



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 22, 2019

VIA EMAIL AND FIRST CLASS MAIL

Nicolas Bourtin, Esq.
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004

Re: Law Enforcement Request to Keep TD Bank Accounts Open

Dear Mr. Bourtin:

Consistent with FinCEN Guidance FIN-2007-G002 (Issued June 13, 2007), the Government requests that TD Bank refrain from closing any TD Bank accounts for the individuals and/or entities described below (the "Listed Accounts") for a period of one month from today's date. We are currently conducting an investigation involving the Listed Accounts, and we are making this request that you keep them open because closing them at this time might jeopardize our investigation. The Listed Accounts are any TD Bank accounts associated with the following individuals and/or entities:

NAME	ADDRESS
[REDACTED]	[REDACTED]
Butterfly Trust	co HBRK Associates Inc 575 Lexington Ave 4th Fl New York, NY 10022
Aviloop LLC	340 Commercial St 4th Floor Manchester, NH 02101

We understand that in keeping the Listed Accounts open, you will be conducting your business in the ordinary course, which may involve processing certain transactions (*e.g.*, deposits, withdrawals, check clearing, ACH) and taking instructions from the Listed Accounts' authorized persons to conduct fund transfers. We also understand that in maintaining the Listed Accounts in the ordinary course it may be necessary for you to speak to the Listed

Letter to Nicolas Bourtin, Esq. re TD Bank
October 22, 2019

Accounts' authorized persons from time to time, and we will not assert any claims against you for keeping the Listed Accounts open and operating them in the ordinary course from this date forward. This does not relieve you of your legal obligation to monitor account activity and file Bank Secrecy Act reports, as appropriate.

At the end of the period referenced above, we may renew our written request for an additional period. If we do not provide you with a written request to renew, we understand that you may choose to immediately close the Listed Accounts.

Notwithstanding our request that you keep the Listed Accounts open, we understand that you are not legally required to do so. **In the event that you do decide to terminate the Listed Accounts, please contact me at the number below prior to taking action.**

We will try to provide you with reasonable prior notice in the event that our Office intends to issue a press release about the Listed Accounts or their owners or authorized persons.

We request that you do not disclose the contents of this letter (or any renewals) to the Listed Accounts' owners or to any unauthorized third parties. Thank you very much for your assistance with this matter.

Very truly yours,

GEOFFREY S. BERMAN
United States Attorney

By:

[REDACTED]
Assistant United States Attorney
Southern District of New York
[REDACTED]