

PARVIN DAPHNE MOYNE  
[REDACTED]

September 20, 2019

**CONFIDENTIAL PURSUANT TO FED. R. CRIM. P. 6(e)**

**VIA ELECTRONIC DELIVERY**

[REDACTED]  
Assistant U.S. Attorney  
U.S. Attorney's Office  
Southern District of New York  
1 Saint Andrew's Plaza  
New York, NY 10007

*Re: July 11, 2019 Subpoena to Deutsche Bank*

Dear [REDACTED]

On behalf of our client, Deutsche Bank AG, New York Branch and its affiliates ("Deutsche Bank" or the "Bank"), we write in further response to the grand jury subpoena dated July 11, 2019 (the "Subpoena"). This letter and the enclosed document production represent the ninth submission in our client's rolling response to the Subpoena.

Enclosed with this letter is an encrypted file labeled DB-SDNY-PROD009 containing documents responsive to items 1, 2, 5, 17, 18, 23, 26, and 27 of the Subpoena. Specifically, the production contains appendices to Know Your Customer records, labeled DB-SDNY-0016252 through 0027832. The appendices pertain to the onboarding and periodic review of Jeffrey Epstein-affiliated accounts, including photo IDs and due diligence reports for parties to each account. The appendices also include articles of incorporation, corporate resolutions, and certificates of good standing for organizational clients, as well as trust documents and amendments thereto. Per our previous discussion, we have also included the December 21, 2018 "Exit Letter" transmitted to Jeffrey Epstein and his associates, labeled DB-SDNY-0027833, which communicated the Bank's intention to terminate its relationship. The decryption password for the production will be provided by separate email. As we have discussed, we continue to collect relevant information related to the Subpoena, and expect to make additional productions shortly.

\* \* \*

Because we are producing these materials pursuant to a grand jury subpoena, it is our understanding that this production will be treated as confidential consistent with Federal Rule of

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Criminal Procedure 6(e). Notwithstanding the confidentiality of the enclosed materials and information, should you receive any request for disclosure of such information, pursuant to the Freedom of Information Act or otherwise, we ask to be notified in a timely fashion and given the opportunity to object to such disclosure. Further, should you determine to disclose any materials to any third party, we ask to be given reasonable advance notice in order to allow us to pursue any available remedies. In such event, we request that you contact the undersigned by email or telephone rather than rely on regular mail or facsimile transmission to provide such notice. Please advise us if you object to or disagree with the foregoing requests.

For the avoidance of doubt, no response or document provided in response to the Subpoena shall be construed as a waiver of any applicable privilege or doctrine available to Deutsche Bank under state or federal law. If it were found that production of any of the enclosed materials constitutes disclosure of otherwise privileged matters, such disclosure would be inadvertent. By the production of such documents, Deutsche Bank does not intend to waive and has not waived the attorney-client privilege or any other protections.

Please do not hesitate to contact us at [REDACTED] or [REDACTED] if you have any questions. We look forward to continuing to work with you in a cooperative manner.

Sincerely,



Parvin D. Moyne  
James J. Benjamin, Jr.  
Thomas C. Moyer

Enclosures

EFTA00079144