



BSAR Transcript
BSA: 31000150359184 and DCN:

Filing Information	
Type of Report	Continuing Activity Report Correct/Amend Report
Filing Date	07/11/2019
Received Date	07/11/2019
Entry Date	07/12/2019
Amended	Yes - Prior BSA ID: 31000110544793
Submission Method	Electronic batch filing

Subject Information		
Subject 1 of 2 : Epstein		
Role	Subject	
Subject Type	Payee/Receiver	
Individual/Organization	Individual	
Last(or Entity) Name	Epstein	
First Name	Jeffrey	
Gender Type	Male	
Date of Birth	[REDACTED]	
SSN/ITIN	[REDACTED]	
Form(s) of Identification	Identification Type	Driver's license/State ID
	Identification Number	[REDACTED]
	Issuing State Code	VI
	Issuing State	Virgin Islands, U.S.
	Issuing Country Code	VI
Address(es)	Address Type	Subject permanent/mailling address
	Street Address	6100 Red Hook Quarter; B3
		6100 RED HOOK QUARTER; B3 - Enhanced
	City	Saint Thomas
		SAINT THOMAS - Enhanced
	State	VI
		VI - Enhanced
	ZIP Code	008021348
00802-1348 - Enhanced		
Country	VI	
	US - Enhanced	
Corroborative Statement to Filer	No	
Relationship to Reporting	Institution TIN	134941247



BSAR Transcript
BSA: 31000150359184 and DCN:

Subject Information		
Institution(s)	Relationship of Subject	Customer: Yes
Affected Account(s)	Account Number	35269691
	Closed	Yes
	Financial Institution TIN	134941247
Subject 2 of 2 : Indyke		
Role	Subject	
Subject Type	Payee/Receiver	
Individual/Organization	Individual	
Last(or Entity) Name	Indyke	
First Name	Darren	
Middle Name	K	
Alternate Name(s)	Alternate Name	Darren K. Indyke PLLC (d/b/a)
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	[REDACTED]
	Other Text	The Lawfirm's TIN
Issuing Country Code	US	
Address(es)	Address 1 of 2	
	Address Type	Subject permanent/mailing address
	Street Address	[REDACTED]
	City	[REDACTED]
	State	[REDACTED]
	ZIP Code	[REDACTED]
	Country	US



BSAR Transcript
BSA: 31000150359184 and DCN:

Subject Information	
	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
NAICS Code	5411
NAICS Code Text	Legal Services
Occupation/Type of Business	Attorney
Corroborative Statement to Filer	No
Relationship to Reporting Institution(s)	1 of 2
	Institution TIN 134941247
	Relationship of Subject Customer: Yes
	2 of 2
	Institution TIN 134941247
	Relationship of Subject Other: Yes agent of customer
Affected Account(s)	Account 1 of 2
	Account Number [REDACTED]
	Financial Institution TIN 134941247
	Account 2 of 2
	Account Number [REDACTED]
	Closed Yes
	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



BSAR Transcript
BSA: 31000150359184 and DCN:

Suspicious Activity Information	
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	
Primary Regulator	Federal Reserve	
RSSD Number	214807	
Legal Name	Deutsche Bank Trust Company 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
10005-2836 - Enhanced		
Country	US	
	US - Enhanced	
Internal Control File Number	00000585649	

Filer Information		
Primary Regulator	Federal Reserve	
Filer Name	Deutsche Bank Trust Company 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
10005-2836 - Enhanced		
Country	US	



BSAR Transcript
BSA: 31000150359184 and DCN:

Filer Information		
		US - Enhanced
Type of Financial Institution	Depository institution	
RSSD Number	214807	
Internal control/file number	00000585649	
Contact for Assistance	Full Name	Peggy McGarvey
	Phone Number	(212) 250-2464
	Phone Type	Work

Law Enforcement Information
No Law Enforcement Information Available

Narrative
<p>Amended Case Internal Reference Number 585649</p> <p>Deutsche Bank Trust Company Americas in filing this amended SAR to include Jeffrey Epstein, the source of wealth of the affected account, as an additional subject. This SAR was originally filed on 08/17/2017, and was assigned BSA ID #31000110544793. The original SAR supplemented previous SARs filed on 09/07/2016 (BSA ID # 31000092290333) and 06/02/2017 (BSA ID #31000106384765) for which amendments are being concurrently filed, for the same reason. Additionally, the subject profile for Darren K. Indyke was updated to reflect his relationship to the affected account number as agent of client, and the cumulative amount is noted. Aside from these changes discussed above, the remainder of the SAR and the narrative below appear as they did at the time of the original filing.</p> <p>_____</p> <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</p>



BSAR Transcript
BSA: 31000150359184 and DCN:

Narrative

same party involved in the transactions described below. This current SAR contains transactions which were not reported in the previously-filed SAR.

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, 575 Lexington Ave, 4th Flr, New York, NY 10022. Indyke is the sole member and owner of the law firm. Indyke's personal residence is on record as [REDACTED]

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.

On a monthly basis, Indyke has routinely cashed a \$7,500 check drawn on Epstein's WM account at the WM private bank branch 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



BSAR Transcript
BSA: 31000150359184 and DCN:

Narrative

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.

In connection 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 call with Indyke to discuss 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 CTR Reporting. 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.