



August 2, 2019

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

VIA ELECTRONIC DELIVERY



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 

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 fifth submission in our client's rolling response to the Subpoena.

Enclosed with this letter is an encrypted file labeled DB-SDNY-PROD005 containing documents responsive to items 1 and 3 of the Subpoena. Specifically, the enclosed production includes certain additional "Know Your Customer" records for Jeffrey Epstein-affiliated accounts (labeled DB-SDNY-0002515 through 0002894), and account statements for Jeffrey Epstein's custody account (labeled DB-SDNY-0001711 through 0002514). 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 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

August 2, 2019
[REDACTED]

Page 2

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, [REDACTED] 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 (212) 872-1076 or pmoyne@akingump.com if you have any questions. We look forward to continuing to work with you in a cooperative manner.

Sincerely,

A handwritten signature in black ink, appearing to read "Parvin D. Moyne". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Parvin D. Moyne
James J. Benjamin, Jr.

Enclosures

EFTA00083922