



BSAR Transcript
BSA: 31000110544793 and DCN:

Filing Information	
Type of Report	Continuing Activity Report
Filing Date	08/17/2017
Received Date	08/17/2017
Entry Date	08/18/2017
Amended	Prior BSA ID: 31000106384765
Submission Method	Electronic discrete filing

Subject Information		
Subject 1 of 1 : Indyke		
Role	Subject	
Subject Type	Other	
Individual/Organization	Individual	
Last(or Entity) Name	Indyke	
First Name	Darren	
Middle Name	K	
Alternate Name(s)	Alternate Name Darren K. Indyke PLLC	
Gender Type	Male	
Date of Birth	[REDACTED]	
SSN/ITIN	[REDACTED]	
Form(s) of Identification	Identification 1 of 2	
	Identification Type	Driver's license/State ID
	Identification Number	[REDACTED]
	Issuing State Code	NJ
	Issuing State	New Jersey
	Issuing Country Code	US
	Identification 2 of 2	
	Identification Type	Other
	Identification Number	300503849
	Other Text	The Lawfirm's TIN
Issuing Country Code	US	
Address(es)	Address 1 of 2	
	Address Type	Subject permanent/mailling address
	Street Address	[REDACTED]
	City	[REDACTED]



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Subject Information		
	State	[REDACTED]
	ZIP Code	[REDACTED]
	Country	US
		US - Enhanced
	Address 2 of 2	
	Address Type	Subject permanent/mailling address
	Street Address	[REDACTED]
	City	[REDACTED]
	State	[REDACTED]
	ZIP Code	[REDACTED]
Country	US	
	US - Enhanced	
Occupation/Type of Business	Attorney	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	134941247
	Relationship of Subject	Customer: Yes
Affected Account(s)	Account Number	[REDACTED]
	Financial Institution TIN	134941247

Suspicious Activity Information	
Amount Involved	\$15,000
Cumulative Amount	\$38,000
Date or Date Range of Activity	06/21/2017 - 06/23/2017
Structuring	Other: Ongoing structuring concern
Financial instrument or payment mechanism	Personal/Business check

Activity Location	
Financial Institution Location 1 of 1	
No Branch Activity Involved	Yes
Type of Financial Institution	Depository institution



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Activity Location		
Primary Regulator	Federal Reserve	
RSSD Number	214807	
Legal Name	Deutsche Bank Trust Co. Americas	
EIN	134941247	
Address	Address Type	Address where transaction occurred
	Street Address	60 Wall Street
		60 WALL ST - Enhanced
	City	New York
		NEW YORK - Enhanced
	State	NY
		NY - Enhanced
	ZIP Code	10005-2858
10005-2858 - Enhanced		
Country	US	
	US - Enhanced	
Internal Control File Number	SP 2641	
Loss To Financial Institution	\$0	

Filer Information		
Primary Regulator	Federal Reserve	
Filer Name	Deutsche Bank Trust Co. Americas	
EIN	134941247	
Address	Address Type	Reporting party address
	Street Address	60 Wall Street
		60 WALL ST - Enhanced
	City	New York
		NEW YORK - Enhanced
	State	NY
		NY - Enhanced
	ZIP Code	10005-2858
10005-2858 - Enhanced		
Country	US	
	US - Enhanced	
Type of Financial Institution	Depository institution	
RSSD Number	214807	
Internal control/file number	SP 2641	
Contact for Assistance	Full Name	AMLCentral



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Filer Information	
Phone Number	[REDACTED]
Phone Type	Work

Law Enforcement Information
No Law Enforcement Information Available

Narrative
<p>Internal File Reference Number: SP 2641, Analyst - WJH</p> <p>Deutsche Bank Trust Company Americas ("DBTCA") is filing this SAR to report ongoing check cashing activities of a Deutsche Bank Wealth Management ("WM") client which appear to have been structured in order to circumvent Currency Transaction Reporting ("CTR") reporting requirements.</p> <p>This SAR supplements previous SARs filed on 09/07/2016 and 06/02/2017 concerning Darren K. Indyke ("Indyke"), who is the same party involved in the transactions described below. This current SAR contains transactions which were not reported in the previously-filed SAR.</p> <p>Indyke is an attorney practicing law in the State of New York. Indyke maintains a WM business checking account as follows: Account Number: [REDACTED] Open Date: 11/1/2013, registered as Darren K. Indyke PLLC, [REDACTED] [REDACTED] Indyke is the sole member and owner of the law firm. Indyke's personal residence is on record as [REDACTED] [REDACTED]</p> <p>WM account records indicate that Jeffrey Epstein ("Epstein") of 6100 Red Hook Quarter B3, St. Thomas, US VI 00802, has appointed Indyke to act as agent for him. Epstein maintains a WM checking account as follows: Account Number: 35269691, Open Date: 03/08/2016, registered as Jeffrey Epstein, 6100 Red Hook Qtr, B3, Saint Thomas, United States Virgin Islands 00802-1348.</p> <p>On a monthly basis, Indyke has routinely cashed a \$7,500 check drawn on Epstein's WM account at the WM private bank branch</p>



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located at 345 Park Avenue, New York, NY. Occasionally, Indyke also withdraws funds from his own accounts at the same time. DBTCA has previously filed CTRs on the cash withdrawal activities of Indyke exceeding \$10,000 on 05/28/2014 02/16/2016, and 12/21/2016.

Suspicious Activity:

According to a WM bank teller from 345 Park Avenue the following events transpired:

- 1) On 06/21/2017, Indyke cashed Check number 1055, dated 06/20/2017, made payable to cash and drawn on Indyke's WM attorney business checking account in the amount of \$7,500.
- 2) On 06/22/2017, Indyke, in his capacity as agent for Epstein, arranged to withdraw 6,600 Euros in a foreign currency exchange transaction that was completed using Epstein's WM checking account. Indyke explained the reason for this transaction was to have cash on hand for his client's vacation in the upcoming week.
- 3) On 06/23/2017, Indyke cashed Check number 1125, dated 04/25/2017, made payable to cash and drawn on Epstein's WM checking account in the amount of \$7,500.00.

Inconnection with the activities detailed in the previous SARs filed, Indyke made inquiry with branch personnel on more than one occasion regarding the regulatory reporting requirements associated with his intended check withdrawal activities. When advised that a CTR would be required, Indyke altered his transaction pattern, presumably to avoid CTR filing requirements.

The current activity appears to be a continuation of Indyke structuring of his cash withdrawal activities in order to avoid the CTR requirement.

On 07/25/2017, members of the WM AFC Team and the Relationship Manager of Indyke's accounts had a telephone conference



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call with Indyke to discuss the their concerns with the activity described above and in the prior SARs.

Indyke was informed that his pattern of cashing checks gives the appearance of structuring to avoid CTRReporting. WM AFC explained the concept of structuring to the client. WM AFC made it clear that they were not mandating that he change the manner in which he chooses to conduct his business or how he should cash his checks, but the pattern of check cashing activity was problematic for both him and DBTCA.

Indyke stated that he frequently requires cash for his business as well as for Mr. Epstein's household expenses, and did not realize that he was cashing checks in any particular concerning pattern. Moreover, Indyke stated that it was not his intention to structure any of the activity described above.