

EXHIBIT 227

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

Government of the United States Virgin
Islands,

CASE NO.: 1:22-cv-10904 (JSR)

Plaintiff,

vs.

JPMorgan Chase Bank, N.A.,

Defendant.

**JPMORGAN CHASE BANK, N.A.’S FIRST SUPPLEMENTAL
RESPONSES AND OBJECTIONS TO INTERROGATORIES
IN LIEU OF RULE 30(B)(6) DEPOSITION TESTIMONY**

Pursuant to Federal Rules of Civil Procedure 26, 30, and 33, and by agreement of the parties as an alternative to certain topics in Plaintiff’s request for deposition testimony under Rule 30(b)(6), Defendant JPMorgan Chase Bank, N.A. (“JPMC”) hereby serves its first supplemental objections and responses to the topics set forth below, based on information reasonably available to JPMC at this time and without prejudice to JPMC’s right to revise, supplement, or amend these objections and responses in accordance with Rules 26 and 33.

PRELIMINARY STATEMENT

These objections and responses are made solely for the purposes of the above-captioned case. Each of JPMC’s objections and responses to Plaintiff’s Interrogatories is based on information and documents presently available to JPMC after reasonable inquiry. Discovery is ongoing and JPMC specifically reserves the right to amend or supplement these objections and responses as necessary, including in the event further information and documents are discovered or produced by JPMC after discovery has been completed. In addition, JPMC’s objections and

TOPIC NO. 21 (as amended)

Any information JPMorgan has relating to Epstein’s illegal and/or conduct, including, but not limited:

- (a) Epstein's criminal history, including Epstein's 2006 Florida arrest and his 2008 guilty plea stemming from that arrest;
- (b) Epstein's registration as a sex offender;
- (c) large cash withdrawals from Epstein-related accounts;
- (d) wire transfers from Epstein-related accounts to women with Eastern European surnames;
- (e) Epstein's association with young or underage girls;
- (f) any visit by JPMorgan employees to one of Epstein's properties, including his Manhattan townhouse, Little St. James in the U.S. Virgin Islands, Zorro Ranch in New Mexico, and his home in Palm Beach;
- (g) Any litigation filed by alleged Epstein victims;
- (h) Government investigations of Epstein or any investigative material that is publicly available; and
- (i) News articles relating to Epstein's involvement in human trafficking or other sex-related crimes.

RESPONSE TO TOPIC NO. 21

In addition to and specifically incorporating its foregoing General Objections and Objections to Definitions, JPMC objects to Topic No. 21 on the grounds that complying with this topic would impose undue burden and expense that is disproportionate to the issues in the case, especially where the information sought can be obtained from a more convenient, less burdensome, or less expensive source, such as requests for production of documents under Rule 34. Fed. R. Civ. P. 26(b)(1), 26(b)(2)(C)(i). JPMC also objects to the extent that this topic seeks testimony pertaining to matters subject to attorney-client privilege, work product doctrine, or any other applicable privilege. JPMC further objects on the grounds that this Topic contains terms are vague and ambiguous, including: “large cash withdrawals,” “women with Eastern European surnames,” and “association with young or underage girls.”

Subject to and without waiving its objections, and based upon a reasonable and diligent investigation, JPMC provides the following responses:

- (a) *Epstein's criminal history, including Epstein's 2006 Florida arrest and his 2008 guilty plea stemming from that arrest;*
- (b) *Epstein's registration as a sex offender;*

On July 26, 2006, a JPMC employee emailed a news article to other JPMC employees that discussed Epstein's indictment on one count of felony solicitation of prostitution. *See* JPM-SDNYLIT-00105789. On July 1, 2008, JPMC employees emailed and discussed a news article reporting Epstein's guilty plea to felony solicitation of prostitution and procuring a person under 18 for prostitution. *See* JPM-SDNYLIT-00002952. That article stated that upon Epstein's release from prison, he would need to register as a sex offender wherever he goes in the U.S. *See id.* On November 18, 2011, JPMC employees emailed a news article reporting that the New York Court of Appeals had upheld Epstein's status as a Level 3 sex offender. *See* JPM-SDNYLIT-00153179. Pursuant to Fed. R. Civ. P. 33(d), JPMC refers USVI to documents cited above. The burden of ascertaining the answer to this request from those documents is substantially the same for the USVI as JPMC.

- (c) *large cash withdrawals from Epstein-related accounts;*

JPMC receives and records data from transactions, including cash transactions, involving a JPMC account at or about the time of the transaction. The date on which JPMC received information about cash transactions in Epstein accounts is reflected in account statements, which JPMC has produced at JPM-SDNYLIT-00037279 to JPM-SDNYLIT-00091034. In addition, cash withdrawals from Epstein's accounts are discussed in some Rapid Response Team documents, Know-Your-Customer documents, Due Diligence Review documents, and Suspicious Activity Reports. *See, e.g.* JPM-SDNYLIT-00149613–JPM-SDNYLIT-00149869; JPM-SDNYLIT-00036258–JPM-SDNYLIT-00037278. Pursuant to Fed. R. Civ. P. 33(d), JPMC refers USVI to documents cited above. The burden of ascertaining the answer to this request from those documents is substantially the same for the USVI as JPMC.

(d) *wire transfer from Epstein-related accounts to women with Eastern European surnames;*

Wire transfers from accounts of Epstein and potentially Epstein-related individuals and entities are reflected in documents in account statements which can be found at JPM-SDNYLIT00157291 – JPM-SDNYLIT-00173952. Pursuant to Fed. R. Civ. P. 33(d), JPMC refers USVI to documents cited above. The burden of ascertaining the answer to this request from those documents is substantially the same for the USVI as JPMC.

(e) *Epstein's association with young or underage girls;*

JPMC interprets the phrase “young or underage girls” to refer to females under the age of 18 and answers as follows: On July 1, 2008, JPMC employees emailed and discussed a news article reporting Epstein’s pleading guilty to felony solicitation of prostitution and procuring a person under 18 for prostitution. *See* JPM-SDNYLIT-00002952. On November 18, 2011, JPMC employees emailed a news article that stated Epstein had been convicted of soliciting a minor. *See* JPM-SDNYLIT-00153179. At least some Know-Your-Customer (“KYC”) and Due Diligence Review (“DDR”) documents referenced Epstein’s conviction and alleged conduct involving minors. *See* JPM-SDNYLIT-00036570; JPM-SDNYLIT-00036300; JPM-SDNYLIT-00036258. In addition, JPMC employees also identified news coverage regarding Epstein’s arrest in 2019 following his indictment for alleged conduct between 2002 and 2005. *See* JPM-SDNYLIT-00150144; JPM-SDNYLIT-00154016. Pursuant to Fed. R. Civ. P. 33(d), JPMC refers USVI to documents cited above. The burden of ascertaining the answer to this request from those documents is substantially the same for the USVI as JPMC.

(f) *any visit by JPMorgan employees to one of Epstein's properties, including his Manhattan townhouse, Little St. James in the U.S. Virgin Islands, Zorro Ranch in New Mexico, and his home in Palm Beach;*

JPMC understands that James Staley met with Epstein at his Manhattan townhouse on January 7, 2010; April 7, 2010; May 21, 2010; June 2, 2010; July 8, 2010; September 21, 2010; January 6, 2011; January 19, 2011. Staley also traveled to Little St. James in the U.S. Virgin Islands on November 1, 2009 and on January 22, 2011.

Justin Nelson met with Epstein at his Manhattan townhouse on November 20, 2012; January 15, 2013; April 4, 2013 with Thomas McGraw; on April 24, 2013 with David Frame and Paul Barrett; June 6, 2013 with Chris French; May 8, 2014; December 3, 2014; May 4, 2015; September 29, 2015; November 19, 2015; December 14, 2015 with Carolyn Reers; February 14, 2017. In January 2016 he went to the Zorro Ranch..

Paul Morris met with Epstein at his Manhattan townhouse on April 8, 2010 with Jeffrey Matusow and on December 14, 2010 and May 10, 2012 with Thomas McGraw.

Mary Casey met with Epstein at his Manhattan townhouse on two or three occasions between 2000 and prior to his arrest in 2006. Others from JPMC who she cannot recall attended each of those meetings with her.

Mary Erdoes met with Epstein twice at his Manhattan townhouse in 2011 and in the Summer of 2013.

John Duffy met with Epstein at his Manhattan townhouse on April 24, 2013.

Jim Condren and Joanna Jagoda met with Epstein at his Manhattan townhouse in May 2011.

(g) Any litigation filed by alleged Epstein victims;

On July 23, 2010, a JPMC employee emailed another JPMC regarding a news article, which reported that Epstein had settled lawsuits with potential victims. *See JPM-SDNYLIT-00100251.* On November 8, 2010, a JPMC employee emailed other JPMC employees news reports regarding Epstein, which discussed settlements between Epstein and alleged victims. *See JPM-*

SDNYLIT-00010816. At least one KYC document stated that Epstein had settled up to a dozen civil lawsuits with alleged victims out of court. *See* JPM-SDNYLIT-00036258. Pursuant to Fed. R. Civ. P. 33(d), JPMC refers USVI to documents cited above. The burden of ascertaining the answer to this request from those documents is substantially the same for the USVI as JPMC.

- (h) *Government investigations of Epstein or any investigative material that is publicly available; and*
- (i) *News articles relating to Epstein's involvement in human trafficking or other sex-related crimes.*

Subsequent to his guilty plea, JPMC employees identified news coverage reporting that law enforcement authorities were continuing to investigate Epstein's activities prior to his arrest in the Florida matter. *See* JPM-SDNYLIT-00105789; JPM-SDNYLIT-00105857; JPM-SDNYLIT-00000314; JPM-SDNYLIT-00100251; JPM-SDNYLIT-00012008; JPM-SDNYLIT-00012010-11; JPM-SDNYLIT-00012014-15; JPM-SDNYLIT-00010816-17; JPM-SDNYLIT-00100251; JPM-SDNYLIT-00152738-42; JPM-SDNYLIT-00013432-33; JPM-SDNYLIT-00012008-15; JPM-SDNYLIT-00036570; JPM-SDNYLIT-00036300; JPM-SDNYLIT-00036258; JPM-SDNYLIT-00035173. JPMC employees also identified news coverage regarding Epstein's arrest in 2019 following his indictment for alleged conduct between 2002 and 2005. *See* JPM-SDNYLIT-00150144. Pursuant to Fed. R. Civ. P. 33(d), JPMC refers USVI to documents cited above. The burden of ascertaining the answer to this request from those documents is substantially the same for the USVI as JPMC.

TOPIC NO. 26

Your Board of Directors,' including the Board's Audit, Risk, and Public Responsibility committees,' knowledge and oversight of Your BSA/AML Compliance Program, including, but not limited to, with respect to commercial sex or human trafficking, including child sex trafficking,

In addition, at some point around 2009-2011, Phillip DeLuca called Special Agent Tim Moyer, a regular contact of Mr. DeLuca's at the FBI, to inquire about Epstein. Mr. Moyer told Mr. DeLuca over the phone that he would call Mr. DeLuca back later to discuss Epstein, but Mr. Moyer did not do so.

Dated: April 14, 2023

JPMORGAN CHASE BANK, N.A.

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VERIFICATION OF INTERROGATORY ANSWERS

I, Francis J. Pearn, state that, based on reasonable inquiry, including a review of documents and information provided by other employees of JPMorgan Chase Bank, N.A. and counsel, the foregoing answers are true and correct to the best of my knowledge, information, and belief.

I verify under penalty of perjury that the foregoing is true and correct.

DATED: April 14, 2023

By: **Francis J. Pearn** _____
Francis J. Pearn

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2023, the foregoing document, titled “JPMorgan Chase Bank, N.A.’s Responses and Objections to Interrogatories In Lieu of Rule 30(b)(6) Deposition Testimony,” was served in accordance with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Southern District of New York upon the attorneys for the plaintiff in the above-entitled action by electronic mail.

DATED: April 14, 2023

By: *John Butts* _____
John J. Butts