

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED	)	
STATES VIRGIN ISLANDS	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case Number: 1:22-cv-10904-JSR
	)	
JPMORGAN CHASE BANK, N.A.	)	
	)	
Defendant/Third-Party Plaintiff.	)	
	)	
-----	)	
JPMORGAN CHASE BANK, N.A.	)	
	)	
Third-Party Plaintiff,	)	
	)	
v.	)	
	)	
JAMES EDWARD STALEY	)	
	)	
Third-Party Defendant.	)	
	)	

**DECLARATION OF MIMI LIU IN SUPPORT OF  
GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS'  
MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, Mimi Liu, declare under penalty of perjury as follows:

1. I am a member in good standing of the bars of the State of New York and the District of Columbia. I am one of the attorneys representing the Government of the United States Virgin Islands in the above-captioned action and have been admitted to this Court pro hac vice. I am a Member of the law firm of Motley Rice LLC, 401 9th Street NW, Suite 630, Washington, DC 20004. I am familiar with the facts set forth herein and if called as a witness, I could and would competently testify thereto. I submit this declaration and the attached Exhibits in support of the United States Virgin Islands' Motion for Partial Summary Judgment.

2. Attached hereto are true and correct copies of the following:

Exhibit Number	Description
Exhibit 1	Article by Kevin Breuninger, et al., <i>JPMorgan Prepared to Pay \$290 Million in Settlement with Jeffrey Epstein Victims</i> , CNBC (June 12, 2023), <a href="https://www.cnbc.com/2023/06/12/jpmorgan-reaches-settlement-with-epstein-victim-in-lawsuit.html">https://www.cnbc.com/2023/06/12/jpmorgan-reaches-settlement-with-epstein-victim-in-lawsuit.html</a> .
Exhibit 2	Document at <b>Bates JPM-SDNYLIT-W-00018180-00018196</b> produced by JPMorgan in this Action and marked as Cutler Exhibit 38 at deposition. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 3	Document at <b>Bates JPM-SDNYLIT-W-00002185-00002196</b> produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 4	Document at <b>Bates JPM-SDNYLIT-00184442-00184461, JPM-SDNYLIT-00184460-00184461 (excerpts)</b> produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 5	August 10, 2019, email, <b>Bates JPM-SDNYLIT-00154364</b> produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 6	Article by William K. Rashbaum, Benjamin Weiser, & Michael Gold, <i>Jeffrey Epstein Dead in Suicide at Jail, Spurring Inquiries</i> , N.Y. Times (Aug. 10, 2019) <a href="https://www.nytimes.com/2019/08/10/nyregion/jeffrey-epstein-suicide.html">https://www.nytimes.com/2019/08/10/nyregion/jeffrey-epstein-suicide.html</a> .
Exhibit 7	Document, “Risk Level & Designation Determination,” New York State Division of Criminal Justice Services, <a href="https://www.criminaljustice.ny.gov/nsor/risk_levels.htm#:~:text=Level%203%20(high%20risk%20of,threat%20to%20public%20safety%20exists)">https://www.criminaljustice.ny.gov/nsor/risk_levels.htm#:~:text=Level%203%20(high%20risk%20of,threat%20to%20public%20safety%20exists)</a> .
Exhibit 8	Document at <b>Bates EVCP0000006</b> produced by nonparty Epstein Victims Compensation Program (“EVCP”) in this Action, designated Confidential by the EVCP pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 9	Excerpt of Expert Report of Bridgette Carr, June 16, 2023. Designated Confidential pursuant to the Protective Order in this matter and filed under seal.

Exhibit 10	Document at <b>Bates LN_000001-000024</b> produced by a nonparty in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 11	Document at <b>JDoe_DBAG_010034-010044</b> produced by a nonparty in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 12	Document at <b>JDoe_DBAG_010023-010032</b> produced by a nonparty in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 13	Document at <b>Bates JDoe_JPMC_007438-007448</b> produced by Plaintiff Doe in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 14	Document at <b>Bates JDoe_JPMC_007449-007464</b> produced by Plaintiff Doe in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 15	Document at <b>Bates LC 000456-000476</b> produced by a nonparty in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 16	Creditor's Claim on behalf of Jane Doe 981: <i>In the Matter of the Estate of Jeffrey Epstein</i> , Superior Court of the Virgin Islands, March 12, 2020.
Exhibit 17	Creditor's Claim on behalf of [REDACTED] <i>In the Matter of the Estate of Jeffrey Epstein</i> , Superior Court of the Virgin Islands, November 26, 2019.
Exhibit 18	Complaint, <i>Jane Doe No. 2 v. Epstein</i> , No. 08-cv-80119 (S.D. Fla. Feb. 6, 2008).
Exhibit 19	Excerpt of Complaint, [REDACTED] <i>v. Epstein</i> , No. 10-cv-81111 (S.D. Fl. Sept. 17, 2010).
Exhibit 20	Complaint and Demand for Jury Trial, <i>Jane Doe No. 102 v. Epstein</i> , No. 09-cv-80656 (S.D. Fla. May 4, 2009).
Exhibit 21	First Amended Complaint, <i>Jane Doe 43 v. Epstein</i> , No. 17-cv-616 (S.D.N.Y. June 5, 2017).
Exhibit 22	Flight manifests at <b>Bates ESTATE_000454, ESTATE_000464, ESTATE_000466, ESTATE_000474, ESTATE_000500, ESTATE_000536</b> produced by nonparty The Estate of Jeffrey E. Epstein in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>

Exhibit 23	Flight manifests at <b>Bates ESTATE_000570-000572</b> produced by nonparty The Estate of Jeffrey E. Epstein in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 24	Excerpts of flight manifests at <b>Bates LV_000198, LV_000204-000206, LV-000256-000257</b> produced by nonparty Larry Visoski in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 25	Flight manifests at <b>Bates LV_000339-000340, LV_000362-00363, LV_000381-000382, LV_000391-000392, LV_000401-000402</b> produced by nonparty Larry Visoski in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 26	Flight manifests at <b>Bates LV_000423-000424, LV_000429-000430, LV_000473-000474, LV_000491-000492</b> produced by nonparty Larry Visoski in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 27	Document at <b>Bates JPM-SDNYLIT-W-00038289, JPM-SDNYLIT-W-00038401-00038408</b> produced by JPMorgan in this Action, designated confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 28	Excerpts of JPMorgan Chase Bank, N.A.'s Responses and Objections to Third-Party Defendant's (Staley) First Request for Admissions, No. 22-cv-10019-JSR, dated May 22, 2023.
Exhibit 29	Document at <b>Bates JPM-SDNYLIT-00128026-00128033</b> produced by JPMorgan in this Action, and previously marked as Pearn Exhibit 2 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 30	Document at <b>Bates JPM-SDNYLIT-00131915-00131916</b> produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 31	Due Diligence Report approved on April 14, 2011, <b>Bates JPM-SDNYLIT-00036570-00036578</b> produced by JPMorgan in this Action, and previously marked as Langford Exhibit 53 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>

Exhibit 32	Transcript excerpts of the <b>Deposition of Mary Casey</b> , taken April 7, 2023, in this Action. JPMorgan has withdrawn its initial designation of Confidential for the testimony contained in these excerpts.
Exhibit 33	Transcript excerpts of the <b>30(b)(6) Deposition of Senior Advisor, Risk and Compliance, Francis Pearn</b> , taken on March 29, 2023, in this Action. JPMorgan has withdrawn its initial designation of Confidential for the testimony contained in these excerpts.
Exhibit 34	Transcript excerpts of the <b>Deposition of Vice Chairman and Banker, Private Bank, William Marcus Sheridan</b> , taken on July 12, 2023, in this Action. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 35	Transcript excerpts of <b>Deposition of Private Bank Risk Manager, Kevin McCleerey</b> , taken on April 28, 2023, in this Action. JPMorgan has withdrawn its designation of Confidential for the testimony contained in these excerpts.
Exhibit 36	Transcript excerpts of <b>Deposition of former AML Compliance Manager, Maryanne Ryan</b> , taken May 24, 2023, in this Action, designated Confidential in part by JPMorgan pursuant to the Protective Order in this matter and filed under seal in part. <b>[Sealed in part]</b>
Exhibit 37	Due Diligence Report from Aug.-Sept. 2006, <b>Bates JPM-SDNYLIT-00037183-00037205</b> , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 17 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 38	Excerpt of Due Diligence Report requested February 22, 2011, <b>Bates JPM-SDNYLIT-00013546, JPM-SDNYLIT-00013551</b> , produced by JPMorgan in this Action, and previously marked as Langford Exhibit 49 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 39	Excerpts of JPMorgan Chase Bank, N.A.'s Responses and Objections to Plaintiff Government of the United States Virgin Island's First Request for Admissions, No. 1:22-cv-10904 (JSR) (S.D.N.Y.), dated May 17, 2023. JPMorgan initially designated this document as Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>

Exhibit 40	Article, <i>After long probe, billionaire faces solicitation charge</i> , The Palm Beach Post (July 26, 2006), previously marked as Erdoes Exhibit 9 at deposition in this Action.
Exhibit 41	Probable Cause Affidavit, Palm Beach Police Department, dated May 1, 2006, and previously marked as Langford Exhibit 15 at deposition in this Action. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 42	July 28, 2006, article from ABC News: The Blotter, <i>Warrants Were Prepared to Arrest Others in Millionaire Sex Scandal</i> , <b>Bates JPM-SDNYLIT-00269657-00269658</b> , produced by JPMorgan in the Action, designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 43	August 14, 2006, email, <b>Bates JPM-SDNYLIT-00105859</b> , produced by JPMorgan in this Action, and a <i>New York Post</i> article by Dan Mangan, <i>Mystery Mogul's Teen-Sex Secret Bared in Probe</i> , dated August 14, 2006, <a href="http://www.nypost.com/news/regionalnews/mystery_moguls_teen_sex_secret_bared_in_probeRegionalnews_dan_mangan.htm">http://www.nypost.com/news/regionalnews/mystery_moguls_teen_sex_secret_bared_in_probeRegionalnews_dan_mangan.htm</a> , accessed April 4, 2023, together previously marked as Casey Exhibit 11 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 44	AML Operations Human Trafficking Overview, <b>Bates JPM-SDNYLIT-00174047-00174061</b> , dated August 5, 2008, produced by JPMorgan in this Action, and is an excerpt of a document previously marked as Langford Exhibit 14 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation for this portion of Langford Exhibit 14.
Exhibit 45	September 22, 2006, email and attachment, <b>Bates JPM-SDNYLIT-00269393-00269403</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 46	Transcript excerpts of <b>Deposition of Third-Party Defendant James E. Staley</b> , taken on June 10-11, 2023, in this Action, designated Confidential in part by JPMorgan pursuant to the Protective Order in this matter and filed under seal in part. <b>[Sealed in part]</b>
Exhibit 47	July 26, 2006, email, <b>Bates JPM-SDNYLIT-00099334</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 8 at deposition.

	JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 48	Excerpts of Third-Party Defendant James E. Staley's Responses and Objections to United States Virgin Islands' First Set of Request for Admissions, dated May 22, 2023.
Exhibit 49	May 21, 2003, email, <b>Bates JPM-SDNYLIT-00137281</b> , produced by JPMorgan in this Action, and an article by Vicky Ward, <i>The Talented Mr. Epstein</i> , Vanity Fair (March 1, 2003), <a href="https://www.vanityfair.com/news/2003/03/jeffrey-epstein-200303">https://www.vanityfair.com/news/2003/03/jeffrey-epstein-200303</a> (accessed March 31, 2023), together previously marked as Casey Exhibit 4 at deposition. JPM-SDNYLIT-00137281 is stamped Confidential, but JPMorgan has withdrawn the designation
Exhibit 50	Document at <b>Bates JPM-SDNYLIT-W-00025790 - 00025790_003</b> , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 125 at deposition. Designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 51	Document at <b>Bates JPM-SDNYLIT-W-00025792 - 00025792_003</b> , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 126 at deposition. Designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 52	Document at <b>JPM-SDNYLIT-W-00025791 - 00025791_003</b> , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 127 at deposition. Designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 53	Presentation, "Human Trafficking," <b>Bates JPM-SDNYLIT-00151917-00151921</b> , produced by JPMorgan in this Action, and previously marked as Pearn Exhibit 8 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 54	Document at <b>Bates JPM-SDNYLIT-00174386-00174391</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 55	Document at <b>Bates JPM-SDNYLIT-W-00037475-00037476</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. [Sealed]

Exhibit 56	Expert Report of Jorge Amador, June 16, 2023. Designated Confidential pursuant to the Protective Order in this matter and filed under seal.
Exhibit 57	Index of account statements for Epstein's JPMorgan account ending in 0438, produced by JPMorgan in this Action.*
Exhibit 58	Index of account statements for Epstein's JPMorgan account ending in 1001, produced by JPMorgan in this Action.*
Exhibit 59	Index of account statements for Financial Trust's JPMorgan account ending in 0001, produced by JPMorgan in this Action.*
Exhibit 60	Index of account statements for Financial Trust's JPMorgan account ending in 5001, produced by JPMorgan in this Action.*
Exhibit 61	February 8, 2006, email, <b>Bates JPM-SDNYLIT-00449033</b> , produced by JPMorgan in this action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 62	Excerpts of JPMorgan Chase Bank, N.A.'s Responses and Objections to Plaintiff Doe's First Request for Admissions, Case No. 1:22-cv-10019, dated March 23, 2023.
Exhibit 63	Oct. 19-23, 2007, email thread with multiple attachments, <b>Bates JPM-SDNYLIT-00269651-00269660</b> , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 8 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 64	Account summary for account ending in 2810, <b>Bates JPM-SDNYLIT-00091213</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 65	Document at <b>Bates JPM-SDNYLIT-00104316-00104317</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]

\*For all account statements, the Government is producing an index rather than attaching these documents because they are voluminous (thousands of pages). The Government's SUF includes tables summarizing relevant information from the account statements. The Government will provide these documents to the Court at its request.

Exhibit 66	January 14, 2011, email and attachment, <b>Bates JPM-SDNYLIT-00152804-00152806</b> , produced by JPMorgan, and previously marked as Ryan Exhibit 34 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 67	Document at <b>Bates JPM-SDNYLIT-00149696-00149700</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 68	February 9, 2004, Due Diligence Report, <b>Bates JPM-SDNYLIT-00036564-00036569</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 6 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 69	Document at <b>Bates SDNYLIT-W-00041545-00041550</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 70	January 10, 2011, email, <b>Bates JPM-SDNYLIT-00152748_R</b> , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 28 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 71	Document entitled, "Human Trafficking Finance: Nature, Scope and Control Project," November 2010. <b>Bates JPM-SDNYLIT-00173973-00173992</b> , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 38 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 72	John Carney, <i>Meet [REDACTED] Star Girl of the Raunchiest Part of Epstein Scandal</i> , Dealbreaker (July 28, 2006), <a href="https://dealbreaker.com/2006/07/meet-[REDACTED]-star-girl-of-the-raunchiest-part-of-epstein-scandal">https://dealbreaker.com/2006/07/meet-[REDACTED]-star-girl-of-the-raunchiest-part-of-epstein-scandal</a> , accessed July 1, 2023.
Exhibit 73	March 8, 2007, email and attachment, <b>Bates JPM-SDNYLIT-00001494-00001496</b> , produced by JPMorgan in this Action and previously marked as Casey Exhibit 15. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>

Exhibit 74	June 9, 2010, email, <b>Bates JPM-SDNYLIT-00008237-00008240</b> , produced by JPMorgan in this action, and previously marked as Casey Exhibit 35 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation while retaining its original redactions to the document.
Exhibit 75	Document at <b>Bates JPM-SDNYLIT-00026318</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 76	Oct. 17, 2006 Rapid Response Team memorandum, <b>Bates JPM-SDNYLIT-00127953</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 3 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 77	Transcript excerpts of the <b>Deposition of Risk Manager, Bonnie Perry</b> , taken May 10, 2023, in this Action, designated Confidential in part by JPMorgan pursuant to the Protective Order in this matter and filed under seal in part. <b>[Sealed in part]</b>
Exhibit 78	Document at <b>Bates JPM-SDNYLIT-W-00021995-00021996</b> , produced by JPMorgan in this Action, and previously marked as DeLuca Exhibit 29 at deposition. Designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 79	Currency Transaction Reports, produced by third-party the Financial Crimes Enforcement Network (“FinCEN”) in this Action. **
Exhibit 80	July 16, 2008, email and attachment, <b>Bates JPM-SDNYLIT-00269718-00269719</b> , produced by JPMorgan in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 81	Document at <b>Bates JPM-SDNYLIT-W-00021932-00021937</b> , produced by JPMorgan in this Action, and previously marked as McCleerey Exhibit 13 at deposition. Designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 82	Document at <b>Bates JPM-SDNYLIT-W-00021965-0021966</b> , produced by JPMorgan in this Action, and previously marked as Ryan Exhibit 23 at Deposition. JPMorgan initially designated this document Confidential pursuant

\*\*The Government is producing an index rather than attaching the currency transaction reports because they are voluminous (nearly 700 pages). The Government's SUF includes tables summarizing relevant information from the currency transaction reports. The Government will provide these documents to the Court at its request.

	to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 83	July 19, 2013, email, <b>Bates JPM-SDNYLIT-00100966</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 30 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 84	January 7, 2011, Rapid Response Team memo, <b>Bates JPM-SDNYLIT-00127930-00127932</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 24 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 85	Document at <b>Bates JPM-SDNYLIT-00230825-00230830</b> , produced by JPMorgan in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 86	Document at <b>Bates JPM-SDNYLIT-00036884-00036890</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 87	Document at <b>Bates JPM-SDNYLIT-W-00019086-00019096</b> , produced by JPMorgan in this Action, and previously marked as McCleerey Exhibit 33 at deposition. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 88	Transcript excerpts of <b>Deposition of former CEO of Private Bank John Duffy</b> , taken July 13, 2023, in this Action. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 89	Document at <b>Bates JPM-SDNYLIT-00006049-00006050</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 90	November 9, 2010, email, <b>Bates JPM-SDNYLIT-00010814-0001080815</b> , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 37 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>

Exhibit 91	July 26, 2006, email, <b>Bates JPM-SDNYLIT-00099335</b> , produced by JPMorgan in this Action, and <i>Palm Beach Post</i> article by Larry Keller, <i>After long probe, Palm Beach billionaire faces solicitation charge</i> , published July 26, 2006, at <a href="http://www.palmbeachpost.com/pbccentral/content/local_new/epaper/2006/07/26/slb_EPSTEIN_0726.html">http://www.palmbeachpost.com/pbccentral/content/local_new/epaper/2006/07/26/slb_EPSTEIN_0726.html</a> , accessed March 15, 2023 through <a href="https://web.archive.org/web/20060929041447/">https://web.archive.org/web/20060929041447/</a> , together previously marked as Casey Exhibit 5 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 92	September 20, 2007, emails, <b>Bates JPM-SDNYLIT-000099500, JPM-SDNYLIT-000099501, JPM-SDNYLIT-00390951, JPM-SDNYLIT-00390952</b> , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 14. JPMorgan initially designated these documents Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the documents are filed under seal in part. <b>[Sealed in part]</b>
Exhibit 93	June 17, 2013, email and attachment, <b>Bates JPM-SDNYLIT-00194342-00194344</b> , produced by JPMorgan in this Action, and previously marked as DeLuca Exhibit 23 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 94	Jeffrey Epstein's 2007 Non-Prosecution Agreement, <b>Bates JDoe_JPMC_003010-003023</b> , produced by Plaintiff Jane Doe in this Action, and previously marked as Erdoes Exhibit 39 in deposition.
Exhibit 95	Oct. 10, 2007, email and attachment, <b>Bates JPM-SDNYLIT-00099526-00099528</b> , produced by JPMorgan in this Action, and previously marked as McCleerey Exhibit 6 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 96	July 1, 2008, email and attachment, <b>Bates JPM-SDNYLIT-00002952-00002955</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 17 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 97	July 15, 2008, email and multiple attachments, <b>Bates JPM-SDNYLIT-00003026-00003035</b> , produced by JPMorgan in this Action, and previously

	marked as Casey Exhibit 27 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 98	Sept. 9, 2010, email, <b>Bates JPM-SDNYLIT-00229703</b> , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 9 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 99	Transcript excerpts of the <b>Deposition of former General Counsel Stephen Cutler</b> , taken May 24, 2023, in this Action. Designated Confidential in part by JPMorgan pursuant to the Protective Order in this matter and filed under seal in part. [Sealed in part]
Exhibit 100	March 16, 2011, email, <b>Bates JPM-SDNYLIT-00274527-00274531</b> , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 29 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 101	Oct. 6, 2007, article, <b>Bates JPM-SDNYLIT-00036593</b> , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 24 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 102	Oct. 26, 2007, email, <b>Bates JPM-SDNYLIT-00001962-00001965</b> , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 23 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 103	Document at <b>Bates JPM-SDNYLIT-00002155</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 104	July 31, 2010, email, <b>Bates JPM-SDNYLIT-00100251</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 23 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 105	Document at <b>Bates JPM-SDNYLIT-00011902</b> , produced by JPMorgan in this Action, designated confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 106	August 4, 2010, article, <b>Bates JPM-SDNYLIT-00036596-00036598</b> , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 13 at deposition. JPMorgan initially designated this document Confidential pursuant

	to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 107	March 7, 2011, email and attachment, <b>Bates JPM-SDNYLIT-00013499-00013500</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 26 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 108	Document at <b>Bates JPM-SDNYLIT-00751685</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 109	Document at <b>Bates JPM-SDNYLIT-00751686</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 110	Article by Dareh Gregorian, <i>Second Girl Sues Mogul</i> , New York Post (February 7, 2008), <a href="https://nypost.com/2008/02/07/second-girl-sues-mogul/">https://nypost.com/2008/02/07/second-girl-sues-mogul/</a> (accessed July 11, 2023).
Exhibit 111	Intentionally left blank.
Exhibit 112	Due Diligence Report, <b>Bates JPM-SDNYLIT-00036258-00036263</b> , produced by JPMorgan in this Action, and previously marked as Pearn Exhibit 17 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 113	October 22 – December 21, 2010, email thread, <b>Bates JPM-SDNYLIT-00194018-00194021</b> , produced by JPMorgan in this Action, and previously marked as DeLuca Exhibit 7 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 114	December 22, 2010, email, <b>Bates JPM-SDNYLIT-00152738-00152742</b> , produced by JPMorgan, and previously marked as DeLuca Exhibit 8 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 115	December 23, 2010, email, <b>Bates JPM-SDNYLIT-00204777</b> , produced by JPMorgan in this Action, and previously marked as DeLuca Exhibit 10 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation while retaining its original redactions to the document.

Exhibit 116	January 4, 2011, email, <b>Bates JPM-SDNYLIT-00011967-00011968</b> , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 40 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 117	January 6, 2011, email, <b>JPM-SDNYLIT-00194062-00194063</b> , produced by JPMorgan in this Action, and previously marked as Ryan Exhibit 6 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 118	January 10, 2011, email and attachments, <b>JPM-SDNYLIT-00157065_R-00157082</b> , produced by JPMorgan in this Action, and previously marked as Ryan Exhibit 8 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 119	Transcript excerpts of the <b>Deposition of former head of Compliance at JPMorgan, William Langford</b> , taken on May 3, 2023, in this Action. JPMorgan has withdrawn its designation of Confidential for the testimony contained in these excerpts.
Exhibit 120	Transcript excerpts of the <b>Deposition of the Former Managing Director, Global FIU Investigations, Phillip DeLuca</b> , taken on April 19, 2023, in this Action. JPMorgan has withdrawn its designation of Confidential for the testimony contained in these excerpts.
Exhibit 121	March 12, 2013, email, <b>Bates JPM-SDLIT-00194272-00194273</b> , produced by JPMorgan in this Action, and previously marked as DeLuca Exhibit 22 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 122	“Bear Stearns Collapses, Sold to J.P. Morgan Chase,” available: <a href="https://www.history.com/this-day-in-history/bear-stearns-sold-to-j-p-morgan-chase">https://www.history.com/this-day-in-history/bear-stearns-sold-to-j-p-morgan-chase</a> , accessed June 23, 2023.
Exhibit 123	Transcript excerpts of the <b>Deposition of CEO of Asset Wealth Management, Mary Erdoes</b> , taken March 15, 2023, in this Action, designated confidential in part by JPMorgan pursuant to the Protective Order in this matter and filed under seal in part. <b>[Sealed in part]</b> .
Exhibit 124	Due Diligence Report, <b>Bates JPM-SDNYLIT-00037171-00037177</b> , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 34 at deposition. JPMorgan initially designated this document Confidential pursuant

	to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 125	Document at <b>Bates JPM-SDNYLIT-00373074-00373076</b> , produced by JPMorgan in this Action, designated confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 126	Arthur Middlemiss LinkedIn Profile, <a href="https://www.linkedin.com/in/arthur-middlemiss-341a6b11/">https://www.linkedin.com/in/arthur-middlemiss-341a6b11/</a> .
Exhibit 127	January 10, 2011, email, <b>JPM-SDNYLIT-00157192-00157193</b> , produced by JPMorgan in this Action, and previously marked as Langford Exhibit 37 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation while retaining its original redactions to the document.
Exhibit 128	Document at <b>Bates JPM-SDNYLIT-00373247</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 129	Document at <b>Bates JPM-SDNYLIT-00373248-00373252</b> , produced by JPMorgan in this Action, designated confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 130	Aug. 27, 2006, email, <b>Bates JPM-SDNYLIT-00099337</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 1.0 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 131	Document at <b>Bates JPM-SDNYLIT-00106627</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 132	Article, <i>The Truth About Jeffrey Epstein and 'Vanity Fair'</i> , posted by Chaire, <a href="http://www.gawker.com/302773/the-truth-about-jeffrey-epstein-and-vanity-fair">http://www.gawker.com/302773/the-truth-about-jeffrey-epstein-and-vanity-fair</a> , accessed June 27, 2023.
Exhibit 133	May 28, 2008, email, <b>Bates JPM-SDNYLIT-00134475</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 44 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 134	Article by John M. Cunningham, <i>Miley Cyrus</i> , <a href="http://www.britanica.com/biography/Miley-Cyrus">http://www.britanica.com/biography/Miley-Cyrus</a> , accessed July 12, 2023.

Exhibit 135	February 9, 2011, email, <b>Bates JPM-SDNYLIT-00453044</b> , produced by JPMorgan in this Action, and previously marked as Ryan Exhibit 13 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 136	Article, <i>Law &amp; Order Commemorates Jeffrey Epstein's Taste for Teen Hookers</i> , Gawker, <a href="https://www.gawker.com/5751094/law--order-commemorates-jeffrey-epsteins-taste-for-teen-hookers">https://www.gawker.com/5751094/law--order-commemorates-jeffrey-epsteins-taste-for-teen-hookers</a> , accessed June 30, 2023.
Exhibit 137	November 29, 2011, email, <b>Bates JPM-SDNYLIT-00100689</b> , produced by JPMorgan in this Action, and previously marked as DeLuca Exhibit 20 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 138	June 17, 2013, email, <b>Bates JPM-SDNYLIT-00100935-00100936</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 29 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 139	September 13, 2012, email, <b>Bates JPM-SDNYLIT-00755203</b> , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 19 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 140	July 10, 2010, email, <b>Bates JPM-SDNYLIT-00008669-00008670</b> , produced by JPMorgan in this Action, and marked as Staley Exhibit 35 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 141	January 23, 2008, email, <b>Bates JPM-SDNYLIT-00006171</b> , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 11 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 142	September 1, 2009, email, <b>Bates ESTATE_JPM002773</b> , produced by nonparty The Estate of Jeffrey E. Epstein in this Action, and previously marked as Staley Exhibit 36 at Deposition. The Estate initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 143	December 20, 2009, email and attachment, <b>Bates JPM-SDNYLIT-00006791-00006792</b> , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 37 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn

	the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 144	Document at <b>Bates JPM-SDNYLIT-00901998-00902019</b> , produced by JPMorgan in this Action, and marked Staley Exhibit 21 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 145	December 5, 2009, email and attachment, <b>Bates JPM-SDNYLIT-00006715-00006716</b> , produced by JPMorgan in this Action, and marked as Staley Exhibit 38 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 146	Document at <b>Bates JPM-SDNYLIT-00006718-00006719</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 147	Department of Financial Services announcement: "Superintendent Lacewell Announces DFS Imposes \$150 Million Penalty on Deutsche Bank in Connection with Bank's Relationship with Jeffrey Epstein and Correspondent Relationships with Danke Estonia and FBME Bank." Previously marked as Cutler Exhibit 39 at deposition.
Exhibit 148	Consent Order, <i>In the Matter of Deutsche Bank AG, et al.</i> , New York State Department of Financial Services, signed July 6, 2020. Previously marked as Cutler Exhibit 40 at deposition.
Exhibit 149	Excerpt of document at <b>Bates JPM-SDNYLIT-00921097</b> , produced in Excel format by JPMorgan in the Action. This excerpt was created to show relevant rows and columns by filtering for specific "Beneficiary_Normalized" entries and by hiding multiple columns. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 150	Bank statement for account ending in 6312, <b>Bates JPM-SDNYLIT-00085024-00085031</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 151	Bank statement for account ending in 4324, <b>Bates JPM-SDNYLIT-00076877-00076880</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]

Exhibit 152	Index of account statements for Epstein's JPMorgan account ending in 0663, produced by JPMorgan in this Action.*
Exhibit 153	Index of account statements for The C.O.U.Q. Foundation's JPMorgan account ending in 1565, produced by JPMorgan in this Action.*
Exhibit 154	Compilation of wire instructions, <b>Bates JPM-SDNYLIT-00095431-95432; JPM-SDNYLIT-00095431-95432; JPM-SDNYLIT-00095471; JPM-SDNYLIT-00095709; JPM-SDNYLIT-00096355; JPM-SDNYLIT-00097240; JPM-SDNYLIT-00097437-97438; JPM-SDNYLIT-00097820-97821</b> , produced by JPMorgan in this Action. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 155	Account statement summary for account ending in 4810, <b>Bates JPM-SDNYLIT-00091214</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 156	Documents related to Epstein's 2012 gift tax return, <b>Bates MP-00000778-00000832832</b> , produced by nonparty Marks Paneth in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 157	November 20, 2012, Private Bank Client Cash Transaction Guidelines, <b>Bates JPM-SDNYLIT-00130224-00130226</b> , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 32 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 158	Excerpt of document, <b>Bates JPM-SDNYLIT-W-00017133 – W-00017134, JPM-SDNYLIT-W-00017206 – W-00017210</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 159	Document at <b>Bates JPM-SDNYLIT-W-00000001-00000002, JPM-SDNYLIT-W-00000175-00000182 (excerpts)</b> , produced by JPMorgan in this Action, previously marked as Dimon Exhibit 132 at deposition. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 160	Transcript excerpts of the <b>Deposition of former Private Banker Paul Morris</b> taken April 18, 2023, in this Action. Designated Confidential in part by JPMorgan pursuant to the Protective Order in this matter and filed under seal in part. <b>[Sealed in part]</b>

Exhibit 161	Document, "Wealth Management Top 25 Investor Clients," <b>Bates JPM-SDNYLIT-00133088</b> , produced in Excel format by JPMorgan in this Action, and previously marked as Staley Exhibit 3 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 162	October 2, 2006, email, <b>Bates JPM-SDNYLIT-00001091-00001099</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 5 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 163	April 20, 2004, email, <b>Bates JPM-SDNYLIT-00105030</b> , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 9 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 164	February 24, 2005, email, Bates <b>JPM-SDNYLIT-00448615-00448616</b> , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 5 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 165	July 15, 2008, Rapid Response Team memorandum, <b>Bates JPM-SDNYLIT-00127944</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 18 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 166	Document at <b>Bates JPM-SDNYLIT-00003755-00003758</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 167	Document at <b>Bates JPM-SDNYLIT-00011654-00011655</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 168	Document at <b>Bates JPM-SDNYLIT-00754975-00754979</b> , produced by JPMorgan in this Action, and previously marked Staley Exhibit 4 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>

Exhibit 169.	July 3, 2013, email, <b>Bates JPM-SDNYLIT-00029230</b> , produced by JPMorgan in this Action, and previously marked as Nelson Exhibit 7 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 170	Document at <b>Bates JPM-SDNYLIT-00394015-00394017</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 171	Transcript excerpts of the <b>Deposition of Justin Nelson</b> , taken April 21, 2023, in this Action. JPMorgan has withdrawn its designation of Confidential for the testimony contained in these excerpts.
Exhibit 172	Third-Party Defendant James E. Staley's Responses and Objections to the Government of the United States Virgin Islands' First Set of Interrogatories, dated April 20, 2023.
Exhibit 173	January 23, 2008, email, <b>Bates JPM-SDNYLIT-00002152</b> , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 113 at deposition. JPMorgan initially designated this document as Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 174	June 5, 2009, email, <b>Bates JPM-SDNYLIT-00005959</b> , produced by JPMorgan in this Action. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 175	Excerpt of document at <b>Bates JPM-SDNYLIT-00907707</b> , produced in Excel format produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this Matter and filed under seal. <b>[Sealed]</b>
Exhibit 176	June 18, 2009, email, <b>Bates JPM-SDNYLIT-00006005</b> , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 101 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 177	Document at <b>Bates JPM-SDNYLIT-00004763</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 178	Document at <b>Bates JPM-SDNYLIT-00007534-00007535</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>

Exhibit 179	Document at <b>Bates JPM-SDNYLIT-00007970</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 180	Document at <b>Bates JPM-SDNYLIT-00009703</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 181	December 2, 2010, email, <b>Bates ESTATE_006071</b> , produced by nonparty The Estate of Jeffrey E. Epstein. The Estate initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 182	Document at <b>Bates JPM-SDNYLIT-00011808</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 183	November 23, 2013, email, <b>Bates JPM-SDNYLIT-00153462-00153463</b> , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 13 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 184	Document at <b>Bates JPM-SDNYLIT-00102986</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 185	Document at <b>Bates JPM-SDNYLIT-00102892-00102893</b> , produced by JPMorgan in this Action, and previously marked Casey Exhibit 10 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 186	Document at <b>Bates JPM-SDNYLIT-00000184_R-00000186_R</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 187	Document at <b>Bates JPM-SDNYLIT-00099558-00099560</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 188	Documents at <b>Bates SB-0001-0006</b> , produced by nonparty Sergey Brin in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed]

Exhibit 189	Documents at <b>Bates AUBURN-001-AUBURN-024</b> , produced by nonparty Larry Page in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b> .
Exhibit 190	July 23, 2014, KYC Summary, <b>Bates JPM-SDNYLIT-00902708-00902714</b> , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 10 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 191	Document at <b>Bates JPM-SDNYLIT-00449185</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 192	Document at <b>Bates JPM-SDNYLIT-00390515</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 193	Document at <b>Bates JPM-SDNYLIT-00390516</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 194	Document at <b>Bates JPM-SDNYLIT-00390517</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 195	Document at <b>Bates JPM-SDNYLIT-00390519</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 196	October 26, 2006, email, <b>Bates JPM-SDNYLIT-00099356</b> , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 9 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 197	Document at <b>Bates JPM-SDNYLIT-00390520-00390521</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 198	Document at <b>Bates JPM-SDNYLIT-00390522-00390523</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 199	Document at <b>Bates JPM-SDNYLIT-00390590-00390591</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>

Exhibit 200	Document at <b>Bates JPM-SDNYLIT-00099423</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 201	Document at <b>Bates JPM-SDNYLIT-00134152</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 202	Document at <b>Bates JPM-SDNYLIT-00449668</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 203	Document at <b>Bates JPM-SDNYLIT-00449669-00449672</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 204	Document at <b>Bates JPM-SDNYLIT-00390671</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 205	January 31, 2007, email, <b>Bates JPM-SDNYLIT-00390720</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 206	Document at <b>Bates JPM-SDNYLIT-00449037-00449038</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 207	Mahmoud Difrawy LinkedIn Profile, available at: <a href="https://www.linkedin.com/in/mahmoud-difrawy-41889529/?originalSubdomain=uk">https://www.linkedin.com/in/mahmoud-difrawy-41889529/?originalSubdomain=uk</a> .
Exhibit 208	Document at <b>Bates JPM-SDNYLIT-00006724-00006725</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 209	December 8, 2009, email, <b>Bates ESTATE_JPM002897</b> , produced by nonparty The Estate of Jeffrey E. Epstein in this Action. The Estate initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 210	Document at <b>Bates JPM-SDNYLIT-00006727</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]

Exhibit 211	Document at <b>Bates JPM-SDNYLIT-00006729</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 212	August 15, 2013, email, <b>Bates JPM-SDNYLIT-00101010-00101011</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 49 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 213	July 10, 2012, email, <b>Bates JPM-SDNYLIT-00022569</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 31 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 214	Document at <b>Bates JPM-SDNYLIT-00393112</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 215	Document at <b>Bates JPM-SDNYLIT-00028892-00028893</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 216	Document at <b>Bates JPM-SDNYLIT-00029911-00029913</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 217	Document at <b>Bates Apollo_VI_00000423</b> , produced by nonparty Apollo Global Management, Inc. in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 218	Document at <b>Bates Apollo_VI_00000646</b> , produced by nonparty Apollo Global Management, Inc. in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 219	March 23, 2011, email, <b>Bates JPM-SDNYLIT-00013841</b> , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 12 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 220	Document at <b>Bates JPM-SDNYLIT-00014260</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]

Exhibit 221	Document at <b>Bates JPM-SDNYLIT-00017368</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 222	Excerpt of JPMorgan Chase Bank, N.A.'s Responses and Objections to Third-Party Defendant's First Set of Interrogatories, dated May 18, 2023. Designated Confidential by JPMorgan pursuant to the Protective Order in this Matter and filed under seal. [Sealed]
Exhibit 223	Document at <b>Bates JPM-SDNYLIT-00032344-00032346</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 224	Document at <b>Bates JPM-SDNYLIT-00032434-00032435</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 225	September 30, 2014, email, <b>Bates JPM-SDNYLIT-00032511-00032516</b> , produced by JPMorgan in this Action, and previously marked as Nelson Exhibit 6 at deposition. JPMorgan initially designated this document Confidential, pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 226	April 21, 2023, email, <b>Bates JPM-SDNYLIT-00032218-0003220</b> , produced by JPMorgan in this Action, and previously marked as Nelson Exhibit 5 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 227	Excerpt of JPMorgan Chase Bank, N.A.'s First Supplemental Responses and Objections to Interrogatories in Lieu of Rule 30(b)(6) Deposition Testimony, dated April 14, 2023. JPMorgan has designated portions of the document Confidential pursuant to the Protective Order in this matter and the document is filed under seal in part.
Exhibit 228	Document at <b>Bates JPM-SDNYLIT-00030644-00030645</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 229	Document at <b>Bates JPM-SDNYLIT-00031300</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 230	Document at <b>Bates JPM-SDNYLIT-00394592-00394593</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]

Exhibit 231	Document at <b>Bates JPM-SDNYLIT-00032975-00032976</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 232	Document at <b>Bates JPM-SDNYLIT-00033177-00033179</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 233	Document at <b>Bates JPM-SDNYLIT-00034618</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 234	JPMorgan Chase Bank, N.A.'s Supplemental Responses and Objections to Doe Plaintiff's First Set of Interrogatories, dated April 11, 2023.
Exhibit 235	Document at <b>Bates JPM-SDNYLIT-00233394</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 236	Document at <b>Bates JPM-SDNYLIT-00233392</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 237	Document at <b>Bates JPM-SDNYLIT-00791467</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 238	Document at <b>Bates JPM-SDNYLIT-00448060-00448065</b> , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 107 at deposition. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 239	January 3, 2010, document, <b>Bates ESTATE_JPM010125-010128</b> , produced by nonparty The Estate of Jeffrey E. Epstein in this Action. The Estate initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 240	Document at <b>Bates JPM-SDNYLIT-00154163-00165164</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 241	February 15, 2005, email, <b>Bates JPM-SDNYLIT-00448590-00448591</b> , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 1 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the

	designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 242	June 16, 2004, email and attachments, <b>Bates JPM-SDNYLIT-00448149-00448196</b> , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 2 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 243	Article by Andrew Ross Sorkin and Landon Thomas Jr., <i>J.P. Morgan Chase to Acquire Bank One in \$58 Billion Deal</i> , New York Times (January 14, 2004), <a href="https://www.nytimes.com/2004/01/14/business/jp-morgan-chase -to acquire-bank-one-in-58-billion-deal.html">https://www.nytimes.com/2004/01/14/business/jp-morgan-chase -to acquire-bank-one-in-58-billion-deal.html</a> .
Exhibit 244	Document at <b>Bates JPM-SDNYLIT-00724984-00725000</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 245	Document at <b>Bates JPM-SDNYLIT-00448780</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 246	Document at <b>Bates JPM-SDNYLIT-00016246-00016256</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 247	Article by Reuters, <i>J.P. Morgan to Buy Control of Hedge Fund</i> , The New York Times (Sept. 28, 2004), <a href="https://www.nytimes.com/2004/09/28/business/jp-morgan-to-buy-control-of-hedge-fund.html">https://www.nytimes.com/2004/09/28/business/jp-morgan-to-buy-control-of-hedge-fund.html</a> , accessed July 20, 2023.
Exhibit 248	Article, <i>Purchase of Highbridge Capital Management</i> , J.P. Morgan (June 11, 2009), <a href="https://web.archive.org/web/20120426055706/https://careers.jpmorganchase.com/cm">https://web.archive.org/web/20120426055706/https://careers.jpmorganchase.com/cm</a> . Previously marked as Staley Exhibit 17 at deposition.
Exhibit 249	Document at <b>Bates JPM-SDNYLIT-00004787-00004789</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 250	August 8, 2006, email, <b>Bates JPM-SDNYLIT-00000254-00000255</b> , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 8 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.

Exhibit 251	Document at <b>Bates JPM-SDNYLIT-00026223</b> , produced by JPMorgan in this Action, and previously marked as Third-Party Exhibit 109 at the deposition of John Duffy. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 252	Excerpt of “JPMC- Cumulative Privilege Log” (May 9, 2023), produced in Excel format by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protect Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 253	Verified Complaint, <i>Financial Trust Company, Inc. v. The Bear Stearns Companies Inc.</i> , 3:09-cv-00106-CVG-GWB (D.V.I. Div. St. Thomas & St. John, Aug. 5, 2009)
Exhibit 254	July 20, 2011, email, <b>Bates JPM-SDNYLIT-00274561</b> , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 21 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation while retaining its original redactions to the document.
Exhibit 255	July 22, 2011, email, <b>Bates JPM-SDNYLIT-00135958_R-00135958_R</b> , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 22 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 256	Document at <b>Bates JPM-SDNYLIT-00269848</b> , produced in Excel format by JPMorgan in this Action, and previously marked as Langford Exhibit 45 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 257	April 8, 2011, email and attachment, <b>Bates JPM-SDNYLIT-00230025-00230028</b> , produced by JPMorgan in this Action, and previously marked as McCleerey Exhibit 25 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 258	July 22, 2011, email, <b>Bates JPM-SDNYLIT-00754982-0075984</b> , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 23 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>

Exhibit 259	7/26/2011, email, <b>Bates JPM-SDNYLIT-00136106</b> , produced by JPMorgan in this Action, produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 260	March 29, 2011, email, <b>Bates JPM-SDNYLIT-00731610</b> , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 30 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 261	Document at <b>Bates JPM-SDNYLIT-00790948_R-00790950_R</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 262	Document at <b>Bates JPM-SDNYLIT-00892560-00892561</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 263	August 16, 2010, email, <b>Bates JPM-SDNYLIT-00752910-000752912</b> , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 20 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation while retaining its original redactions to the document.
Exhibit 264	February 6, 2011, email, <b>Bates ESTATE_JPM-001591</b> , produced by nonparty The Estate of Jeffrey E. Epstein in this Action. The Estate initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation.
Exhibit 265	Document at <b>Bates JPM-SDNYLIT-00016652-00016654</b> , produced by JPMorgan in this Action. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 266	Document at <b>Bates JPM-SDNYLIT-00016924</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 267	Document at <b>Bates GF000664-000670</b> , produced by nonparty Bill & Melinda Gates Foundation in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 268	Document at <b>Bates GV000028</b> , produced by nonparty Gates Ventures in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>

Exhibit 269	Document at <b>Bates JPM-SDNYLIT-00133931-00133932</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 270	Document at <b>Bates JPM-SDNYLIT-00005844</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 271	Document at <b>Bates JPM-SDNYLIT-00010121-00010122</b> , produced by JPMorgan in this Action, designated confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 272	December 12, 2008, email, <b>Bates JPM-SDNYLIT-00099627</b> , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 41 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part]
Exhibit 273	Full Transcript: <i>CNN Anchor Poppy Harlow's exclusive interview with JPMorgan Chase Chairman and CEO Jamie Dimon</i> , CNN (April 7, 2023), <a href="http://cnnpressroom.blogs.cnn.com/2023/04/07/full-transcript-cnn-anchor-poppy-harlows-exclusive-interview-with-jpmorgan-chase-chairman-and-ceo-jamie-dimon">cnnpressroom.blogs.cnn.com/2023/04/07/full-transcript-cnn-anchor-poppy-harlows-exclusive-interview-with-jpmorgan-chase-chairman-and-ceo-jamie-dimon</a> . Previously marked as Cutler Exhibit 3 at deposition.
Exhibit 274	Excerpt of Expert Report of Shaun O'Neill, CPA, CFF, CFE, dated May 16, 2023. Designated Confidential pursuant to the Protective Order in this matter and filed under seal.
Exhibit 275	Due Diligence Report, <b>Bates JPM-SDNYLIT-00149678-00149683</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 276	March 1, 2011, email, <b>Bates JPM-SDNYLIT-00100422-00100423</b> , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed]
Exhibit 277	Article by Constant Méheut, <i>Epstein Associate Is Charged with Rape of Minors in France</i> , New York Times (December 19, 2020), <a href="https://www.nytimes.com/2020/12/19/world/europe/france-epstein-brunel.html">https://www.nytimes.com/2020/12/19/world/europe/france-epstein-brunel.html</a> (accessed July 20, 2023).
Exhibit 278	Transcript excerpts of the <b>Deposition of former U.S. Virgin Islands Attorney General Vincent Frazer</b> , taken on July 13, 2023, in this Action.

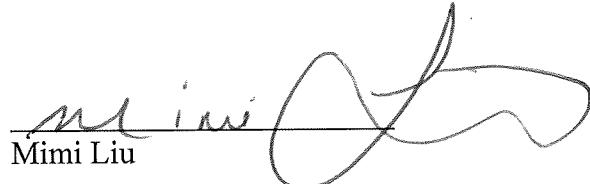
Exhibit 279	2012 correspondence between Hodge & Francois and the Office of the Attorney General of the Virgin Islands at <b>Bates VI-JPM-000012484 – 0000125491</b> . This is an excerpt of <b>Bates VI-JPM-000012328-000012522</b> , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Frazer Exhibit 18 at deposition.
Exhibit 280	Transcript excerpts of the <b>30(b)(6) Deposition of U.S. Virgin Islands Department of Justice Sexual Offender Registry Coordinator Shani Pinney</b> , taken on July 18, 2023, in this Action.
Exhibit 281	2012 correspondence between Hodge & Francois or Darren Indyke and the Office of the Attorney General of the Virgin Islands at <b>Bates VI-JPM-000012246-000012250</b> , <b>VI-JPM-000012263-000012265</b> , and <b>VI-JPM-000012268-000012272</b> . These are excerpts of <b>Bates VI-JPM-000012328-000012522</b> , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Frazer Exhibit 4 at deposition.
Exhibit 282	Transcript excerpts of the <b>Deposition of former U.S. Virgin Islands Attorney General Denise George</b> , taken on July 17, 2023, in this Action.
Exhibit 283	Transcript excerpts of the <b>Deposition of U.S. Virgin Islands Board of Education Interim Executive Director and former Economic Development Authority Compliance Officer U.S. Sandra Bess</b> , taken on May 17, 2023, in this Action.
Exhibit 284	Industrial Development Certificate for Financial Trust Company, Inc., March 22, 1999, <b>Bates VI-JPM-000017992-000018004</b> , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Bess Exhibit 1 at deposition.
Exhibit 285	Industrial Development Certificate (Extension) for Financial Trust Company, Inc., effective January 1, 2012, <b>Bates VI-JPM-000017983-000017991</b> , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Bess Exhibit 2 at deposition.
Exhibit 286	Industrial Development Certificate for Financial Trust Company, Inc., October 25, 2012, <b>Bates VI-JPM-000018005-000018014</b> , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Bess Exhibit 3 at deposition.
Exhibit 287	Transcript excerpts of the <b>30(b)(6) Deposition of U.S. Virgin Islands Economic Development Authority Managing Director Margarita Benjamin</b> , taken on May 26, 2023, in this Action.

Exhibit 288	Outline, "Jeffrey Epstein's EDC Companies," with handwritten notes, <b>Bates VI-JPM-000019063 –000019067</b> , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Benjamin Exhibit 1 at deposition.
Exhibit 289	Outline, "Jeffrey Epstein's EDC Companies," <b>Bates VI-JPM-000019063 –000019067</b> , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Benjamin Exhibit 12 at deposition.
Exhibit 290	Transcript of Public Hearing of the Economic Development Commission held November 15, 2012, <b>Bates VI-JPM-000016206-000016247</b> , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Benjamin Exhibit 19 at deposition.
Exhibit 291	Transcript excerpts of the <b>Deposition of U.S. Virgin Islands Governor Albert Bryan</b> , taken on June 6, 2023, in this Action.
Exhibit 292	Excerpt of transcript of Public Hearing of the Economic Development Commission held February 12, 2009, <b>Bates VI-JPM-000016200-000016205</b> , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Bryan Exhibit 1 at deposition.
Exhibit 293	Letter dated January 7, 2015, from Stephanie Berry to Jeffrey Epstein regarding Southern Trust Company, <b>Bates Estate_JPM018432</b> , produced by nonparty The Estate of Jeffrey E. Epstein in this Action, and previously marked as Benjamin Exhibit 32 at deposition. Designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 294	Letter dated January 8, 2014, from Erika Kellerhals to Stephanie Berry regarding Southern Trust Company, Inc., <b>Bates VI-JPM-000040186</b> , produced by Plaintiff Government of the United States Virgin Islands in this Action.
Exhibit 295	Transcript excerpts of <b>Deposition of U.S. Virgin Islands Congresswoman and former Economic Development Authority Counsel Stacey Plaskett</b> , taken on May 9, 2023, in this Action. Designated confidential in part by Representative Plaskett pursuant to the Protective Order in this matter and filed under seal in part.
Exhibit 296	Excerpt of transcript of Public Hearing of the Economic Development Commission held February 12, 2009, <b>Bates VI-JPM-000016200-000016205</b> , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Plaskett Exhibit 2 at deposition.

Exhibit 297	Transcript excerpts of <b>Deposition of former Financial Trust Company and Southern Trust Company Office Manager Cecile de Jongh</b> , taken on May 29, 2023, in this Action.
Exhibit 298	Transcript excerpts of the <b>30(b)(6) Deposition of U.S. Virgin Islands Economic Development Authority Managing Director Margarita Benjamin</b> , taken on July 14, 2023, in this Action.
Exhibit 299	Transcript excerpts of <b>Deposition of U.S. Virgin Islands Superior Court Judge and former Acting Attorney General Carol Thomas-Jacobs</b> , taken on July 13, 2023, in this Action.
Exhibit 300	May 13-15, 2013, email thread regarding Quick response re: TOEFL, <b>Bates ESTATE_JPM024114-024118</b> , produced by nonparty The Estate of Jeffrey E. Epstein in this Action, and previously marked as C. de Jongh Exhibit 25 at deposition Designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 301	August 28, 2008, email, <b>Bates JPM-SDNYLIT-00003706_R</b> , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 29 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. <b>[Sealed in part]</b>
Exhibit 302	July 10-11, 2011, emails and attachment, <b>Bates JPM-SDNYLIT-00110055-00110056</b> and <b>JPM-SDNYLIT-00100548-00100549</b> , produced by JPMorgan in this Action, and previously marked as Third-Party Exhibit 85 at the July 12, 2023, deposition of Mary Erdoes. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>
Exhibit 303	Photograph, previously marked as Third-Party Exhibit 85B at the July 12, 2023, deposition of Mary Erdoes. Designated Confidential pursuant to the Protective Order in this matter and filed under seal. <b>[Sealed]</b>

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 24, 2023



Mimi Liu