

March 3, 2020

Anjan Sahni

**FOIA CONFIDENTIAL TREATMENT REQUESTED
PURSUANT TO 28 C.F.R. § 16.8 AND 5 U.S.C. § 552**

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By E-mail (Without Enclosures) And by FedEx

[REDACTED], Esq.
Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007

Re: August 11, 2019 Grand Jury Subpoenas to JPMorgan Chase Bank, N.A., Chase Bank USA, N.A., and J.P. Morgan Securities LLC; August 16, 2019 and September 3, 2019 Grand Jury Subpoenas to JP Morgan Chase

Dear Mr. [REDACTED]:

In response to the above-referenced subpoenas, on behalf of our client JPMorgan Chase ("JPMorgan" or the "Firm"), we submit the enclosed encrypted disc containing documents bates labeled JPM-SDNY-00003382 through JPM-SDNY-00054724.

Enclosed at JPM-SDNY-00003382 through JPM-SDNY-00054724 are account statements related to Jeffrey Epstein, Ghislaine Maxwell, and [REDACTED]. For your convenience, Appendix A includes a chart identifying the account numbers, account names, and date ranges of account statements by Bates number. The chart is organized by the individual associated with each account. Consistent with our production dated September 25, 2019, accounts listed under the header "JE DM" are associated with Mr. Epstein's overall relationship with the Firm, but Mr. Epstein does not necessarily have control of or access to those accounts. Certain accounts associated with Mr. Epstein and Ms. Maxwell overlap with accounts related to "JE DM," and are identified as such.

As discussed, we anticipate making further productions on a rolling basis.

* * *

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, 28 C.F.R. § 16.8, and any other applicable law, rule, or regulation, Wilmer Cutler Pickering Hale and Dorr LLP requests on behalf of JPMorgan that confidential treatment be accorded to this letter (Bates numbered JPM-SDNY-CL-005-0001 through JPM-SDNY-CL-005-0009) and the referenced materials (Bates numbered JPM-SDNY-00003382 through JPM-SDNY-00054724 on JPM-

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Material has been marked “Confidential Treatment Requested by JPMorgan Chase.” The Confidential Material contains confidential business information concerning JPMorgan. Furthermore, public disclosure of the Confidential Material could reasonably be expected to cause substantial competitive harm to JPMorgan. Accordingly, the Confidential Material is subject to, without limitation, Exemption 4 of the FOIA, 5 U.S.C. § 552(b)(4), and the Trade Secrets Act, 18 U.S.C. § 1905, and will continue to remain exempt from mandatory disclosure even after the conclusion of the Department of Justice’s (“Department”) consideration of this matter.

We note further that, since the Confidential Material constitutes investigatory records obtained by the Department in connection with a potential law enforcement proceeding, such records are subject, at least at present, to the exemption from mandatory disclosure under Exemption 7(A) of the FOIA, 5 U.S.C. § 552(b)(7)(A).¹ Since the documents pertain to the activities of JPMorgan, its employees, and its clients and their employees and agents, and not to the activities of any federal agency, JPMorgan also believes the documents are exempt from disclosure pursuant to Exemption 7(C) of the FOIA, 5 U.S.C. § 552(b)(7)(C).²

Should any third person request the opportunity to inspect or copy the Confidential Material pursuant to the FOIA or otherwise, we request on behalf of JPMorgan that the undersigned immediately be notified of such request and be furnished with a copy of all written materials pertaining to such request (including but not limited to the request and any agency determination with respect to such request). JPMorgan expects that it will be given an opportunity to object to such disclosure. And, should the Department be inclined to grant any such request, it is JPMorgan’s expectation that, pursuant to the procedures required by 28 C.F.R. § 16.8, and Exec. Order 12,600, 52 Fed. Reg. 23,781 (1987), we will be given reasonable advance notice of any such decision to enable our client to pursue any remedy that may be available to it.³ In such event, we request that you telephone the undersigned rather than rely upon the United States mail for such notice. If the Department is not satisfied that the submission is exempt from disclosure pursuant to the FOIA, we stand ready to supply further particulars.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, recordings, or other writings of any sort whatsoever which are made by, or at the request of, any employee of the Department (or any other government agency) and which (1) incorporate, include, or relate to any of the information contained in the Confidential Material; or (2) refer to any conference, meeting, telephone conversation, or interview between (a) our client’s current or

¹ See, e.g., *NLRB v. Robbins Tire & Rubber Co.*, 437 U.S. 214 (1978).

² See *Dep’t of Justice v. Reports Comm. For Freedom of Press*, 489 U.S. 749 (1989).

³ See, e.g., *Chrysler Corp. v. Brown*, 441 U.S. 281 (1979).

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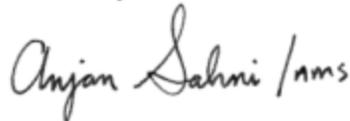
former employees, associates, representatives, agents, auditors, or counsel and (b) employees of the Department (or any other government agency).

This letter is not intended to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production.

* * *

If you have any questions, please do not hesitate to contact me at the above-referenced number.

Sincerely,

Handwritten signature of Anjan Sahni in cursive script, including the initials "/ams".

Anjan Sahni

Enclosure

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APPENDIX A

Account Number	Account Name	Date Range		Bates Range
1. Epstein Accounts				
[REDACTED]	Jeffrey E Epstein - Private Client Savings	2/28/2013	12/31/2013	JPM-SDNY-00003382 - JPM-SDNY-00003489
[REDACTED]	Jeffrey E Epstein C/O New York Strategy Group, Darren Indyke	1/31/2003	3/31/2014	JPM-SDNY-00003490 - JPM-SDNY-00005124
[REDACTED]	Jeffrey Epstein Asset Account Portfolio	12/1999	12/31/2013	JPM-SDNY-00005125 - JPM-SDNY-00007690
[REDACTED]	New York Strategy Group LLC	10/31/2006	12/31/2013	JPM-SDNY-00007691 - JPM-SDNY-00008691
[REDACTED]	JPMorgan Card	12/2012	8/2014	JPM-SDNY-00008692 - JPM-SDNY-00008763
2. Epstein & "JE DM" Accounts				
[REDACTED]	Air Ghislaine Inc	5/31/2007	1/31/2013	JPM-SDNY-00008764 - JPM-SDNY-00009262
[REDACTED]	Epstein Interests Private Bank Business Checking	3/29/2013	12/31/2013	JPM-SDNY-00009263 - JPM-SDNY-00010199
[REDACTED]	Financial Trust Company, Inc. - JPMorgan Chase Bank, N.A.	3/29/2013	12/31/2013	JPM-SDNY-00010200 - JPM-SDNY-00017329
[REDACTED]	Hyperion Air LLC	8/31/2013	3/31/2014	JPM-SDNY-00017330 - JPM-SDNY-00017409
[REDACTED]	Hyperion Air, Inc.	3/21/2013	7/31/2013	JPM-SDNY-00017410 - JPM-SDNY-00018112
[REDACTED]	JEEPERS, Inc.	2/28/2013	11/30/2013	JPM-SDNY-00018113 - JPM-SDNY-00018846

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[REDACTED]	JEGE INC	7/31/2013	3/31/2014	JPM-SDNY-00018847 - JPM-SDNY-00019556
[REDACTED]	JEGE LLC	2/28/2013	12/31/2013	JPM-SDNY-00019557 - JPM-SDNY-00019640
[REDACTED]	Mort Inc.	2/28/2013	3/31/2014	JPM-SDNY-00019641 - JPM-SDNY-00019780
[REDACTED]	Neptune LLC	9/29/2006	1/31/2013	JPM-SDNY-00019781 - JPM-SDNY-00020040
[REDACTED]	NES, LLC	4/30/2010	12/31/2013	JPM-SDNY-00020041 - JPM-SDNY-00022796
[REDACTED]	Plan D Inc	5/31/2011	1/31/2014	JPM-SDNY-00022797 - JPM-SDNY-00023151
[REDACTED]	Plan D LLC	4/30/2010	12/31/2013	JPM-SDNY-00023152 - JPM-SDNY-00023231
[REDACTED]	Southern Financial, LLC	12/31/2001	1/31/2013	JPM-SDNY-00023232 - JPM-SDNY-00023307
[REDACTED]	Southern Financial, LLC - JPMorgan Chase Bank, N.A.	5/31/2007	1/31/2013	JPM-SDNY-00023308 - JPM-SDNY-00023733
[REDACTED]	Southern Financial, LLC - JPMorgan Chase Bank, N.A.	3/29/2013	12/31/2013	JPM-SDNY-00023734 - JPM-SDNY-00023853
[REDACTED]	Southern Trust Company, Inc	3/29/2013	12/31/2013	JPM-SDNY-00023854 - JPM-SDNY-00024071
[REDACTED]	Southern Trust Company, Inc - Asset Account	8/31/2013	3/31/2014	JPM-SDNY-00024072 - JPM-SDNY-00024531
[REDACTED]	Southern Trust Company, Inc. - Business Checking	3/21/2013	7/31/2013	JPM-SDNY-00024532 - JPM-SDNY-00024595
[REDACTED]	Southern Trust Company, Inc. - Business Savings	2/28/2013	11/30/2013	JPM-SDNY-00024596 - JPM-SDNY-00024751

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[REDACTED]	THE C O U Q FDN INC	7/31/2013	3/31/2014	JPM-SDNY-00024752 - JPM-SDNY-00025413
[REDACTED]	The Haze Trust - Checking	2/28/2013	12/31/2013	JPM-SDNY-00025414 - JPM-SDNY-00026189
[REDACTED]	The Haze Trust - JPMorgan Chase Bank, N.A.	2/28/2013	3/31/2014	JPM-SDNY-00026190 - JPM-SDNY-00027075
[REDACTED]	The Haze Trust - Savings	9/29/2006	1/31/2013	JPM-SDNY-00027076 - JPM-SDNY-00027847
[REDACTED]	Zorro Trust	4/30/2010	12/31/2013	JPM-SDNY-00027848 - JPM-SDNY-00028369
3. "JE DM" Accounts				
[REDACTED]	New York Strategy Group, LLC - Business Checking, Money Market Investment Account	4/30/2003	3/31/2014	JPM-SDNY-00028370 - JPM-SDNY-00028683
[REDACTED]	Darren K Indyke PLLC	10/31/2008	12/31/2013	JPM-SDNY-00028684 - JPM-SDNY-00029203
[REDACTED]	DARREN K. INDYKE IRA ROLLOVER	2/28/2010	12/31/2013	JPM-SDNY-00029204 - JPM-SDNY-00029553
[REDACTED]	Darren R Indyke PLLC ATTY TR Acct-Client Funds Account	2/27/2009	12/31/2013	JPM-SDNY-00029554 - JPM-SDNY-00029897
[REDACTED]	Darren R Indyke PLLC ATTY TR Acct-Client Funds Account - Savings	3/31/2009	12/31/2013	JPM-SDNY-00029898 - JPM-SDNY-00036856
[REDACTED]	Financial Trust Company, Inc. - JPMorgan Private Bank	5/31/2002	7/31/2013	JPM-SDNY-00036857 - JPM-SDNY-00039474

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[REDACTED]	Financial Trust Company, Inc. - Morgan Guaranty Trust Company	8/31/1999	7/31/2013	JPM-SDNY-00039475 - JPM-SDNY-00039826
[REDACTED]	HBRK Associates Inc	10/31/2008	12/31/2013	JPM-SDNY-00039827 - JPM-SDNY-00040048
[REDACTED]	Lyn & JOJO LLC	4/28/2006	10/31/2013	JPM-SDNY-00040049 - JPM-SDNY-00041313
[REDACTED]	Southern Trust Company, Inc - Derivatives Account	7/31/2013	12/31/2013	JPM-SDNY-00041314 - JPM-SDNY-00041361
[REDACTED]	The 2007 Jeffrey E Epstein Insurance Trust #3 DTD 11/01/2007	11/28/2008	12/31/2013	JPM-SDNY-00041362 - JPM-SDNY-00041639
[REDACTED]	The Jeffrey E Epstein Insurance Trust #1 DTD 11/01/2007	11/28/2008	1/31/2013	JPM-SDNY-00041640 - JPM-SDNY-00041843
[REDACTED]	The Jeffrey E Epstein Insurance Trust #2 DTD 11/01/2007	11/28/2008	1/31/2013	JPM-SDNY-00041844 - JPM-SDNY-00042051
4. "JE DM" & Maxwell Accounts				
[REDACTED]	Max Foundation	9/30/2009	5/30/2014	JPM-SDNY-00042052 - JPM-SDNY-00043105
[REDACTED]	116 EAST 65TH ST LLC	10/2006	4/30/2014	JPM-SDNY-00043106 - JPM-SDNY-00044447
[REDACTED]	Ellmax	9/30/2011	4/30/2014	JPM-SDNY-00044448 - JPM-SDNY-00044667
[REDACTED]	Pot and Kettle	9/30/2011	4/30/2014	JPM-SDNY-00044668 - JPM-SDNY-00044879
[REDACTED]	Terra Mar Project, Inc.	4/30/2012	4/30/2014	JPM-SDNY-00044880 - JPM-SDNY-00045131

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[REDACTED]	Terra Mar Project, Inc. - Savings Account	4/30/2012	4/30/2014	JPM-SDNY-00045132 - JPM-SDNY-00045259
5. Maxwell Accounts				
[REDACTED]	Ghislaine Maxwell - OAP IHD, TAP DYS, TAP ARFI	1/31/2013	6/30/2014	JPM-SDNY-00045260 - JPM-SDNY-00046933
[REDACTED]	Ghislaine Maxwell - Asset Account Portfolio	2/28/2005	5/31/2014	JPM-SDNY-00046934 - JPM-SDNY-00049525
[REDACTED]	Ghislaine Maxwell - HY	10/2/2019	4/30/2014	JPM-SDNY-00049526 - JPM-SDNY-00050097
[REDACTED]	Ghislaine Maxwell - OAP FDG	7/31/2011	3/31/2014	JPM-SDNY-00050098 - JPM-SDNY-00050891
[REDACTED]	Ghislaine Maxwell IRA	5/31/2008	3/31/2014	JPM-SDNY-00050892 - JPM-SDNY-00051717
[REDACTED]	Ghislaine Maxwell JPMorgan Chase Bank, N.A. Money Mark Deposit Account	9/30/2009	4/30/2014	JPM-SDNY-00051718 - JPM-SDNY-00051941
[REDACTED]	Ghislaine Maxwell Premier Checking	3/31/2003	4/30/2014	JPM-SDNY-00051942 - JPM-SDNY-00052759
[REDACTED]	Chase Business Custom Checking Max Hotel Services Corp	5/2011	4/2014	JPM-SDNY-00052760 - JPM-SDNY-00052901
6. [REDACTED] Accounts				
[REDACTED]				

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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]