

FY 2020 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: [REDACTED]
2. Estimated Amount of Request: \$300,000
3. Specify Expense Type¹ and Amount Associated with Case:
 - Expense Type: Litigation fees
Expense Amount: \$200,000
 - Expense Type: Travel Expenses
Expense Amount: \$100,000
4. Estimated Amount of Forfeited Assets: \$100 million or more

Brief Synopsis of Case: This Office is investigating Jeffrey Epstein for possible violations of 18 U.S.C. § 1591 (sex trafficking of a minor), 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 through at least in or about 2007.

Epstein is alleged to have engaged in a years-long pattern of enticing minor girls to engage in sex acts, starting with massages and escalating to acts including sexual intercourse, often in exchange for money. He has undertaken this conduct in at least New York, Florida, the U.S. Virgin Islands, New Mexico, and certain cities abroad. Epstein was assisted by individuals, including employees, girlfriends and friends, in the recruitment and enticement of the minors, and he paid certain minors to recruit additional underage girls.

We estimate that there are at least 50 victims who were abused in New York, Florida and elsewhere, and who currently live throughout the United States and abroad. Significant investigative costs include frequent travel to interview victims and witnesses, and hiring a vendor to process voluminous paper records and media, among other costs.