

WASHINGTON, DC 20510-6200

December 17, 2025

The Honorable Pam Bondi Attorney General U.S. Department of Justice 950 Pennsylvania Avenue, N.W. Washington, D.C. 20530 The Honorable Kashyap Patel Director Federal Bureau of Investigation 935 Pennsylvania Avenue, N.W. Washington, D.C.

Dear Attorney General Bondi and Director Patel:

We write to demand information in response to reports that federal law enforcement never questioned Darren Indyke and Richard Kahn in connection with criminal sex trafficking investigations into Jeffrey Epstein and Ghislaine Maxwell.<sup>1</sup>

The reported failure to interview Indyke and Kahn raises concerns that the Department of Justice ("DOJ") and Federal Bureau of Investigation ("FBI") declined to investigate key members of Epstein's inner circle out of fear of retaliation by Epstein's estate ("the estate"). As executors of the estate, Indyke and Kahn are in possession of a trove of documents and images that may contain compromising information on President Trump and other powerful figures.

As you are aware, Indyke and Kahn were employed by Jeffrey Epstein for decades. In their capacities as Epstein's in-house attorney and accountant, Indyke and Kahn controlled the movement of funds through Epstein's bank accounts and oversaw virtually every aspect of the financial infrastructure that paid for Epstein's sex trafficking activities.<sup>2</sup> New reports also indicate that Kahn may have even lied to U.S. immigration officials by supporting a sham marriage designed to help one of Epstein's victims remain in the United States.<sup>3</sup>

Furthermore, at Epstein's direction, Indyke and Kahn structured hundreds of Epstein's bank accounts, created and administered dozens of corporate entities, regularly made large cash withdrawals on Epstein's behalf and authorized thousands of suspicious wire transfers.<sup>4</sup> According to bank records recently unsealed in federal court, Indyke and Kahn had signatory authority or power of attorney over Epstein's bank accounts and were the subject of numerous suspicious activity reports (SARs) filed with the U.S. Treasury Department.<sup>5</sup> It does not appear

<sup>&</sup>lt;sup>1</sup> The CPA and the Lawyer Who Served Jeffrey Epstein – and Control His Fortune and Secrets, The Wall Street Journal, Nov. 22, 2025, online at <a href="https://www.wsj.com/us-news/epstein-accountant-lawyer-control-estate-0d31070b?">https://www.wsj.com/us-news/epstein-accountant-lawyer-control-estate-0d31070b?</a> <a href="mailto:mod=Searchresults&pos=1&page=1">mod=Searchresults&pos=1&page=1</a>

<sup>&</sup>lt;sup>2</sup> *Id*.

<sup>&</sup>lt;sup>3</sup> *Id*.

<sup>4</sup> Id.

<sup>&</sup>lt;sup>5</sup> JPMC-SDNYLIT-W-00018180 – JPMC-SDNYLIT-W-00018196; JPM-SDNYLIT-W-00002185 – JPM-SDNYLIT-W-00002196; JPM-SDNYLIT-W-00025790 – JPM-SDNYLIT-W-00025790\_003; JPM-SDNYLIT-W-00025792 – JPMSDNYLIT-W-00025792\_003; JPM-SDNYLIT-W-00025791 – JPM-SDNYLIT-W-00025791\_003;

that the DOJ has ever followed up on those SARs or conducted any investigation into the financing of Epstein's criminal sex trafficking organization.

SARs filed by JPMorgan Chase & Co. ("JPMC") flagging more than \$1.3 billion worth of suspicious wire transfers through Epstein's accounts noted that Darren Indyke "controlled the movement of Epstein's funds as signer of several Epstein accounts." Similarly, SARs filed by JPMC also noted that Richard Kahn and Kahn's company, HBRK Associates Inc., had signatory authority over Epstein's accounts at JPMC and other financial institutions. An expert report discovered that a 2023 internal know your customer profile of Kahn by JPMC stated that "Kahn was a primary actor in movement of Epstein's funds" and that Kahn "potentially assisted in facilitating the sex trafficking ring."

Indyke and Kahn were paid extraordinary sums for the work they performed for Epstein. According to a report by a forensic accountant, between 2003 – 2013 Epstein paid Indyke \$10.7 million. Between 2011 and 2019, Epstein and Epstein owned entities paid more than \$16 million to Indyke and over \$10 million to Kahn, according to a lawsuit filed by the U.S. Virgin Islands. <sup>10</sup>

It appears that Indyke and Kahn also received sizable sums from Epstein's accounts once it became clear that Epstein was in serious legal jeopardy. For example, in April 2019, shortly before Epstein was arrested, an Epstein trust made two payments: \$1 million to Indyke's personal TD Bank account and \$1 million to Kahn's personal JPMC account. The payments did not end there. It appears that in April 2020, months after Epstein's death, another Epstein trust moved approximately \$6.5 million in investment proceeds to a trust where Indyke and Kahn were among the beneficiaries. <sup>11</sup>

Today, Indyke and Kahn serve as co-executors of the estate and beneficiaries of Epstein's 1953 trust. As co-executors of the estate, Indyke and Kahn control Epstein's \$100 million fortune and the dissemination of all records in the estate's possession. The estate's records include thousands of Epstein's emails, bank documents, photographs, calendar items, and flight logs. It is clear by the release of certain estate documents that the estate is in possession of

<sup>&</sup>lt;sup>6</sup> JPM-SDNYLIT-W-00017207, JPM-SDNYLIT-W-00017206, JPM-SDNY-W-00000176, (JPMC SAR number 127304700 filed with the U.S. Treasury Department on August 13, 2019 and JPMC SAR 310000152314782 filed on September 26, 2019)

<sup>&</sup>lt;sup>7</sup> JPM-SDNY-S-0000178; JPM-SDNY-S-00000180; PM-SDNYLIT-W-00018196

<sup>&</sup>lt;sup>8</sup> Pg. 47 of June 16, 2023 expert report of Bridgette Carr, citing internal JPMC document JPM-SDNYLIT-00184442.

<sup>&</sup>lt;sup>9</sup> Pg. 52 of June 16, 2023 expert report of forensic accountant Jorge Amador.

<sup>&</sup>lt;sup>10</sup> The CPA and the Lawyer Who Served Jeffrey Epstein – and Control His Fortune and Secrets, The Wall Street Journal, Nov. 22, 2025, online at <a href="https://www.wsj.com/us-news/epstein-accountant-lawyer-control-estate-0d31070b?">https://www.wsj.com/us-news/epstein-accountant-lawyer-control-estate-0d31070b?</a> <a href="mailto:mod=Searchresults&pos=1&page=1">mod=Searchresults&pos=1&page=1</a>

 $<sup>^{11}</sup>Id$ .

<sup>&</sup>lt;sup>12</sup> U.S. Virgin Islands Attorney General Settles Sex Trafficking Case Against Estate of Jeffrey Epstein and Co-Defendants for Over \$105 million, U.S. Virgin Islands Department of Justice, Dec. 1, 2022, online at <a href="https://usvidoj.com/u-s-virgin-islands-attorney-general-settles-sex-trafficking-case-against-estate-of-jeffrey-epstein-and-co-defendants-for-over-105-million/">https://usvidoj.com/u-s-virgin-islands-attorney-general-settles-sex-trafficking-case-against-estate-of-jeffrey-epstein-and-co-defendants-for-over-105-million/</a>

potentially compromising information on President Trump and other powerful political figures and businessmen.

In light of the work Indyke and Kahn performed for Epstein and the outsize role they played in his personal and financial affairs; it is inexcusable that the DOJ and the FBI never questioned these individuals in connection with investigations into Epstein and Ghislaine Maxwell. A failure of this magnitude cannot be attributed to simple oversight or misunderstanding, and it is incumbent on Congress to understand why such a failure occurred.

In order to better understand the DOJ and FBI's handling of criminal investigations in Jeffrey Epstein and Ghislaine Maxwell, please provide the following information no later than January 5, 2026:

- 1. Did the DOJ ever request any voluntary interviews with Darren Indyke or Richard Kahn in connection with any criminal investigations into Jeffrey Epstein, Ghislaine Maxwell, or any other related individuals? If yes, please specify whether Indyke and Kahn agreed to the interviews and when the interviews were conducted. Please provide the date and location of each interview as well as the prosecutor(s) and/or FBI agent(s) that conducted the interviews.
- 2. According to the Wall Street Journal, "neither Indyke nor Kahn was questioned by law enforcement," in relation to criminal investigations conducted by the federal prosecutors in the Southern District of New York into Jeffrey Epstein and Ghislaine Maxwell. Are these reports inaccurate? If yes, please provide a detailed explanation as to why.
- 3. Did the DOJ ever issue any grand jury subpoenas to Darren Indyke or Richard Kahn in connection with any criminal investigations into Jeffrey Epstein or Ghislaine Maxwell? If yes, please provide copies of all responsive subpoenas.
- 4. Did the DOJ ever conduct any depositions of Darren Indyke or Richard Kahn in connection with any criminal investigations into Jeffrey Epstein or Ghislaine Maxwell? If yes, please provide the date and location of each deposition as well as the DOJ employee(s) that conducted the deposition.
- 5. Were Darren Indyke or Richard Kahn ever the subject of a criminal investigation by the DOJ? Please answer yes or no. If yes, please identify the time period in which Indyke or Kahn were the subject of a criminal investigation as well as a description of the conduct being investigated.
- 6. Were Darren Indyke or Richard Kahn ever the target of a criminal investigation by the DOJ? Please answer yes or no. If yes, please identify the time period in which Indyke or Kahn were the target of a criminal investigation as well as a description of the conduct being investigated.

Thank you for your attention to this important matter. Should you wish to discuss this request please do not hesitate to contact us or our staff.

## Sincerely,

Ron Wyden
United States Senator
Ranking Member, Committee
on Finance

Chris Van Hollen United States Senator

Sheldon Whitehouse United States Senator Richard Blumenthal United States Senator

Amy Klobuchar United States Senator