

January 18, 2026

VIA E-MAIL

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, New York, New York 10007

bermanNYSDchambers@nysd.uscourts.gov

Re: *United States of America v. Jeffrey Epstein*

**RE: Request for Appointment of Special Master to Protect Victims and
Enforce DOJ Compliance with the Epstein Transparency Act**

Dear Judge Berman,

My name is Haley Robson. I am a survivor of Jeffrey Epstein's sex trafficking operation, and I write this letter on behalf of myself and numerous other survivors whose lives were forever changed by crimes that were enabled, facilitated, and concealed by powerful individuals who have yet to be held accountable.

Many of us have spoken publicly, at great personal cost, in support of the Epstein Transparency Act. I personally spoke at both press conferences on Capitol Hill and have been very outspoken in advocating for its passage, believing—as we all did—that once Congress acted, the Federal government would comply with the law and finally allow truth and accountability to prevail.

The Epstein Transparency Act required the Department of Justice to release records related to Jeffrey Epstein and his criminal enterprise within 30 days. That statutory deadline has long since passed. To date, the Department of Justice has failed to comply. When they began releasing documents, they posted hundreds of thousands of pages of documents that had already been publicly available for years. These documents did not provide us with the transparency and accountability that Congress intended or that we deserve as survivors.

We know that the Department of Justice still has failed to release the most important documents for transparency including:

- Hundreds of thousands of pages of emails other documents from computers that were taken from Jeffrey Epstein's email accounts during the 2018 and 2019 investigations into Epstein and Ghislaine Maxwell. We know these exist because even news organizations like Bloomberg have obtained and reported on them. How is the press releasing this type of evidence before the Department of Justice?
- Our victim interview statements from the first investigation in Florida and the later investigations in New York. We know that the Department of Justice has our FBI 302 statements. Why haven't those been released with our names redacted?

- The 53-page draft indictment and an 82-page prosecution memorandum prepared during the 2007 Florida investigation that we hope will help us understand how Jeffrey got away with what he did to all of us when we were kids in Florida. We deserve to know what crimes the government knew he had committed because they gave him his immunity deal in Florida.

As survivors, this failure is not merely procedural—it is deeply personal. Continued noncompliance perpetuates the same secrecy that allowed these crimes to continue unchecked for years. It reinforces the painful and all too familiar message that while the law governs ordinary people, it does not govern the government and the wealthy, powerful individuals whose actions enabled widespread abuse. We do not seek vengeance. We seek accountability, transparency, and equal application of the law, just like our Congress promised us through the Act.

Each survivor has already paid a tremendous price. Coming forward has required extraordinary courage, exposing ourselves to public scrutiny, retaliation, and lifelong emotional consequences. We did so with belief in our government and trusting that when Congress passed this law, the Executive Branch would honor it. Instead, we are met with continued delay, silence, and ongoing protection of identities that should no longer remain hidden.

Judge Berman, the way that you have correctly enforced the Crime Victims' Rights Act at every stage of the criminal process is something that we appreciate. We now respectfully ask the Court to intervene and require the Department of Justice to comply with the Epstein Transparency Act as enacted by Congress. The judiciary serves as a vital safeguard to ensure that no branch of government is above the law. When statutory mandates are ignored—particularly those intended to bring justice and transparency to victims—the integrity of our legal system is placed at risk.

We ask that the Court help ensure that the law is followed as written, that disclosures are complete and not improperly withheld or over-redacted with respect to those who are not survivors, and that continued delays or discretionary noncompliance do not further retraumatize us. Oversight would protect the integrity of the process while preserving the Court's authority and ensuring fairness to all parties.

We understand the seriousness of requesting judicial intervention and oversight. We do not make this request lightly. We make it because survivors have waited decades for truth to be acknowledged and for accountability to follow. We were promised transparency. We were promised action. We are still waiting.

We are asking this Court to help ensure that the law is enforced as written, without further delay, and without continued shielding of those who enabled or participated in these crimes.

Thank you for your time, your consideration, and your commitment to justice.

Respectfully,

Haley Robson