTED]

From: [REDACTED]
Sent: Saturday, February 08, 2020 14:25
To: Jill Greenfield <[REDACTED]>
Cc: Kyle Phillips <[REDACTED]>; Louise Scott <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein investigation

Jill,

Thanks for circling back, and we'll do our best to answer these questions. In terms of who would be in the room, the most likely answer is that it would be two of the prosecutors and the two law enforcement officers on the case. The only reason I saw "most likely" rather than having a definitive answer is that when we're interviewing in a foreign country, it sometimes is the case the local law enforcement also insists on having representatives present. I don't believe that's required in the U.K., but we can check on it and give you a definitive answer in the coming days if that's useful. (Also, if she preferred to be interviewed in the U.S., we certainly could guarantee that the room would be just the case team, and we could arrange for travel and lodging for her. Let us know if that's the case, but otherwise we're of course happy to travel to her.)

Regarding access to notes, it would principally be the investigative team—so again, the prosecutors and the FBI team working on the case. Our respective supervisors also theoretically have access to our files, but the reports are not generally widely disseminated. The basic logistics are that an agent takes notes during an interview, and then types up those notes into a formal report (called an FBI Form 302). We don't ordinarily share notes with other entities, but I can also check on that to see if I can make a more specific representation with respect to your client.

With respect to anonymity, I confess that I'm not familiar with the distinction you're referring to. In terms of our investigation, we don't publicly disclose the names of individuals we meet with, and we don't disclose to any other witnesses, for example, the identities of victims or witnesses we are meeting with. (And our policies on that don't change even for individuals who are in the position of your client, who have been widely publicly reported to have been connected to Epstein and/or his employees or associates). But if that doesn't answer your question, we're of course happy to discuss further. Let me know if it might be useful to have a call? Or if not, also happy to address any follow-up via email.

thanks,

[REDACTED]

From: Jill Greenfield <[REDACTED]>
Sent: Saturday, February 08, 2020 13:17
To: [REDACTED] <[REDACTED]>
Cc: Kyle Phillips <[REDACTED]>; Louise Scott <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Re: Epstein investigation

Hi [REDACTED]

Thanks for this. I've been asked who would be in the room and thereafter who would have access to any notes made. Would her permission be sought before disclosing to any other parties or officials?

As you know there is a real difficulty in relation to her anonymity in the US versus the UK. Are you able to provide any comfort on this?

Many thanks

Jill

Jill Greenfield

Partner

D: [REDACTED]

M: [REDACTED]

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EFTA00026797

Sent from my iPhone

On 6 Feb 2020, at 21:53, [REDACTED] <[REDACTED]> wrote:

Ms. Greenfield,

Thank you again for speaking with us earlier today regarding our interest in talking with your client in connection with our investigation into the conduct of Jeffrey Epstein.

As requested, we wanted to briefly memorialize our current views and understandings of your client, and also to reiterate our interest in approaching any discussion with great care and sensitivity, particularly to avoid adding to her trauma or causing re-victimization.

As we mentioned on the phone, your client is not a target of our investigation—it sounds like the analogue in the U.K. may be the “suspect” category—and we currently do not have reason to believe that she has committed any U.S. federal crime. As we discussed, our knowledge of your client specifically is somewhat limited, having never spoken to her—and therefore knowing about her only through other witnesses and records—but it certainly has been our experience that the overwhelming majority of young women and girls who were in the orbit of Jeffrey Epstein during the relevant periods were subject to his abuse. It does not surprise us, nor do we have any trouble believing, that your client was similarly a victim. I hope that is helpful in understanding the capacity in which we hope to speak with her.

Separately, and as we also discussed, any discussion with our team would be entirely voluntary—and that extends not just to whether she would be willing to meet with us at all, but also including her ability to decline to discuss particular topics or even particular questions, and to talk with her counsel at any time, to take any breaks that would be beneficial while we’re meeting, etc.

In terms of topic areas, we would be hoping to learn about the general narrative of her interactions with Epstein and his other associates and employees, including Ghislaine Maxwell, whom we understand she may have worked directly for. That would broadly include how she came to be in contact with them, the nature and scope of her employment, any instructions she was given relating to other women or girls, and just generally her experiences and observations in interacting with them. We ordinarily would also be interested in understanding the general nature of the abuse she was subjected to, but I want to emphasize that we would not need to discuss with her the specifics if she weren’t comfortable with that, and in particular we often don’t even broach that subject in a first meeting.

Please let us know if you have any additional questions, and in particular whether any other information from us would be useful, and we look forward to speaking with you again soon.

Regards,

[REDACTED]

[REDACTED]
Assistant U.S. Attorney
Southern District of New York
[REDACTED]

Fieldfisher, Riverbank House, 2 Swan Lane, London EC4R 3TT.

www.fieldfisher.com

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