

Akin Gump
STRAUSS HAUER & FELD LLP

PARVIN DAPHNE MOYNE

December 24, 2019

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

VIA ELECTRONIC DELIVERY

Assistant U.S. Attorney
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 Mr. [REDACTED]:

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

Enclosed with this letter is an encrypted file labeled DB-SDNY-PROD013, responsive to items 1, 2, 3, 4, 5, 6, 7, 8, 9, 17, 18, 19, 20, 21, 24, 26, and 27 of the Subpoena. The documents are labeled DB-SDNY-0100861 to 0124801. We have prepared a production index, attached as Appendix A, which identifies the following categories of documents responsive to the Subpoena:

- [REDACTED] *Emails*: Today's production contains emails from the custodial files of [REDACTED], who served as Jeffrey Epstein's relationship manager from 2013 to 2016. The emails generally relate to Mr. [REDACTED] management of the Bank's relationship with Jeffrey Epstein and his associates. Mr. [REDACTED] emails are responsive to multiple requests in the Subpoena, including account openings, KYC reviews, wire transfers, and correspondence with account holders. Mr. [REDACTED] emails are identified as "[REDACTED] Emails" in the attached production index.
- [REDACTED] *Emails*: Today's production contains emails from the custodial files of [REDACTED], who served as the Co-Head of [REDACTED] from 2013 to 2016. Mr. Packard was involved in the decision to

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onboard Mr. Epstein as a client, as well as the decision to maintain the relationship after concerns were raised in January 2015. Mr. [REDACTED] emails are designated “[REDACTED] Emails” in the attached production index.

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 in the near future.

* * *

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 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, Deutsche Bank 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 [REDACTED] or [REDACTED] if you have any questions. We look forward to continuing to work with you in a cooperative manner.

Sincerely,



Parvin D. Moyne
James J. Benjamin, Jr.
Thomas C. Moyer

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[REDACTED]
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Enclosures