

October 16, 2019

Via Messenger

Maurene Comey  
Assistant United States Attorney  
Southern District of New York  
The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

Re: October 3, 2019 Grand Jury Subpoena to TD Bank N.A.

Dear Ms. Comey:

In response to your October 3, 2019 subpoena to Toronto Dominion Bank, N.A., and in accordance with our telephone conversation on October 15, 2019, I enclose a disc containing monthly account statements (bearing production numbers TD-DOJ-00000466 – TD-DOJ-00000630) for eight accounts held or controlled by HBRK Associates Inc. The table below includes the account number, names of account holder(s), and date range for the included account statements.

Account Number	Account Holder(s)	Date Range	Production Numbers
	<ul style="list-style-type: none"><li>HBRK Associates Inc.</li><li>NES</li></ul>	04/18/2019 – 09/30/2019	TD-DOJ-00000467 - TD-DOJ-00000489
	<ul style="list-style-type: none"><li>HBRK Associates Inc.</li><li>Zorro</li></ul>	04/17/2019 – 09/30/2019	TD-DOJ-00000490 - TD-DOJ-00000512

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Account Number	Account Holder(s)	Date Range	Production Numbers
[REDACTED]	<ul style="list-style-type: none"> <li>• HBRK Associates Inc.</li> <li>• Jege</li> </ul>	04/17/2019 – 09/30/2019	TD-DOJ-00000513 - TD-DOJ-00000527
[REDACTED]	<ul style="list-style-type: none"> <li>• HBRK Associates Inc.</li> <li>• Plan D</li> </ul>	04/17/2019 – 09/30/2019	TD-DOJ-00000528 - TD-DOJ-00000544
[REDACTED]	<ul style="list-style-type: none"> <li>• HBRK Associates Inc.</li> </ul>	02/05/2019 – 09/30/2019	TD-DOJ-00000545 - TD-DOJ-00000577
[REDACTED]	<ul style="list-style-type: none"> <li>• HBRK Associates Inc.</li> <li>• Hyperion</li> </ul>	04/17/2019 – 09/30/2019	TD-DOJ-00000578 - TD-DOJ-00000590
[REDACTED]	<ul style="list-style-type: none"> <li>• HBRK Associates Inc.</li> <li>• LSJE</li> </ul>	04/17/2019 – 09/30/2019	TD-DOJ-00000591 - TD-DOJ-00000607
[REDACTED]	<ul style="list-style-type: none"> <li>• HBRK Associates Inc.</li> <li>• Neptune</li> </ul>	04/17/2019 – 09/30/2019	TD-DOJ-00000608 - TD-DOJ-00000630

Please note that the enclosed media is being produced to you using the 7-Zip encryption software. The software necessary to view these materials is provided along with this production.

\* \* \*

We request that the enclosed materials be treated as confidential grand jury materials. We further request that, pursuant to the Freedom of Information Act, 5

Maurene Comey

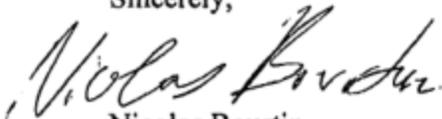
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U.S.C. § 552(b)(4) and U.S. Department of Justice Stated policy (see 28 CFR § 16.7), all copies of the enclosed documents labeled "Confidential" be treated as confidential and exempt from disclosure to third parties. Finally, we request that confidential treatment be accorded to this letter and any notes, memoranda or other records created by or for the direction of the U.S. Department of Justice or its officers or staff members that reflect, refer or relate to these documents. Please promptly inform us of any FOIA request seeking access to the documents, or any of the above-mentioned records, including this letter, to enable us to substantiate the grounds for confidential treatment, unless the U.S. Attorney's Office intends to deny such request for access on other grounds.

We will provide the password to the production under separate cover. Please let us know if you have any difficulties accessing the production.

If you have any questions, please do not hesitate to contact me.

Sincerely,

  
Nicolas Bourtin

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(Enclosure)

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