

**Confidential Treatment Requested by Toronto Dominion Bank, N.A.**

October 15, 2019

**Via E-mail and Federal Express**

██████████  
Assistant United States Attorney  
Southern District of New York  
The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

Re: October 3, 2019 Grand Jury Subpoena to TD Bank, N.A.

Dear Ms. ██████████:

In response to your October 3, 2019 subpoena to Toronto Dominion Bank, N.A., and in accordance with our subsequent telephone conversations, I enclose a disc containing monthly account statements (bearing production numbers TD-DOJ-00000001 – TD-DOJ-00000466) for accounts held or controlled by ██████████ LLC and ██████████ during the life of those accounts (March 10, 2014 – September 30, 2019 and December 12, 2015 – September 20, 2019, respectively). As discussed, please note that TD Bank did not locate any accounts or account statements for Butterfly Trust.

Account Number	Account Holder	Account Statements
██████████	██████████ LLC	TD-DOJ-00000001 – TD-DOJ-00000305
██████████	██████████	TD-DOJ-00000306 – TD-DOJ-00000465

Please note that the enclosed media is being produced to you using the 7-Zip encryption software. The software necessary to view these materials is provided along with this production.

\* \* \*

We request that the enclosed materials be treated as confidential grand jury materials. We further request that, pursuant to the Freedom of Information Act, 5 U.S.C. §

**CONFIDENTIAL**

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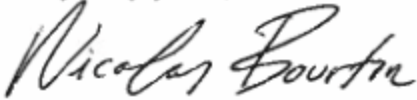
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552(b)(4) and U.S. Department of Justice Stated policy (see 28 CFR § 16.7), all copies of the enclosed documents labeled "Confidential" be treated as confidential and exempt from disclosure to third parties. Finally, we request that confidential treatment be accorded to this letter and any notes, memoranda or other records created by or for the direction of the U.S. Department of Justice or its officers or staff members that reflect, refer or relate to these documents. Please promptly inform us of any FOIA request seeking access to the documents, or any of the above-mentioned records, including this letter, to enable us to substantiate the grounds for confidential treatment, unless the U.S. Attorney's Office intends to deny such request for access on other grounds.

We will provide the password to the production under separate cover. Please let us know if you have any difficulties accessing the production.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

 <sup>GPS</sup>  
Nicolas Bourtin

(Enclosure)