



"I will stand for my client's rights.
I am a trial lawyer."
-Ron Motley (1944-2013)

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CONFIDENTIAL, FILED UNDER SEAL

June 7, 2023

BY ECF

Hon. Jed S. Rakoff
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: *Gov't of the U.S. Virgin Islands v. JPMorgan Chase Bank, N.A.*, Case No. 1:22-cv-10904-JSR (S.D.N.Y.) – Motion Seeking Leave to Reopen Depositions

Dear Judge Rakoff:

On May 31, 2023, the Court ordered Plaintiffs to submit letter briefs no later than 5:00 PM on June 7, 2023 seeking to recall a witness if they believe “that a document was produced in an untimely fashion, and that they would have confronted a witness at a deposition with that document if it were produced in a more timely fashion.”

Based on several documents produced late in the discovery period, Plaintiff the Government of the United States Virgin Islands (“USVI”) respectfully requests that the Court:

1. grant leave to recall Mr. Dimon for one additional hour; and
2. grant leave to reopen the Rule 30(b)(6) deposition on the topic of Epstein client referrals; and
3. grant leave to take the deposition of Howard Maleton; and
4. compel JPMorgan to produce specific categories of documents about Bear Stearns employees’ knowledge of Epstein’s activities and relationship with Bear Stearns until and after it was acquired by JPMorgan in 2008.



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Background

Between and including May 26, the day of Jamie Dimon's deposition, and June 4, five days after the last day of discovery, JPMorgan produced 1,654 documents, or 115,702 pages of documents. Many of the documents produced late in discovery were from the custodial files of individuals involved in "Project Jeep," a 2019 investigation by JPMorgan [REDACTED]. None of these custodians were identified as persons with knowledge in JPMorgan's initial disclosures.

On May 30, JPMorgan produced an unredacted version of an email chain dated July 22, 2019. The redacted version was produced on May 23. It begins with an email from Darin Oduyoye, the Chief Communications Officer for JPMorgan Asset Management, about a New York Times article of the same date, "Jeffrey Epstein's Deep Ties to Top Wall Street Figures." Exhibit 1 (JPM-SDNYLIT-00790944). Much of the article focused on Epstein's relationship with Jes Staley, and the "dozens of wealthy clients" Epstein had "funneled . . . to Mr. Staley and his bank." *Id.* Peter Neilson (Managing Director and Global Head of Financial Crimes Compliance) forwarded Oduyoye's email to Jeremy Bell (Chief Compliance Officer, JPMorgan Securities) and Frank Pearn (Chief Compliance Officer and Head of Operational Risk). *Id.* The text of Neilson's email was redacted in the version of the email produced on May 23. *Id.*

The unredacted email from Peter Neilson to Bell and Pearn, produced on May 30, states: "Have been working on this (Epstein et al) today. ***Top of house*** requested that we expand our analysis to related parties and put together slides. Should have in a few days. We are treating it as a project at this point. There is a highbridge angle and one dating back to Bear. More as I know it." Exhibit 2 (JPM-SDNYLIT-00790944_R) (emphasis added).

This "project" ordered by "top of house" was what became known as Project Jeep. *See* JPM-SDNYLIT-00791805 (" [REDACTED] " . . . " [REDACTED] ").

On May 28, JPMorgan produced an email dated October 28, 2019, with subject line, "Project Jeep Current Review" and its attachment, which was a 22-page "summary of the e-comms review that Trade Surveillance conducted regarding Epstein and Staley." Exhibit 3 (JPM-SDNYLIT-00901997); Exhibit 4 (JPM-SDNYLIT-00901998). The summary was a 22-page bulleted list of quotes from and descriptions of emails primarily between and among Jeffrey Epstein, Jes Staley, Mary Erdoes, and occasionally others. The e-comms summary groups the emails by topic, and includes emails dating back to 2008. The following topics, which are significant because they reflect JPMorgan's own analysis of the documents, are included:

- "Jes Staley appears to have a close relationship with Jeffrey Epstein, regularly communicating with him and seeking advice from him including while Epstein is



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incarcerated. Other employees also communicated with Epstein intermittently on a variety of matters.”

- “Jeffrey Epstein makes limited references to his interest in women but no explicit references to age. There are also some comments which, while unconfirmed, may have the appearance of relating to inappropriate behavior with one reference between Epstein and Staley to a modeling agency.”
- “Jeffrey Epstein appears to maintain relationships with a number of senior business executives and senior government officials globally.”
- “Jeffrey Epstein appears to maintain a particularly close relationship with Prince Andrew the Duke of York and Lord Peter Mandelson, a senior member of the British Government. He also appears to have a close relationship with Sultan Ahmed Bin Sulayem who is a senior UAE official involved in ownership of the Dubai Ports.”
- “Beginning in 2011 Jes Staley and Mary Erdoes have regular communication with Jeffrey Epstein relating to certain strategic initiatives and business proposals. There are occasional personal e-mails between Erdoes and Epstein interspersed within this time period.”
- “Certain messages appear to relate to lawsuits and litigation involving Epstein, JPMC, Bear Stearns, Highbridge, Zwirn etc. or the Firm’s maintenance of a relationship with Epstein in general.”

See Exhibit 4.

The cover email to the e-comms summary refers to a “timeline combining the e-comms with the relevant transactional activity.” Exhibit 3. The USVI has been unable to locate that timeline in JPMorgan’s production and does not believe that JPMorgan has produced the document. The USVI asked that it be produced and has received no response.

JPMorgan has produced additional documents late in the discovery period that highlight other, previously unknown deficiencies in its document production. There are a handful of emails indicating involvement by certain Bear Stearns employees in the Epstein relationship in the fall of 2008 and the summer of 2010, including one that indicates that Alan “Ace” Greenberg (former Bear Stearns CEO, Chairman of the Board, and Chairman of the Executive Committee) went to Steve Cutler (former JPMorgan Executive Vice President and General Counsel) “for an exception to the felony policy” for Epstein. *See, e.g.*, Exhibit 5 (JPM-SDNYLIT-00752910) (produced May 21); Exhibit 6 (JPM-SDNYLIT-00892560) (produced May 28). All of these documents, and no



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doubt other Bear Stearns documents that JPMorgan has not produced, are responsive to the USVI's document requests.

In an email about the documents described in the e-comms summary, counsel for JPMorgan represented that “over 95% of the referenced documents were produced. The few that were not, were not captured by the negotiated scope of search and we do not believe they are relevant.” Email from J. Butts to B. Narwold, L. Singer re “Fwd: New Production” (Jun. 5, 2023).

Among the documents in the e-comms summary that were not produced—that counsel for JPMorgan does not believe are relevant—is a January 19, 2011 email from Laura Schreiner from JPMS to Epstein, “Ace would love to speak to Jeffrey. Can you please call Ace at 212-272-4605, or e-mail him a phone number where Jeffrey can be reached?” Exhibit 4 at 00902007. The timing of the call suggests the document is highly relevant to discussions that were occurring in January 2011 about whether Epstein would be terminated or retained by the bank. *See, e.g.*, Exhibit 7 (JPM-SDNYLIT-00152756_R) (email documenting meeting among compliance personnel and executives of Private Bank on January 7, 2011 at which Catherine Keating, head of the U.S. Private Bank, stated, “no one on today’s call was in favor of having retained him as a client. Seems it was all due to Jes’s personal relationship.”).

Argument

1. Dimon Deposition

Although Plaintiff had most of the documents included in the e-comms summary before Dimon’s deposition, the summary and its cover email have independent significance. At his deposition, Dimon testified repeatedly that almost everything he knew about Epstein’s relationship with the bank he learned from his lawyers. *See, e.g.*, Exhibit 10 (excerpts of Transcript of Deposition of Jamie Dimon) at 83:8-13; 85:2-16. On that basis, he was instructed not to answer many questions about JPMorgan’s contemporaneous knowledge of Epstein’s activities, an objection and instruction sustained by the Court. The e-comms summary was prepared as part of Project Jeep, which the documents suggest may have been ordered by Dimon himself, not by the legal department and not in relation to any pending or anticipated litigation. That summary outlines JPMorgan’s ongoing knowledge of Epstein’s (and Staley’s) activities and Epstein’s relationship with JPMorgan. It is confounding that this document—which relates to core issues in the case alleged by the USVI and Does, and put at issue by JPMorgan in its own third party complaint—was not produced until the very end of discovery.¹

¹ To the extent JPMorgan contends that the custodian for this document was not added until the end of the discovery period at the request of the USVI, which raised concerns that JPMorgan had



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The USVI is entitled to ask, and would have asked, if the “top of house” order that began Project Jeep came from Dimon,² whether it was precipitated by the New York Times article or other news coverage, and if so, what the scope and objective of the project was intended to be, along with other relevant follow-up questions, such as whether he reviewed the “slides” or other materials prepared as part of Project Jeep. It is entitled to ask, and would have asked, about the non-privileged e-comms summary prepared as part of Project Jeep that shows an extensive analysis of internal documents, and the yet-to-be-produced “timeline” incorporating both internal emails and transactional activity, as well as more than four pages of Epstein referrals to JPMorgan confirmed in the e-comms summary, including Andrew Farkas, Boris Nikolic, Bill Gates, and Peter Mandelson. Dimon was dismissive of Epstein’s referrals: “We did not need introductions to anybody.” Exhibit 10 at 252:18-253:4.

2. Corporate deponent on Epstein’s business referrals

As noted above, the e-comms summary also indicates that JPMorgan was aware of business referrals by Epstein to Staley throughout his relationship with the bank. Exhibit 4 at 00902006-2012. Dimon was dismissive of any such referrals at his deposition, *see e.g.*, Exhibit 10 at 252:18-253:4; 385:16-18, and JPMorgan represented in its May 30 written discovery responses in lieu of 30(b)(6) testimony that, of a long list of potential referrals, only Ghislaine Maxwell became a client of the bank, Exhibit 8 at 8-9. In light of the e-comms summary produced on May 30 and

failed to identify any custodians related to Project Jeep [REDACTED], it is notable that: (1) the USVI has been requesting documents, custodians, and information related to [REDACTED] Project Jeep since early April; (2) Project Jeep was only first disclosed in a document produced the night before Mary Erdoes’s deposition on March 15, 2023; (3) relevant 2019 and Project Jeep custodians were only disclosed in JPMorgan’s interrogatory answers in lieu of 30(b)(6) testimony on April 14, 2023; and (4) it is JPMorgan’s responsibility to identify custodians with knowledge of the facts at issue in the case. *See e.g., Gardner-Alfred v. Fed. Reserve Bank of N.Y.*, 22-cv-01585 (LJL), 2023 WL 3495091, at *15 (S.D.N.Y. May 17, 2023); *The Raine Group LLC v. Reign Capital, LLC*, No. 21-CV-1898 (JPC) (KHP), 2022 WL 538336, at *1 (S.D.N.Y. Feb. 22, 2022). It is hard to imagine a document that would be more central to the issues in the case than this 22-page internal review of Jes Staley’s and other JPMorgan executives’ communications with Jeffrey Epstein, and that JPMorgan did not review the document in connection with the preparation of its third-party complaint.

² Another email produced by JPMorgan at the end of discovery used the phrase “top of the house” to refer to Jaime Dimon. Exhibit 9 (JPM-SDNYLIT-00892568) (“My understanding is that JPM requires top of the house ok for clients who are convicted felons. (ie PCS Legal to Asset Mgt Legal to Cutler to Jaime Daimnon [sic]).”).



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JPMorgan's written responses served on May 30, the USVI believes it should be permitted to question a corporate designee for one hour on Epstein's business referrals to the bank.

3. Deposition of Howard Maleton

Howard Maleton is a JPMorgan VP and Compliance Manager who was involved in Project Jeep. He is identified as the custodian of the 22-page e-comms summary, which was produced on the last day of discovery, and several other late-produced documents relating to Project Jeep. He was one of 28 individuals identified by JPMorgan in its written responses in lieu of 30(b)(6) testimony [REDACTED]. It was not until after review and analysis of documents produced in the last two weeks of discovery that the USVI has been able to determine that Maleton is the appropriate deponent out of the 28 individuals identified in JPMorgan's April 14 written responses. The USVI has now determined that Howard Maleton has knowledge of both Project Jeep [REDACTED], and is likely well-qualified to testify about many of the later-produced documents. The USVI therefore respectfully requests leave to depose him.

4. Production of responsive, relevant Bear Stearns documents

Finally, the USVI asks that JPMorgan be compelled to produce all responsive Bear Stearns documents that fall into the following categories:

1. Bear Stearns AML Group's Epstein Case File, including documents and correspondence relating to any Epstein-related subpoena received by Bear Stearns, and any other due diligence conducted by Bear Stearns AML Group on Epstein or related individuals or entities;
2. Emails or documents relating to Epstein--Bear Stearns litigation;
3. Emails between Alan "Ace" Greenberg and Jeffrey Epstein;
4. Emails about Epstein between or among Greenberg and Dimon, Erdoes, Staley, Cutler, Schwartz, or other JPMorgan compliance employees or bankers; and
5. Emails and documents showing involvement by Bear Stearns employees in discussions about retaining or exiting Epstein.

To learn as the USVI did, only on the last day of discovery, that Ace Greenberg, who had previously intervened on Epstein's behalf, had reached out to Epstein in January 2011 in the midst of a massive push to exit him from the bank, raises serious concerns about deficiencies in



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JPMorgan’s production of highly relevant, responsive Bear Stearns documents in its control. Exhibit 4 at 00902007. According to counsel for JPMorgan, that highly relevant document was not produced³ because it was not within the “negotiated scope of search.” But that “negotiated scope of search” depended on a forthright identification of custodians, including Bear Stearns employees, that did not occur here. Throughout discovery, JPMorgan identified a single Bear Stearns compliance employee who became a JPMorgan compliance employee (Arthur Middlemiss). It identified no Bear Stearns bankers, executives, or individuals who had contact with Epstein. Moreover, JPMorgan is required to “search custodians and locations it identifies on its own as sources for relevant information as part of its obligations under Rules 26 and 34” *Raine Group*, 2022 WL 538336, at *1. Negotiated search terms and custodians “work in tandem with the parties’ obligations under the Federal Rules and do not replace a party’s independent obligation to produce electronic (or paper) documents that are reasonably accessible, relevant, and responsive within the meaning of Rule 34.” *Id.*; see also *Gardner-Alfred*, 2023 WL 3495091, at *15 (discussing inappropriate limitation by custodian and stating “the producing party, even absent agreement or discussion about the appropriate terms, still has an independent obligation to craft search terms to fulfill the requirements of Rules 26 and 34”).

Because late-produced documents have established the relevance and responsiveness of Bear Stearns documents, and because the negotiated search protocol in this case does not absolve JPMorgan of its independent obligation under the Rules to produce relevant and responsive documents, the USVI respectfully requests that the Court compel JPMorgan to produce the five categories of Bear Stearns documents identified in this filing.

Respectfully submitted,

/s/ Linda Singer
Linda Singer

cc: Counsel of record (via ECF)

³ After a specific request from the USVI, that document was produced on June 7, 2023.

EXHIBIT 1

From: Neilson, Peter J [/O=CORPEXCHANGE/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=O583015AAB]
Sent: 7/22/2019 9:37:15 PM
To: Bell, Jeremy S [jeremy.s.bell@jpmchase.com]; Pearn, Frank J [frank.j.pearn@jpmorgan.com]
Subject: RE: FYI - NYT: Jeffrey Epstein's Deep Ties to Top Wall Street Figures

Redacted - Privileged

From: Bell, Jeremy S
Sent: Monday, July 22, 2019 5:31 PM
To: Neilson, Peter J <peter.j.neilson@jpmchase.com>; Pearn, Frank J <frank.j.pearn@jpmorgan.com>
Subject: FW: FYI - NYT: Jeffrey Epstein's Deep Ties to Top Wall Street Figures

FYI

From: Oduyoye, Darin O
Sent: Monday, July 22, 2019 5:16 PM
To: AWM OC <AM_OC@restricted.chase.com>; Asset Management OC <asset_management_oc@restricted.chase.com>; Wealth Management OC <wealth_management_oc@restricted.chase.com>
Cc: DO Directs <do_directs@restricted.chase.com>
Subject: FYI - NYT: Jeffrey Epstein's Deep Ties to Top Wall Street Figures

FYI. The below story just posted to the NYT. We declined to comment.

The New York Times

Jeffrey Epstein's Deep Ties to Top Wall Street Figures

By Kate Kelly, Matthew Goldstein, Jessica Silver-Greenberg and James B. Stewart
July 22, 2019

When Jeffrey Epstein was serving time in Florida for soliciting prostitution from a minor, he got a surprising visitor: James E. Staley, a top JPMorgan Chase executive and one of the highest-ranking figures on Wall Street.

Mr. Staley had good reason to maintain his relationship with Mr. Epstein, who received him at his Palm Beach office, where he had been permitted to serve some of his 13-month sentence in 2008 and 2009. Over the years, Mr. Epstein had funneled dozens of wealthy clients to Mr. Staley and his bank.

Mr. Epstein, who was charged this month with sex trafficking of teenage girls, liked to portray himself as a financial wizard, someone whose business and investing acumen made him indispensable to corporate executives and other leaders. But there is little evidence to support that notion. The financial services that Mr. Epstein dispensed appear to have been mostly pedestrian, and his list of clients small.

Mr. Epstein nonetheless managed to affix himself to a handful of prominent Wall Street veterans, including Mr. Staley, who is now chief executive of the British bank Barclays.

Mr. Epstein provided personal tax services to Leon D. Black, whose Apollo Global Management is one of the world's largest private-equity firms. He discussed a major investment idea with and entrusted millions of dollars to Glenn Dubin, who ran the hedge fund Highbridge Capital Management. And, with Mr. Staley, he laid some of the early groundwork for JPMorgan to make a major acquisition — one that would vault Mr. Staley's career to a higher plane.

Mr. Black, Mr. Dubin and Mr. Staley were not Mr. Epstein's biggest business relationships: That distinction belongs to Leslie H. Wexner, the billionaire founder of the L Brands retail empire, which included Victoria's Secret and The Limited. He gave Mr. Epstein broad powers to invest his fortune for nearly two decades.

In the weeks after Mr. Epstein's arrest, it has become clear that he lied about the identities of some of his clients and the services he was providing, part of a successful effort to create the illusion of a sophisticated investor and management guru advising a who's who of corporate America.

Mr. Epstein boasted of having advised Elon Musk after the Tesla founder's impulsive Twitter posts sent shares plummeting last summer. He has claimed to have worked closely with Lawrence Summers, the former Treasury secretary and Harvard president. He has told others he was a tax consultant to the Microsoft co-founder Bill Gates. Representatives for the three men told The New York Times that there was no truth to Mr. Epstein's statements.

A decade ago, he tried to woo Nicholas and Thomas Pritzker, two scions of the family that created the Hyatt Hotel chain, by inviting a top scientist in the field of virtual reality to meet them in New York, according to a person who attended. He contended that billionaires like the Pritzker family needed his advice because he had special insights that could translate the ideas of mathematicians into workable financial strategies. The Pritzkers never considered working with him, according to a person close to the family.

Some of the investment ideas he trumpeted to would-be clients appeared far-fetched. One supposed strategy was to constantly make overnight loans to banks around the world. (There is no sign of Mr. Epstein having actually made any such loans, and it is hard to imagine such a strategy generating substantial profits, since overnight loans generate minuscule interest rates and last for only a matter of hours.)

Yet starting in the 1990s, Mr. Epstein — whose Wall Street experience consisted of a five-year stint at the investment bank Bear Stearns — managed to build a small but powerful finance network.

Mr. Black, the Apollo founder, was a widely respected figure on Wall Street when he met Mr. Epstein in the late 1990s. Before long, Mr. Black had entrusted Mr. Epstein with periodically providing a variety of tax and estate-planning services, according to a person close to Mr. Black. It was an unlikely assignment: Armies of lawyers and accountants have expertise in those fields; Mr. Epstein did not.

Over the next 15 or so years, including after Mr. Epstein pleaded guilty to prostitution charges in 2008, Mr. Black met with Mr. Epstein at his palatial townhouse on Manhattan's Upper East Side, according to people who were there.

Mr. Black also put Mr. Epstein on the board of his family's main foundation in 2000. According to public charitable filings, he remained on the board of the Debra and Leon Black Family Foundation until 2012, although a spokeswoman for the foundation, Carolyn Sargent, said he actually resigned in 2007.

In 2011, Mr. Epstein invested in a small publicly traded company, Environmental Solutions Worldwide, along with Mr. Black and his four children. And in 2015, an investment vehicle owned by Mr. Black contributed \$10 million to a charity that Mr. Epstein started after his Florida incarceration, according to tax documents and a person familiar with the transaction.

In the clubby world of Wall Street, one connection often begets another, and Mr. Epstein around 1999 connected with Mr. Staley — one of Mr. Black's good friends. Mr. Staley at the time was running JPMorgan's private bank, which caters to wealthy individuals and where Mr. Epstein was a client.

Mr. Epstein and Mr. Staley soon became friends, and Mr. Epstein began referring rich individuals to Mr. Staley, who over the next decade converted dozens of those referrals into clients of JPMorgan's private bank, according to a person with knowledge of the relationship.

One introduction proved especially valuable: Mr. Epstein connected Mr. Staley with Mr. Dubin, who at the time was running Highbridge, one of the country's largest hedge funds, according to people familiar with the relationship. Mr. Epstein knew Mr. Dubin because he had once dated Eva Andersson, before she married Mr. Dubin.

A few years later, in 2004, Mr. Staley orchestrated a deal in which JPMorgan bought a majority stake in Highbridge. Mr. Dubin, and the Highbridge co-founder Henry Swieca, became JPMorgan employees. It is not clear whether or how Mr. Epstein was compensated for helping broker that deal.

"Mr. Staley has never engaged or paid fees to Mr. Epstein to advise him, or to provide professional services, either in his various roles at JPMorgan, or personally," said Stephen Doherty, a spokesman for Barclays, Mr. Staley's current employer.

The Highbridge deal helped elevate JPMorgan's asset-management division — which at the time was under Mr. Staley's leadership — into a major player in the fast-growing hedge fund world, and it cemented Mr. Staley's role in the bank as an up-and-comer. (Mr. Swieca left the bank in 2009, and Mr. Dubin left in 2013.)

Mr. Epstein, meanwhile, invested \$10 million in Highbridge through a financial consulting firm he owned in the Virgin Islands. He withdrew the money — which by then was worth about \$30 million — from Highbridge in 2013, around the time that Mr. Dubin stepped down from the hedge fund.

Mr. Dubin has described Mr. Epstein as a friend and has provided him with financial advice. On one occasion, in the early 2000s, he recommended that Mr. Epstein invest in a new hedge fund run by Daniel Zwirn. Mr. Epstein invested up to \$80 million via his consulting company, Financial Trust, according to court papers. At its peak, the investment was worth \$140 million.

Mr. Dubin and Mr. Epstein parted professional ways after Mr. Zwirn's fund shut down and Mr. Epstein sued, according to a person close to Mr. Dubin. The two men, however, continued to socialize, with Mr. Epstein joining the Dubins at their Palm Beach, Fla., home for a large Thanksgiving celebration in 2009, according to an email that Ms. Dubin sent to Mr. Epstein's probation officer. The letter was first reported by Business Insider.

Ellen Davis, a spokeswoman for Mr. Dubin and his wife, said that the "Dubins are horrified by the new allegations" against Mr. Epstein. The statement added, "Mr. Dubin's business relationship with Mr. Epstein, which ended more than a decade ago, was extremely limited. The Dubins were loyal friends and mistakenly believed Mr. Epstein, a person they had known for decades, had rehabilitated himself after his 2008 plea and deserved a second chance."

Mr. Staley and JPMorgan, too, stuck with Mr. Epstein for years after his guilty plea — a period in which, according to prosecutors, Mr. Epstein engaged in an extensive sex-trafficking operation. It wasn't until around 2013, when Mr. Staley left JPMorgan, that Mr. Epstein ceased being a JPMorgan client.

Spokesmen for JPMorgan declined to comment on any aspect of their roughly 15-year relationship with Mr. Epstein.

EXHIBIT 2

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Over the next 15 or so years, including after Mr. Epstein pleaded guilty to prostitution charges in 2008, Mr. Black met with Mr. Epstein at his palatial townhouse on Manhattan's Upper East Side, according to people who were there.

Mr. Black also put Mr. Epstein on the board of his family's main foundation in 2000. According to public charitable filings, he remained on the board of the Debra and Leon Black Family Foundation until 2012, although a spokeswoman for the foundation, Carolyn Sargent, said he actually resigned in 2007.

In 2011, Mr. Epstein invested in a small publicly traded company, Environmental Solutions Worldwide, along with Mr. Black and his four children. And in 2015, an investment vehicle owned by Mr. Black contributed \$10 million to a charity that Mr. Epstein started after his Florida incarceration, according to tax documents and a person familiar with the transaction.

In the clubby world of Wall Street, one connection often begets another, and Mr. Epstein around 1999 connected with Mr. Staley — one of Mr. Black's good friends. Mr. Staley at the time was running JPMorgan's private bank, which caters to wealthy individuals and where Mr. Epstein was a client.

Mr. Epstein and Mr. Staley soon became friends, and Mr. Epstein began referring rich individuals to Mr. Staley, who over the next decade converted dozens of those referrals into clients of JPMorgan's private bank, according to a person with knowledge of the relationship.

One introduction proved especially valuable: Mr. Epstein connected Mr. Staley with Mr. Dubin, who at the time was running Highbridge, one of the country's largest hedge funds, according to people familiar with the relationship. Mr. Epstein knew Mr. Dubin because he had once dated Eva Andersson, before she married Mr. Dubin.

A few years later, in 2004, Mr. Staley orchestrated a deal in which JPMorgan bought a majority stake in Highbridge. Mr. Dubin, and the Highbridge co-founder Henry Swieca, became JPMorgan employees. It is not clear whether or how Mr. Epstein was compensated for helping broker that deal.

"Mr. Staley has never engaged or paid fees to Mr. Epstein to advise him, or to provide professional services, either in his various roles at JPMorgan, or personally," said Stephen Doherty, a spokesman for Barclays, Mr. Staley's current employer.

The Highbridge deal helped elevate JPMorgan's asset-management division — which at the time was under Mr. Staley's leadership — into a major player in the fast-growing hedge fund world, and it cemented Mr. Staley's role in the bank as an up-and-comer. (Mr. Swieca left the bank in 2009, and Mr. Dubin left in 2013.)

Mr. Epstein, meanwhile, invested \$10 million in Highbridge through a financial consulting firm he owned in the Virgin Islands. He withdrew the money — which by then was worth about \$30 million — from Highbridge in 2013, around the time that Mr. Dubin stepped down from the hedge fund.

Mr. Dubin has described Mr. Epstein as a friend and has provided him with financial advice. On one occasion, in the early 2000s, he recommended that Mr. Epstein invest in a new hedge fund run by Daniel Zwirn. Mr. Epstein invested up to \$80 million via his consulting company, Financial Trust, according to court papers. At its peak, the investment was worth \$140 million.

Mr. Dubin and Mr. Epstein parted professional ways after Mr. Zwirn's fund shut down and Mr. Epstein sued, according to a person close to Mr. Dubin. The two men, however, continued to socialize, with Mr. Epstein joining the Dubins at their Palm Beach, Fla., home for a large Thanksgiving celebration in 2009, according to an email that Ms. Dubin sent to Mr. Epstein's probation officer. The letter was first reported by Business Insider.

Ellen Davis, a spokeswoman for Mr. Dubin and his wife, said that the "Dubins are horrified by the new allegations" against Mr. Epstein. The statement added, "Mr. Dubin's business relationship with Mr. Epstein, which ended more than a decade ago, was extremely limited. The Dubins were loyal friends and mistakenly believed Mr. Epstein, a person they had known for decades, had rehabilitated himself after his 2008 plea and deserved a second chance."

Mr. Staley and JPMorgan, too, stuck with Mr. Epstein for years after his guilty plea — a period in which, according to prosecutors, Mr. Epstein engaged in an extensive sex-trafficking operation. It wasn't until around 2013, when Mr. Staley left JPMorgan, that Mr. Epstein ceased being a JPMorgan client.

Spokesmen for JPMorgan declined to comment on any aspect of their roughly 15-year relationship with Mr. Epstein.

EXHIBIT 3

To: Reich, Steven[steven.reich@jpmorgan.com]
From: Maleton, Howard[howard.maleton@chase.com]
Sent: Mon 10/28/2019 11:45:17 AM (UTC)
Subject: FW: Project Jeep Current Review
JE Summary (9.17.2019) - Privileged.docx

FYI.....

From: Filbert, Brian D (Compliance, USA)
Sent: Sunday, October 27, 2019 8:11 PM
To: Kaufman, Rachel (Compliance, USA) <rachel.kaufman@jpmorgan.com>
Cc: Maleton, Howard (Compliance, USA) <Howard.Maleton@chase.com>
Subject: Project Jeep Current Review

Hi, attached is a summary of the e-comms review that Trade Surveillance conducted regarding Epstein and Staley. Esther has created a timeline combining the e-comms with the relevant transactional activity. From that analysis we've identified the two items below and these are the ones I've discussed with you. Please let us know if you have questions, etc. Our analysis is continuing. Thanks, Brian

Page 8, under section that states: Jeffrey Epstein makes limited references to his interest in women but no explicit references to age. There are also some comments which, while unconfirmed, may have the appearance of relating to inappropriate behavior with one reference between Epstein and Staley to a modeling agency:

- On August 27, 2009 Jes Staley writes to Epstein that he is on his (Staley's) boat and that he will be "In London with Jamie, mid week." Epstein writes "how long london? Do you need anything there?" Staley replies on August 29, 2009 with "Yep."
 - On August 29, 2009; 1 wire payment for \$3,000 is sent from Epstein's JPMC account to a women by the name of [REDACTED] in Lithuania. The women appears to be associated with a ballet company in Lithuania called Baltic Ballet.

Page 1-2, under section that states: Jes Staley appears to have a close relationship with Jeffrey Epstein, regularly communicating with him and seeking advice from him including while Epstein is incarcerated. Other employees also communicate with Epstein intermittently on a variety of matters.

- On December 30, 2008 Epstein writes to Staley, "sunday will not work for me ., everyone is gone except the housekeepers, you are more than welcome to use the house . you will be well looked after. the chef from paris is there." Staley replies the next day, I think I will head back. If something changes , let me know. Otherwise I've asked Rosa to make a date free in early January for me to visit the Palm Beach office and spend some time with you."
 - This same women, [REDACTED], received a prior wire for \$2,000 from Epstein on January 8, 2009.

EXHIBIT 4

Jes Staley appears to have a close relationship with Jeffrey Epstein, regularly communicating with him and seeking advice from him including while Epstein is incarcerated. Other employees also communicate with Epstein intermittently on a variety of matters.

- On July 10, 2008 Staley writes to Epstein, "I miss you. The world is in a tough place. Hang in there." Epstein replies on July 11th, "So am I."
- On July 16, 2008 Staley writes to Epstein:
 - "Jamie wants me to tell him how much I should make this year, given the expected bank results and my results. To put it in context, my business will be down around 15% this year. What do you think? I hope you're managing. I miss our calls. Its boring without you around? Do you have any books yet?"
 - Epstein replies the next day, "Tell him a one million dollar increase to 25 mllion.. The times are tougher and the market would pay more for you to be a trouble shooter at one of the messes.. Plus options you can point out that your options aren;t worth much, and that for two years you were underpaid.. He cannot reduce your salary.. It can't be stay with me and you'll be fine, and the future will take care of itself, and when the future is tough ou get penalized.. DO Not give in. I'll try to call later today"
- On July 18, 2008 Staley mentions to Epstein that he is in Miami three times in January and asks if he can visit. Epstein replies "Yes,,don't give in to a reduction..."
- On July 31, 2008 Staley writes to Epstein ""Hey boss, We just got done with Jamie's off site. I think we did ok. The mortgage market continues to deteriorate. But with commodities coming off we are betting that markets will start to improve.... I hope you are hangin there. Just think of the island and my boat anchored in front. I do."
- On August 22, 2008 Staley writes to Epstein ""I'm trying to do two deals at the same time: buy dimensional and sell american century. It's going to be an interesting fall. I will miss stopping by your office for advice."
- On September 26, 2008 Staley writes to Epstein:
 - "Wamu is an unbelievable deal. But thus is still going out of control. I need a break"
 - Epstein replies the next day, "Ou'll have plent of time. Enjoy this, its a once in a lifetime opportunity, make friends. Keep your eyes open for opportunity."
 - Staley replies later on September 27, writing "I miss you. What a deal Jamie did. I'm spending a lot of time with Treasury. The Private Bank has brought in \$44 billion dollars in the last two weeks. Unreal. Also, do u know [REDACTED]. I am throughing him out of the bank on Monday. Thanks for the note."
- On September 29, 2008 Staley writes to Epstein "I hope you keep the island. We all may need to live there."
- On October 10, 2008 Staley writes to Epstein ""I am dealing with the Fed on an idea to solve things. I need a smart friend to help me think through this stuff. Can I get you out for a weekend to help me (are they listening?). "
- On October 11-12, 2008 Staley forwards Epstein a term sheet that was sent to others at the Treasury/Fed
- On November 9, 2008 Staley writes "My one exposure is if Glenn slips. He has to stay correct, and show calmness." Glenn may be a reference to Glenn Dubin who founded Highbridge.
- On December 30, 2008 Epstein writes to Staley, "sunday will not work for me ., everyone is gone except the housekeepers, you are more than welcome to use the house . you will be well

looked after. the chef from paris is there.” Staley replies the next day, I think I will head back. If something changes , let me know. Otherwise I've asked Rosa to make a date free in early January for me to visit the Palm Beach office and spend some time with you.”

- On March 18, 2009 Staley writes to Epstein, “Sorry I missed you today. The Ford TALF deal is a big deal. Let’s talk tomorrow.”
- On April 24, 2009 Epstein writes to Staley, “American century?” Staley replies the same day “I may have resolved it today. I will call u after lunch.”
- On June 19, 2009 Staley writes to Epstein “We settled with Am Century. Details tomorrow. I kept reminding myself of this being ‘cute.’ Thanks for your counsel.”
- On July 22, 2008 Epstein writes to Staley “free and home.” Staley replies the same day, “Three solid days of reviewing our \$20 b real estate portfolio”
- In September 2009, there are a number of e-mails in which it appears Epstein has advanced knowledge of Staley’s move into the IB CEO role:
 - On September 3, 2009, Epstein writes to Staley “I am told you are on track.”
 - On September 11, 2009 Epstein writes to Staley, “slow thoughtful,, un emotional. .. the thought is that co=head of both asset and ib is ok,, steves really a dead man walking. so little he can do.” This appears to be a reference to Steve Black who was head of the investment bank at JPMC until being named a Vice Chairman of the Firm in January 2010. Jes Staley became the sole CEO of the investment bank on the back of that move.
 - On September 21, 2009 Epstein writes to Staley, “more edits? What day london?, keep an eye on steve, , ithink he now knows”
 - On September 25, 2009, Epstein writes to Staley, “message to be delivered THREE parts 1----I know this must be difficult for you....2.. I will really need you help. you’ve done a great job 3. I would like this transistion to go as smooth as possible, and would welcome any suggestions.=====Nothing more,,short sweet in response to any questions - there are lots of details to be worked out,,. you and I need to spend some real time WHEN I GET BACK>”
 - On September 27, 2009, Kristin Lemkau sends Staley a draft organizational announcement regarding Steve Black becoming Executing/Vice Chairman and Staley stepping into the CEO role. Staley then forwards to Epstein as “FYI.”
 - On September 28, 2009, Epstein writes to Staley, “Steve and you should agree guidelines for comp,, so it protects you from him promising someone something for next year that you will be forced to live with.. He and you should agree on comp. , and then he should execute.. stay out of it, but oversee it. your risk is he will make you look like the bad guy , for people that you will have to win over/”
- On September 19-20, 2009 Epstein and Staley appear to exchange edits on a speech that Staley is delivering which appears to be hosted by the Bahrain Economic Development Board, Central Bank of Bahrain and Bahraini Association of Banks.
- On October 18, 2009 Epstein writes to Staley, “feel free to call often, it is difficult for the quarterback to see the playing field. That’s why he calls up to the box”
- On October 23, 2009, Epstein writes to Staley, “my suggestion Your first Great move , should be a new CHina, initiative. first it was alternative investments now china. , you should have a dedicated china entity , with its own board of advisors, should include china politicos. they love to travel. you should be their link to treasury.. or you can issue credit default swaps, for their

investment in us co , and you can ask the treasury to be the third party - just an example.”
Staley replies, “Brilliant!”

- On October 25, 2009, Epstein writes to Staley, “One big problem that in china is how to maintain good relationship (Guangxi) with the employees/ Chinese emphasize courtesy and face-saving. This has to do with China’s culture. Being courteous to government officials, and employees are essential. Chinese people are hospitable, but it is easy to insult them.. ; like blacks who don't want to be dissed This craziness is accentuated in the north , which has complex rules of ‘face-saving’. I will send someone to you this week for a coffee, that will explain some of this”
- On October 26, 2009, Epstein writes to Staley, “i have organized a quick tutorial for you tomorrow any time,, oxford educated, speaks fluent chinese... the answer to" do you move your trading op there is" ASK THEM... make the chinese part of the process.. i want to build a relationship,, i seek your advice, we are in this for the long term. i have the greatest respect for your culture, and will attempt to learn,, forgive me if i make mistakes early, it is only out of a desire to learn,, BLAH BLAH BAH”. Staley asks if they can be in London because he is there “tonight and tomorrow night beginning the management changes I need to make.” Epstein writes that the individual is in New York and then “I will lay the groundwork”
- On October 27, 2009 Epstein writes Staley an extensive e-mail laying out the steps necessary for JPMC to expand its business in China down to details surrounding culture, office locations and suggestions for approaching government officials.
- On October 30, 2009 Staley asks Epstein “Any chance I can go to Santa Fe?” Then on November 1, 2009 Staley writes to Epstein “So when all hell breaks lose, and the world is crumbling, I will come here, and be at peace. Presently, I’m in the hot tub with a glass of white wine. This is an amazing place. Truly amazing. Next time, we’re here together. I owe you much. And I deeply appreciate our friendship. I have few so profound.”
- On November 28, 2009, Epstein writes to Staley “I think you might want to approach abu dhabi, and say as a key player in the world financial system , you will advise them for free. If and only if they decide to implement your advice i.e. sale of assets. thats how you will be compensated. just an idea”
- On November 29, 2009 Staley forwards Epstein what appears to be an internal e-mail regarding discussions with senior officials in the Dubai and Abu Dhabi departments of finance. Brian Sankey suggests that Jes Staley speak with Hani Deaibes who is a current JPMC employee involved in Middle East Debt Capital Markets.
- On December 1, 2009 Epstein writes to Staley “The first most elegant deal that you can do. is to have China buy Dubai World Ports. They want turnkey, ops where they can then use their worldwide construction cos for building. would be a first great deal for the new ceo of the IB”
- On December 3, 2009, Staley writes to Epstein, “I realize the danger in sending this e-mail. But it was great to be able, today, to give you, in New York City, a long heartfelt, hug. To my friend, thanks. Jes” It appears that at this point in time Epstein was not permitted to leave the state of Florida based on the terms of his sentence which provides context to the preface of Staley’s e-mail.
- On December 17, 2009 Epstein writes to Staley “do you think Jamie would consider upping the amount paid to the small business fund by an additional 25. If the tax on bonuses was lowered?”
- On December 20, 2009, Staley sends an e-mail to Epstein which includes a lengthy list of bullet points, some of which include confidential JPMC information, that appear to address questions

surrounding an internal discussion on compensation with JPMC (potentially for the Firm's Risk Committee).

- On December 26, 2009 Epstein writes to Staley "I think your presentation to the risk committee should be made by others, and attended by you. " I've asked them to explain to US" .. not you explaining to them. its too early for you to be seen as lecturing. slowly slowly"
- On January 6, 2010 Staley writes to Epstein "Fun tonight. What do we do next?????" Jeffrey Epstein e-mails Staley shortly after and writes "my car and driver, , former dea armed. will pick you up in st thomas we have all the on field permits.. helicopter also availble for a tour around , ... remember I own the two big marinas.. yacht haven grand, in st thomas and the marina at red hook... you can use my atv's jet ski ,gym etc. , i will organize the harbor at Norman island if you like, in the bvil . as well as lunch at guana."
- On January 11, 2010, Staley's Admin Assistant e-mails Epstein and writes "Hi Jeffrey: If available, Jes would like to use the Yacht Haven Grand marina this Wednesday and Thursday nights. At your convenience, can you please let me know who I can contact to arrange. Also, can you please let me know if you have US Customs at the marina. Captain Bill Truesdale would like to clear at the marina if possible. Many thanks, Rosa"
- On January 14, 2010, Staley writes to Epstein "Arrived at your harbor. Someday, we have to do this together."
- On January 22, 2010, Epstein writes to Staley "As I said at dinner, you are perceived as too big. however with the new campiagn finance law, you are also now seen as very very powerful. The chancelor of the exchequer , Darling is willing to sit with you and discuss these issues in Davos. I think you should decline , and set a real meeting. not a meeting squeezed between lunches and others. We should talk."
- On January 25, 2010 Epstein writes to Staley "the more time you have to announce the better. Ive set up you and peter to meet in davos with darling. it would be better afterwards to announce. I would go slowly, this can set the stage for lots to come. Obama really wants a fight. its crzy. " They took bailout money and then" the problems are all inherited , not of his doing, he reached out a hand to help and was taken advantage of -, typical but problematic."
- On January 25, 2010 Staley sends Epstein an exact numerical breakdown of the number of JPMC employees in the UK by office location.
- On January 27, 2010 Staley inquires with Epstein about whether he can assist in securing an audience with either Peter Mandelson or Alistair Darling who was Chancellor of the Exchequer at the time.
- On March 2, 2010, Staley's Admin Assistant e-mails Epstein (copying Lesley Groff at lgroff@dkipllc.com) noting that Staley will "be there at 8:30pm".
- On March 18, 2010, Epstein writes to Staley "youre covered for the end of the month" to which Staley replies "the stars align"
- On April 10, 2010 Tom Pritzker [REDACTED] has an e-mail exchange with Staley about what appears to be a family office restructuring where they are engaged with JPMC. Staley forwards the exchange to Epstein.
 - On April 13, 2010 Staley writes to Epstein "Tom's handler for cash and investments is John Stellato"
 - On May 14, 2010 Staley's Admin Assistant e-mails Epstein meeting materials for a meeting between Staley, Carlin and JPMC with Pritzker.

- On June 20, 2010 Epstein writes to Tom Pritzker and Staley "I spoke to the hutchinson people, they prefer we wait until the full year results are in. they definitely want out. they want to show the spread between their 3g business and ports."
- On April 12, 2010, Epstein writes "[REDACTED] boyfriend, [REDACTED] would like to work at jpm.. I would very much appreciate it if we can get him in a training program for private banking,, he is responsible 27, and very personable. he could be a great asset eventually to your florida office" to which Staley replies "Have him send me his resume." [REDACTED] was the boyfriend of [REDACTED] who was reported to be involved with Epstein's relationships with young women. He was one of the most frequent visitors of Epstein while he was incarcerated in Palm Beach Florida.
 - On May 5, 2010 Epstein writes to Staley "[REDACTED] is meeting with Charlie Farhoody and Michael Bruno, tomorrow in palm beach"
 - On May 10, 2010 Epstein writes to Staley "any word on [REDACTED] interview?" Staley replied "It wasn't great. No role for now. They're letting him know."
- On June 9, 2010 Epstein writes to Staley "Do not sell cheap , it will look as you are trying to buy goby"
- On June 12, 2010 Epstein writes to Staley "re. mgm. consider barry josephson , used ot run paramount. good guy."
- On June 20, 2010 Staley forwards an internal guidance memo sent to senior executives at JPMC regarding talking points around JPMC negotiations to buy Gavea Investimentos. Gavea was acquired by JPMC with a strategic alliance with Highbridge.
- On September 2, 2010 Staley writes to Epstein "And I just had the most senior meeting JPM has had save for Jamie meeting with [REDACTED]. I spent almost 2 hours with [REDACTED] of the [REDACTED] He will be in the [REDACTED] I will tell u what he offered/asked when we meet. Very cool. I'm seeing the Prince this afternoon. "
- On December 27, 2010 Epstein asks Staley where he is and Staley replies "In Bahia, on a beach far from anything. No cell. Sporadic email. Nice break and no need for security. Back a week from today. Scheduled dinner on Little St Jeff's on Jan 21st. I'm in Amersterdam on Jan 6 and Zurich the 7 and 8th. Hope u r on the Island, and avoiding the foreign country called Palm Beach. Jes"
- On January 20, 2011 Tom Pritzker sends Epstein a photo and a note "A picture tells a thousand words. Here is your happy birthday photo. What do all the people in this picture (save one) have in common? tjp". Epstein forwards the email to Staley but it does not appear the photo comes through.
- On January 21, 2011 Staley writes to Epstein "Anchored in Christmas Cove. Heaven is being on Bequia [Staley's boat]. Safe travels to Paris. And, as always, thanks for the friendship. Jes" Epstein replies "You are welcome to use jet skis snorkels mpvies boats"
- On January 27, 2011 Epstein e-mails Staley an article *E-Mails Show Bear Stearns Cheated Clients out of Billions* from The Atlantic.
- On February 13, 2011 Epstein asks Staley "Would you like heli in st barts"
- On March 3, 2011 Epstein writes to Staley, "Told you ---- family" to which Staley replies "family"
- On March 5, 2011 Epstein e-mails Staley "more bad press. Ignore it." Staley replies "The post?" And Epstein replies "no,, english papers have gone berserk,, claiming fbi re opening

investigation. not true,, publishing a phonebook that is not mine , but was stolen by my houseman currently in prison for doing so”

- On March 8, 2011 Epstein sends Staley a Vanity Fair article about Epstein and Ghislaine Maxwell from that date.
- On March 10, 2011 Epstein writes to Staley “the English papers want Andrews’ head, , tomorrow they will say the FBI investigation wants to talk to him,, it’s all bull,, but it sells”
- On March 18, 2011 Epstein writes to Staley “Dear family member,, don’t fret,”
- On June 13, 2011 Epstein writes to Paul Morris at JPMC regarding his interest (in the name of Financial Trust) in a property in London at 11 Cadogan Gardens (appears to be \$12m deposit or purchase
- On June 13, 2011, Epstein writes to Paul Morris “can you have someone pull up all the details on a co called OPERA in Norway,, I might want to make a run at it”
- On August 13, 2011 Staley writes to Epstein “we miss u”
- On May 2, 2012, Paul Morris of JPMC writes to Epstein “Jeffrey, separately, McGraw and I would like to come see you and discuss your estate plan and what we are seeing with other clients.” It is unclear the extent to which JPMC employees were involved in Epstein’s estate plans generally.
- On May 12, 2012 Epstein writes to Paul Morris “client buying a huge art work, what form should he buy it in.. Delaware trust. [REDACTED]. llc.. need answer Mon night. (the scream, for your info only).” Note that it was later publicized that Leon Black had purchased the painting. A number of e-mails are subsequently exchanged back and forth regarding the painting and logistics. On May 16, 2012 Paul Morris and Tom McGraw send Epstein a draft LLC structure for purchasing the painting in the name of irrevocable trusts on behalf of [REDACTED].
- On June 1, 2012, David Giuffrida from JPMC (copying Paul Barrett) wrote to Epstein “We gave Larry Unrein your contact #s. He will be trying to get in touch with you.” The subject was “Jawbone”
- On June 30, 2012 Paul Morris writes to Epstein “Will get back to asap, if I can get a minute of your time over the weekend that would be helpful. Many thanks Jeffrey.” Epstein writes “what is the question.” Morris replies Jeffrey, sorry for being so limited on the emails but I guess I’m too discreet. Anyway, I really appreciate everything you’re doing and this is a fantastic opportunity that you are opening the door to,. I briefed our CEO and think he will get a sense of the LB relationship over the weekend. Come back to you asap and thank you again.” Morris replied a second time to Epstein’s e-mail “No question just wanted to discuss conversation had with our CEO about LB and that I wanted to get an indication out to you on an art loan. We will circle up again Monday.”
- On July 15, 2012 Jes Staley sends Epstein a draft organizational announcement regarding a move by Jes Staley from IB CEO to focus on forming a Regulation and Technology council that would “that will seek out and sponsor opportunities in technology and regulation that address the evolving needs of global finance.” The announcement is in draft and Epstein replies with his proposed edits on the organizational announcement.
- On July 15, 2012, Epstein writes to Paul Morris “I would appreciate it if someone in your shop put together a sample portfolio of funds and products for a 100 million dollar. structured to yield about 10%” Note that on September 20, 2012 Paul Morris writes to Epstein copying David Giuffrida from JPMC “Jeffrey Would you like us to revisit the 100mm portfolio we discussed back in July? Paul”

- On August 10, 2012 Epstein writes to Maurice Sonnenberg of JPMC “fun seeing you in san fran .. Mr biology gurus at harvard all agree that the signal intelligence used by the various agencies , could be put to work on breaking the dna code or protein signal problems. breaking foreign codes is the expertise of the us and nsa. it would be great to know which agency button to push” to which Sonnenberg replies “Hi Jeffrey. Good running into you. When you get back, give me a ring and we might chat a little more about this.”
- On November 8, 2012, Staley writes to Epstein “One challenge w oak tree is that deb doesn't want to move to LA.”
- On November 14, 2012, Staley writes to Epstein “Thanks for your friendship and generosity in supporting this year’s NY Hall of Science fundraiser. The event was a great success and we could not have done it without you.”
- On October 30, 2013, Jes Staley sends a test e-mail to Epstein and a number of JPMC employees and family members and friends from jstaley@bluemountaincapital.com.

Jeffrey Epstein appears to be helping Jes Staley with the graduate school admissions process for [REDACTED]

- On April 27, 2009 Epstein E-mails Staley with the subject [REDACTED] which is [REDACTED] and writes [REDACTED] can meet have dinner lunch a weekend with any of the following seth lloyd mit quantum computing.. murray gell-man , santa-fe institute, quarks ,, brian greene columbia - string theory,, leonard susskind ,, strings theory, lawrence krause,, origins institute phoenix arizona.., lee smolin perimeter institute, loop quantum gravity , she can see the large hadron collider in switzerland. private tour.”
- On September 24, 2010 Staley forwards an e-mail thread between his wife [REDACTED] asking whether Epstein can get in touch with a Professor Robert Mawhinney at Columbia University. Epstein replies he can do so “in a snap”
- On November 11, 2010 Staley sends [REDACTED] resume to Epstein and writes “[REDACTED]” Epstein replies “she can sit with Richard Axel when I get back, he won the Nobel prize.. he has guaranteed me.” Staley replies [REDACTED]” Epstein then writes back “john kluge gave 4 billion to the school,, will you relax”
- On January 18, 2011, [REDACTED] writes to [REDACTED], Spoke with Jim today and he mentioned that [REDACTED] is what it is - not to worry - the score does not seem to be a problem according to my sources...What's going on with your applications? Have you heard back from anyone? Any thoughts or is [REDACTED] still high on your list? Look forward to hearing from you! Best, [REDACTED]” [REDACTED] “Huh?” on top of the e-mail, and then Staley forwards to Epstein and writes “:)”
- On January 19, 2011 Epstein writes to Staley “lee bollinger will come say hi, in davos as well”. Note that Lee Bollinger has been President of Columbia University since 2002. He has also served on the Board of Directors of the Federal Reserve Bank in New York City.
- On January 19, 2011 Epstein writes “woody here from 7- 830,, richard axel sultan, leonwill stop by,, if you can,, also alex is now 70-30 up from 45-55”

- On February 2, 2011 Staley writes to Epstein “spent an hour w the President.” It is unclear if the reference is to the President of Columbia, POTUS, or other.
- On March 5, 2011 Staley writes to Epstein “Deby and I were talking tonight about what you have meant to me and to [REDACTED]. You have paid a price for what has been accused. But we know what u have done for us. And we count you as one of our deepest friends. And most honest of people. Thanks, Jes” Epstein replies “family”
- On August 23, 2012 Staley writes to Epstein “I can't tell you how much your friendship has meant to me. Thank you deeply for the last few weeks. All will be fine, and we have [REDACTED]. To my most cherished friend, Jes”. Epstein replies “I appreciate you and your thoughts”
- On December 9, 2012 [REDACTED] Jes “Got an A+ in QM.” Jes Staley forwards the e-mail to Epstein and writes “FYI thanks”
- On April 15, 2014 [REDACTED] e-mails a list of family and friends to let them know about [REDACTED] that she was involved in making. Both Epstein and Nikolic are recipients of her e-mail among others.

Jeffrey Epstein makes limited references to his interest in women but no explicit references to age. There are also some comments which, while unconfirmed, may have the appearance of relating to inappropriate behavior with one reference between Epstein and Staley to a modeling agency:

- On August 27, 2009 Jes Staley writes to Epstein that he is on his (Staley’s) boat and that he will be “In London with Jamie, mid week.” Epstein writes “how long london? Do you need anything there?” Staley replies on August 29, 2009 with “Yep.”
- On December 4, 2009 Epstein e-mails Staley and writes “you were with larry, and I had to put up with...” Attached to the e-mail is an image of a young woman wearing a revealing outfit in a modeling pose. Staley replies back the same day and writes “Don’t tell me a French wine.”
- On December 20, 2009 Epstein e-mails Staley with a blank e-mail that includes an attachment which appears to be a modeling photo of a young woman.
- On June 14, 2010 Staley writes to Epstein “he has a S&A next to him”. Epstein replies “do you mean t&a”. Staley replies “Do u know a catherine keating (sp?_”. Katherine Keating is daughter of a former Australian Prime Minister who was shown in news reports leaving Epstein’s home in NYC while Prince Andrew waved to her while leaving.
- On June 16, 2010 Staley writes to Epstein “is she free tonight?” It is unclear what this is in reference to. Epstein replies “call me” and Staley replies “I’m with A” which presumably may have been Prince Andrew.
- On July 9, 2010 Staley writes to Epstein “Maybe they're tracking u?? That was fun. Say hi to Snow White.” Epstein replies “what character would you like next” to which Staley replied “Beauty and the Beast....” Epstein further replied “well one side is available”
- On November 24, 2010 Staley writes to Epstein “I'm here at some ball with [REDACTED]. She says u slept with her!!” While Epstein was reported to have a social relationship with [REDACTED] it is unclear if this is the [REDACTED] being referenced.
- On December 31, 2010, Staley writes to Epstein “I'm here in brazil with three beautiful women. Have a happy new year.” Epstein replies that they have even more in common than he thinks.

- On March 11, 2011 Epstein writes to Staley “is there a problem with the letter of credit in favor of the modeling agency,, I was just told that PAul morris is not returning my guys calls. I called him twice myself today , If you get a chance , nothing urgent”

Jeffrey Epstein appears to maintain relationships with a number of senior business executives and senior government officials globally.

- On January 15, 2009, Epstein writes to Staley “...david gergen is coming to see me today.. we should talk before twelve.” David Gergen is the name of a former adviser to Presidents Nixon, Ford, Reagan and Clinton through 1994.
- On January 19, 2009, Andrew Farkas e-mails Epstein an update surrounding Turner Construction’s operations in Dubai. Andrew Farkas is a major real estate investor who founded Island Capital Group and a is major donor to Harvard University. His family owned Alexander’s department stores.
- Farkas also appears to be friendly with Epstein and provides him with information on a sailboat that has hit the market for purchase which Epstein forwards to Jes Staley. Recent news reports have identified Farkas as an associate of Jeffrey Epstein who entered into a joint venture with him to purchase the American Yacht Harbor at 6100 Red Hook Quarter in the USVI. The e-mail address that appear to be affiliated with Farkas is [REDACTED]
- Note that Epstein also appears to be close with Jonathan Farkas, another member of the Farkas family, with whom he appears to have a business relationship. The e-mail address that appears to be affiliated with Jonathan Farkas is [REDACTED]. On April 2, 2009, Epstein forwards an e-mail from Farkas to Jes Staley with a presentation on an investment management entity called Asset Alliance. On April 6, 2009 Epstein asked Staley for his thoughts on the deck to which Staley replied It raised more questions than answers. A diversified asset management business with only \$10 billion doesn’t have much financial leverage. But , as you know, I like the business of managing money.”
- On March 29, 2012 Epstein writes to Paul Morris of JPMC “andrew farkas , can meet with you on monday or tues,. to discuss the project”
- On August 9, 2009, Epstein writes to Staley “are you available to take a call from the chairman of sal Oppenheim.” Sal Oppenheim was a German Bank which became a subsidiary of Deutsche Bank in 2010 and was rolled into the Deutsche Bank brand in 2017.
- On September 20, 2009, Staley writes to Epstein “Meeting Blair in a few minutes”
- On October 16, 2009, Epstein writes to Staley “sorry, didn’t get back to you last night.. had sultan and one of putins people here”
- On April 4, 2010 Epstein asks Staley to call him. Staley replies “Apparently, Gates will be there for dinner.” Epstein replies “his right hand in boris nilolic.. and nathan,, you should focus your ques on boris” Epstein subsequently forwards an e-mail from Boris Nikolic that the meeting scheduling is a mistake and that Bill Gates is in the Galapagos Islands and Boris is at other meetings.
- On April 15, 2010 Staley and Epstein exchange e-mails regarding Steve Rattner who founded a firm called Quadrangle. Based on the e-mail and an internet search Rattner was in the process by being sued by the SEC for fraud while he was simultaneously looking to sue the Firm he founded.

Political Consultative Conference. Mr. Shum serves as a member of the standing committee of the Institute of Finance and Banking, Chinese Academy of Social Sciences, and is the founder of Kaifeng Foundation China. He is also an honorary trustee of Tsinghua University. He holds a bachelor's degree in finance and accounting from University of Wisconsin, Madison, and an executive MBA from a joint program of the Kellogg School of Business, Northwestern University, and Hong Kong University of Science and Technology." Stern replies "I can meet with him when I'm in Beijing next to see what to do with him"

- On February 5, 2011 Epstein forwards an e-mail to Staley that he appeared to receive from Larry Summers [REDACTED] which says "What is real story on madoff? Shouldn't jpm have known better? If they had no obligation to figure it out why should people private bank w them." Staley replies "I can't reply in email. Will call." Staley writes to Epstein "Like taking financial advice from the guy who single handily, create the biggest loss in the Harvard Endowment's history."
- On February 5, 2011 Epstein writes to Staley "leon and sultan here for lunch"
- On February 10, 2011 Epstein writes to Staley "I told you this was crazy.. His next stop is this morning at my house 8 am for a couple of hours. Call me at home ny..." Epstein then links to an article about Ehud Barak's schedule while visiting government officials in the United States.
- On February 14, 2011 Epstein writes to Staley "leon black and carl icahn will be on a boat in st barts for the weekend"
- On February 16, 2011 Epstein writes to Staley "Bahrain,, next up at bat. Heavy iranian input"
- On February 16, 2011 Epstein writes to Staley "interesting call from glenn"
- On March 15, 2011 David Stern wrote to Epstein "Today Fang Fang (JPM Vice Chairman Asia and CEO China Investment Banking) called me because he believed we had a call scheduled. We did not. He had nothing to say either. These guys are confused and need help...." Epstein forwarded to Staley
- On March 23, 2011 Roy Navon writes to Jacob Frenkel and Jes Staley of JPMC "Against all odds, we have been granted a meeting with Prime Minister Netanyahu." Staley then forwards the note to Epstein and writes "Thanks." Epstein replies back "surprisee suprise"
- On April 10, 2011 Epstein writes to Staley "I will be back tomorrow. Karim Wade son of the senegalese president and one of the most important players in africa, will be at the house this week, i think you will enjoy him." On April 16, 2011 Epstein sends another note to Staley "karim wants to hedge a million barrels each quarter of oil buying. This is going to be fun"
- On May 3, 2011 Epstein writes to Staley "the son of the former primer minister will take you for fun, i will send you his details". Later on May 3, 2011 Katherine Keating (referenced above and daughter of former PM of Australia) sends Epstein her brother Patrick Keating's [REDACTED] contact information.
- On July 28, 2011 Epstein writes to Mary Erdoes "mottola says he knows you forever" to which Erdoes replies "Yup 15 yrs". Tommy Mottola has been referenced in prior identified communications as someone with whom Epstein may have had a business relationship (Epstein was on a call with JPMC relating to management of Mottola's money)
- On September 16, 2011 Epstein writes to Staley "eduardo tedodorni, ,, family head, and member of agnelli family, owner of ferrari maserate and fiat will be with me next sat, save time"

- On September 16, 2011 Epstein writes to Staley “co founder of facebook, and founder of spotify, sean parker , will be at the house for dinner on sunday –come”
- On July 28, 2012 Epstein forwards Staley an e-mail that appears to come from the President of the Maldives Mohammed Waheed Hassan who writes “ Hi I talked to our finance minister. He is looking around to borrow upto 500 million dollars to be repaid over a ten year period preferably with a grace period of one year. Would be very helpful to know what can be expected under the current market conditions. Thanks you. Warm regards. Waheed”. Note that on August 31, 2012 a Reuters article noted that China had made a \$500 million loan to the Maldives.

Jeffrey Epstein appears to maintain a particularly close relationship with Prince Andrew the Duke of York and Lord Peter Mandelson, a senior member of the British Government. He also appears to have a close relationship with Sultan Ahmed bin Sulayem who is a senior UAE official involved in ownership of the Dubai Ports.

Lord Peter Mandelson

- On June 5, 2009 Epstein writes to Staley, “well for all intends and purposes peter mandelson is now deputy prime minister.” Note that there are a number of references to Peter Mandelson, who was a senior government official in the UK. Epstein and Staley both appear to speak with him and meet with him on a number of occasions.
- On June 17, 2009 Epstein writes to Staley, “peter will be staying at 71 st over weekend, do you want to organize either you, or you and Jamie,, quietly,, up to you.”
- On October 12, 2009, Epstein sends an article to Staley regarding Gordon Brown and an apparent intent to sell certain assets with a note that “This is why you should sit with Peter.”
- On January 29, 2010 Staley writes to Epstein Saw “Peter last night. Darling in 20 minutes. Will talk again with Peter this AM.” Epstein replies “my view is sempra is an asset that comes up once every ten years. How does it fit in the global strategy?. does it give energy expertise. That is one of the big world needs” Later that day, Epstein writes “was petie helpful? another idea. you can always portray the purchase as done bu the investment bank, it should be the primary buyer, the argument might go that if we eventually are forced to split the IB will have a stronger franchise.” The discussions appear to be related to JPMC efforts to purchase the Royal Bank of Scotland’s stake in Sempra Energy.
- On March 29, 2010 Peter Mandelson [REDACTED] e-mails Epstein “Took 250 last night, 500 today. Feeling better. Can Jes send me email on issues re Dodds/Volcker.” Epstein forwards the e-mail to Staley and notes “jeffrey wrote: youll have it late monday early tues.. can we set up a 20 minute call/ jes/me ?sometime before your meeting. tonight? tomorrow??jes , you should decide on the " ask".. meeting with you and/or jamie-cutlerr , etc”
- On May 10, 2010 Epstein e-mails Peter Mandelson and writes “I like to see my suggestions come to fruition” and then forwards the e-mail to Staley.
- On May 11, 2010 Epstein e-mails Staley writing “Peties quitting”. The timing appeared to be correlated with an election loss for Mandelson’s party around that time period in the UK.
- On May 13, 2010 Epstein writes to Staley “lets talk tomorrow about petie. and deutschbank”. Staley replied “He sent me a note. I'm in Lond in two weeks.”
- On May 16, 2010 Epstein asks Staley about his schedule while in London and writes “what days will you be there? do you have time for the prince andrew and or peter”

- On May 27, 2010 Peter Mandelson writes to Epstein “This is thing I am speaking to in Shanghai. If you can open the attachments you will see that the entire Chinese banking fraternity is attending. Isn't it something that JPM should be represented at if they want to spread their wings in China?” Epstein forwards Mandelson’s e-mail to Staley writing “I think he is right. you should read the attachments”
- On June 21, 2010 Staley asked Epstein “How did Peter M like his meeting with Peter Scher?”
- On October 7, 2010 Epstein writes to Staley “petie said he will be back in londong around nov 9th same time as doug wirth.”
- On October 7, 2010 Staley forwards Epstein an e-mail from Peter Mandelson who writes “In Congo Brazzaville last week, I talked at length with President Sassou N'Guesso, including about the above new mine. Exploration, he told me, has been undertaken by a consortium of investors backed by JP Morgan. The government is reaching a final decision on whether to issue a full mining licence. I spoke to the Minister of Mines about this, who is favourable to the licence, but the President wanted to discuss it further with me. No obligation but if there is anyone in JPM who might want to talk to me privately about this, please shout. I would be grateful for no approaches to other third parties about this in meantime. Hope you are well. Sorry not to see you in London this week.”
- On October 8, 2010 Epstein writes to Staley “would it make sense to have peter have a relationship with cazanov,”
- On October 20, 2010 Epstein writes to Staley “petie is just back from russia and now in london”
- On October 21, 2010 it appears Staley met with Peter Mandelson. On the same date Epstein e-mailed Staley writing “ok , pritsker coming to dinner tonight. think about casenov with peter or Andrew”
- On October 27, 2010 Staley forwards Epstein an e-mail he sent to Peter Mandelson that appears to include internal JPMC information on a deal regarding privatization of businesses in Russia. Staley offers to his colleagues “When Lord Mandelson can help, please let me know.”
- On November 12, 2010 Epstein writes to Staley “petie , and others in paris this weekend. “ Staley replies “12:00 at u r place. Is set” to which Epstein replies “Youre set”
- On January 22, 2011 Epstein sends Staley an e-mail with the subject “peter in paris with me” and a link to a financial times article [unable to access the article].
- On February 2, 2011 Epstein writes to Staley “are we still on for tomrw/thurs night... petie is here”. Staley replies “I may have to deal with Glenn on a HB issue.... So much going on. Spain is interesting. Spoke with the two largest business families in Egypt. The team here likes Stern. I fly back thurs morning.”
- On March 16, 2011 a reporter from the Daily Mail named Daniel Bates e-mails Epstein’s lawyer Jack Goldberger and writes:
 - Hello, My name is Daniel Bates and I cover New York for the Daily Mail. We are following up something in relation to your client, Jeffrey Epstein, and I wanted to ask you some questions ahead of the piece going in the paper. Both relate to a British man called Peter Mandelson. We have been told that in March 2009 Mr Epstein was contacted by Mr Mandelson who asked him to speak to Jamie Dimon, the chief executive of JP Morgan, with a view to setting up discussions between the two men of important financial matters. Is that correct? And is that a correct summary of the conversation? Secondly, did Mr Epstein contact Mr Dimon on behalf of Mr Mandelson?

What was the nature of the conversation between the two men? We understand that at the time this took place Mr Epstein was on day release following his conviction. I just want to double check with you that is factually correct as well. Please let me know as soon as you can - an article is due to go in the paper tomorrow.”

- Goldberg forwards to Epstein with a note “ignoring” which is then forwarded to Staley.

Prince Andrew, Duke of York

- On June 24, 2009 Epstein writes to Staley, “Ask Andrew about the island, tell him about your boat plans.” This appears to be a reference to Prince Andrew, the Duke of York, with whom Epstein and Staley appear to speak and meet with on a number of occasions.
- On April 15, 2010 Epstein writes to Prince Andrew the Duke of York [REDACTED] “jes staley will be in london on thurs the 22.. i think you should meet if you are in town..” Prince Andrew replies that he is unavailable but will look to visit New York in the near future.
- On May 18, 2010 Epstein writes to Staley “andrew will try to see you on your trip to london”
- On June 14, 2010 Epstein writes to Staley “Andrew just sat next to me at dinner. We will try to connect this week. Any word on M? This is fun.”
- On August 29, 2010 Epstein writes to Staley “andrew will call tim , if you give me the numbers”. It is a reference to Tim Collins, CEO of Ripplewood Holdings.
- On September 2, 2010 Epstein writes to Staley “About to connect with Andrew.”
- On September 2, 2010 Lesley Groff writes to Epstein “Jes Staley's office called saying last night Jes met up with Prince Andrew and Tim Collins. Tim Collins office calls Jes' office asking for Prince Andrew's contact number. Jes' office does not have Prince Andrew's number and have called us requesting it. Please advise.” Epstein forwards the note to both Staley and Prince Andrew.
- On September 28, 2010 Epstein writes to Staley “prince Andrew would like much more to represent casanov in china than tim Collins”. This may relate to JPMC Cazenove business in London.
- On December 2, 2010 Jeffrey Epstein forwards an email to Staley from Prince Andrew with an inquiry the Prince received from Aria Petroleum looking for a \$200 million working capital line. Since the company is based in the US Prince Andrew appeared to suggest Epstein connect them with a US bank.
- On December 22, 2010 Prince Andrew writes to Jes “Wishing you a very happy Christmas and New Year. Sorry to have missed you this week. I had to go to Afghanistan so couldn't be here and couldn't tell you why or where I was. Hope to catch up sometime after the New Year. I will be at Davos as usual.” Staley replied “Be safe there. I bet it helps people that you're there. I will get u the schedule of the JP Morgan stuff. (Rosa -- can u send the place and time of the Morgan events in Davos). I must say, getting a Christmas note from The Duke of York is sort of cool. Sorry we missed in London. I was there to announce or deal in Canary Warf. We got pretty good press. Maybe in London the next time I'm there, I could show u the building we bought. (The old Lehman building). The mayor of London was funny as always.”
- On February 28, 2011 Epstein writes to Staley “andrew asked for your london schedule”

Sultan Ahmed bin Sulayem

- Note that this relationship appears to play into references Epstein makes to Staley regarding a suggestion for Staley to do a deal between the Chinese and UAE ports.
- On September 23, 2009 Sultan Ahmed bin Sulayem (senior official involved in Dubai ports and Chairman/CEO of DP World) e-mails Epstein an article about a Liberian government minister, Willis Knuckles, who lost his position when a picture was published of him engaged in sexual relations with two women. Epstein then forwards the graphic image to Staley.
- On December 7, 2009 Epstein writes to Staley "if you can have a one on one off the record with sultan , he will meet you .."
- On December 8, 2009 Epstein writes to Staley "no to china / ports yet.. sultan will meet you privately to give you guidance, on the players, the groundwork is well prepared. Remember you are going as the senior statements, you do not need to talk about the nitty gritty of deals ,, leave that to underlyings"
- On December 8, 2009 Epstein writes to Sultan bin Sulayem and writes "sultan, jes is free thurs,, from 5-10pm. Where and when,, only the two of you please"
- On December 9, 2009 Epstein writes to Staley "sultan is laying the groundwork for you to establish a serious presence.. jpm reputation in the region is poor. I understand it comes from not being fooled. However, I think it in your interest to rebuild. The swiss banks, are no longer sacrosanct., the wealth management, and IB, are open opportunities and like china very much personal."
- On December 10, 2009 Epstein asks Staley "having fun?" Staley replies "Wild. Just saw the crown prince."
- On March 4, 2010 Sultan bin Sulayem e-mails Epstein a draft of a letter addressed to Jes Staley regarding refinancing for Sulayem's ownership of Duke's Hotel in London. Epstein replies that he needs "to see the numbers" and then forwards the draft e-mail to Jes Staley.

Beginning in 2011 Jes Staley and Mary Erdoes have regular communication with Jeffrey Epstein relating to certain strategic initiatives and business proposals. There are occasional personal e-mails between Erdoes and Epstein interspersed within this time period.

- On February 6, 2011 Epstein writes to Staley "donor advised fund. ;/ 1. you could tie it initially just to the gates program,, minimum gift. 100 million. it could then be opened up later. IT will be the largest foundation in the world. You need an advisory board for 1, investments. 2. distributions. . you will need an administration , mirroring a mutual fund. 4. tax compliance dept. dedicated to the operation. IT will underpin a trust and estate . dept, the size of which will be enormous, 5. I would suggest , an irs auditor full time on site. 6, as a DAF , you will be able to take in funky assets. (subs, closely held c's , Art,) valuation services. . sale and mgmt of 144 stock_). done right its 100 billion dollars in 2 years. the tension is making money from a Charitable Org. therefore the money making parts need to be arms length . salaries are disclosable ,and closely watched . Farming the investments to a highbridge is no brainer , but must be done with airtight opinions and reviewed by committees. I thought of University Heads. Foundation Chairs,for the boards It will be the most sort after board in the country."
- On February 18, 2011 Epstein writes to Juliet Pullis from JPMC and Jes Staley and writes "It would be a JPM donor advised fund,, A stellar board, broken down into investment committee and distribution. There are a number of people that have pledged to give more than half of their net worth to charity,, Bill gates and Warren Buffett Pledge program,, more than 60 billion

so far. .. The next step is unknown ,, They all have a tax advisor, but have no real clue on how to give it away. ie. metrics re successful giving, review of broad areas etc. No set timeline, , the cash pressure is enormous. , re anonymity,, not important but would not want to be seen as supporting one bank. JPM would be an integral part. Not advisor,, operator , compliance it should be a jpm program to meet the needs of the pledgers. i would envision both already received and yet to be received deductions. each donor individual, advises on type of investment,, donor gets to suggest recipients as well as have ideas presented. Juliet,, please review fidelity donor advised fund, for a similar structure, but without the very large minimums that i would envision. , ." Staley replies only to Epstein "We need to talk."

- On February 25, 2011 Epstein writes to Staley "gates guys here today. - no reporters. I took care of that. -- stay calm and focused. we need to speak, I am staying until very late tonight.. seeing gates re donor a f . on tues thru fri.. wed set aside for two -three hours. to discuss just this."
- On March 4, 2011 Staley sends Epstein a JPMC internal comparison of the Gates and Ford family foundations.
- On August 2, 2011 Erdoes' Admin Assistant sends her a note "Called from Paris. He thought you'd appreciate that he just got out of the pool at the Ritz. He'll call you back later." Erdoes forwarded the note to Epstein writing "Rude and insensitive"
- On August 10, 2011 Epstein writes to Staley and Erdoes:
 - "for the meeting with Dick , we should have a complete presentation..IT needs to address how it enhances current giving by GF . vaccines, maternal care,, These should be two of the donor silos. . IT should have a structure, that for example purposes only, has , the best investors in the role of advisors. (we should decide whether being on the investment commitee, automatially disqualifies an investment in ones particular fund , for example if LEon sat on the advisory board, should there be no apollo investments. (legal issue as well as optical).. JPM acts as fiduciary in every capacity,,It should deal with hard to value assets.. appreciated real estate. , (a real estate group, should be available). valuation firms, trust and estate experts. . The web based, investor access to information , could set an example for simple user interface. click or touch an investment silo to retrieve all relevant data, in many forms. This will be very HIGH profile. I propose a minimum of 100 million donation . It will be the most exclusive of clubs, In addition , though membersip in the "club"could be known . the gifts can be given anonymously. This will fulfill the wishes of many that have spoken to bill about wanting to do things but not wanting the publicity. For example funding Gay, Aids, Jewish, orgs, that otherwise might bring unwanted attention to the giver by both the press and its competing groups. For example, If someone wants to give money to a program that in any way competes with their self or perceived image. Another school. , program etc. many have expressed reservations that giving publicly woudl send a complex message to those institutions that have already close relations with the donor."
 - Erdoes replies "Got it. We should fine a way to go through over next week or so when jes is back.
- On August 11, 2011 Epstein writes to Erdoes "The french bank rumor problem , i fear is only the begging.. as twitter and facebook have spurred the riots in the middle east. , it is open to abuse where a cybermessage goes to thousands to buy or sell X. or spread rumor a or b". Erdoes replies to Epstein and Staley's gmail account [REDACTED] "We are trying to stem rumors ourselves. But the BoFA, socgen stuff is rapid"
- On August 27, 2011 Epstein writes to Staley and Erdoes "Careful, the people at Gates- Gabriella Fitzgerald is a a public advocacy person,, no real experience in anything but,, jenniferalcon is very junior, Connie Colligswrth, and Dick . are the senior people , and they say they are getting

confusing messages from JPM. They say that JPM wants to use the current foundation to do other things. Bill is at his country house. and most likely will not deal with it before wed. There are too many people without direction. lets speak,,

- On August 28, 2011 Erdoes writes to Epstein "Jackie Elias, a young woman who is part of philanthropy group, has been taking to Alcorn around the concept of a healthcare daf (this is on the back of the healthcare summit) for months. Then about a month ago, Jackie , the Ray Chambers and Gates foundation met and discussed importance and viability of on the health care facility. That is not the same thing as what we have been working on for the meeting with Dick, and I'm sorry that Gates people are confused. As for the meeting Wed, we do have a full 18 page external book and a 138 page internal book. I will be speaking with cutler and jes this week to discuss how to properly deal with you arranging this. Jes is likely more focused on Irene attacking his boat at the current moment. " Epstein replies "I suggest you postpone the meeting, your audience is not conditioned properly and i strongly believe it will do more harm than good at the moment.. further details when we speak"
- On August 28, 2011 Erdoes e-mails Epstein and Staley a formal deck outlining their efforts surrounding the creation of a Donor Advised Fund within the confines of the Gates Foundation. It appears the initiative was named "Project Molecule" within JPMC. Staley e-mails Epstein an updated version of the presentation on August 30, 2011.
- On August 31, 2011 Epstein e-mails Staley and Erdoes and writes "RE financail deal. ideas.. 1. I think there will be many diverse and interesting opportunities to turn over almost turnkey transactions to JPM.. The Middle East, as it re-forms. will be a gold mine of new transacations, people, govt needs. I;m not sure of interest in places people , like syria, egypt, libya. , though there will be great needs and serious wealth and support. I am aware of the paramount need for sunshine. The new issues is these leaders are wary , of a strictly JPM approach as it represents to them a quasi- Us govt arm. a. There can be a relation with JPM and me. Jpm and a new or current investment boutique . (Pritsker?, David Stern?, (prince Andrew? , he is now allowed to make money)) or Joint venture with IAn Osbourne, (Bloomberg would eventually join , if not otherwise occupied. --. There could be a fee /sharing. (a bit boring but standard for hedge funds. (the money gets 1/2 % - 1 out of the 2 fee,, and ussally 5 of the 20 carry. I am well aware of my current unfortunate rainbow . I am also aware that JPM has a colorful array of clients. so a client relationship is much less problematic than a instiutiioall joint venture. .. on the flip side the G20 issues, , regulation, in europe. (last time Great Britain)etc. was successfully handled. wiht no blow back , and i would argue great value to JPM. As mary kindly pointed out, last time with Highbridge , the outcome was less than perfect. I would appreciate your/cutler thoughts. , and as both of you have not jumped with enthusiasm at the prospect of me sitting with him face to face, I leave it in your hands"
- On September 20, 2011 Epstein writes to Erdoes "I think the structure could be as simple as FTC my co . getting ten percent of your profit. on the daf and its offshoots. . . . I am willing to put up ten percent of the costs of formation. . It was my idea. . I will help see it through, It should be an ongoing arrrrangement, I am aware that the private bank does not pay for its clients. I am looking forward to seeing a written proposal soon ,as there will be an internal gates meeting soon, and I would suggest we try to have an agreement if not finalized at least quite a way down the path before that meeting . thanks hope you are swimming at the berkeley"
- On September 22, 2011 Epstein writes to Staley and Erdoes "IF you do decide to go to Seattle , I think it might be helpful to review your plans". Erdoes replies "Team is going to go out next thursday (I am in rome) so I am going to dial in. I can go out the following week but they want to meet before an oct 1 meeting with Bg/Mg."

- On September 26, 2011 Epstein writes to Erdoes “I would suggest you bounce your ideas off me before it goes too far down a road that might not be acceptable .. I met with Bill over two months ago to set up the jes dick meeting, I know you are trying to come up with something that is fair and balanced. and I appreciate it. I assume you mean tomorrow you will call ? If that is not the case please let me know. Thanks”
- On September 28, 2011 Epstein writes to Staley and Erdoes “The proposal that Bill gets reduced fees , and then channels the discount to me, is an idea that is still born for many of the reasons that we discussed. I think the solution is quite simple. JPM engage an entity , (a law firm , bank, trust co .etc) that it pays a percentage of its profits on the DAF every year. This amount could be supplemented or decreased by other business directly related to that entity (kazzak govt for example).. The only issues would be what type of entity and the relevant rules and reporting requirements. and the amounts and how they are calculated. AS I had proposed , I stand willing to pay my share of costs . legal etc. / An early iteration was that A bill entitty simply hired JPM to do the administration for his DAF. I didn;t think that was the right structure, as the profits would mostly stay in his entity, , but maybe that can be revisited.”
- On September 29, 2011 Epstein writes to Staley and Erdoes “A entity that passes all the tests will be created. thats my responsibility. We should agree on the fee structure , calculations ,payments and we can easily move forward,, , i.e imagine you were paying pritskers investment bank, I suggest that Jpm cacluate its profit. (method to be clearly enumerated), on the DAF, first,, we can then add other types of transactions . I would start at 15% , you would start at 5 , we can after many back and forths now agree at 10%.. and move forward.”
- On October 2, 2011 Epstein writes to Staley “JES ,, the daf is dying. due to cross purposes.. ...we need to speak.”
- On October 2, 2011 Epstein writes to Staley:
 - “I saw Bill on Aug 16.. that was a year after my raising with him the DAF idea for the first time. Since then , seperate from helping to tweak your presentation , there has been little interaction between your team and me. I was very cognizant re settling our legal issues to take that out of the equation. It is not going well. and at the moment the chances of success are 50/ 50 at best. that is down from 95-5. This is not about SOCIAL INVESTING”.
 - Erdoes replies “I'm not following your thoughts below. Everyone is marching together to create something very powerful and we will solve the comp issues. We worked on it this weekend and have some thoughts on taking your last proposal and using revs not profits and doing years 1-3. Not sure what makes this all only a 50/50 shot. ME”
 - Epstein writes “the comp issue is seperate.. the presentation , is not tailored to bill.. He is the only person , the only one, that counts. and the feedback is not good. Your side does not fully understand and cannot deal with the foundation internal politics. This is a deal that can only really be done with Jes directly with Bill.. The comp issue will be moot, anyway if this continues on this path. that being said, I see no reason that with a ramp up as you are aware will be the greatest between years 3 and 5. any deal should only be limited to the startup years.”
- On October 3, 2011 Epstein writes to Staley and Erdoes “The pyramid of the DAF deal, is upside down, with a wide swath of low level foundation people all attempting to drive /participate, / screw it up. That being said I would like to see a real proposal today if possible. thanks.”
- On October 4, 2011 after a number of follow up messages from Epstein to Erdoes Staley tells Epstein to “stop pushing.” Epstein replies to Staley “I m sure you are swamped. did not get your schedule from roza. On mary,, I will ease off, I thought I was following plan”

- On January 20, 2012 Erdoes writes to Epstein, "Not sure where you are celebrating it, but I hope you have a great birthday weekend." Epstein replies, "Thanks , Boris said you were terrific"
- On September 14, 2013, Epstein writes to Erdoes "lets try to speak soon, before your Gates meeting," Erdoes replies "Happy to talk early tomorrow am. What timezone will you be on?"
- On September 20, 2013 Epstein writes to Erdoes "answers?" Erdoes replies "I spoke to john yesterday who has been in London, hence the delay. He will be calling you this am."
- On September 20, 2013 John Duffy writes to Epstein "Jeffrey - I have your answers happy to discuss. I called earlier and will try you again before 3 and then before 4. In a mtg from 4 to 5." The two exchanged additional e-mails coordinating a time for a phone call.

Certain messages appear to relate to lawsuits and litigation involving Epstein, JPMC, Bear Stearns, Highbridge, Zwirn etc. or the Firm's maintenance of a relationship with Epstein in general.

- On August 26, 2010 Epstein writes to Staley "steve cutler sent alan greenberg a note , telling him , you and isettled. ??? i haven't seen anything since our conversation. ???"
- On September 16, 2010 Epstein writes to Staley (copying attorneys Darren Indyke and Harry Susman) "I am having my attorneys now prepare my version of settlement. documents . 16 million dollars. (35 % 46m) --releases , that are clear and delineate the issues."
- On September 23, 2010 Epstein writes to Staley "can i send to steve cutler the terms under which we would sign,, and then review the numbers". Later that day Epstein writes to Staley "im told that FTC invested 15 in high grade but then rolled it into enhanced leverage for 21 million , ftc invested ten million in abs, and couq invested 10 million in abs, for a total of 41 million,, the lawsuit contained interest calculations, that I assume are not releveant.. therefore total invested 41 million". He then forwards a draft settlement agreement to Staley asking that Staley forward to Steve Cutler.
- On September 24, 2010 Epstein writes to Staley "i received a call from cutler.. I said thanks, i just hung up with your boss.,, and he snidely replied JES is not my boss.. a difficult character". Staley replies "He was head of SEC enforcement. He is a good guy at heart"
- On January 14, 2011 Epstein writes to Staley "thanks for today, , kenstarr, dershowitz.. lefkowitz at Kirkland. All very famililar with the nonsense. each , all, whatever, cutler wants or needs ."
- In February and March 2011, there appear to be a number of discussions involving Steve Cutler where Epstein and his attorneys are looking to speak with him. There appears to be a call finally scheduled for February 17, 2011 where Epstein writes to Staley "shwartz not cutler on call"
- On February 2, 2011 Epstein e-mails Staley and writes "did Cutler call Starr. ? I would be happy to meet with him before or after a call"
- On February 7, 2011 Epstein writes to his attorney Kenneth Starr [REDACTED] "Kenny, Steve Culter at JPM , says he has left a number of messages for you.. I would really appreciate it if you could call him . As I had mentioned to you,- He is the lead counsel for Morgan , and needs to be reassured that I am a good egg - Steve's cell: [REDACTED] Thanks in advance , and can't wait to see you face to face." Starr replied "Yikes. Will do. I got one message, but not multiple. Apologies. Tomorrow first thing. Best, Ken." Starr then wrote "News flash: We called late today. Left a message. Will try again tomorrow. Best, Ken."
- Staley wrote to Epstein on February 9, 2011 in regard to Starr's efforts to reach Steve Cutler, "Anything more you would like me to do.? I will be in new york tomorrow at 1 thru Sunday." Staley then writes "They must have the wrong numbers. Steve says he hasn't heard anything. Can I have Rosa set up a call?" Epstein replied "Give steve kens email , I want him super comfortable." Staley then e-mails Starr with Cutler's e-mail address and contact info.

- On March 20, 2011, Epstein writes to Staley "I m working on getting steve cutler the comfort he needs". Staley replies "Agree"
- On March 24, 2011 Epstein writes to Staley "take photos.. call if you get a chance. I will be back in ny 30-31 , cutler? Shwartz? I m ready"
- On March 28, 2011 Epstein forwards Staley an e-mail with unclear sources that says "Jeffrey , It should now be apparent to both you and Glenn's own counsel that there is a serious problem . In today's email it states that Glenn now admits to knowing about the Zwiwrn plane in Sept or Oct of 06.- both before your withdrawal notice of Nov 13.06 . His protestations and rantings at our last meeting, witnessed by his counsel confirmed "Had he known , he would never have convinced you to only put in for your 80 million withdrawal". He is in a box. We know that Schulte Roth was called in in May 06 , so that is really when he first found out. The money for the plane was taken from the Highbridge managed acct. Highbridge was owned my JPM at that time. This is ugly."
- On March 28, 2010, Epstein writes to Darren Indyke (dkiesq@aol.com) "detail for me glenns involvement with zwiwrn mgmt. glenn and henry were limited partners of the gp management?" Indyke replies "Will pull out lap top tonight but as I recall, dsam was lp of db zwiwrn & co. Lp which was investment manager of the fund. dsam was also member of db zwiwrn partners llc, the fund's general partner, and a member of dbz gp, llc, which was the managing member of db zwiwrn partners llc (the gp of the fund)." Epstein forwards the reply to Staley.
- On May 14, 2011 Epstein writes to Mary Erdoes "Wendall said he was not aware of the reason to meet. ?? He knew it was something relating to Zwiwrn.?? Im available on my cell". Mary replies "He knows" .
- On May 23, 2011 Epstein writes to Erdoes "Thanks for today, Im not sure if you were aware that I still have investments with Highbridge. As I have had since 2002. There is clearly a fiduciary relationship that has existed since 02.."
- On May 24, 2011 Epstein writes to Erdoes "Is it possible to have nina at the wendel meeting at 4 oclock with my attnys". Erdoes replies "Jeffrey – I am so sorry but I am just seeing this, having been in an all day OC with Jamie. I hope the meeting went well. I'm anxious to hear." Epstein replied "also , the SEC in its letter of reprimand , described Zwiwrn as a sub-advisor of Highbridge."
- On May 24, 2011 Epstein writes to Erdoes "seperate and part from the money ,, fees were paid to Zwiwrn/dubin – the total fees paid by FTC/JEEPERS to was \$24,514,951 (\$13,244,319 incentive fees and \$11,270,632 management fees)"
- On May 27, 2011 Epstein writes to Erdoes "IF you think right I am happy to meet with Jim Condren , on the Highbridge issue as he said it was his area of responsibility.. He is well aware of the regs and is tough on plaintiffs". Erdoes replies "Yes great minds think alike. That is what Nina and I discussed last night. Condren will join the team. ME"
- On May 27, 2011 Epstein left a message for Mary Erdoes and she replied that she is traveling [REDACTED] and will regroup after the Memorial Day weekend.
- On May 30, 2011 Epstein writes to Erdoes:
 - "I think you should ask Wendall to recall the meeting he had with Sussman and Glenn. Glenn was unequivocal., adamant ,and loud in front of them both - that had he known about zwiwrn taking money for the airplane (form the Highbridge acct no less , in dec of 04).. he would have immediatley told me to take all my money out . He said he would have taken all his money out .. We only recently received the doc regarding the schulte meeting,, (shulte was called in in investigate the problem), where though my oral redemption request was in oct, and the written reduced demand on NOV. 13,schulte had a meeting in sept in which glenn attended, that informed Zwiwrn and

Glenn of the problem in detail. (wendall knows this!)/ I am aware of the issue being legal vs moral duty. However, the legal is abundantly clear once all the documents are reviewed, as opposed to only what wendall has. I expressed in no uncertain terms in talking with Condren that I view this as a dispute (Me vs JPM, in the Bear Stearns case) as a family disagreement, hopefully not discounted, by my well stated desire, never to file suit. that should not be a factor in a fair resolution of both issues. Im not sure if Condren can say Jeffreys claim is worth x- million if he were to file a claim, and only x minus, now that we know he is unlikely to file".

- Erdoes replies "Yes, we are going to have Condren step in here on this issue as well as the Bear issues. We will have everyone get together this week, if possible, and then we will see what to do from there."
- Epstein replies "info needed, -- managed acct NAV at 10 /05 10 /06. realized value,? .. redemption schedule, we have documnets that schulte had a meeting to disclose wrongdoing sept 06 BEFORE my withdrawal request and the discussions why I should not redeem my entire 140 million. but reduce it to 80million. Managed acct should have had virtually the same assets as the Fund."
- On June 6, 2011 Epstein informs Erdoes that "we have asked for meeting with condren on Friday"
- On June 29, 2011 Epstein writes to Erdoes (copying Lesley Groff) "I think a call with you, me and Condren today could be very helpful. I would like to try to resolve the Bear Stearns issues. Of course it would be for settlement purposes only, and be held under our already agreed rules.- preferably before 2 pm"
- On June 30, 2011 Epstein, Condren and Darren Indyke are part of an e-mail chain surrounding settlement discussions and the Bear High Grade Investment.
- 
- On July 11, 2011 Epstein writes to Erdoes "the amount of my loss that i provided, did not include pre-judgement interest that I would obviously ask for if we cannot agree. As I suggested on our call- the 21 million, would / should make neither one of us happy, which i think it does. I would appreciate a response. Thanks"
- On July 19, 2011, Epstein writes to Staley, Erdoes and Condren:
 - "eJim was very kind in offering me 5 million to settle the funds issue and 2.2 to settle the stock claim. Again very professionally jim pointed out that jes had told him I agreed to be treated like a retail client. Therefore..we had in essence agreed to 5 .. What I told jim was that we were still in dispute over what amounts were in dispute. It is difficult to understand how i would recieve the same settlement as a person who put 15 million in the asset backed fund two weeks before the enhanced investment, though I had a confirmantion that 20.3 million was put in. Jims argumement that the increase value that is reflected on my sunscription doc. should be totally ignored, does not seem fair. I also asked jim, if in arbitration others had received an award greater than 30%, and he told me he could not disclose that information. Mary when you and I are in the same city, i would like to sit down and discuss,, Again, I have a great deal of respect for Jim, and i have vocalized my appreciation for the way he has handled this to date."
 - Erdoes replies "Let talk by phone any time today"

- On July 20, 2011 Epstein writes “mary, Thank you for calling from dreary London today. So that I may fully consider my options , please confirm in writing , the new offer . My understanding is that you have agreed to use the full amount of subscription, 20 plus million, and pay one third of that amount. In addiion you have offered ten cents on the dollar for the stock, claim.. I think it would be helpful if Jim could send the documents he would want me to sign so that there are no misunderstandings.. Again,, I sincerely appreciate the good faith shown by your side.”
- Condren then replies: “So we're all clear, I think we should be using the exact numbers instead of concepts -- the offer is for us to pay \$9.2 million in exchange for a full release concerning any claim (yet asserted or not) based on an investment in any Bear fund (including High Grade, Enhanced Leverage and ABS) or in Bear stock. If you want to think of it as broken down into components, it's \$7 million for High Grade/Enhanced Leverage and \$2.2 million for Bear stock. As Mary mentioned, this is our final offer. I'll have one of the lawyers in my group mark up the prior agreement and send it to Darren. JE, I have personally very much appreciated how professional and candid you have been in our dealings on these issues. We hope you appreciate (and believe you do) that this offer represents an extraordinary effort on our part to resolve your claims. – Jim”
- On July 25, 2011 Condren sends a draft settlement agreement to Epstein and Darren Indyke copying Mary Erdoes. Later that day Condren confirms to the same group “Jeffrey, thanks again for the call and the kind thoughts. Just to let Mary know, we have a deal for \$9.2 million. I will work with Darren on whatever minor issues there may be with the settlement agreement (e.g., as you mentioned, where we transfer the \$). Best regards. – Jim”
- On October 17, 2011 Epstein writes to Staley “I would lke to meet with steve cutler either thurs or fri,?”
- On March 28, 2013, Paul Barrett writes to Epstein “I would like you to meet John Duffy who is the Private Bank CEO especially now that Jes has left. When are you next in NY?”

EXHIBIT 5

From: Anne E Verdon [Anne.Verdon@chase.com]
Sent: 8/16/2010 9:50:15 PM
To: Melissa Getler [Melissa.Getler@jpmorgan.com]; Todd Cook [todd.cook@jpmorgan.com]; James Condren [James.Condren@chase.com]
CC: GREG QUENTAL [GREG.QUENTAL@jpmorgan.com]
Subject: Re: Epstein

This has a JES connection.

From: Melissa Getler
To: Todd Cook; James Condren
Cc: Anne E Verdon; GREG QUENTAL
Sent: Mon Aug 16 17:24:04 2010
Subject: Re: Epstein

That's my understanding.

From: Todd Cook
To: Melissa Getler; James Condren
Cc: Anne E Verdon; GREG QUENTAL
Sent: Mon Aug 16 17:22:32 2010
Subject: Re: Epstein

Did Ace go to him for an exception to the felon policy?

Sent from my BlackBerry Wireless Device

From: Melissa Getler
To: Todd Cook; James Condren
Cc: Anne E Verdon; GREG QUENTAL
Sent: Mon Aug 16 17:17:46 2010
Subject: Re: Epstein

We are in contact with Cutler on this.

From: Todd Cook
To: James Condren; Melissa Getler
Cc: Anne E Verdon; GREG QUENTAL
Sent: Mon Aug 16 17:14:39 2010
Subject: Re: Epstein

After we spoke, I realized that, not only is Epstein suing us, but since he's a convicted felon, the approval of Cutler or Zubrow wd be required by the Firm's felon policy. It looks like Ace may have reached out to Cutler. (Greg- Joe Danowsky has the background on Epstein or we could chat when I get in on wednesday.)

Sent from my BlackBerry Wireless Device

From: James Condren
To: Todd Cook
Sent: Mon Aug 16 13:05:13 2010
Subject: Fw: Epstein

FYI

From: Melissa Getler
To: James Condren
Sent: Mon Aug 16 13:04:03 2010
Subject: RE: Epstein

OK- that provides some context (maybe). Thanks.

From: James Condren
Sent: Monday, August 16, 2010 1:02 PM
To: Melissa Getler
Subject: Re: Epstein

Maybe not coincidentally, Todd called me about Epstein last week. Ace Greenberg wants to do business with him. I told Todd: Redacted - Privileged So maybe Ace is pushing it.

From: Melissa Getler
To: James Condren
Sent: Mon Aug 16 12:49:16 2010
Subject: Epstein

Just an FYI.

From: Melissa Getler
Sent: Monday, August 16, 2010 12:32 PM
To: Stephen M Cutler
Subject: RE: Please call me at 212-270-3220

Redacted - Privileged

From: Stephen M Cutler
Sent: Monday, August 16, 2010 12:23 PM
To: Melissa Getler
Subject: Please call me at 212-270-3220

Melissa – Redacted - Privileged
Redacted - Privileged

S.

EXHIBIT 6

From: Goldberg, Ira - Communication of Counsel (Exchange) [igoldberg@bear.com]
Sent: 10/24/2008 3:32:22 PM
To: Munowitz, Gary (Exchange) [gmunowitz@bear.com]; Everett, Melissa (Exchange) [meverett@bear.com]
CC: Mallery, Clifford (Exchange) [cmallery@bear.com]; Waters, Lisa E [lisa.e.waters@jpmorgan.com]; Cook, Todd - Communication of Counsel (Exchange) [jtcook@bear.com]
Subject: RE: Jeffrey Epstein credit memo & supporting doc

Gary

My understanding is that JPM requires top of the house ok for clients who are convicted felons. (ie PCS Legal to Asset Mgt Legal to Cutler to Jaime Daimnon). If you want to keep the account i can call Asset Mgt Legal and get the ball rolling. Am awaiting your direction.

Thx

From: Munowitz, Gary (Exchange)
Sent: Thursday, October 23, 2008 1:18 PM
To: Everett, Melissa (Exchange)
Cc: Mallery, Clifford (Exchange); Goldberg, Ira - Communication of Counsel (Exchange)
Subject: RE: Jeffrey Epstein credit memo & supporting doc

The broker would like to continue to handle the accounts. The larger account indicated as having \$3mm on the AML Diligence report is down to \$20k. Let me know what else you require. If there is a firm policy regarding a specific course of action let me know.

Gary F. Munowitz
Senior Managing Director
Bear Stearns, a division of J.P. Morgan
383 Madison Avenue
New York, NY 10514
Tel: 212 272 4857
Fax: 917 849 4436
gmunowitz@bear.com
www.bearstearns.com

J.P. Morgan Securities Inc.

From: Everett, Melissa (Exchange)
Sent: Wednesday, October 22, 2008 9:57 AM
To: Munowitz, Gary (Exchange)
Cc: Mallery, Clifford (Exchange); Goldberg, Ira - Communication of Counsel (Exchange)
Subject: FW: Jeffrey Epstein credit memo & supporting doc

Gary,

This e-mail is a follow-up regarding [REDACTED] I have yet to receive a response regarding how this matter will be handled. I need a decision from you regarding this matter before the close of business on Monday, October 27, 2008.

If you have any questions or concerns regarding this request, please feel free to contact me as soon as possible.

Regards,
Melissa

From: Penzell, Abigail - Communication of Counsel (Exchange)
Sent: Monday, September 08, 2008 1:48 PM

To: Munowitz, Gary (Exchange)
Cc: Goldberg, Ira - Communication of Counsel (Exchange); Mallery, Clifford (Exchange); Everett, Melissa (Exchange)
Subject: FW: Jeffrey Epstein credit memo & supporting doc

Good afternoon Gary,

Attached please find a news brief [REDACTED] and an article from the *The Guardian*. The client is Jeffrey Epstein. Mr. Epstein has begun serving an 18-month jail term after pleading guilty to soliciting sex from girls as young as 14.

Please review the attached brief and report back to Melissa Everett by Friday, September 12, 2008, as to whether there are any steps that you would wish to consider from a reputational harm perspective. For example, you may consider reviewing whether to fire the customer; or, that no further action is warranted based upon the current information, etc.

Best,
Abigail

From: Gonzales, Estevan (Exchange)
Sent: Friday, September 05, 2008 11:22 AM
To: Everett, Melissa (Exchange)
Cc: Goldberg, Ira - Communication of Counsel (Exchange)
Subject: Jeffrey Epstein credit memo & supporting doc

Please find the attached credit memo for Jeffrey Epstein & the supporting article. Thank you.

Estevan Gonzales
320 Park Ave.
New York, NY 10022
phone: 212-272-9034
fax: 917-849-2697

EXHIBIT 7

From: DeLuca, Phillip A [phillip.a.deluca@jpmchase.com]
Sent: 1/10/2011 2:35:25 PM
To: Langford, William D [william.d.langford@jpmchase.com]; Nichols, Nina A [nina.a.nichols@jpmchase.com]
Subject: RE: Jeffrey Epstein

Will do

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

From: Langford, William D
Sent: Monday, January 10, 2011 9:18 AM
To: DeLuca, Phillip A; Nichols, Nina A
Subject: RE: Jeffrey Epstein

Ok. Can you all assemble prior email on the facts and include any relevant press reports so we can get all the facts asap in advance is any meeting with Jes?

Thanks.

W

Sent with Good (www.good.com)

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

From: DeLuca, Phillip A
Sent: Monday, January 10, 2011 07:50 AM Eastern Standard Time
To: Nichols, Nina A
CC: Langford, William D
Subject: FW: Jeffrey Epstein

Nina,

Welcome! Sorry to start your day off with a crazy matter but I'm sure when you discuss this with William he'll provide some color around this matter. This fits into the never a dull moment category.

Please see below. I can also fill you in with additional details when we speak. In essence:

- JPMC maintains the Private Banking (PB) relationship for this individual, Jeffrey Epstein.
- He is alleged to be involved in the human trafficking of young girls and law enforcement is also allegedly investigating his involvement in this activity.
- He is also an alleged personal associate of the CEO of the Investment Bank (Jes Staley)
- AML Operations went to a PB risk meeting late last week requesting that we exit this relationship.
- The CEO of PB US (Catherine Keating) and PB General Counsel (Anne Verdon) suggest that William and PB management meet with Jes Staley to review our recent HT initiative with him.

I'm copying William as we have discussed this individual in the past and you may not have email set up yet. Maryanne Ryan's email below discusses the request as well as additional detail related to Epstein.

Please let me know when you have a few moments to discuss.

Thanks,

Phil

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

From: Ryan, Maryanne X
Sent: Friday, January 07, 2011 7:33 PM
To: DeLuca, Phillip A
Cc: Middlemiss, Arthur
Subject: Jeffrey Epstein

Phil-

This email is a summary of the Rapid Response meeting regarding Jeffrey Epstein. It involves an ask of William so I am sending to you first.

The RR meeting attended by Catherine Keating, Ann Verdon, the current and former banker, Kevin, Jim and Bonnie Perry from Risk and Art and I.

Jeffrey Epstein is a friend of Jes S and Catherine feels that PB along with William should meet with him to explain the HT project and explain the banks recognition on the project and whether Epstein if further exposed could have a potential serious impact.

Epstein was released in July from house arrest and the Palm Beach Post carried two articles saying DOJ may be investigating for child trafficking via a modeling agency he is part owner in. I think Catherine believes that after the briefing on HT that Jes would need to point blank ask Jeffrey the status of any criminal investigations. Catherine made sure we knew that no one on today's call was in favor of having retained him as a client. Seems it all is due to Jes's personal relationship. Note he has about 212 mil in the bank and some in JPMS (old Bear PCS)

I asked legal and asked on the call about if we were ever subpoenaed and seems it is NO which I find very interesting as Bear was. I also spent a good deal of time looking at his assistant or young lady he brought over from Prague (or some place like that) account. She was involved in some of the detailed escapades. She opened accounts in PB sponsored by him. Oh my were her debit transactions enlightening as compared to countless stories related to his escapades. Lots of salon, lingerie shops, drug stores ny palm beach and in st thomas (his places of residence). Plus lots of video like girls gone wild and some other shops not fit for my good catholic upbringing! The transactions are old 05 to 08. Besides frequent frequent spa like charges it has died down. Surprised she was never subpoenaed.

The one new concerning thing is the one article about the DOJ investigation is saying they brought under age girls to the US via a modeling agency M2 that is owned by a guy named Brunel. Turns out the banker said today we extended Epstein a loan in relation to this modeling agency. It appears to be a legit modeling agency. If girls were exploited via their contract or arrangement it would be hard for us to tell.

Bottom line we need W to meet with Jes to explain HT and then Jes could decide the next steps.

Typed on my bb so sorry for typos. I do have a PB rapid response memo I can forward as well.

EXHIBIT 8

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Government of the United States Virgin
Islands,

CASE NO.: 1:22-cv-10904 (JSR)

Plaintiff,

vs.

JPMorgan Chase Bank, N.A.,

Defendant.

**JPMORGAN CHASE BANK, N.A.'S THIRD SUPPLEMENTAL
RESPONSES AND OBJECTIONS TO INTERROGATORIES
IN LIEU OF RULE 30(B)(6) DEPOSITION TESTIMONY**

Pursuant to Federal Rules of Civil Procedure 26, 30, and 33, Defendant JPMorgan Chase Bank, N.A. ("JPMC") hereby serves its second supplemental objections and responses to the Responses and Objections to Interrogatories in lieu of Rule 30(b)(6) testimony, which includes supplemental responses based on agreements with USVI and Doe. JPMC does so, based on information reasonably available to JPMC at this time and without prejudice to JPMC's right to revise, supplement, or amend these objections and responses in accordance with Rules 26 and 33.

PRELIMINARY STATEMENT

These objections and responses are made solely for the purposes of the above-captioned case. Each of JPMC's objections and responses to Plaintiff's Interrogatories is based on information and documents presently available to JPMC after reasonable inquiry. Discovery is ongoing and JPMC specifically reserves the right to amend or supplement these objections and responses as necessary, including in the event further information and documents are discovered or produced by JPMC after discovery has been completed. In addition, JPMC's objections and

responses are given without prejudice to its rights to introduce at trial evidence of any subsequently discovered or unintentionally omitted facts or documents.

To the extent JPMC responds to a specific interrogatory below, JPMC does not admit to Plaintiff's characterization of any documents, facts, theories, or conclusions. JPMC's responses to the Interrogatories do not constitute acquiescence or agreement to any definition proposed by Plaintiff.

JPMC's objections and responses are made without in any way waiving or intending to waive, but to the contrary, are intended to preserve:

1. All questions as to competency, relevancy, materiality, privilege, and admissibility as evidence for any purpose of the responses or subject matter thereof, in this action or any subsequent proceeding associated with this action or any other matter;
2. The right to object on any ground to the use of said responses, or the subject matter thereof, in any subsequent proceeding associated with this action or any other matter; and
3. The right to object at any time to other requests or other discovery procedures involving or relating to the subject matter of these Interrogatories.

GENERAL OBJECTIONS

1. JPMC incorporates by reference all General Objections stated in its Responses and Objections to [USVI's] Notice of Deposition to JPMorgan Chase Bank, N.A., which JPMC served on February 15, 2023, and also its Responses and Objections to [Doe's] Notice of Deposition to JPMorgan Chase Bank, N.A., which JPMC served on May 5, 2023.

OBJECTIONS TO DEFINITIONS

1. JPMC incorporates by reference all Objections to Definitions stated in its Responses and Objections to Plaintiff's Notice of Deposition to JPMorgan Chase Bank, N.A.,

which JPMC served on February 15, 2023, and also its Responses and Objections to [Doe's] Notice of Deposition to JPMorgan Chase Bank, N.A.

SPECIFIC RESPONSES

TOPIC NO. 1

All persons who had responsibility as the principal BSA/AML compliance officer for JPMorgan.

SUPPLEMENTAL RESPONSE TO TOPIC NO. 1

In addition to and specifically incorporating its foregoing General Objections and Objections to Definitions, JPMC objects to Topic No. 1 because it would be more convenient, less burdensome, and less expensive to obtain the identity of individuals at JPMC through interrogatories under Federal Rule of Civil Procedure ("Rule") 33 or requests for production under Rule 34. Fed. R. Civ. P. 26(b)(2)(C)(i). JPMC also objects to this Topic on the grounds that it seeks information that is not relevant to any claim or defense of the parties. Fed. R. Civ. P. 26(b)(1).

In the parties' meet and confers, JPMC agreed to provide, and USVI agreed to accept in lieu of testimony, an interrogatory answer identifying persons with primary responsibility as JPMC's principal BSA/AML compliance officer between 2000 and 2019. In response to the Doe Rule 30(b)(6) notice, JPMC agreed to extend the start period of its answer to 1998.

For the period prior to the merger of JP Morgan and Chase, JPMC interprets this question to seek information about legacy JP Morgan.

Subject to and without waiving its objections, and based upon a reasonable and diligent investigation, JPMC identifies the following individuals as those with primary responsibility as JPMC's principal BSA/AML compliance officer between 1998 and 2019: William H. McDavid (1998-2000); Lynne Federman (2000-2006); William Langford (2006-2010); Nina Nichols

(2010-2011); William Langford; (2011-2012); Pamela J. Dearden (2012-2017); and Peter Neilson (2017-2019).

TOPIC NO. 2

The identity of any organizations and committees within JPMorgan that had responsibilities relating to Your BSA/AML Compliance Program relevant to Epstein Accounts and a description of those responsibilities.

SUPPLEMENTAL RESPONSE TO TOPIC NO. 2

In addition to and specifically incorporating its foregoing General Objections and Objections to Definitions, JPMC objects to Topic No. 2 because it would be more convenient, less burdensome, and less expensive to obtain the identity of individuals at JPMC through interrogatories under Federal Rule of Civil Procedure (“Rule”) 33 or requests for production under Rule 34. Fed. R. Civ. P. 26(b)(2)(C)(i).

In the parties’ meet and confers JPMC agreed to provide, and USVI agreed to accept in lieu of testimony, an interrogatory answer that identifies organizations and committees with primary responsibility for JPMC’s BSA/AML Compliance Program between 2000 and 2019 and that provides a general description of those organizations’ and committees’ primary responsibilities. In response to the Doe Rule 30(b)(6) notice, JPMC agreed to extend the start period of its answer to 1998.

Subject to and without waiving its objections, and based upon a reasonable and diligent investigation, JPMC identifies the following organizations and committees with primary responsibility for JPMC’s BSA/AML Compliance Program applicable to JPMC’s private bank at points during the applicable period and a general description of their responsibilities:

Committees

Committee	Description of Responsibilities
Firmwide	
Corporate AML Oversight Committee (AMLOC)	<p>The AMLOC provides guidance and oversight for all aspects of BSA/AML compliance, including establishing policies and corporate standards. The AMLOC has a number of subcommittees including the:</p> <ul style="list-style-type: none"> - AML Training Committee - AML Transaction Monitoring Steering Committee - Compliance Data Mart (CMP) List Screening Governance Committee - CTR Advisory Committee - KYC Committee - SAR Governance Committee
Private Bank	
Line of Business AMLOCs	<p>Since approximately 2012, the U.S. Private Bank shared a line of business AMLOC with Private Wealth Management and J.P. Morgan Securities. This committee is responsible for BSA/AML governance and oversight of these lines of business.</p>
U.S. Private Bank Reputation Risk Committee (RRC)	<p>The RRC reviews clients, transactions, and broader platform issues that could result in reputation risk to the firm</p>

Organizations

Organization	Description of Responsibilities
Firmwide	
Compliance Department	<p>Prior to 2012, the BSA/AML compliance program was part of the broader Compliance Department.</p>
Global Financial Crimes Compliance (GFCC)	<p>In or about 2012, the GFCC unit was created within the Compliance Department to oversee the bank's BSA/AML compliance programs.</p>

Organization	Description of Responsibilities
Line of Business – Private Bank	
Bankers/Market Managers/Region Heads	Bankers, market and regional managers, and client services are the first line of defense in identifying unusual trends, activity, or transactions inconsistent with the account parameters in DDRs. Until approximately 2013, bankers also reviewed transaction alerts generated from the bank’s SONAR system.
Incident & Client Advisory (ICA)	Until approximately 2013, ICA was responsible for reviewing client and transactional risk triggers; performing due diligence and making alert disposition recommendations for U.S. Private Bank; managing client escalations to GFCC and RRC.
U.S. Private Bank AML Operations	Until approximately 2013, AML Operations reviewed Fortent alerts and investigated, as necessary. AML Operations also escalated negative news reports about customers.
U.S. Private Bank Client Review Oversight Committee (CROC)	Until approximately 2013, CROC was responsible for oversight and providing counsel for due diligence efforts of U.S. Private Bank clients.
U.S. Private Bank Risk Management	Between approximately 2004 and 2013, the U.S. Private Bank Risk Management was responsible for reviewing SONAR alerts and escalating transactions for additional diligence and possible reporting.

TOPIC NO. 20

Any personnel actions or complaints related to Your BSA/AML Compliance Program, including, but not limited to, any actions or complaints with regard to Epstein Accounts.

SUPPLEMENTAL RESPONSE TO TOPIC NO. 20

In addition to and specifically incorporating its foregoing General Objections and Objections to Definitions, JPMC objects to Topic No. 20 to the extent it seeks testimony on matters unrelated to Epstein or Epstein-related individuals or entities and to the extent it seeks testimony on matters unrelated to JPMC’s private banking division. Such testimony would not be “relevant to any party’s claim or defense” and not “proportional to the needs of the case.”

Fed. R. Civ. P. 26(b)(1). JPMC also objects to Topic No. 20 on the grounds that complying with this topic would impose undue burden and expense that is disproportionate to the issues in the case, particularly as the information requested can be obtained from a more convenient, less burdensome, or less expensive source, such as requests for production of documents under Rule 34 or depositions under Rule 30(b)(1).

In the parties' meet and confers, JPMC agreed to provide, and USVI agreed to accept in lieu of testimony, an interrogatory answer identifying, based on a reasonable search of centralized sources in its Human Resources Department, any complaints about any employees' alleged failure to comply with BSA/AML policies with respect to Epstein accounts as well as disciplinary actions. In response to the Doe Rule 30(b)(6) notice, JPMC agreed to extend the start period of its answer to 1998 and state whether any action was taken with regard to the handling of the Epstein Accounts.

Subject to and without waiving its objections, and based upon a reasonable and diligent investigation, JPMC states that, between 1998 and 2019, no complaints were made about any employee's alleged failure to comply with BSA/AML policies and no disciplinary actions were taken with regard to the handling of the Epstein Accounts.

TOPIC NO. 23:

All revenue You received and/or anticipated from Epstein Accounts and any business relationships which Epstein facilitated, including, but not limited to, Your relationship with Highbridge Capital Management LLC, Leon Black, Leslie Wexner, and Bill Gates/the Gates Foundation.

SUPPLEMENTAL RESPONSE TO TOPIC NO. 23:

In addition to and specifically incorporating its foregoing General Objections and Objections to Definitions, JPMC objects to Topic No. 23 on the grounds that complying with this topic would impose undue burden and expense that is disproportionate to the issues in the case.

Fed. R. Civ. P. 26(b)(1). That is especially so where the information sought in Topic No. 23 can be obtained from a more convenient, less burdensome, or less expensive source, such as requests for production of documents under Rule 34 or depositions under Rule 30(b)(1). Fed. R. Civ. P. 26(b)(2)(C)(i). JPMC also objects to Topic No. 23 because the terms “anticipated” and “facilitated” are vague and ambiguous. JPMC also objects to the grounds that accounts are not always readily apparent as belonging to a specific individual, particularly where they are held in the name of an entity, and within its millions of customers, there are often multiple customers with the same name.

In the parties’ meet and confers, JPMC agreed to provide, and USVI agreed to accept in lieu of testimony, an interrogatory answer identifying fees earned from the accounts of Jeffrey Epstein, Leon Black, Les Wexner, the Gates Foundation, and Bill Gates. Subsequently, USVI asked JPMC to provide the same information for accounts of Andrew Farkas, Larry Page, Serge, Brin, Peter Mandelson, Ghislaine Maxwell, Michael Ovitz, Joseph Pagano, Ed Scott (Aria Petroleum), Sultan Ahmed bin Sulayem, Mort Zuckerman, Thomas Pritzker, Ehud Barak; the “Chinese banker(s) referred to in JPM-SDNYLIT-00008108;” the “Account redacted but referenced to in JPM-SDNYLIT-00000184,” and other account for which Epstein had authority to act as a representative, including but not limited to the accounts identified in JPM-SDNYLIT-00011904. JPMC agreed to do so provided such information could be discovered from a reasonable search of its centralized systems.

Subject to and without waiving its objections, and based upon a reasonable and diligent investigation, including using reasonable efforts to identify account ownership, JPMC refers the USVI to the information attached as Exhibit A, which reflects private bank revenue information (not profit) during the years 2009 to 2019, which in some cases required the application of

judgment including the year in which revenue was recognized. JPMC reserves the right to amend these responses to the extent it may become necessary. Of the individuals listed in the preceding paragraph, only Ghislaine Maxwell became a JPMC customer following a referral from Epstein. The provision of fee information for any of the individuals or entities listed above is otherwise not a concession that Jeffrey Epstein facilitated JPMC's relationship with such individuals or entities.

Also, Exhibit A includes additional people and entities which are the product JPMC's good faith effort to identify accounts that it understands USVI considers an account of Jeffrey Epstein. The inclusion of any such account on Exhibit A is not a concession that that account is actually an account of Mr. Epstein or that Epstein exercised had or exercised authority over any accounts. In addition, information for prior years is not available from centralized databases. With regard to Epstein, JPMC has produced account statements that include fee information. *See, e.g.*, JPM-SDNYLIT-00149613; JPM-SDNYLIT-00149869; JPM-SDNYLIT-00036258; JPM-SDNYLIT-00037278. Pursuant to Fed. R. Civ. P. 33(d), JPMC refers USVI to documents cited above. The burden of ascertaining the answer to this request from those documents is substantially the same for the USVI as JPMC. JPMC has not been able to determine who USVI is referring by "the Chinese banker(s) referred to in JPM-SDNYLIT-00008108."

TOPIC NO. 26

Your Board of Directors,' including the Board's Audit, Risk, and Public Responsibility committees,' knowledge and oversight of Your BSA/AML Compliance Program, including, but not limited to, with respect to commercial sex or human trafficking, including child sex trafficking,

sex trafficking, forced labor, and child exploitation or sexual abuse, Government investigations and/or actions against JPMorgan, and the Epstein Accounts.

SUPPLEMENTAL RESPONSE TO TOPIC NO. 26

In addition to and specifically incorporating its foregoing General Objections and Objections to Definitions, JPMC objects to Topic No. 26 to the extent it seeks testimony on matters unrelated to Epstein or Epstein-related individuals and therefore not “relevant to any party’s claim or defense” and not “proportional to the needs of the case.” Fed. R. Civ. P. 26(b)(1). JPMC further objects to Topic No. 26 because it would be more convenient, less burdensome, and less expensive to obtain discovery into policies and procedures encompassed by this topic through requests for production under Rule 34. Fed. R. Civ. P. 26(b)(2)(C)(i); *Blackrock*, 2017 WL 9400671 at *2. JPMC also objects to the extent that it seeks testimony pertaining to matters subject to the attorney-client privilege, bank examiner privilege, work product doctrine, or any other applicable privilege. JPMC also objects to Topic No. 19 to the extent it seeks information prohibited from disclosure under federal law. *See, e.g.*, 15 U.S.C. § 6802; 31 U.S.C. § 5318. JPMC is prohibited by the Bank Secrecy Act and federal regulation from disclosing information related to SARs, including any material that would disclose whether or not a particular SAR was filed. The prohibition against disclosure cannot be waived by JPMC. *See* 31 U.S.C. § 5318(g)(2)(A)(i); 12 C.F.R. § 21.11; 31 C.F.R. § 1020.320.

In the parties’ meet and confers, JPMC agreed to provide, and USVI agreed to accept in lieu of testimony, an interrogatory answer identifying any meetings of JPMC’s Board of Directors between 2000 and 2019 in which Epstein-related issues were discussed, and for any such meetings to provide board minutes and presentations on those issues (redacting unrelated issues). In response to the Doe Rule 30(b)(6) notice, JPMC agreed to extend the start period of its answer to 1998.

Subject to and without waiving its objections, and based upon a reasonable and diligent investigation, JPMC states that Epstein-related issues were not discussed at any of its Board of Directors' meetings between January 1, 1998 and August 31, 2019. Between September 1, 2019 and December 31, 2019, Epstein-related issues were discussed during two of its Board of Directors' meetings. Each of those discussions, and related documents, are protected by attorney-client privilege. JPMC will not produce these documents. JPMC will, however, identify them on a privilege log in due course. In addition, Epstein related issues were addressed in an August 2019 update to the Board of Directors' Risk Committee and in a meeting of that committee held on September 16, 2019.

TOPIC NO. 28

Any inquiries You made to local, state, federal, or international law enforcement agencies regarding Epstein and/or any Epstein Account.

SUPPLEMENTAL RESPONSE TO TOPIC NO. 28

In addition to and specifically incorporating its foregoing General Objections and Objections to Definitions and Instructions, JPMC objects to Topic No. 28 on the grounds that it that it seeks testimony on matters that are not "relevant to any party's claim or defense," and would also impose an undue burden that is not "proportional to the needs of the case." Fed. R. Civ. P. 26(b)(1). In response to the Doe Rule 30(b)(6) notice, JPMC agreed to extend the start date of its answer to 1998.

Subject to and without waiving its objections, and based upon a reasonable and diligent investigation, JPMC provided the following response for the period 1998 through 2019. In March 2011, at the direction of JPMC's then-General Counsel, Stephen Cutler, the then-General Counsel of JPMC's Investment Bank, Jonathan Schwartz, contacted the U.S. Attorney for the Southern District of Florida in an effort to determine whether there was an active criminal investigation into

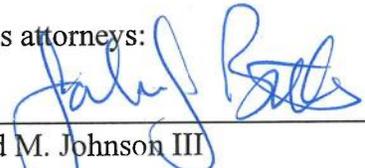
Epstein for alleged sex crimes. Mr. Schwartz contacted the U.S. Attorney in response to contemporaneous press reports regarding Epstein. Schwartz spoke to the U.S. Attorney, but the U.S. Attorney did not disclose the existence of any such investigation.

In addition, at some point around 2009-2011, Phillip DeLuca called Special Agent [REDACTED] a regular contact of Mr. DeLuca's at the FBI, to inquire about Epstein. Mr. [REDACTED] told Mr. DeLuca over the phone that he would call Mr. DeLuca back later to discuss Epstein, but Mr. [REDACTED] did not do so.

Dated: May 30, 2023

JPMORGAN CHASE BANK, N.A.

By its attorneys:


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*Attorneys for Defendant JPMorgan Chase Bank,
N.A.*

VERIFICATION OF INTERROGATORY ANSWERS

I, Francis J. Pearn, state that, based on reasonable inquiry, including a review of documents and information provided by other employees of JPMorgan Chase Bank, N.A. and counsel, the foregoing answers are true and correct to the best of my knowledge, information, and belief.

I verify under penalty of perjury that the foregoing is true and correct.

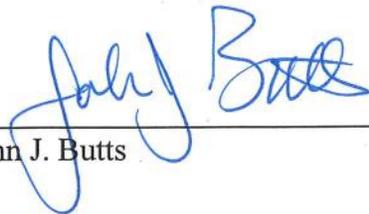
DATED: May 30, 2023

By: 
Francis J. Pearn

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2023, the foregoing document was served in accordance with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Southern District of New York upon the attorneys for the plaintiff in the above-entitled action by hand delivery or electronic mail.

DATED: May 30, 2023



John J. Butts

EXHIBIT 9

From: Goldberg, Ira - Communication of Counsel (Exchange) [igoldberg@bear.com]
Sent: 11/3/2008 7:24:38 PM
To: Munowitz, Gary (Exchange) [gmunowitz@bear.com]; Everett, Melissa (Exchange) [meverett@bear.com]
CC: Mallery, Clifford (Exchange) [cmallery@bear.com]; Waters, Lisa E [lisa.e.waters@jpmorgan.com]; Cook, Todd - Communication of Counsel (Exchange) [jtcook@bear.com]
Subject: RE: Jeffrey Epstein credit memo & supporting doc

Gary / Lisa –

As per our conversation, this account is a known situation and approved by senior management.

Ira

From: Munowitz, Gary (Exchange)
Sent: Monday, October 27, 2008 8:30 AM
To: Goldberg, Ira - Communication of Counsel (Exchange); Everett, Melissa (Exchange)
Cc: Mallery, Clifford (Exchange); Waters, Lisa E; Cook, Todd - Communication of Counsel (Exchange)
Subject: RE: Jeffrey Epstein credit memo & supporting doc

As indicated earlier, the broker would like to keep the account.

Gary F. Munowitz
Senior Managing Director
Bear Stearns, a division of J.P. Morgan
383 Madison Avenue
New York, NY 10514
Tel: 212 272 4857
Fax: 917 849 4436
gmunowitz@bear.com
www.bearstearns.com

J.P. Morgan Securities Inc.

From: Goldberg, Ira - Communication of Counsel (Exchange)
Sent: Friday, October 24, 2008 11:32 AM
To: Munowitz, Gary (Exchange); Everett, Melissa (Exchange)
Cc: Mallery, Clifford (Exchange); Waters, Lisa E; Cook, Todd - Communication of Counsel (Exchange)
Subject: RE: Jeffrey Epstein credit memo & supporting doc

Gary

My understanding is that JPM requires top of the house ok for clients who are convicted felons. (ie PCS Legal to Asset Mgt Legal to Cutler to Jaime Daimnon). If you want to keep the account i can call Asset Mgt Legal and get the ball rolling. Am awaiting your direction.

Thx

From: Munowitz, Gary (Exchange)
Sent: Thursday, October 23, 2008 1:18 PM
To: Everett, Melissa (Exchange)
Cc: Mallery, Clifford (Exchange); Goldberg, Ira - Communication of Counsel (Exchange)
Subject: RE: Jeffrey Epstein credit memo & supporting doc

The broker would like to continue to handle the accounts. The larger account indicated as having \$3mm on the AML Diligence report is down to \$20k. Let me know what else you require. If there is a firm policy regarding a specific course of action let me know.

Gary F. Munowitz

Senior Managing Director

Bear Stearns, a division of J.P. Morgan

383 Madison Avenue

New York, NY 10514

Tel: 212 272 4857

Fax: 917 849 4436

gmunowitz@bear.com

www.bearstearn.com

J.P. Morgan Securities Inc.

From: Everett, Melissa (Exchange)

Sent: Wednesday, October 22, 2008 9:57 AM

To: Munowitz, Gary (Exchange)

Cc: Mallery, Clifford (Exchange); Goldberg, Ira - Communication of Counsel (Exchange)

Subject: FW: Jeffrey Epstein credit memo & supporting doc

Gary,

This e-mail is a follow-up regarding the AML notification below. I have yet to receive a response regarding how this matter will be handled. I need a decision from you regarding this matter before the close of business on Monday, October 27, 2008.

If you have any questions or concerns regarding this request, please feel free to contact me as soon as possible.

Regards,
Melissa

From: Penzell, Abigail - Communication of Counsel (Exchange)

Sent: Monday, September 08, 2008 1:48 PM

To: Munowitz, Gary (Exchange)

Cc: Goldberg, Ira - Communication of Counsel (Exchange); Mallery, Clifford (Exchange); Everett, Melissa (Exchange)

Subject: FW: Jeffrey Epstein credit memo & supporting doc

Good afternoon Gary,

Attached please find [REDACTED] an article from the *The Guardian*. The client is Jeffrey Epstein. Mr. Epstein has begun serving an 18-month jail term after pleading guilty to soliciting sex from girls as young as 14.

Please review the attached brief and report back to Melissa Everett by Friday, September 12, 2008, as to whether there are any steps that you would wish to consider from a reputational harm perspective. For example, you may consider reviewing whether to fire the customer; or, that no further action is warranted based upon the current information, etc.

Best,
Abigail

From: Gonzales, Estevan (Exchange)
Sent: Friday, September 05, 2008 11:22 AM
To: Everett, Melissa (Exchange)
Cc: Goldberg, Ira - Communication of Counsel (Exchange)
Subject: Jeffrey Epstein credit memo & supporting doc

Please find the attached credit memo for Jeffrey Epstein & the supporting article. Thank you.

Estevan Gonzales
320 Park Ave.
New York, NY 10022
phone: 212-272-9034
fax: 917-849-2697

EXHIBIT 10

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS)	
)	
Plaintiff,)	
)	
vs.)	1:22-cv-10904-JSR
)	
JPMORGAN CHASE BANK, N.A.,)	
)	
Defendant/Third-Party Plaintiff.)	
)	
<u>JPMORGAN CHASE BANK, N.A.</u>)	
)	
Third-Party Plaintiff,)	
)	
vs.)	
)	
JAMES EDWARD STALEY,)	
)	
Third-Party Defendant.)	

FRIDAY, MAY 26, 2023

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

CONFIDENTIAL BSA PORTIONS UNDER SEPARATE COVER

- - -

Videotaped deposition of James Dimon, held at the offices of JPMorgan Chase, 383 Madison Avenue, New York, New York, commencing at 9:02 a.m. Eastern, on the above date, before Carrie A. Campbell, Registered Diplomat Reporter and Certified Realtime Reporter.

- - -

GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

1 trial Monday. Take care.

2 MR. BUTTS: Sounds like no
3 holiday for you.

4 MS. FRIEDMAN: Should we take a
5 break?

6 MR. BUTTS: Yeah, let's do.

7 VIDEOGRAPHER: We're going off
8 record. The time is 10:30.

9 (Off the record at 10:30 a.m.)

10 VIDEOGRAPHER: We're going back
11 on record. The time is 10:39.

12 DIRECT EXAMINATION

13 QUESTIONS BY MS. SINGER:

14 Q. Good morning, Mr. Dimon. My
15 name is Linda Singer. I would like to say I
16 bring down the average age of the examiners
17 on our side, but I don't know that that's
18 true, actually, so I'm going to skip that.

19 I don't think we did this at
20 the outset, so could you state your position
21 for the record, please?

22 A. I am chairman and chief
23 executive officer of JPMorgan Chase.

24 Q. And where generally do you
25 reside?

1 A. New York City.

2 Q. And do you have any plans of
3 moving your residence between now and
4 November of 2023?

5 A. No.

6 Q. When did you first learn that
7 Jeffrey Epstein was a customer of JPMorgan?

8 A. I don't recall knowing anything
9 about Jeffrey Epstein until the stories broke
10 sometime in 2019. And I was surprised that I
11 didn't even -- had never even heard of the
12 guy, pretty much, and how involved he was
13 with so many people.

14 Q. Were you aware that Jeffrey
15 Epstein was promoting you to contacts as a
16 candidate for Secretary of the Treasury?

17 MR. BUTTS: Objection.

18 You may answer.

19 THE WITNESS: Nope.

20 QUESTIONS BY MS. SINGER:

21 Q. Were you aware that JPMorgan
22 entered into a settlement or settlements with
23 Jeffrey Epstein?

24 A. Not until recently, no.

25 Q. When did you learn that?

1 A. I think as part of this case.

2 Q. Okay. So as part of your
3 preparation for this deposition or at some
4 other time?

5 A. No, it was part of preparation
6 for this deposition.

7 (Dimon Exhibit 15 marked for
8 identification.)

9 QUESTIONS BY MS. SINGER:

10 Q. We want to play a clip from an
11 interview that you did recently on CNN.
12 Hopefully, that will work.

13 (Video played.)

14 Q. All right. Mr. Dimon, does
15 that segment from CNN accurately reflect what
16 you said during the interview with Poppy
17 Harlin {sic}?

18 MS. FRIEDMAN: Harlow.

19 THE WITNESS: You know, there
20 was a teeny piece of the interview,
21 but, yes.

22 QUESTIONS BY MS. SINGER:

23 Q. Okay.

24 A. That piece was accurate, I
25 think.

1 Q. And what did you rely on to
2 state that JPMorgan did not have
3 contemporaneous knowledge of Epstein's
4 offenses?

5 MR. BUTTS: Objection.

6 THE WITNESS: I didn't say
7 that.

8 QUESTIONS BY MS. SINGER:

9 Q. Okay. You did say hindsight is
10 fabulous, correct?

11 A. I did.

12 Q. Okay. So prior to your
13 interview, what information did you have
14 about what JPMorgan knew or didn't know about
15 Jeffrey Epstein and JPMorgan's handling of
16 his accounts?

17 MR. BUTTS: Objection. And
18 I'll instruct you not to answer to the
19 extent that any knowledge comes from
20 counsel.

21 THE WITNESS: I knew very
22 little about any of this until this
23 case was opened. And then of course
24 I've learned quite a bit since then.
25

1 QUESTIONS BY MS. SINGER:

2 Q. Okay. So in making your
3 comment that hindsight is fabulous, what
4 information had you reviewed about what
5 JPMorgan knew or didn't know about its
6 handling of Jeffrey Epstein's business?

7 MR. BUTTS: Objection.

8 And the same caution, you
9 should not reveal any information you
10 reviewed in the context of discussions
11 with counsel.

12 THE WITNESS: Well, I mean,
13 almost all of it was done in
14 consultation with counsel.

15 MR. BUTTS: Then you can't
16 answer the question.

17 THE WITNESS: Okay.

18 QUESTIONS BY MS. SINGER:

19 Q. Other than conversations with
20 your lawyers, which I never mean for you to
21 reveal, nor would Mr. Butts allow you, did
22 you have any knowledge of what JPMorgan had
23 done or knew about Jeffrey Epstein prior to
24 your interview with CNN?

25 MR. BUTTS: Objection.

1 connection with Mr. Epstein?

2 A. No.

3 Q. Are you aware of whether or not
4 she worked for Mr. Epstein?

5 A. Nope.

6 Q. On February 26, 2010, Lesley
7 Groff writes Mr. Epstein on the subject of
8 Peter, Jes and Jamie. "Shall I have Lynn
9 prepare heavy snacks for your evening
10 appointments with Peter Mandelson, Jes Staley
11 and Jamie Dimon? Or is this to be a nice,
12 sit-down dinner at 9 p.m.?"

13 And Mr. Epstein replies,
14 "Snacks."

15 Do you see that?

16 A. Yes.

17 Q. Did you in fact have an
18 appointment with Peter Mandelson, Jes Staley
19 and Jamie Dimon?

20 A. I have never had an appointment
21 with Jeff Epstein. I've never met Jeff
22 Epstein. I never knew Jeff Epstein. I never
23 went to Jeff Epstein's house. I never had a
24 meal with Jeff Epstein. I have no idea what
25 they're referring to here.

1 I did know Peter Mandelson, and
2 obviously I knew Jes.

3 Q. Do you have an explanation why
4 Lesley Groff would have written this e-mail?

5 MR. BUTTS: Objection.

6 You may answer.

7 THE WITNESS: Likely
8 misinformed. Not likely.

9 Misinformed.

10 QUESTIONS BY MR. BOIES:

11 Q. Now, Mr. Epstein does not write
12 back to her saying, you're misinformed, Jamie
13 Dimon is not coming.

14 You see that?

15 A. I don't know what he thought at
16 the time. He was obviously misinformed. I
17 never -- this never took place.

18 Q. Okay. Did Mr. Epstein arrange
19 for you to meet with Ehud Barak?

20 A. Who?

21 MR. BUTTS: Objection.

22 You may answer.

23 THE WITNESS: Who?

24 QUESTIONS BY MR. BOIES:

25 Q. Ehud Barak.

1 A. I don't think Jeff Epstein ever
2 arranged for me to meet with anybody, to my
3 knowledge. And I knew Ehud Barak. We did
4 not need introductions to anybody.

5 (Dimon Exhibit 113 marked for
6 identification.)

7 QUESTIONS BY MR. BOIES:

8 Q. Let me ask you to look at a
9 document that has been previously marked as
10 Exhibit 113.

11 This is a series of e-mails.
12 The one at the bottom, January 23, 2008, at
13 12:44 p.m., says, "Hello Rosa, I think [REDACTED]
14 may have already e-mailed you, but wanted to
15 follow up just in case. Jeffrey was talking
16 to me on the phone and to [REDACTED] who was
17 standing with him at the same time, so not
18 sure which one of us was actually to e-mail
19 you. Jeffrey requested that we give you the
20 contact e-mail for Ehud Barak so that you
21 could organize the meeting with Jamie Dimon
22 and Barak on your end for simplification."

23 And then Rosa writes to Jes
24 Staley, "Jes, is it okay for me to contact
25 Ehud Barak directly to arrange a meeting with

1 Jamie?"

2 And Jes Staley responds, "Go
3 through Jamie's office."

4 Do you see that?

5 A. Uh-huh.

6 Q. And did Rosa M. da Silva go
7 through your office to arrange a meeting with
8 Ehud Barak?

9 A. It would almost certainly have
10 to have gone through my office. I don't
11 know -- I've met with Ehud Barak. I don't
12 know -- I don't need a Jeff Epstein to meet
13 with Ehud Barak, so I don't know what he had
14 to do with all of that, but I have met with
15 him a couple of times.

16 MR. BUTTS: He being Ehud
17 Barak?

18 THE WITNESS: Ehud Barak, yeah.
19 (Dimon Exhibit 154 marked for
20 identification.)

21 QUESTIONS BY MR. BOIES:

22 Q. Let me ask you to look at
23 Exhibit 154.

24 Exhibit 113 that we were just
25 looking at before was dated back in 2008.

1 Do you see that subject line?

2 A. Where does it say that?

3 Q. The subject line at the very
4 top.

5 A. Yes.

6 Q. Okay. And again, going down
7 halfway down, it indicates, "Leon Black is a
8 prospect of Dennis Sheeran, CEO, and a
9 prospect of Andrew Young, fin spon."

10 I take it CEO there corresponds
11 to CEO of the private bank or some division.

12 Is that right?

13 MR. BUTTS: Objection.

14 You may answer.

15 THE WITNESS: I don't know

16 Dennis Sheeran.

17 QUESTIONS BY MS. SINGER:

18 Q. Okay. And fin spon, do you
19 understand that to mean financial sponsor or
20 something else?

21 A. Financial sponsor, I
22 understand, yes.

23 Q. Okay. Okay. And let's go to
24 the attachment, which is the third page I
25 gave you.

1 Can you see that it lists Leon
2 Black as the second name on this list?

3 A. What page are you on?

4 Q. I'm on the very last page, the
5 third page.

6 A. Yes.

7 Q. All right. And you see Leon
8 Black listed as status prospect, correct?

9 A. Yes.

10 Q. Okay. And was it your
11 understanding that Leon Black -- and forgive
12 me if I'm treading ground that was covered --
13 was a prospect referred by Jeffrey Epstein?

14 MR. BUTTS: Same objection and
15 instruction about --

16 THE WITNESS: No one needed a
17 Jeffrey Epstein referral to get to
18 Leon Black. He was a major client of
19 the firm already, at least in the
20 corporate side, and for all I know,
21 he's a client of the private bank
22 before that.

23 QUESTIONS BY MS. SINGER:

24 Q. Although here he's listed as a
25 prospect.

1 Is that not right?

2 A. That's what it lists. I don't
3 know if it's true.

4 (Dimon Exhibit 22 marked for
5 identification.)

6 QUESTIONS BY MS. SINGER:

7 Q. Okay. We're also going to take
8 a look at Exhibit 22, JPM-SDNYLIT-00150148_R.
9 Do you recognize Project Jeep,
10 Mr. Dimon?

11 A. I do not.

12 Q. Okay. So this document is
13 headed "Project Jeep - Client Review October
14 2019."

15 Correct?

16 A. Yes.

17 Q. And have you seen this document
18 before?

19 A. No.

20 Q. At the top --

21 A. Not that I recall.

22 Q. Okay. At the top, it indicates
23 that it is reviewing three client
24 relationships related to Jeffrey Epstein
25 media.