

Fact Witness Travel Request (Domestic Witness Travel)

AUSA, see instructions below.

To: SDNY Victim/Witness Unit

From: AUSA [REDACTED]

Date: August 16, 2021

Re: *United States v. Ghislaine Maxwell*

Court Docket No: 20 Cr. 330 (AJN)

USAO No: 2018R01618

Witness-1 Name: [REDACTED]

Witness-1 DOB: [REDACTED]

Witness-1 Address: [REDACTED]

Witness-1 TelNos [REDACTED]

Witness-1 e-mail: [REDACTED]

Witness-2 Name: [REDACTED]

Witness-2 DOB: [REDACTED]

Witness-2 Address: [REDACTED]

Witness-2 TelNos [REDACTED]

Witness-2 e-mail: [REDACTED]

Witnesses Needed to Appear in SDNY on Dates: August 25-27, 2021

Witness Needed to Appear for:

Trial () Date:

Grand Jury () Date:

Trial Prep (X) Dates: Both witnesses needed for prep on 8/25, 8/26, and 8/27

Estimated Dates Witness will Arrive: August 24, 2021

Depart: August 29, 2021

Is the person a Fact Witness and not an Expert Witness? (Yes/No): Yes for both

Current Federal Civilian or Military Employee? (Yes/No): No for both

Is the Witness Facing Criminal Charges? (Yes/No): No for both

Does the Witness Reside Outside the Continental United States? (Yes/No): No for both

Is this Witness a Victim-Witness? (Yes/No): Yes for both

No for [REDACTED]

Hotel Required? (Yes/No): Yes for both

Has the Witness advised you of any unusual travel expenses? (Yes/No): Yes

Unusual expenses of fact witnesses can include

- *special travel arrangements*
- *care for dependent child or incapacitated family member left at home*
- *kennel fees for pets*
- *necessary travel companion*
- *extra baggage (more than one bag)*

Please describe the unusual expense:

We are requesting that [REDACTED] husband and three minor children travel with [REDACTED] and [REDACTED] for this trip. The process of preparing to testify about years of childhood sexual abuse is extremely traumatizing for [REDACTED] and she relies heavily on her family, including her husband and mother, for emotional support. [REDACTED] has struggled significantly with flashbacks and relived trauma as a result of trial preparation and the significant extent of the sexual abuse she suffered at the hands of Jeffrey Epstein, so the presence of her husband and mother on this trip is essential for her wellbeing and ability to prep. [REDACTED] her husband, and [REDACTED] are the sole caretakers for [REDACTED] minor children. In order for [REDACTED] her husband, and [REDACTED] to travel together to New York, where we will prepare both [REDACTED] and [REDACTED] to testify at trial, they will also need to bring [REDACTED] minor children.

The husband's information is below:

Name: [REDACTED]
DOB: [REDACTED]
Address: [REDACTED]
TelNos: [REDACTED]
e-mail: [REDACTED]

Information for minor children is below:

Name: [REDACTED]
DOB: [REDACTED]

Name: [REDACTED]
DOB: [REDACTED]

Name: [REDACTED]
DOB: [REDACTED]

For Victim-Witness Coordinator:

1. (For UEFW other than travel, which must be itemized and approved in advance:) This UEFW is apparently within VWC approval authority and tentatively approved pending receipt(s) for UEFW expenses (Yes/No): _____

2. Other VWC comments:

VWC Initials and Date: _____

Instructions to AUSA:

- Use this form for all fact witnesses within the U.S. except government employees and military personnel, for whom a Request for Armed Forces or Government-Employee Witness should be used.
- For foreign witnesses, use the International Witness Travel Request. Complete an Early or Extended stay memo if the witness is being brought in more than 3 business days prior to court/GJ testimony.
- Witnesses may only be brought in under the FEWS appropriation for grand jury testimony that has been scheduled and where the witness is expected to testify before the grand jury; court testimony; or preparation for same. Any other witness travel, *e.g.*, for investigative interviews, must be covered by the investigating component from litigative funds. See Ed Tyrrell.
- *See generally* DOJ Instruction 1300.01.01 (approved 9/28/2018) and sources referenced therein.