

Addendum

8. Basis of Claim

Summary

This Notice of Claim is filed on behalf of claimants [REDACTED] [REDACTED] and [REDACTED]. Both are victims and survivors of the Jeffrey Epstein sex trafficking conspiracy. The Notice is filed on behalf of these two claimants personally and also as representatives of the class of all Epstein victims and survivors trafficked after August 29, 1996 when [REDACTED] reported the conspiracy to the FBI and also those who suffered before or after August 29, 1996 from possible Child Sex Abuse Materials (“CSAM”) and other sex trafficking-related crimes.

The trafficking of [REDACTED] and [REDACTED], along with the trafficking of hundreds of others, and possible CSAM crimes, were caused and/or enabled, in whole or in part, by the abject failures of the United States Federal Bureau of Investigation (“FBI”) for nearly 25 years.

[REDACTED] Story – Epstein and Maxwell’s Abuse of Her, and Her 1996 Report to the FBI of the Epstein Sex Trafficking Conspiracy, Which the FBI Flatly Ignored

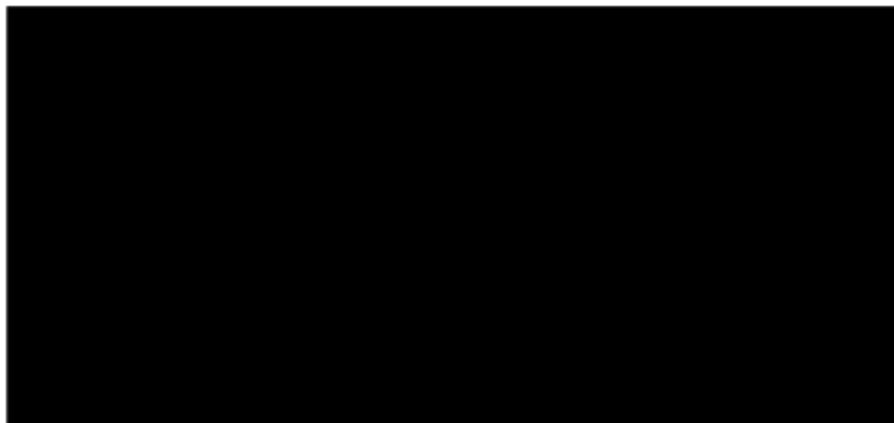
In the mid-1990s, [REDACTED], then in her mid-twenties, was an [REDACTED]

[REDACTED] Upon graduation, she started working for Epstein, first assisting him to collect art and then acting as a kind of receptionist and providing other services as needed at his New York City residence, the apartment building on East 66th Street where Epstein housed many young girls, and his offices. Epstein presented himself to [REDACTED] and others as someone who was very interested in art and a philanthropist who was interested in helping young people achieve their educational and other dreams. At Epstein’s New York City residence, [REDACTED] saw or heard about the visits of many high-level politicians and business leaders. She also saw many young girls come and go to and from Epstein’s house.

While working at Epstein’s mansion, Maxwell actively put together what she called a “modeling book” containing photographs of young girls and boys in various stages of undress. Maxwell kept the “modeling book” in Epstein’s safe.

Maxwell said that the “modeling book” was used to recruit models for Victoria Secret which was one of the businesses of Les Wexner, another person close to Epstein. From time to time, [REDACTED] ran errands with Maxwell using Epstein’s car during which time Maxwell would direct the driver to stop the car so that she could “go get girls” for Epstein. She also helped with interior design at the 66th Street apartment building, where she saw many young girls who mostly appeared to be teenagers.

For the summer of 1996, Epstein encouraged [REDACTED] to leave New York City and work as an artist-in-residence at his residence in New Albany, Ohio which was adjacent to property owned by Wexner. That summer, Epstein directed [REDACTED] to obtain an Ohio driver’s license using his Ohio address on the license so that she could readily pick Epstein and Maxwell up at the airport.



Epstein told [REDACTED] to leave him the keys to her apartment which they might use while she was in Ohio.

That summer, on the last visit of Epstein and Maxwell to the Ohio residence, they sexually abused [REDACTED]. They also stole photographs [REDACTED] had been working with at the residence, including images of her then-[REDACTED]-year-old partially dressed sister. [REDACTED] was then prevented from leaving the property without “permission”; terrified, [REDACTED] called friends and colleagues, including mentor artist [REDACTED] who told [REDACTED] to get out of there as soon as possible. *See* Ex. 1. (Fischl Affidavit). [REDACTED] contacted family members who came to New Albany to rescue her.

When [REDACTED] returned to New York, her apartment had been painted black and most of her furniture was missing. [REDACTED] confronted Epstein and Maxwell and

asked them to return her photographs. They refused, threatening to hurt her, hurt her family, and burn all of her artwork. They told her they were connected to important people and bad things would happen to her if she did or said anything. Maxwell warned her that one night while she would be walking in a New York City park or near the West Side Highway, someone would silently come up behind her and she would be maimed or killed. █████ realized that Epstein and Maxwell's abuse of her and theft of her young sister's images were part of a far-ranging criminal enterprise. She was terrified but knew what she had to do – report them to law enforcement – so that the government could protect her and others, and such misconduct could be stopped.

On August 29, 1996, █████ reported the Epstein sex trafficking conspiracy to the FBI (“█████ 1996 FBI Report”). █████ told the FBI about Epstein and Maxwell's sexual abuse of her a few weeks earlier in Ohio. She told them about the theft of the photographs of her partially dressed █████-year-old sister and their creation of the “modeling book” which they kept in a locked safe. She told the FBI that she believed that they were operating a pedophile ring and producing child pornography. She also told them about the efforts to “go get girls” for Epstein, their frightening threats against her, and other lawlessness.

█████ also reported Epstein and Maxwell to the Sixth Precinct of the New York Police Department. NYPD Police Report Complaint #1196-006-7241, dated 8/29/96, attached as Ex. 2 (“[█████ █████] states...[Epstein] did call her and stated he was going to burn victim's painting and send her polaroids of the burnt paintings. [Epstein] has keys to victim's apartment.”). The NYPD advised her that the Ohio abuse was outside of their jurisdiction and that the kinds of crimes she was alleging were handled by the FBI.

█████ confirmed her 1996 FBI Report in a 19CS97 entry in her personal journal. She explained, “I had to turn them into the FBI”:

[REDACTED] (She even [REDACTED] Epstein & Maxwell
tried to ruin my life, [REDACTED] life, &
[REDACTED] as well!). They molested all of
us in various ways & made us all feel
debiled [REDACTED]

& I had to turn them in to the FBI.

Ex. 3 (Journal title page and excerpt).

FBI field notes in 2006 also confirmed [REDACTED] 1996 FBI Report.

[REDACTED]
6th precinct told [REDACTED] to call FBI

Excerpt of hand-marked page 19 of FBI redacted notes of 11/14/06 meeting with Ms. [REDACTED] regarding Epstein (“[NYPD]” 6th precinct told [REDACTED] to call FBI”) in Ex. 4 (FBI redacted notes in full).¹

Terrified for her life and her artwork, [REDACTED] promptly moved out of New York City. For the next many years, [REDACTED] moved from place to place, attempting to stay ahead of Epstein and Maxwell. She tried to use different names but they found her anyway, telling her that they “knew people” in high places, she could not escape them no matter how many times she relocated. They told her that if she

¹ Oddly, despite repeated requests, the FBI has advised [REDACTED], in response to repeated FOIA requests, that they have no documents or other record(s) regarding her 1996 Report. Given the FBI’s arrival at her doorstep in 2006, and admission that they knew about her report, the FBI’s response appears to be false.

opened her mouth about them there would be life and limb consequences for her and for others she loved.

At or about the time of ██████ 1996 FBI Report, the FBI's policies, procedures, protocols and/or guidelines mandated that the FBI consider the information provided by ██████ to constitute evidence of a serious threat to ██████ life and others, an ongoing, wide-ranging sex trafficking conspiracy, and a likelihood that Epstein and Maxwell were producing CSAM in violation of the criminal anti-child pornography laws. At that point, the FBI should have promptly commenced an investigation of ██████ complaint. Instead, for nearly a quarter of a century, the FBI and other federal law enforcement did nothing, resulting in many more young girls becoming victims of the Epstein sex trafficking conspiracy.

Due to Epstein's abuse and the failures of the FBI to address ██████ 1996 FBI Report, ██████ has suffered substantial pain and suffering, including serious physical illnesses.

Federal Law Enforcement's Additional Failures in 2005-2008

After ██████ 1996 FBI Report, the FBI and other federal law enforcement agencies had several other opportunities to stop the Epstein sex trafficking conspiracy. From 2005 to 2008, federal law enforcement in Florida again met with ██████, this time seeking her out for information. They told her that they wanted her to testify against Epstein to make sure that he was stopped. They promised her that this time they would convict him, and he would go to jail. At the same time, Federal law enforcement in Florida interviewed and lined up other victims and survivors purportedly to help stop Epstein's sex trafficking.

However, rather than have ██████ and others testify against Epstein to finally stop the Epstein sex trafficking conspiracy, and rather than charging Epstein and others with serious crimes, federal law enforcement gave Epstein the deal of a lifetime – a secret non-prosecution agreement in Florida, for which Epstein served only 13 months in a Palm Beach County jail, with daily 12 hour “work” release and immunity was granted to all co-conspirators. The federal authorities did nothing to stop Epstein and others from sex trafficking or producing sexually explicit images of young girls.

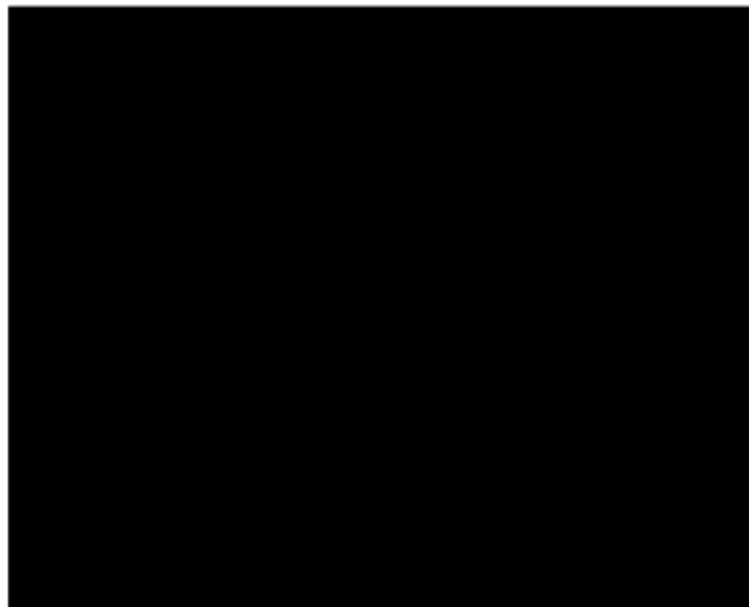
Once again, federal law enforcement failed to follow their policies, procedures, protocols and/or guidelines. Florida prosecutors failed to properly pursue claims against Epstein. *See* OPR Report dated 11-12-20 and [REDACTED] previous Notices of Claim filed 11-10-22 and 11-11-22 which are incorporated by reference. As a result, for another decade, hundreds of young girls and women continued to be sexually abused and otherwise seriously injured in the Epstein sex trafficking conspiracy.

[REDACTED] Story – [REDACTED] was sex trafficked at the very same time that Florida federal law enforcement was supposedly investigating Epstein

Indeed, while federal law enforcement conducted its “investigation” of Epstein in Florida, Epstein was busily trafficking young women elsewhere. Claimant [REDACTED] [REDACTED] was one of the victims. From approximately 2006-2007, she and many others were trafficked by Epstein and Maxwell in the Virgin Islands, New York, and elsewhere.

As with [REDACTED], Epstein, along with Maxwell, told [REDACTED] repeatedly that if she ever tried to get away from them, she would be found and her family killed. Indeed, [REDACTED] later discovered that Epstein in fact repeatedly tried to locate her.

As a result of being trafficked, [REDACTED] [REDACTED]
Here are photos from [REDACTED]





Federal Law Enforcement's Failures for More than Another Decade

The FBI did virtually nothing to stop the Epstein sex trafficking conspiracy for more than another decade and took further substantive action only --

- after [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] and other survivors complained again to law enforcement and actively engaged with non-FBI law enforcement;
- after lengthy prosecution of federal civil litigation alleging the NPA violated the Crime Victims Rights Act guarantees, leading to a judicial determination that the government's failure to notify victims of the settlement and the NPA itself violated the Act; E.g., *Doe v. United States*, 359 F. Supp.3d 1201 (S.D. Fla. 2019);
- after numerous journalists reported the story; and
- after numerous other private lawsuits and other efforts brought this conspiracy to light and still do so. E.g., *Jane Doe v. Epstein*, (2009) (579 F. Supp.3d (S.D.N.Y. 2012)); [REDACTED] v. *Maxwell*, Case No. 1-15-cv-07433-LAP (S.D.N.Y. complaint filed 2015); *Jane Doe 1 v. Deutsche Bank et al.*, 22-cv-10018 (S.D.N.Y. 2022).

It was not until approximately 2019 that the federal government finally prosecuted first Epstein and then Maxwell for the sex trafficking conspiracy. *See* OPR Report, pp. 27 n.38, 33, 44.

Serious questions remain about the failures of the FBI to investigate and stop the Epstein sex trafficking conspiracy, including –

- Why was absolutely nothing done in response to Ms. [REDACTED] 1996 report of Epstein's and Maxwell's sex trafficking and possible CSAM?
- Why were other repeated early complaints about Epstein to law enforcement ignored?
- Was law enforcement pressured to limit or truncate the Epstein investigation?
- Was law enforcement directed to cut Epstein loose to protect powerful public officials and businessmen who associated with Epstein or to protect Epstein's confidential informant status?
- Why did law enforcement give Epstein a pass on potential CSAM crimes by failing to obtain his computer equipment or by suspending the investigation?
- Why haven't the actions and inactions of the FBI regarding Epstein been investigated? Even the Florida Department of Law Enforcement investigated and reported on state law enforcement's handling of Epstein's wrongdoing ([Investigative Summary: Work Release | PDF | Prison | Criminal Record \(scribd.com\)](#)), but not the federal government.) -- but to date federal law enforcement has utterly failed to do so.

The FBI is said to hold itself to the highest of standards and integrity, grounding its initials in its motto of "Fidelity, Bravery and Integrity," and serving as the "lead agency for enforcing civil rights laws, aggressively investigat[ing] ... human trafficking and involuntary servitude...." <https://www.fbi.gov/history/seal-motto>; <https://www.fbi.gov/investigate/civil-rights>. The FBI grotesquely missed those marks as to [REDACTED], [REDACTED], and countless other sex trafficking survivors.

The FBI's Failure to Seriously Investigate Epstein's Possible CSAM Crimes

The FBI and other parts of federal law enforcement ignored the complaints of [REDACTED] and others regarding Epstein and Maxwell's production of sexually exploitive images of young girls.

In 2008, after child erotica was found in Epstein's Palm Beach home, law enforcement "prematurely" truncated their investigation of Epstein's computer hard drives which had been suspiciously removed from his Palm Beach estate immediately before a police raid. *See OPR Report*, p. 7.

In 2019, more child erotica was found displayed in Epstein's properties with additional images located in his NY home safe (e.g., search of Epstein's NY mansion unearthed a "'vast trove of lewd photographs' of young-looking girls, including hundreds of meticulously labeled nude pictures locked in a safe.'" [Jeffrey Epstein: Inside billionaire's New York mansion \(usatoday.com\)](#)). "CDs in the safe had hand-written labels, including "'Young [Name] + [Name],' 'Misc nudes 1,' and 'Girl pics nude,'" [Feds found 'vast trove' of nude photos in Jeffrey Epstein's safe \(nypost.com\)](#).

In March and April 2023, in federal litigation in New York, Epstein's Estate alerted the parties and the court about the possible existence of CSAM among images the Estate had just discovered. Exs. 4 and 5.

The Estate...advised counsel for the Government and Jane Doe1 of its concern that some of the Epstein Media might contain child sex abuse imagery ("CSAM"). The knowing accessing, possession, or distribution of CSAM is forbidden by federal law. *See* 18 U.S.C. §§ 2252, 2252A. The Estate has expressed concern that its counsel's review of the Epstein Media could subject counsel to criminal investigation or charges or civil claims....

Government of the United States Virgin Islands v. JPMorgan Chase Bank, N.A., Case No. 1:22-cv-10904-JSR, Stipulated Motion dated March 27, 2023, Ex. 5. (footnote omitted). On April 5, 2023, the federal district court issued an Order establishing a protocol for review of the images, calling for the Estate to be on alert for CSAM.

If, during the course of that review [of images], the Estate sees a particular recording that appears to contain possible CSAM, it shall promptly stop further review of that recording and notify the Federal Bureau of Investigation (“FBI”) or such other agency or entity as the FBI may direct of the recording’s existence. No CSAM shall be copied or transmitted to another party, except as directed by the FBI or other government agency.

Ex. 6. (Order April 5, 2023).

In response to [REDACTED] clear-eyed prescient 1996 FBI Report--and despite subsequent repeated red flags that Epstein trafficked girls, collected and possibly produced sexualized images of children--the FBI appears, for years, to have **done nothing** regarding reports of possible CSAM. All CSAM arising from the Epstein sex trafficking conspiracy, no matter when created, particularly materials that continue to be in circulation or that otherwise continue to be viewed, constitutes an ongoing victimization and imposes continued injury to survivor(s) depicted in the materials. *See Paroline v. U.S.*, 572 U.S. 434, 457 (2014) (“[E]very viewing of child pornography is a repetition of the victim’s abuse.”)

Circumstantial Evidence that Epstein Was Given Special Treatment

In 1981, Epstein reportedly left Bear Stearns abruptly after committing a possible Regulation D violation with rumors of him engaging in other illegal activities; nothing happened to him. *See [The Talented Mr. Epstein - Vicky Ward](#)*. Epstein subsequently worked with Steven Hoffenberg at Towers Financial who was prosecuted and imprisoned for bilking investors out of over \$450 million in a Ponzi scheme that was then the largest financial fraud in American history; nothing happened to Epstein. Instead, in 1992, the U.S. State Department rented Epstein a luxurious townhouse in New York City that had been seized from the Iranian government. [The State Department Once Rented A Townhouse Seized From Iran To Jeffrey Epstein — Then Sued Him For Subletting It \(buzzfeednews.com\)](#)

There has been rampant speculation for years that Epstein was a confidential government informant. Epstein has been connected with many high-level government and business elites who accompanied him on multiple trips on the

“Lolita Express” to the island of “Little St. Jeffs” and elsewhere, but these individuals have not been the subject of scrutiny. The FBI closed a forfeiture proceeding against Epstein noting that “Epstein... has provided information to the FBI as agreed upon.” [Jeffrey Epstein Part 06 of 08.pdf](#) (last page). Only recently, a new “trove of papers” revealed that “William Burns, [director of the Central Intelligence Agency](#) since 2021, had three meetings scheduled with Epstein in 2014 when he was deputy secretary of state...” [Jeffrey Epstein’s Private Calendar: CIA Director William Burns, Goldman Sachs’s Top Lawyer, Noam Chomsky - WSJ](#). Epstein told colleagues and friends that he was an intelligence asset. [Andrew’s Fixer: She’s the Daughter of Robert Maxwell and She’s Manipulating His Jetset Lifestyle \(unlimitedhangout.com\)](#). There is strong circumstantial evidence in the public domain that Epstein’s special relationship with the government explains the FBI’s failure to investigate or prosecute Epstein in 1996, the special treatment he received from 2005 to 2008, and the failure to investigate the possible wrongdoing of important public officials and powerful businessmen.

Unanswered Call for an FBI Investigation

By letter dated May 2, 2023, [REDACTED] attorneys sent a letter to the FBI and others calling for the federal government to investigate the FBI’s grotesque failure to investigate [REDACTED] 1996 complaint. Ex. 7. The FBI did not respond, nor did any other agency provide a substantive response.

The FBI’s Pattern of Failing to Seriously Investigate Dangerous or Life-Threatening Reports and the FBI’s Accountability

In recent years, the FBI has repeatedly failed to timely investigate grave threats of life and limb and, not surprisingly, accountability has resulted, including:

- Larry Nassar’s sex abuse of gymnasts –Two FBI agents in Indianapolis committed “fundamental errors” for not acting sooner on allegations of abuse. The FBI failed to respond to the allegations of abuse “with the utmost seriousness and urgency that they deserved and required” and violated FBI policy. *See* DOJ OIG Releases Report of Investigation and Review of the FBI’s Handling of Allegations of Sexual Abuse by Former USA Gymnastics Physician Lawrence Gerard Nassar (justice.gov); Inspector General Says F.B.I. Botched Nassar Abuse Investigation - The New York Times

(nytimes.com). Nassar victims filed a Notice of Claim seeking \$1 billion and, last year, the FBI expressed their interest in negotiating a resolution of these claims.

- The Parkland shooting -- A federal investigation revealed that the FBI had received credible threats in the months before the shooting. *See [Summary and Timeline Related to Parkland Shooting Investigation — FBI](#)* (House Judiciary Committee investigation). As the FBI explained regarding the Parkland shooting, “Under established protocols, the information provided by the caller should have been assessed as a potential threat to life. The information then should have been forwarded to the FBI Miami Field Office where appropriate investigative steps would have been taken.” [FBI Statement on the Shooting in Parkland, Florida — FBI](#). FBI employees were disciplined and Parkland victims were paid \$130 million. [Justice Department to Pay About \\$130 Million to Parkland Shooting Victims - The New York Times \(nytimes.com\)](#).
- The Charleston Church massacre -- The FBI’s lapses in background checks allowed the perpetrator, a self-proclaimed white supremacist who wanted to start a “race-war,” to buy the semiautomatic weapon used in the shootings. New background check procedures were instituted and approximately \$100 million in compensation was paid to victims. [Justice Department Announces Multi-Million Dollar Civil Settlement in Principle in Mother Emanuel Charleston Church Mass Shooting | OPA | Department of Justice](#).

Conclusion

After █████ 1996 FBI Report, and even after reports by █████ and many others starting in 2006, hundreds of girls and young women were sex trafficking by Epstein and Maxwell. █████ and █████, on behalf of themselves and others similarly situated, seek damages for their losses, including mental pain and suffering. For nearly a quarter of a century, the FBI’s repeated and continual failures, delays, and inaction allowed Epstein and others to continue, revamp, and expand –unabated – and virtually in plain sight -- their sex trafficking conspiracy and possible CSAM crimes.

11. Witnesses

The following individuals may have relevant information pertaining to the facts stated in the basis for this Claim:

1. [REDACTED]
2. Eric Fischl
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]
8. [REDACTED]
9. Sharon Churcher
10. [REDACTED]
11. [REDACTED]
12. [REDACTED]
13. [REDACTED]
14. [REDACTED]
15. [REDACTED]
16. Sergey Brin
17. Anne Wojcicki
18. Anne Regan
19. [REDACTED]
20. Miles Alexander
21. [REDACTED]
22. [REDACTED]
23. [REDACTED]
24. Former Palm Beach Police Chief [REDACTED]
25. Current or former FBI agents, employees, administrators, and/or representatives with knowledge about FBI protocols, guidelines, procedures and practices
26. [REDACTED] and other current and former FBI agents, employees, administrators, and/or representatives with knowledge about any investigations into the Epstein sex trafficking conspiracy, including any internal reviews or investigations into the FBI's

handling of information it received from [REDACTED] [REDACTED] and others relating to the Epstein sex trafficking conspiracy

27. [REDACTED] and other current and former federal prosecutors.
28. Detective Phelan and all other NYPD personnel with knowledge of [REDACTED] [REDACTED] 1996 report to the NYPD

This list is subject to expansion and change as more evidence and other information is revealed.