

FY 2021 Large Case-Related Expenses Request Form

District: *Southern District of New York*

Point of Contact: [REDACTED], *Co-Chief, Money Laundering and Transnational Criminal Enterprises Unit*, [REDACTED]

Instructions: Please provide responses to the case specific questions below. Use a separate form for each request. E-mail completed form to:

Funds may be available for expenses incurred in connection with the identification, seizure, and forfeiture of assets in a pending judicial forfeiture case or USAO forfeiture matter. These expenses include all litigation expenses associated with civil forfeiture cases, and those litigation expenses associated with the forfeiture aspect of criminal forfeiture cases. Large case-related expense requests should be limited to expenses that exceed the annual allocation the district received from EOUSA for case-related expenses.

Before submitting this request, please confirm with your Budget Officer that the expense is eligible for payment from the Assets Forfeiture Fund.

Case Name: *In re Jeffrey Epstein*

1. Case Number: 2018R01618
2. Estimated Amount of Request: \$200,000
3. Specify Expense Type¹ and Amount Associated with Case:
 - Expense Type: Database Hosting/Discovery Costs
Expense Amount: \$100,000
 - Expense Type: Travel Expenses
Expense Amount: \$100,000
4. Estimated Amount of Forfeited Assets: \$100 million

Brief Synopsis of Case: Following the death of Jeffrey Epstein, this Office is investigating his co-conspirator Ghislaine Maxwell for possible violations of 18 U.S.C. § 2422 (coercion and enticement), 18 U.S.C. § 2423 (transportation and/or travel in interstate commerce for the purpose of engaging in illicit sexual contact with minors), and conspiracy to commit those

¹ Allowable Expense Types include: Case specific travel, forfeiture related subpoena costs, litigation consultant fees, discovery & deposition costs, transcription & translation fees, advertising & publication costs, lien & *lis pendens* fees, financial records production/reproduction costs, and court appointed fiduciaries.

Expense Types Not Reimbursable from the AFF: Expert/witness testimony or travel related expenses (may be allowed from FEW fund), office equipment, office supplies, salaries, or overtime.

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crimes, respectively. The investigation arises from conduct alleged to have occurred from in or about the 1990s. In parallel, we are considering filing civil forfeiture actions against Epstein properties used by Epstein and Maxwell to facilitate their criminal conduct, which are collectively worth in excess of \$100 million.

Epstein is alleged to have engaged in a years-long pattern of enticing minor girls to engage in sex acts, aided and abetted and facilitated by Maxwell. Epstein undertook this conduct in at least New York, Florida, the U.S. Virgin Islands, New Mexico, and certain cities abroad.

We estimate that there are at least 50 victims who were abused by Epstein in New York, Florida and elsewhere, and who currently live throughout the United States and abroad, and several whose abuse was facilitated by Maxwell. Significant investigative costs include significant travel to interview victims and witnesses, and data hosting and discovery support relating from voluminous records obtained from dozens of devices obtained via search warrants, among other discovery costs.