

From: "[REDACTED]" <[REDACTED]>
To: Jill Greenfield <[REDACTED]>, Kyle Phillips <[REDACTED]>
Cc: Louise Scott <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

Subject: RE: SDNY investigation [FFW-DOCS.FID6003375]

Date: Thu, 30 Jul 2020 18:05:34 +0000

Inline-Images: image002.png; image003.png; image004.jpg

Jill,

Thanks very much for being in touch, and we would welcome the opportunity to follow up on those topics. Would it work to schedule a call for Wednesday, August 12? We could do 4:00 p.m. London time (11:00 a.m. for us), if that would be convenient for you? And we can schedule it as a WebEx so we can see each other, if that's alright, or do it as a call if you prefer.

thanks,

[REDACTED]

From: Jill Greenfield <[REDACTED]>
Sent: Thursday, July 30, 2020 12:51
To: [REDACTED] <[REDACTED]>; Kyle Phillips <[REDACTED]>
Cc: Louise Scott <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: SDNY investigation [FFW-DOCS.FID6003375]

Thanks [REDACTED]

I have been in discussions with my client and we ought to be in a position to provide you with more information in the categories suggested. I am away next week but shall we schedule a call on my return, the week commencing 10th August?

Kind regards,

Jill

Jill Greenfield

Partner

D: [REDACTED]

M: [REDACTED]

[Click here for information relating to Covid-19 business impacts](#)

[REDACTED]



From: [REDACTED] <[REDACTED]>
Sent: Monday, July 20, 2020 4:19 PM

To: Jill Greenfield <[REDACTED]>; Kyle Phillips <[REDACTED]>
Cc: Louise Scott <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
[REDACTED] <[REDACTED]>
Subject: RE: SDNY investigation

Jill, Kyle,

Following up on our recent WebEx discussion, and with apologies for the slight delay, we wanted to get you a list of initial categories of question that we think might assist in your discussion with your client, with the goal of then doing an attorney proffer, or attorney summary, and discussing possible next steps.

We note that the below questions are simply general thoughts and suggestions—some may not need to be asked at all, others may prompt follow-up from you in the moment, etc. In any interviews with us, we ordinarily are guided both by the comfort level and the narrative of the witness, but we hope these give you a sense of what we would be interested in. We also note that we included questions about sexual contact because it is our very general understanding from you that abuse occurred, but we do not make any presumptions about what happened, if anything, separate from what your client recalls. On that note, as we've discussed, but to reiterate, if there are any questions or topics your client is uncomfortable addressing, there will be no pressure from us to do so, including at this early stage.

With those caveats, possible questions are below, and please let us know if it would be useful for us to chat again before you talk with your client, or otherwise please let us know when it would next be appropriate to check in.

Questions / topics:

- 1) General background queries: Where did you grow up? How far did you go in school? What is your date of birth? How generally would you describe your upbringing and early professional life?
- 2) How did you initially meet Ghislaine Maxwell and Jeffrey Epstein, and how old were you at that time? What was the nature of your work with them, and did the role change over time? How long did you work for Maxwell and/or Epstein?
- 3) In general, what kinds of tasks did you perform for Maxwell or Epstein, and in what locations? Did you travel with either of them? When you weren't traveling with them, where did you reside? Did you ever reside with Maxwell or Epstein? If so, where – in what locations and at which properties?
- 4) Did there come a time when Epstein and/or Maxwell engaged in sexual contact with you? If so, how did that happen the first time? Were there sexualized discussions or was there sexualized conduct leading up to any first incident?
- 5) Were there other instances when you experienced sexual abuse or sexual contact while working for Maxwell? If so, how did those incidents occur? Did they occur with Epstein alone, or was Maxwell ever directly involved in the sexual contact? Did Maxwell ever observe, or was she present for, sexual contact that she herself was not participating in? Were any other individuals present or participating?
- 6) Were you aware of any other girls or women who were subject to sexual abuse or contact by Epstein and/or Maxwell, and if so, who? Did you ever see Epstein or Maxwell involved in sexual or other intimate contact with other girls you believed or suspected may have been under the age of 18? And if so, under what circumstances (when, where, etc.)?
- 7) How did your interactions with Epstein and Maxwell end? Did either of them contact you or attempt to contact you when Epstein was under investigation in 2006-08? Did either of them contact you or attempt to contact you during the New York investigation in 2018-20? If so, what was the nature of that contact? When is the last time you spoke with or otherwise interacted with Epstein and/or Maxwell?

thank you,

[REDACTED]

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

Fieldfisher, Riverbank House, [REDACTED], London EC4R 3TT.

www.fieldfisher.com

We do not intend to change our bank details. If you receive any communication that any of our bank details have changed, telephone us and speak to your contact at our office before transferring any funds. We do not accept responsibility for monies paid into a wrong bank account in any circumstances.

This email and any attachments are confidential and may also be privileged. If you receive this message in error, please contact the sender immediately, destroy the email and any attachments and do not use, copy, store or disclose this email and any attachments for any purpose. Fieldfisher does not accept service of documents by electronic means without express prior agreement.

For details about what personal information we collect and why, please see our Privacy Notice on our website at www.fieldfisher.com.

Fieldfisher is the trading name of Fieldfisher LLP, a limited liability partnership registered in England and Wales (registered number OC318472) and is authorised and regulated by the Solicitors' Regulation Authority. A list of its members and their professional qualifications is available at its registered office, Riverbank House, [REDACTED], London EC4R 3TT. We use the term partner to refer to a member of Fieldfisher LLP or an employee or consultant with equivalent standing or qualifications.