



U.S. Department of Justice

Criminal Division

VAA:WHG:JEC:JTM

DOJ No. CRM-182-73090

Office of International Affairs

Washington, D.C. 20530

FROM: The Central Authority of the United States
TO: The Central Authority of the United Kingdom
SUBJECT: Request for Assistance in the Matter of the Prosecution of Ghislaine Maxwell
DATE: August 3, 2021

The Central Authority of the United States of America (“U.S.”) requests the assistance of the Central Authority of the United Kingdom (“UK”) under the 1994 Treaty on Mutual Legal Assistance in Criminal Matters between the U.S. and the UK, as amended by the 16 December 2004 Instrument and exchange of notes (“the Treaty”). The United States Attorney for the Southern District of New York and the Federal Bureau of Investigation (collectively the “U.S. authorities”) are prosecuting charges of violations of United States criminal law concerning Ghislaine Maxwell and her role in the sexual exploitation and abuse of multiple minor girls by Jeffrey Epstein from at least in or about 1994, up to and including at least in or about 2004. The U.S. authorities seek the following evidence from the UK: ~~British Airways travel records~~, school records, ~~and a birth certificate~~, and border entry and exit records.

The U.S. authorities may use the requested records and information in the U.S. criminal investigation and proceedings, as defined at Article 19 of the Treaty, and in other U.S. criminal investigations and proceedings, as well as non-criminal judicial or administrative proceedings

directly related to the U.S. criminal investigations and proceedings, pursuant to Article 7 of the Treaty.

PRIOR CONTACT WITH UK AUTHORITIES

~~U.S. authorities have been in communication with officers from the [name of UK law enforcement agency] including [officer name, title, and email address].~~

TIME CONSTRAINTS

Please ~~treat this request as urgent and~~ execute this request ~~it~~ on an expedited basis. Trial in the prosecution of *United States v. Ghislaine Maxwell* is scheduled to begin on November 29, 2021, with production of evidence required in advance of trial. Accordingly, the U.S. authorities seek to acquire material as requested herein as soon as possible, and no later than October 15, 2021.

CONFIDENTIALITY

Please treat this request as confidential. This request is sensitive in that it recounts specifics and evidentiary detail that may not be known, the exposure of which could impede the prosecution of Maxwell, and the U.S. authorities' ongoing investigation, with regard to the integrity of evidence and witness accounts. Premature notification of the existence of this request could ~~seriously~~ jeopardize the investigation or compromise the trial of Maxwell, by ~~prompting others to destroy or tamper with evidence; change patterns of behavior; causing others to~~ intimidate potential witnesses, or alert others who could do the same. Accordingly, pursuant to articles 4(3)(j) and 7 of the Treaty, please keep this request confidential and please ensure that neither its contents nor its subject matter are shared with any persons ~~(including the subjects of the investigation)~~, or with any government officials whose knowledge is not necessary for purposes of executing this request.

THE FACTS

U.S. citizen Jeffrey Epstein is alleged to have engaged in the sexual abuse of minor girls during the period of approximately 1994 through 2005. On or about July 2, 2019, a grand jury in the Southern District of New York returned an indictment charging Epstein with violations of U.S. criminal laws in connection with his sexual abuse of minors, including with engaging in a conspiracy to sexually traffic in minors. Epstein was arrested pursuant to the indictment on or about July 6, 2019, and ~~had been~~ was detained pending trial in New York. On or about August 10, 2019, Epstein committed suicide in his cell. Notwithstanding Epstein's death, the investigation that led to his indictment remains ongoing. That investigation has revealed evidence of additional criminal conduct by Epstein and his associates, including Ghislaine Maxwell.

On or about June 29, 2020, a grand jury in the Southern District of New York returned an Indictment charging Maxwell with violations of U.S. criminal laws in connection with her role in assisting, facilitating, and contributing to Epstein's sexual abuse of minors by, among other things, helping Epstein to recruit, groom, and ultimately abuse victims known to Maxwell and Epstein to be under the age of 18. Maxwell was arrested pursuant to the Indictment on or about July 2, 2020, and has been detained pending trial in New York since that date.

On or about March 29, 2021, a grand jury in the Southern District of New York returned a Superseding Indictment charging Maxwell with violations of U.S. criminal laws. The Superseding Indictment alleges that from at least in or about 1994, up to and including at least in or about 2004, Maxwell enticed and conspired with Epstein to entice and cause minor victims to travel to New York, which Maxwell knew and intended would result in their grooming and subjection to sexual abuse by Epstein. The Superseding Indictment also alleges that Maxwell participated in a sex trafficking conspiracy between approximately 2001 and 2004 and that Maxwell participated in the

sex trafficking of a minor, and aided and abetted the same. Finally, the Superseding Indictment also alleges that Maxwell provided false and perjurious statements, under oath, regarding, among other subjects, her role in facilitating the abuse of minor victims by Epstein.

The Superseding Indictment describes Maxwell's conduct as to four particular minor victims. Among other things, Maxwell groomed and befriended one of the minor victims, ██████████, in London, England between approximately 1994 and 1995, including during a period of time in which Maxwell knew that De Georgiou was under the age of 18. Maxwell introduced De Georgiou to Epstein in London and encouraged ██████████ to massage Epstein, knowing that Epstein would engage in sex acts with De Georgiou during those massages. Epstein and Maxwell invited ██████████ to travel with them to various places, including in the United States and Europe.

It is anticipated that ██████████ will testify at trial. U.S. authorities seek evidence from several sources to corroborate this testimony. First, U.S. authorities seek records of ██████████ attendance at Collingham College in London between 1994 and 1995 and the University of Oxford in Oxford during XXX. Second, U.S. authorities seek a copy of ██████████ birth certificate to establish her age at the time of the charged conduct. Third, U.S. authorities request records held by the UK government (including passport, border, and other records) reflecting any travel outside of the UK, and any entries into the UK, during 1994 and 1995, as well as documentation related to the destinations to which she travelled, and identifying information about any persons travelling with her. U.S. authorities note that ██████████ is cooperating with prosecutors in this case and has consented to the production of any responsive records.

THE OFFENSES

The criminal conduct being investigated currently implicates the following offenses. Note that pursuant to Articles 7 and 19 of the Treaty, U.S. authorities may determine that additional or different offenses may also be implicated in this matter:

Title 18, United States Code, Section 371 **Conspiracy**

If two or more persons conspire ... to commit any offense against the United States ... and one or more of such persons do any act to effect the object of the conspiracy, each shall [have committed a crime and be] imprisoned not more than five years.

Title 18, United States Code, Section 2423 **Transportation of Minors**

- (a) Transportation with intent to engage in criminal sexual activity
 - (1) A person who knowingly transports an individual who has not attained the age of 18 years in interstate or foreign commerce, or in any commonwealth, territory or possession of the United States, with intent that the individual engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, shall [have committed a crime and be] imprisoned not less than 10 years or for life.¹

Title 18, United States Code, Section 2422 **Coercion and Enticement**

- (1) (b) Whoever, using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States knowingly persuades, induces, entices, or coerces any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall [have committed a crime and be] imprisoned not less than 10 years or for life.²

Title 18, United States Code, Section 1591 **Sex Trafficking of Minors and by Force, Fraud, and Coercion**

- (a) Whoever knowingly –
 - (1) in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, recruits, entices, harbors,

¹ The penalties stated herein apply to conduct that occurred after July 27, 2006. For conduct that occurred prior to that time, the penalties would be lower and may not include mandatory minimum sentences.

² The penalties stated herein apply to conduct that occurred after July 27, 2006. For conduct that occurred prior to that time, the penalties would be lower and may not include mandatory minimum sentences.

transports, provides, obtains, advertises, maintains, patronizes, or solicits by any means a person; or

- (2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1), knowing, or, except where the act constituting the violation of paragraph (1) is advertising, in reckless disregard of the fact, that means of force, threats of force, fraud, coercion described in subsection (e)(2), or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall [have committed a crime].

(b) The punishment for an offense under subsection (a) is –

- (1) if the offense was effected by means of force, threats of force, fraud, or coercion ...or by any combination of such means, or if the person recruited, enticed, harbored, transported, provided, obtained, advertised, patronized, or solicited had not attained the age of 14 years at the time of such offense, by a fine under this title and imprisonment for any term of years not less than 15 or for life; or
- (2) if the offense was not so effected, and the person recruited, enticed, harbored, transported, provided, obtained, advertised, patronized, or solicited had attained the age of 14 years but had not attained the age of 18 years at the time of such offense, by a fine under this title and imprisonment for not less than 10 years or for life.³

Title 18, United States Code, Section 1623

Perjury

- (a) Whoever under oath (or in any declaration, certificate, verification, or statement under penalty of perjury as permitted under section 1746 of title 28, United States Code) in any proceeding before or ancillary to any court or grand jury of the United States knowingly makes any false material declaration or makes or uses any other information, including any book, paper, document, record, recording, or other material, knowing the same to contain any false material declaration, shall be fined under this title or imprisoned not more than five years, or both.

PERSONS AND ENTITIES INVOLVED

Name: Ghislaine Maxwell
Date of Birth: 25 December 1961
Place of Birth: Maison-Laffitte, France
Citizenship: U.S., UK, France

Name: Jeffrey Epstein
Date of Birth: 20 January 1953
Place of Birth: New York, United States

³ The penalties stated herein apply to conduct that occurred after July 27, 2006. For conduct that occurred prior to that time, the penalties would be lower and may not include mandatory minimum sentences.

Citizenship: U.S.
Name: [REDACTED]
Date of Birth: 04 March 1977
Place of Birth: United Kingdom
Citizenship: UK

ASSISTANCE NEEDED

Business Records

British Airways

Please provide all account information and travel records from British Airways for the following individuals:

- Ghislaine Maxwell*
- Jeffrey Epstein*
- [REDACTED]*

Records are requested for the period 1993 to 1999 and should include, but not be limited to, the following:

- Please provide any and all records, including but not limited to passenger, travel, payment, membership or loyalty records, or any other records, for each of the above-listed individuals.*

Collingham College

Please provide records demonstrating the enrollment and attendance of [REDACTED], including but not limited to registration paperwork and student files, reflecting the dates of enrollment at Collingham College (23, Collingham Gardens, London SW5) on or about DATES, for [REDACTED].

University of Oxford

Please provide records demonstrating the attendance of [REDACTED] at University of Oxford on or about DATES, including but not limited to application, registration

Commented [A1]: Do you know which college? that would assist.
Author

~~paperwork, and student files, reflecting the dates of application and enrollment at University of Oxford for [REDACTED].~~

Commented [A2]: This is too broad because it might include medical records and counselling records, which will sink this request.
Author

Official Records

Birth Certificate

Please provide a certified copy of a birth certificate of [REDACTED].

Travel/Border Records

~~Please provide all records held by the UK government (including passport, border, and other records) reflecting any travel outside of the UK, and any entries into the UK, during 1994 and 1995. With regard to such travel, U.S. authorities also request documents reflecting the destinations to which she travelled and identifying information about any persons travelling with her.~~

~~complete UK official records, including but not limited to of and/or from Her Majesty's Passport Office, as set forth below, for the period between 1993 and 1999:~~

- ~~• Documentation of any birth certificate, or other record or statement of birth, of [REDACTED]~~
- ~~• Documentation of any passports used by [REDACTED] to enter and/or exit the UK [and where De Georgiou traveled]; [not sure if this is something that Passport Office can provide?]~~

PROCEDURES TO BE FOLLOWED

Business Records

Under United States law, foreign business records are usually admitted into evidence in a proceeding in the United States after the party offering them proves, through the testimony at trial of a qualified witness, that:

1. the records produced are true and accurate copies of original records in the custody of the business;

2. the business made or kept the originals in the ordinary course of business and as a regular business practice; and
3. the originals were made, at or near the time of the occurrence of the transactions they record, by a person who either had knowledge of those transactions or received the information from a person with such knowledge.

The testimony of a qualified witness may be unnecessary at trial in the United States where that witness makes or provides a written declaration in a foreign jurisdiction (*i.e.*, the United Kingdom) that (1) contains essentially the same information noted in items 1-3 above and (2) subjects the witness to criminal penalties under the laws of the foreign jurisdiction if the declaration is false. Article 8(5) of the Treaty provides for such a declaration.

In accordance with Article 8 of the Treaty, please have the appropriate authorities in the United Kingdom do the following:

1. require each business official producing records to complete, and sign the attached Certificate of Authenticity of Business Records; and
2. attach the completed certificate to the corresponding records produced by the business official and transmit the records with certificate, through or as directed by the Central Authority for the United Kingdom, to the Office of International Affairs, U.S. Department of Justice.

In accordance with Article 10(2) of the Treaty, please invite each business official producing records to appear, if it should become necessary, at a date to be determined in December 2021, at the United States District Court for the Southern District of New York, 40 Foley Square, Courtroom 906, at the expense of the United States government, to testify at trial.

Please notify entities submitting responsive records that if they fail to complete the necessary certificate, U.S. authorities will need to seek a compelled interview and compelled trial testimony under the terms of the Treaty. Completing the necessary certificate will likely avoid the need for such an interview or testimony.

Official Records

Under United States law, foreign official records are usually admitted into evidence in a proceeding in the United States only after the party offering them proves, through a qualified witness who either gives testimony at trial or provides a certification, that:

1. the records are true and accurate copies of records maintained by a foreign government office or agency;
2. the foreign government office or agency is authorized by foreign law to maintain them; and
3. the foreign official providing the records is doing so in his or her official capacity.

Because a certification containing the information noted above is sufficient, please:

in accordance with Article 9(3) of the Treaty, have the appropriate custodian of official records complete the attached Attestation of Authenticity of Foreign Public Documents; and

attach the completed certificate to the corresponding records produced by the official and transmit the records with certificate, through or as directed by the Central Authority for the United Kingdom, to the Office of International Affairs, U.S. Department of Justice.

CONCLUSION

We thank you for your assistance with this matter of the prosecution of Ghislaine Maxwell and ask that you keep us apprised of all developments.

Date

Jason E. Carter
Associate Director
Office of International Affairs
Criminal Division
U.S. Department of Justice

CERTIFICATE OF AUTHENTICITY OF BUSINESS RECORDS

I, _____ (Name), attest on penalty of criminal punishment for false statement or false attestation that I am employed by _____ (Name of Business from which documents are produced) and that my official title is _____ (Official Title). I further state that each of the records attached hereto is the original or a duplicate of the original of records in the custody of _____ (Name of Business from which documents are produced). I further state that:

- A) such records were made at or near the time of the occurrence of the matters set forth, by (or from information transmitted by) a person with knowledge of those matters;
- B) such records were kept in the course of a regularly conducted business activity;
- C) the business activity made the records as a regular practice; and
- D) if any of such records is not the original, such record is a duplicate of the original.

_____ (Signature)

_____ (Date)

Sworn to or affirmed before me, _____ (Name), a _____ (notary public, judicial officer, etc.), this _____ day of _____, 20_____

ATTESTATION OF AUTHENTICITY OF FOREIGN PUBLIC DOCUMENTS

I, _____ (Name), attest on penalty of criminal punishment for false statement or attestation that my position with the Government of _____ (Country) is _____ (Official Title) and that in that position I am authorized by the law of _____ (Country) to attest that the documents attached and described below are true and accurate copies of original official records which are recorded or filed in _____ (Name of Office or Agency) which is a government office or agency of the Government of _____ (Country).

Description of Documents:

(Signature)

(Title)

(Date)