

Response to Follow Up Questions from 2/13/20 Attorney Proffer

Dear Counsel:

Below please find our reply, in no particular order, to your follow-up questions from the 2/13/20 attorney proffer. As we discussed, the same terms covering the attorney proffer govern these communications as well.

**Who told [REDACTED] to keep to herself, not ask questions and not to fraternize with those she encountered through her work with JE?**

When [REDACTED] was first hired, Ms. Maxwell told her not to fraternize with any of JE's business associates, friends, etc. It was Epstein who reprimanded [REDACTED] for breaking this rule when she appeared at the party, the details of which were set forth on 2/13. So, it was both Maxwell and Epstein who directed [REDACTED] not to fraternize and to stick to business

**[REDACTED] Qualifications for the job. Did she replace anyone? Who trained her? Were massages already on the agenda when [REDACTED] took over?**

Prior to working for JE, [REDACTED] had managed an office supply company for 9 years and then worked in the men's department at Nordstrom's selling clothes. This was a commission-based job and she did quite well. [REDACTED] placed her resume on Monster.com looking for a job in event planning. The headhunter Epstein had hired contacted [REDACTED], not to work for Epstein, but for a job with the NY Knicks as an event planner. Unfortunately, as a result of a large snowstorm LG could not get into the City from NJ and missed the Knicks opportunity (the position had been filled by the time she finally met with Russell, the headhunter.) Once Russell interviewed [REDACTED], he asked if she had time to go meet with someone who she could "event plan" for. [REDACTED] interviewed with Maxwell and then with Epstein and hired. [REDACTED] had not heard of JE prior to that time. [REDACTED] was trained by JE's then assistant, [REDACTED] [REDACTED]. [REDACTED] and others told [REDACTED] that massages were a part of JE's agenda --just part of his normal day. Akin to someone going daily to the gym. [REDACTED] remained in the company as a receptionist after [REDACTED] was hired and later became Ms. Maxwell's assistant after [REDACTED] left.

[REDACTED] was given no explicit instructions regarding massage appointments by [REDACTED]. Massage appointments were to be handled like any other appointments. [REDACTED] does not recall anything specific being discussed about the women. Massage appointments were a part of a normal day and were usually a daily occurrence.

Note: Correction to my proffer. [REDACTED] generally made 1-2 appointments for massages a day. I misstated that JE had 4 or more daily. [REDACTED] does not know if massages were being scheduled after hours after she left for home. Massages

were at times cancelled and rescheduled if JE got busy. [REDACTED] also scheduled massages.

**After JE pleaded guilty in FL, did [REDACTED] schedule massages?**

[REDACTED] was not asked to make massage appointments after his plea, and, to her memory, the word 'massage' was not used again.

**Does [REDACTED] remember the names of people who she scheduled massages with? Is there a list of names? When JE called to schedule a massage, if a person was a repeat masseuse, did JE just say call X? If the person was not available, did [REDACTED] ask the person if she had the name of a third party to do a massage? Who else made massage appointments?**

Names of the masseuses were usually by first name. JE provided [REDACTED] a name and a phone number. Once the name of any new contact was given, [REDACTED] was directed to always add the name and phone number to her company directory maintained on the computer. At times, masseuse(s) would have the same name, so for example, JE referred to X as Little X or Big X. [REDACTED] does not recall any names since there many names and the masseuses would come and go. If a person particular person requested by JE was not available [REDACTED] would inform JE. JE might ask [REDACTED] to call a different individual. At times, JE directed [REDACTED] to ask X (if she was unavailable) if she had a friend who was available. When [REDACTED] was away from the job for vacation, pregnancy, maternity leave, etc., [REDACTED], [REDACTED], [REDACTED] (before she left in approximately 2002/3) made all appointments, business, and otherwise. After the birth of [REDACTED] son in Dec. 2004, she was on maternity leave for 3 months. Upon her return, she worked only 3 days a week for several years.

**Did [REDACTED] ever work out of the mansion? Did [REDACTED] have a workspace or office there? Does [REDACTED] know who worked out of the house?**

[REDACTED] worked out of the Villard House at the Helmsley exclusively from day one until they moved the office to the 66<sup>th</sup> Street apartments around 2009. [REDACTED] worked out of the Palm Beach office twice in 2009 for approximately one day each visit. The offices moved to 575 Lexington Ave around 2010. [REDACTED] worked from the mansion from approximately 2012 (not sure) onward, but only when Epstein was in NY. Her office was on the first floor at the very front of the mansion. When Mr. Epstein was not in NY, she worked from home, which occurred over 50% of the time.

Mr. Epstein had staff at the mansion. Maid, Houseman, Engineer, Chef, other maids.

**During the time of JE's previous case, did anyone ask [REDACTED] to get rid of anything or is she aware of any other type of obstruction (even if it was not apparent at the time)?**

[REDACTED] was never asked to get rid of anything. They did upgrade the antiquated PC computer system over to Mac around 2009 and converted from BlackBerry phones to Apple iPhones.

Once they moved into the office at 575 Lexington Ave, at some point (she does not recall exactly when) old storage boxes with folders arrived from storage and were shredded by an "office helper" [REDACTED], who did odds and ends type of jobs for Epstein. At one time she was cleaning the apartments and the offices located at the apartment building at 301 East 66<sup>th</sup>. [REDACTED] does not know what was in the folders and was told it was time to get rid of very old files not worth paying to store.

**What was [REDACTED] impression of [REDACTED]? Maxwell? Did she discuss if she had had a relationship with Mr. Epstein? Ever say she was abused? Did she seem intimidated by him? Scared?**

[REDACTED] was hired as Epstein's traveling assistant sometime around 2002/3. [REDACTED] thought [REDACTED] was nice, responsible, organized and professional. [REDACTED] never discussed having a relationship with Epstein or being abused by him. [REDACTED] sure there were times [REDACTED] felt intimidated or scared if she made an error, but it was not discussed. Mr. Epstein was very demanding and could be very intense to everyone he worked with.

[REDACTED] thought both [REDACTED] and Maxwell were professional and treated her with respect. They both were busy people, and [REDACTED] recalls that Maxwell was building her brownstone when [REDACTED] was first hired. [REDACTED] didn't interact with her very much, and she believes that Maxwell was intimidated and scared of Epstein at times. [REDACTED] had no social relationship with either of them.

**Did [REDACTED] schedule massages for JE at locations other than NY?**

Sometimes in FL.

**Did [REDACTED] keep a directory/database of people I called for JE?**

Yes. They had a directory but it was a directory of everyone JE knew. [REDACTED] did not have a separate directory or database for just masseuses. As far as she can recall, everyone in the office had access to the directory and could add to it as well.

**When JE told [REDACTED] to schedule a massage, what was the time frame for the appointment? (i.e. that day? Next week?)**

Mostly that day. Sometimes the next day.

**At any time during the FL investigation, did [REDACTED] receive a subpoena? Was there any discussion with JE about it?**

[REDACTED] did receive a subpoena. She only knows it was handled and was not involved with the FL case/investigation. JE had one conversation with [REDACTED] about the case as relayed in the proffer. JE asked her if she knew about the case, and she replied she didn't need to know. JE said that someone was trying to blackmail him and apologized for the disruption it was causing to the office. JE also said that it was embarrassing.

**Were there any discussions with JE about future payments to [REDACTED] (i.e. in his will, if she left, retirement or otherwise)?**

No.

**Were there any conversations with JE or Maxwell re civil suits? Did they ever ask [REDACTED] to be dishonest in replying? How was she advised by JE or others? Aware of any obstructive conduct?**

[REDACTED] did not have any conversations with JE or Maxwell re civil suits. They never asked her to be dishonest, and never advised by him or others about the suit, and she is not aware of any obstructive conduct.

**What were the logistics of international and other flight travel arrangements? What travel agencies etc. were used?**

Travel was booked through a travel agency and on-line bookings for both international and domestic flights. (Shoppers Travel when she was first hired then Amex Centurion. Other agencies may have been used also but she cannot recall the names. Online services could be Orbitz, Travelocity, Google, etc. Epstein wanted the best pricing but also wanted exact times for flights to depart/land.)

Many times, people flew with Mr. Epstein on his private plane. Prior to JE's plea, most travel was done by other administrator in the office or by [REDACTED]. [REDACTED] may have booked a trip from time to time but usually was too busy to do so. After JE returned to the office around 2011, [REDACTED] still booked travel. Once [REDACTED] was married and left, Epstein had [REDACTED] and sometimes [REDACTED] booking travel. Approximately in 2016 (?) Epstein asked [REDACTED] to take over travel because he felt [REDACTED] was incompetent when it came to finding the best pricing for good flights. Epstein told [REDACTED] he wanted to hire a new person to take over handling all the travel, but he never found anyone.

**When did [REDACTED] leave JE's employ?**

[REDACTED] resigned end of July 2019. She felt betrayed and disgusted once the indictment came out.

**Before the arrest, was she already planning to leave?**

[REDACTED] considered leaving after the arrest in 2010. She perused websites and interviewed with a high-end staffing agency. After considering what was available, she realized her job offered a lifestyle flexibility that she could not replicate anywhere else. Epstein was still communicating with the same businesspeople, scientists, politicians etc., and she simply gave him the benefit of the doubt that he had done his time, etc. JE continued to claim it was all blackmail. Working from home, being a good mother and wife were and are the most important aspects in of her life. This job allowed her both a challenging, interesting job and still be an attentive mom and wife.

**What was [REDACTED] reaction to the charges?**

As discussed in the proffer, she felt used, and realized that despite what JE said to her about the previous case, she realized that the allegations were likely real and she felt betrayed. She had mixed emotions given the time she spent there. [REDACTED] felt that Epstein kept her in front of a curtain, a façade. She was a real executive assistant with real executive functions, but he used her to conceal his personal problems and predilections.

**Was [REDACTED] ever the subject of JE's abuse in any way?**

No.

**Did [REDACTED] ever observe JE acting inappropriately with women? Employees or others?**

No.

**Impression of JE's business? How did he make money?**

Epstein was a money manager. He managed Les Wexner's money and possibly other client's money. [REDACTED] thought he made money just on his own money by interest and trading.

**Was [REDACTED] represented in any way in the FL case where named in the non-prosecution provision?**

She met with Nate Dershowitz once, but does not recall any specific questions from him. She did not know she was in the non-prosecution agreement.

**How much time did [REDACTED] spend at the Palm Beach residence?**

None.

**Did LG ever visit other properties, New Mexico ranch, Little St. James Island, Great St. James island or the Paris residence?**

[REDACTED] never went to the ranch in New Mexico. As stated in the proffer, in or about 2002, when [REDACTED] and her husband went to London for vacation, Epstein suggested they go to Paris while abroad and stay in a guest room of his Paris apartment around. [REDACTED] and her husband also visited Little St. James island and had lunch there on a trip to Tortola for a wedding around 2002/3). Post 2014, [REDACTED] went to Little St. James island on two other occasions- to view construction work. Epstein was hoping [REDACTED] could help by following up with contractors and staff, organization and keeping things on schedule. [REDACTED] flew in, spent a few hours with "[REDACTED]," the island manager, then went back to St. Thomas to a hotel to have dinner and slept there. [REDACTED] was up early the next day to fly home. ([REDACTED] wanted to fly in/out same day but it is not possible with any of the airlines flight schedules). On her second trip, she visited Great St. James as well to view construction. She never went to the Palm Beach residence – only to the Palm Beach office on two or so occasions to work – for quick one-night trip.

**Clearing up a few points:**

2001-2009 (or 2008 when they), cash was always kept in the office in the accounting department while they worked out of the Villard house. Money would be messengered from the office in envelopes prior to Epstein's plea. [REDACTED] do not recall much, if any, messengering of money after he went to jail. Parenthetically, Epstein liked to use messengers and Fed Ex for everything, buying a book online, for example, he wanted to spend the money to expedite the delivery. He didn't want to wait for anything and had the money to pay for the fastest service available.) Money would be messengered per Epstein's directive to do so. [REDACTED] relayed to the accounting department that 'Y' amount should be messengered to X. Sometimes she would set up the messenger and sometimes the receptionist would set up the messenger. Either an address would be given to [REDACTED] by Epstein. Alternatively, [REDACTED], or the receptionist, would need to call X and ask where to messenger the envelope. [REDACTED] does not recall any masseuse or other persons ever coming to the office to pick up an envelope of money. There was never any discussion of prostitution or anything sexual that she heard. No one she saw appeared to be underage.

After 2011, [REDACTED] had an office at Mr. Epstein's mansion because he no longer had a recognizable 'office address' to work from. The office at 575 Lexington was like a We Work environment - lots of small businesses working out of small

offices. Epstein did not want to hold his meetings from the We Work atmosphere and wanted all his appointments to come see him at his mansion. [REDACTED] office was located at the front of the mansion. Generally, when someone entered the residence, he/she passed her office. When a visitor came to meet with Epstein, he would either go straight back to see him from the front door to the dining room where he held his meetings or he would wait in [REDACTED] office until JE was ready/available to meet with them. Due to where [REDACTED] desk was situated, if someone went straight back to the dining room, [REDACTED] would not see them.