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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JEFFREY EPSTEIN,
Defendant

MEMO ENDORSED

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CRIMINAL NO. 19-CR-490

**DEFENDANT JEFFREY EPSTEIN'S MOTION FOR LEAVE TO FILE
SUPPLEMENTAL FINANCIAL DISCLOSURE UNDER SEAL**

Defendant Jeffrey Epstein, by and through undersigned counsel, hereby respectfully moves this Honorable Court for leave to file under seal his supplemental financial disclosure. As noted in Mr. Epstein's bail submission, on advice of counsel, he has not yet provided a complete financial disclosure. Counsel's advice on this point was motivated by a desire to ensure the accuracy and completeness of the information provided to the Court. Mr. Epstein seeks leave to file his forthcoming supplemental disclosure under seal. As grounds and reasons therefor, Mr. Epstein relies on the exceptional amount of publicity that has been generated by this case, much of which relates specifically to his finances. Under the Bail Reform Act, financial information provided by a defendant to a pretrial services officer "shall be used only for the purposes of a bail determination and shall otherwise be confidential." 18 U.S.C. § 3153(c)(1). Here, in the event Mr. Epstein is required to publicly file his financial statement, the information contained therein will inevitably be widely disseminated in the news media, contravening the statutory requirement of confidentiality.

WHEREFORE, Mr. Epstein respectfully requests that this Honorable Court allow him leave to file his supplemental financial disclosure under seal.

Respectfully Submitted,
Jeffrey Epstein
By His Attorneys,

/s/ Reid Weingarten
Reid Weingarten
Steptoe & Johnson, LLP (NYC)
1114 Avenue of the Americas
New York, NY 10036

/s/ Martin G. Weinberg
Martin G. Weinberg (application for
admission *pro hac vice* forthcoming)
20 Park Plaza, Suite 1000
Boston, MA 02116

/s/ Marc Allan Fernich
Marc Allan Fernich
Law Office of Marc Fernich
810 Seventh Ave., Suite 620
New York, NY 10019

Dated: July 11, 2019

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Defense motion granted. Materials to be hand delivered to chambers (and opposing counsel) by 9:00 AM, July 12, 2019.	
SO ORDERED: Date: 7/11/19	<u>Richard M. Berman</u> Richard M. Berman, U.S.D.J.