

September 2, 2020

Anjan Sahni

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

[REDACTED] (b)
[REDACTED] (b)

By E-mail And By FTP

[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; October 9, 2019 Grand Jury Subpoenas to JPMorgan Chase Bank, N.A. And All Affiliates

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 zip files containing documents bates labeled JPM-SDNY-00054737 through JPM-SDNY-00055530.

As you know, on November 15, 2019, we produced wire data for certain accounts related to Jeffrey Epstein or Ghislaine Maxwell (JPM-SDNY-00000004 through JPM-SDNY-00000011). We have since identified additional wire data for certain accounts related to Mr. Epstein, Ms. Maxwell, or [REDACTED]. Enclosed at JPM-SDNY-00054737 through JPM-SDNY-00054772 are Excel files reflecting the wire activity for account numbers related to Mr. Epstein, Ms. Maxwell, or Ms. [REDACTED]. The data was collected from at least 2007 to August 2019. Please note that the data enclosed at JPM-SDNY-00054771 and JPM-SDNY-00054772 was previously produced at JPM-SDNY-00000009; this data is being reproduced with some additional data.

For your convenience, Appendix A includes a chart identifying the account numbers and account names by Bates number. The chart is organized by the individual associated with each account. Consistent with our productions dated September 25, 2019 and November 15, 2019, accounts listed under the header "JE DM" are associated with Mr. Epstein's overall relationship with the Firm, but Mr. Epstein did 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.

Additionally, in response to your request that JPMorgan provide "[a]ny email addresses associated with the accounts/account holders," as noted in our December 4, 2019 letter (JPM-SDNY-CL-003-00001), we are aware of the following email addresses that may have been associated with Mr. Epstein: jeevacation@gmail.com; jeffrey@jeffreypestein.org; and jeeproject@yahoo.com. We

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only identified communications with the jeevacation@gmail.com and jeeproject@yahoo.com email addresses. We are aware of the following email addresses that may have been associated with Ms. Maxwell: [REDACTED] and [REDACTED]. We are aware of the following email addresses that may have been associated with Ms. [REDACTED]: [REDACTED]; [REDACTED]; and [REDACTED].

Finally, enclosed at JPM-SDNY-00054773 through JPM-SDNY-00055530 are productions of data for accounts related to [REDACTED] [REDACTED] (JPM-SDNY-00054773 through JPM-SDNY-00055517) and Ms. Maxwell (JPM-SDNY-00055518 through JPM-SDNY-00055530). Please note that the data enclosed at JPM-SDNY-00054773 through JPM-SDNY-00055530 were previously produced without Bates numbering; they are being reproduced with Bates numbering.

As discussed, with these productions, JPMorgan has completed its response to the above-referenced subpoenas. Should you require any additional materials (including in response to the requests to which you agreed on our August 10, 2020 call that JPMorgan need not respond absent further instruction), please do not hesitate to contact us.

* * *

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-007-0001 through JPM-SDNY-CL-007-0005) and the referenced materials (Bates numbered JPM-SDNY-00054737 through JPM-SDNY-00055530 on JPM-SDNY-VOL-007 and SDNY-VOL-008) (collectively, the “Confidential Material”). Accordingly, the Confidential 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

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

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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).¹

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 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, do not hesitate to contact me at the above-referenced number.

Sincerely,

Anjan Sahni

Enclosure

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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APPENDIX A

Account Number	Account Name	Bates Number
1. Epstein Accounts		
[REDACTED]	Butterfly Trust	JPM-SDNY-00054737
[REDACTED]	Enhanced Education	JPM-SDNY-00054738
2. Epstein & "JE DM" Accounts		
[REDACTED]	Air Ghislaine Inc	JPM-SDNY-00054739
[REDACTED]	Epstein Interests Private Bank Business Checking	JPM-SDNY-00054740
[REDACTED]	Hyperion Air LLC	JPM-SDNY-00054741
[REDACTED]	Hyperion Air, Inc.	JPM-SDNY-00054742
[REDACTED]	JEGE INC	JPM-SDNY-00054743
[REDACTED]	JEGE LLC	JPM-SDNY-00054744
[REDACTED]	Mort Inc.	JPM-SDNY-00054745
[REDACTED]	Neptune LLC	JPM-SDNY-00054746
[REDACTED]	NES, LLC	JPM-SDNY-00054747
[REDACTED]	Plan D LLC	JPM-SDNY-00054748
[REDACTED]	Southern Financial, LLC	JPM-SDNY-00054749
[REDACTED]	Southern Trust Company, Inc. - Business Checking	JPM-SDNY-00054750
[REDACTED]	Southern Trust Company, Inc. - Business Savings	JPM-SDNY-00054751
[REDACTED]	THE C O U Q FDN INC	JPM-SDNY-00054752
[REDACTED]	The Haze Trust - Checking	JPM-SDNY-00054753
[REDACTED]	The Haze Trust - Savings	JPM-SDNY-00054754
[REDACTED]	Zorro Trust	JPM-SDNY-00054755
3. "JE DM" Accounts		
[REDACTED]	Darren K Indyke PLLC	JPM-SDNY-00054756
[REDACTED]	Darren R Indyke PLLC ATTY TR Acct-Client Funds Account	JPM-SDNY-00054757
[REDACTED]	Darren R Indyke PLLC ATTY TR Acct-Client Funds Account - Savings	JPM-SDNY-00054758
[REDACTED]	HBRK Associates Inc	JPM-SDNY-00054759
[REDACTED]	New York Strategy Group, LLC - Business Checking, Money Market Investment Account	JPM-SDNY-00054760
[REDACTED]	New York Strategy Group, LLC - Business Checking, Money Market Investment Account	JPM-SDNY-00054761
[REDACTED]	The 2007 Jeffrey E Epstein Insurance Trust #3 DTD 11/01/2007	JPM-SDNY-00054762
4. "JE DM" & Maxwell Accounts		
[REDACTED]	116 EAST 65TH ST LLC	JPM-SDNY-00054763
[REDACTED]	Ellmax	JPM-SDNY-00054764

Confidential Treatment Requested by JP Morgan Chase

JPM-SDNY-CL-007-0004

EFTA00096345

[REDACTED]	Max Foundation	JPM-SDNY-00054765
[REDACTED]	Max Foundation	JPM-SDNY-00054766
[REDACTED]	Pot and Kettle	JPM-SDNY-00054767
[REDACTED]	Terra Mar Project, Inc.	JPM-SDNY-00054768
5. Maxwell Accounts		
[REDACTED]	Chase Business Custom Checking Max Hotel Services Corp	JPM-SDNY-00054769
6. [REDACTED] Accounts		
[REDACTED]	AVILOOP LLC - Chase Business Select Checking	JPM-SDNY-00054770
[REDACTED]	[REDACTED] Checking and Savings	JPM-SDNY-00054771
[REDACTED]	[REDACTED] Checking and Savings	JPM-SDNY-00054772