



U.S. Department of Justice

Criminal Division

VAA:WHG:TNB:AF:ss

Office of International Affairs

[REDACTED]  
Embassy of the United States of America  
2, avenue Gabriel  
75008 Paris  
Tel.: + [REDACTED]  
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December 30, 2020

Via Email

[REDACTED]  
Assistant United States Attorney  
One St. Andrews Plaza  
New York, New York 10007-1791

Re: Request for Legal Assistance from France in the Investigation of Jean-Luc BRUNEL; OIA Reference Number: CRM-182-74832; French MOJ/BEPI Number: 2020002015

Dear AUSA [REDACTED]:

Please find enclosed a request from France for legal assistance in a foreign criminal matter. The United States is obligated to assist in such matters pursuant to the 1998 U.S.-France Mutual Legal Assistance Treaty, as supplemented by the 2004 U.S.-France Mutual Legal Assistance Instrument. Consistent with the requirements of 18 U.S.C. § 3512, the United States Attorney's Office (USAO) is authorized to seek any requisite court orders and to take other steps necessary to execute the above-referenced request. This matter has been referred to the USAO for execution because your office is pursuing a related investigation. Please note that this matter should be kept confidential, and all filings with the court should be under seal.

The Facts

The facts of the case are set forth in detail in the enclosed request. In sum, French authorities have begun an investigation into the actions of Jeffrey EPSTEIN and his accomplices, notably Jean-Luc BRUNEL. The French investigation has focused on BRUNEL, and French authorities executed a search warrant at EPSTEIN's Paris residence in September 2019, where they obtain evidence and information relating to BRUNEL and Ghislaine MAXWELL. French authorities have identified multiple victims, though a number of charges related to these victims are barred by France's statute of limitations.

In furtherance of its investigation, and as outlined in the request, French authorities seek a wide variety of information from the United States that may be useful to their investigation.

#### Request for Assistance

To further the investigation, and as outlined in the request, French authorities have requested information in possession of U.S. authorities of use to their information related to designated individuals, including BRUNEL, MAXWELL, and other specified victims.

#### Execution of Request

Based on the information provided by French authorities, the AUSA to whom this request is assigned is not expected to need to compel any entities to produce records. Nevertheless, if such a step is required, the AUSA should file an application in the U.S. District Court seeking an order, pursuant to 18 U.S.C. § 3512, appointing him/her to serve as a commissioner. If the court grants the application, the AUSA should serve a "commissioner subpoena(s)" compelling the entity to produce the records. A sample pleading is available upon request.

#### Coordination with OIA

Please provide me with the name and telephone number of the AUSA to whom this request is assigned and ask him or her to analyze the request and notify me immediately if it contains insufficient information to permit execution or there are special considerations that will result in limited or delayed execution of the request or possible denial of the request. For example, if execution would result in harm to a U.S. investigation or prosecution or compromise a confidential source, assistance can be delayed or denied or conditions on use can be imposed. If such considerations arise with respect to this request, please contact me as soon as possible to discuss available options.

Please keep me apprised of the progress made in executing this request. I will serve as the main point of contact for both your office and France. I can be reached by e-mail at [REDACTED] or by telephone at [REDACTED] if you have any questions regarding the execution of the request or need further information from French authorities. You may also contact the International Affairs Specialist to whom this matter is assigned, [REDACTED] by e-mail at [REDACTED] or by telephone at [REDACTED].

Both the Office of International Affairs and law enforcement authorities in France appreciate your assistance in this international criminal matter relating to Jean-Luc BRUNEL.

Sincerely,

[Redacted]

Director  
Office of International Affairs

[Redacted]

By:

[Redacted]

Justice Attaché

Attachments:  
Mutual Legal Assistance Request (in French and English)

Cc: [Redacted]