

From: [REDACTED]

To: [REDACTED]

Subject: FW: A Few Additional Subjects in Epstein Litigation

Date: Tue, 18 Apr 2023 13:22:24 +0000

Importance: Normal

Good morning [REDACTED]

We received additional names to deconflict with your case. See the names below in yellow. Does the FBI has any objection in releasing these additional SARs?

Thanks for your help.

[REDACTED]

From: [REDACTED]

Sent: Tuesday, April 18, 2023 8:40 AM

[REDACTED]

Subject: [EXTERNAL EMAIL] - A Few Additional Subjects in Epstein Litigation

Privileged/BSA Confidential

[REDACTED]

Hope you've been well, and thanks again for all of your help related to the Epstein matter a couple of weeks back.

Minor follow up. Yesterday, we received a supplemental request for authorization to use six additional SARs in that litigation (subject to the protective order) —although four of the SARs are just amended versions of SARs previously reviewed.

Now, all of these SARs involve some of the subjects listed in your April 4 email (below) as objectionable, and thus we'll work with the SDNY prosecutors on those re any concerns related to the Maxwell appeal, as we are with the other SARs with those subjects.

But, just to be safe, we also wanted to be certain that the handful of new subjects from the supplemental SARs didn't raise any addition concerns—i.e., any concerns beyond any relationship to the Maxwell appeal.

The new subjects from these SARs are as follows:

[REDACTED]

So, when you have a chance, please let me know if you all have any concerns related to these SAR subjects. Not an emergency, but the parties are pressing us for a response ASAP, so please let us know as soon as you reasonably can.

Thanks!

From: [REDACTED]

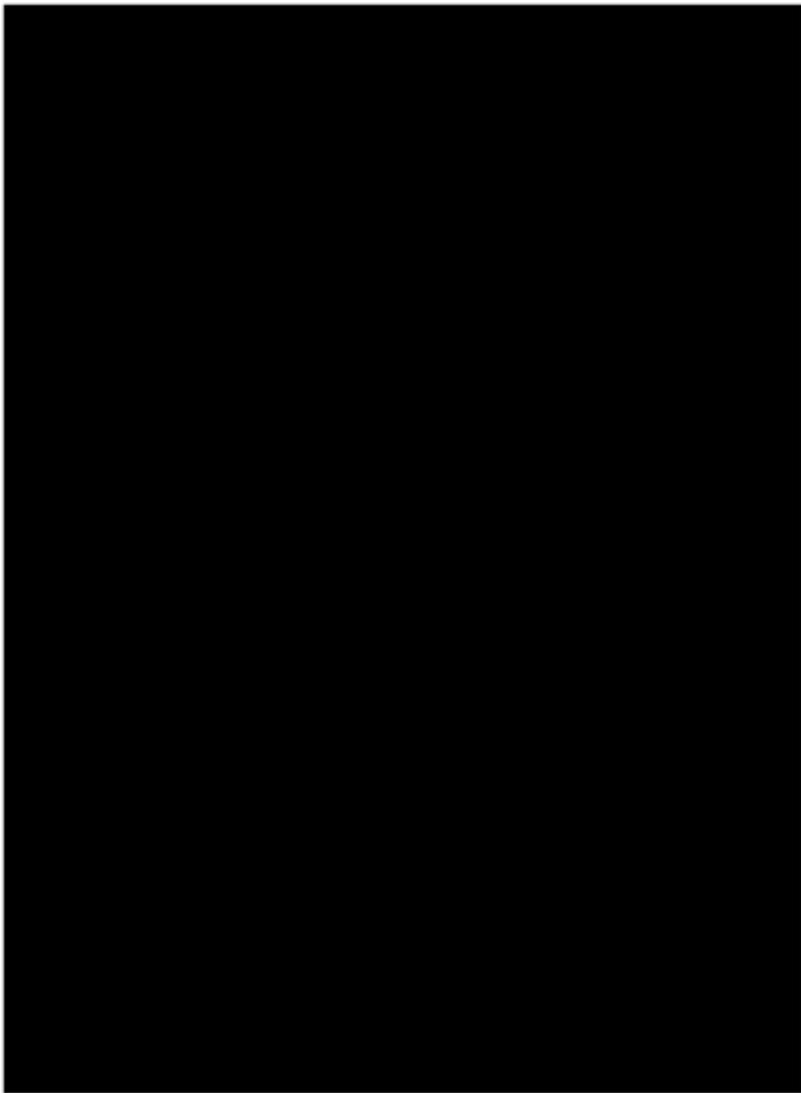
Sent: Tuesday, April 4, 2023 12:04 PM

Subject: [EXTERNAL]RE: Urgent: FinCEN matter

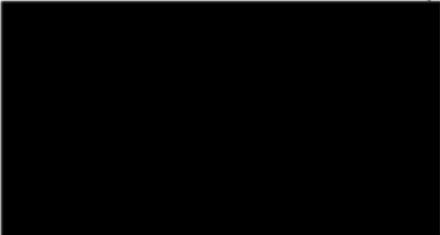
Hi,

The FBI legal department from our New York Office objects to the release of information as it pertains to an ongoing matter, specifically the appeal of the Ghislaine Maxwell conviction. If you would like to discuss the matter with them, please contact:

The names they object to are:



Do not hesitate to let me know if you need any further assistance.



From: [Redacted]

Sent: Tuesday, April 4, 2023 11:23 AM



Subject: [EXTERNAL EMAIL] - RE: Urgent. FINCEN matter

Got it, thanks!



From: [Redacted]

Sent: Tuesday, April 4, 2023 11:22 AM



[REDACTED]
Subject: [EXTERNAL]RE: Urgent: FinCEN matter

There are no issues with the no concerns. The hold on is for the remaining 45 names.

[REDACTED]

From: [REDACTED]
Sent: Tuesday, April 4, 2023 11:19 AM

[REDACTED]
Subject: [EXTERNAL EMAIL] - RE: Urgent: FinCEN matter

Hi again, in light of your 10:43 "please hold" email – confirming whether this batch is still "no concerns" or should we hold on it as well? Many thanks.

[REDACTED]

From: [REDACTED]
Sent: Tuesday, April 4, 2023 9:45 AM

[REDACTED]
Subject: [EXTERNAL]RE: Urgent: FinCEN matter

Hi,

Attached is a list of "no concerns" from the batch received 3/29. The no concerns list from 3-27 and 3-28 batches was previously sent. For the remaining 45 names pending to be deconflicted, we expect to receive a response by COB tomorrow.

Thank you.

[REDACTED]

From: [REDACTED]
Sent: Tuesday, April 4, 2023 7:05 AM

[REDACTED]
Subject: FW: Urgent: FinCEN matter

FYI

[REDACTED]

From: [REDACTED]
Sent: Monday, April 3, 2023 3:39 PM

[REDACTED]
Subject: [EXTERNAL EMAIL] - RE: Urgent: FinCEN matter

Privileged/Confidential

[REDACTED]
Hope all is well. I understand that you work with [REDACTED] as the FBI reps/liaisons to FinCEN? And you may have been assisting [REDACTED] with ensuring that disclosing the Epstein-related SARs (subject to a protective order) in the Epstein-related litigation in the Southern District of New York won't cause problems for the FBI?

If so, given that [REDACTED] is on leave today, I was asked to check in with you and see if you could give us at FinCEN a brief progress report. Just a sentence or two would suffice. For example, I assume you all are still reviewing the first set of subjects, which [REDACTED] has previously estimated you all would need until this Wednesday to complete? (And thus haven't started on the second set yet?) Any updates I can pass up the chain this afternoon?

Thanks!

[REDACTED]

From: [REDACTED]
Sent: Wednesday, March 29, 2023 4:53 PM

[REDACTED]
Subject: Re: Urgent: FinCEN matter

Hi [REDACTED], understood. Is it possible for your colleague to start running the checks on the new tranche that [REDACTED] sent earlier, with a goal of wrapping everything up when you return if possible? We are looking to show that things are in motion. The colleague can send us results on a rolling basis if that would work.

If there are any issues with prioritization across the FinCEN projects, please let us know. The Front Office can help.

Let us know if you or your colleague would like to discuss.

Many thanks.

[REDACTED]

From: [REDACTED]
Sent: Wednesday, March 29, 2023 2:46:00 PM

[REDACTED]
Subject: [EXTERNAL]RE: Urgent: FinCEN matter

H [REDACTED]

What's the latest we can respond to the first set of subjects?

What's the deadline for this second request? I am out of the office on vacation starting tomorrow and will return next Tuesday. So I may not have ready this second request until late next week. We are just two employees assigned to FinCEN, and we also have to continue handling all other requests from employees.

[REDACTED]

-----Original Message-----

From: [REDACTED]

Sent: Wednesday, March 29, 2023 1:38 PM

[REDACTED]

Subject: [EXTERNAL EMAIL] - RE: Urgent: FinCEN matter

Privileged/BSA Confidential

[REDACTED]

As I believe [REDACTED] mentioned, earlier this week, we received a related request to disclose another set of SARs in the same litigation. As opposed to the first set filed by JPMorgan, these were filed by Deutsche Bank.

We've now gone through those and identified the subjects of the SARs in this latest request (that weren't already included in the last set--there was some overlap that we de-duped). Please see the attached list of subjects for your evaluation. The JPMorgan subjects we previously sent take priority, but this request is also time-sensitive.

And because this is part of the same litigation, the answers to your questions re the purpose of the disclosures, etc., remain unchanged.

Much appreciated,

[REDACTED]

-----Original Message-----

From: [REDACTED]

Sent: Wednesday, March 29, 2023 10:47 AM

[REDACTED]

Subject: RE: Urgent: FinCEN matter

This is great, thank you!

I'm attempting to be OOO this afternoon and Friday, so please continue to include [REDACTED] on updates or if we can help in any way.

[REDACTED]

-----Original Message-----

From: [REDACTED]
Sent: Wednesday, March 29, 2023 10:41 AM

Subject: [EXTERNAL]RE: Urgent: FinCEN matter

Hi [REDACTED],

Here are the "no concerns".

-----Original Message-----

From: [REDACTED]
Sent: Tuesday, March 28, 2023 2:45 PM

To: [REDACTED]
Subject: [EXTERNAL EMAIL] - Re: Urgent: FinCEN matter

Many thanks. Do you think you will have heard back from all the relevant FBI folks by Thursday, or do you mean that you will have gotten all the inquiries out by then?

Also, is it possible to get the IDs for which the response has been "no concerns" or similar thus far, as an interim step? (We are considering a partial authorization as a step forward.)

Again, we know this is a big lift and appreciate all your efforts!

[REDACTED]

From: [REDACTED]
Sent: Tuesday, March 28, 2023 12:48 PM

Subject: [EXTERNAL]RE: Urgent: FinCEN matter

Hello,

We should be done by Thursday. Was this list sent to other agencies for deconfliction?

-----Original Message-----

From: [REDACTED]
Sent: Tuesday, March 28, 2023 12:19 PM

[REDACTED]
Subject: [EXTERNAL EMAIL] - Re: Urgent: FinCEN matter

Bank Secrecy Act Confidential

Hi [REDACTED],

Thank you again for all you are doing to support us on this high-profile matter.

We have one potential correction from list we already sent you. I think you have the name [REDACTED] which should be [REDACTED]

Realizing that this is a LOT of work, our bosses have inquired whether you have a sense of an ETA, as well as whether we can do anything to support you. Happy to discuss if that is easier for you.

Best,

[REDACTED]

From [REDACTED]

Sent: Monday, March 27, 2023 4:02:03 PM

[REDACTED]
Subject: [EXTERNAL]RE: Urgent: FinCEN matter

Thank you! We are working on your request.

[REDACTED]

From: [REDACTED]

Sent: Monday, March 27, 2023 2:07 PM

To: [REDACTED]

Subject: [EXTERNAL EMAIL] - RE: Urgent: FinCEN matter

Privileged/BSA Confidential

EFTA00162426

[REDACTED]

Sorry that took a minute. Here are our responses. Hope this is what you need. If not, or if you need more information, please just let us know.

- Purpose of disclosing the reports

Discovery in a series of civil lawsuits in the Federal District Court for the Southern District of New York against banks based on the banks' provision of financial services to sex offender Jeffrey Epstein. Specifically, an unnamed Epstein victim (and a claimed class of victims, "Doe") are suing both JP Morgan Chase and Deutsche Bank. The government of the U.S. Virgin Islands is separately suing JP Morgan. The cases have been consolidated for discovery.

- Who is requesting disclosing these reports

Both the USVI and JP Morgan are seeking disclosure of the SARs in that matter, and all parties are seeking disclosure in the Doe matters.

- Who will be receiving or viewing these reports

Initially, just the attorneys representing the banks and the attorneys for the plaintiffs. But we anticipate the banks are likely seek further authorization to disclose the reports to the plaintiffs themselves, each other (i.e., for Deutsche Bank to see the JPMorgan reports and vice versa), and witnesses (e.g., expert witnesses, bank employees). There are protective orders in place that cover SAR confidentiality.

- Any other relevant information would assist the agents in deciding whether to object or not

Many of these reports relate to transactions that took place over a decade ago, though some of the reports themselves were not filed until roughly a decade later, after Epstein's arrest. We are not aware ourselves of any ongoing investigations related to these matters. Although FinCEN normally does not authorize the disclosure of reports in civil litigation, this litigation presents special circumstances, and the presiding judge has indicated he may order the reports' disclosure if FinCEN does not authorize it.

Best,

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: Monday, March 27, 2023 12:46 PM

[REDACTED]

Subject: [EXTERNAL]RE: Urgent: FinCEN matter

To be able to deconflict with case agents and supervisors, can you please indicate the following?

- Purpose of disclosing the reports
- Who is requesting disclosing these reports
- Who will be receiving or viewing these reports
- Any other relevant information would assist the agents in deciding whether to object or not

Thank you.

[REDACTED]

From: [REDACTED]

Sent: Monday, March 27, 2023 10:43 AM

[REDACTED]

Subject: [EXTERNAL EMAIL] - RE: Urgent: FinCEN matter

Thanks for the update, [REDACTED] Please move as quickly as practical, but we realize you can only do so much.

[REDACTED]

From [REDACTED]

Sent: Monday, March 27, 2023 10:40 AM

Subject: [EXTERNAL]RE: Urgent: FinCEN matter

Hi,

This is a long list, it will take time. It will not be ready by COB today.

From [REDACTED]

Sent: Monday, March 27, 2023 9:58 AM

Subject: [EXTERNAL EMAIL] - RE: Urgent: FinCEN matter

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[REDACTED]

As Katrina indicated, attached please find the first batch of SAR names and dates of birth (where known/applicable). As Katrina noted, this process is taking a bit longer than we originally hoped and we're still working through a number of additional SARs. Thus, we'll shoot to have you a supplemental list later today (which I hope to be short, as I'm expecting a lot of the same subjects in the remaining SARs).

If you have any questions, please let us know.

Best,

EFTA00162429

[REDACTED]

From [REDACTED]
Sent: Monday, March 27, 2023 8:16 AM

[REDACTED]

Subject: Re: Urgent: FinCEN matter

Hi [REDACTED] thank you for speaking with me on Friday and for agreeing to help with this. There are more names than anticipated because several of the SARs have multiple subjects.

I'm about to take off on a flight. My colleague Tim (copied) is coordinating this for us, and will have the first batch of names and DOBs (where applicable) shortly.

Pls feel free to reach out to Tim if you need anything.

[REDACTED]

From [REDACTED]
Sent: Friday, March 24, 2023 4:18:19 PM

[REDACTED]
Subject: Urgent: FinCEN matter

H [REDACTED]

[REDACTED] gave me your email address. Seeking your help with an urgent SAR matter. Realizing that it's late on a Friday, could you please give me a call? If you aren't available, could you direct me to a colleague who could help me with a fast-moving matter?

Thank you very much in advance,

