

From: "Stoddart, Allison" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>, "Sahni, Anjan"
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Subject: RE: [REDACTED] entities subpoenas
Date: Mon, 23 Sep 2019 13:09:53 +0000

Thanks, [REDACTED]. That works for us.

Allison

From: [REDACTED] <[REDACTED]>
Sent: Saturday, September 21, 2019 3:15 PM
To: Stoddart, Allison <[REDACTED]>; Sahni, Anjan <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: [REDACTED] entities subpoenas

EXTERNAL SENDER

Allison,

Thanks for checking in. Regarding the production format for the wire information, unless it's burdensome or the materials are very voluminous, we'd like to receive both the Excel and PDF versions. Let us know, though, if that's an issue. For the second question, why don't you produce the information as it's currently organized in the first instance, and we can get a sense of the volume, structure, searchability, etc. If we then think it would be useful to receive the information by account (which I think ordinarily is easiest for us, though may not be necessary here), we can circle back, if that all sounds alright to you?

thanks,
[REDACTED]

From: Stoddart, Allison <[REDACTED]>
Sent: Friday, September 20, 2019 14:10
To: [REDACTED] <[REDACTED]>; Sahni, Anjan <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: [REDACTED] entities subpoenas
[REDACTED]

We are preparing to produce account lists early next week. We have also started to receive certain wire information, but wanted to discuss the format of that data with you before producing it.

First, the wire information is available in two formats that contain identical information: PDF and Excel. For each transaction, the PDF version has a two-page summary of date, amount, sender, recipient, and other related information. The two-page summaries are compiled chronologically into a single multi-page PDF across all of the individual's accounts. The Excel version includes all of the same information, but each transaction is reflected in a single row. The Excel format is more easily accessible on our end, and we assume that it is more useful for you. Therefore, we would propose to produce only the Excel version, but please let us know if you would like the PDF compilations as well.

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Second, the wire information is pulled by client name and is organized chronologically across all of that individual's accounts. (Note that pulling by name also pulls in instances where the individual's name is mentioned only in the payment details, even where the individual is neither sending nor receiving the money.) The account information for sender and recipient is visible for each transaction, but because the account may be in the "Order," "Debit," or "Credit" Party fields, it is not easily sortable by account number. In light of your request below, please let us know if you would like us to organize the data by account before production. This will take a little work for the Excel format, but is feasible. Given the volume of transactions, it would be incredibly time-consuming to reorganize the PDF compilations.

Happy to discuss further.

Thanks and have a great weekend,
Allison

Allison Stoddart | WilmerHale

250 Greenwich Street
New York, NY 10007 USA

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, September 17, 2019 10:11 AM
To: Sahni, Anjan <[REDACTED]>; Stoddart, Allison <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: [REDACTED] entities subpoenas

EXTERNAL SENDER

Anjan,

Thanks, and this all makes sense. We're happy to get wire information on a rolling basis, and other than that I think it probably will be most efficient for us to receive the priority categories together (as to any individual account) unless there will be a significant time lag due to any particular type of record, which we're happy to be in touch about as you get your arms around the materials. And as always we can be in touch as the process progresses to refine the approach as useful.

thanks,

From: Sahni, Anjan <[REDACTED]>
Sent: Monday, September 16, 2019 23:44
To: [REDACTED] <[REDACTED]>; Stoddart, Allison <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: [REDACTED] entities subpoenas

Thanks, [REDACTED] We're aiming to provide a list of accounts (along with account types) for each of Epstein, [REDACTED], and Maxwell by the end of this week or early next week.

We are prioritizing the collection of [REDACTED] and Maxwell documents, and will also prioritize Butterfly Trust documents. We will do our best to organize the documents in a way that's easily digestible and will certainly provide indices. As you

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noted, some information may be available to us sooner (e.g., wire information) than others (e.g., account statements). Assuming that you'd prefer that we provide information quickly, we'll plan to produce such account information on a rolling basis, but we are happy to hold off until we have collected all of the priority categories – account statements, wire records, account opening documents, and KYC materials – for a given account. Let us know your preference.

Thanks,
Anjan

From: [REDACTED] <[REDACTED]>
Sent: Sunday, September 15, 2019 5:42 PM
To: Sahni, Anjan <[REDACTED]>; Stoddart, Allison <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: [REDACTED] entities subpoenas

EXTERNAL SENDER

Anjan, Allison,

Following up on our discussion earlier this week, wanted to provide some additional information and to confirm some of what we spoke about. We had talked about the likely usefulness of an index—or other description or list—of the number and type of accounts that would be covered by the requests in each of the subpoenas; we certainly understand that may take time, but do you have an estimate of approximately when that information would be available?

As we discussed, although the investigation continues to move forward quickly in all aspects, to the extent the pending subpoenas are being processed in some serial order, the subpoenas relating to Ghislaine Maxwell and [REDACTED] dated August 16 and September 3, respectively, are more time-sensitive for us than the subpoenas relating to Jeffrey Epstein, dated August 11. (Please note that there is a typo in the September 3 subpoena—in the "NAME" field, the second name should say ' [REDACTED] ' rather than [REDACTED] please let us know if we need to serve a corrected version of the subpoena for your records.)

For the Maxwell and [REDACTED] subpoenas, we are especially interested in incoming check and wire information, as well as account statements, in the first instance. And as we also talked about, more generally we are prepared to receive productions on a rolling basis, with account statements, wire records, account opening documents, and KYC materials being prioritized in particular. And if you're able to keep us posted on the likely scope of responsive documents, we'll use that information to further focus and target our requests.

In terms of logistics, I think I neglected to mention this on the phone, but wanted to also note that we sometimes receive [REDACTED] entity subpoena responses that are unusually disorganized—either not separated by account, or that only include account statements and not other associated requested materials, or unaccompanied by an index or other way to discern what materials are reflected in thousands or tens of thousands of pages in a production, etc. My recollection from prior fights with [REDACTED] is that this is in significant part due to the fact that their records still need to be individually printed and scanned for production (and that a fully-electronic review and production system, while in progress, is still a year or two away). We're of course very heartened that these particular productions will go through you, which I imagine will mitigate those issues, but we do want to formally request that any productions be organized by account, produced in electronic format, and accompanied by indices linked to production numbers so we can make sense of what we receive.

Finally, with respect to areas of particular focus, we would like to request expedited production of any records relating to accounts in the name of, or for the benefit of, "Butterfly Trust," in connection with the Epstein subpoenas.

Please let us know if any additional information would be useful, thanks again for talking with us last week, and we look forward to being in touch again soon.

[REDACTED]
[REDACTED]
[REDACTED]
Assistant U.S. Attorney
Southern District of New York
[REDACTED]

From: [REDACTED]
Sent: Monday, September 09, 2019 09:04
To: Sahni, Anjan <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; Stoddart, Allison [REDACTED]
Subject: Re: [REDACTED] entities subpoenas

Sure, give us a call at 10:15. Talk with you then.

[REDACTED]

On Sep 9, 2019, at 09:00, Sahni, Anjan <[REDACTED]> wrote:

Thanks [REDACTED]. We can call you at the number below. If it's possible to do 10:15, that would be great.

Best,
Anjan

On Sep 6, 2019, at 7:24 PM, [REDACTED] <[REDACTED]> wrote:

EXTERNAL SENDER

That works for us. Please let us know if there's a number we should call you at, otherwise we'll be reachable then at

[REDACTED]
[REDACTED]
thanks,

From: Sahni, Anjan [REDACTED]
Sent: Friday, September 06, 2019 19:16
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; Stoddart, Allison [REDACTED]
Subject: Re: [REDACTED] entities subpoenas

Thanks [REDACTED] 10am on Monday?

On Sep 6, 2019, at 2:34 PM, [REDACTED] <[REDACTED]> wrote:

EXTERNAL SENDER

Anjan,

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We unfortunately have a meeting starting imminently that we expect may go a couple hours. We could do anytime before noon on Monday, though, if there's a time then that works for you?

thanks,
[REDACTED]

From: Sahni, Anjan <[REDACTED]>
Sent: Friday, September 06, 2019 12:00
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; Stoddart, Allison [REDACTED]
Subject: RE: [REDACTED] entities subpoenas

Many thanks, Alex. Would later this afternoon work for a call? Might 3pm or 4pm work?

Thanks,
Anjan

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, September 4, 2019 7:47 PM
To: Sahni, Anjan <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: [REDACTED] entities subpoenas

EXTERNAL SENDER

Anjan,

Very good to hear from you, and I apologize for the delay in replying to your voicemail from Friday – I was on trial last week so have spent the past couple days digging out from under piles of emails and voicemails. But we'd be happy to speak with you regarding the subpoenas to the JPMorgan entities in connection with the Epstein investigation. We had been in touch with Steve D'Allessandro, who was very helpful, but he also mentioned that they might bring in outside counsel.

If you let us know a couple times that would work for you tomorrow or Friday—and I'm copying my colleagues [REDACTED] and [REDACTED] who are also working on the case—we'll get a quorum on our side and finalize a time. And please let us know if any other information would be useful in the interim.

thanks,
[REDACTED]

[REDACTED]
Assistant U.S. Attorney
Southern District of New York
[REDACTED]

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