UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 F. Street, NE
Washington, DC 20549

(b)(6);(b)(7)(C)
Assistant Director
Division of Enforcement

Telephone: (b)(6);(b)(7)(C)
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September 25, 2019

VIA UPS and EMAIL

Estate of Jeffrey E. Epstein
c/o Michael Miller, Esq.
Steptoe & Johnson LLP
1114 Avenue of the Americas
New York, New York 10036
mmiller@steptoe.com

Re: In the Matter of Financial Trust Co. (HO-13814)

Dear Mr. Miller:

The staff of the United States Securities and Exchange Commission is conducting an investigation relating to the above-referenced matter to determine if violations of the federal securities laws have occurred. In connection with this investigation, the staff requests your client, the Estate of Jeffrey E. Epstein ("Epstein Estate"), immediately preserve, and voluntarily provide us with, the information and documents set forth in Attachment A by 5:00 p.m., October 9, 2019.

Please send the materials to:

ENF-CPU
U.S. Securities and Exchange Commission
100 F St., N.E.
Washington, DC 20549
Attn: (b)(6);(b)(7)(C)

Please carefully read the attachment, which contains, among other things, important instructions related to the manner of producing documents. In particular, if the Epstein Estate prefers to send us copies of original documents, the staff requests that you scan and produce hard copy documents, as well as electronic documents, in an electronic format consistent with the SEC Data Delivery Standards attached hereto. All electronic documents responsive to the document request, including all metadata, should also be produced in their native software format. If you have any questions concerning the production of documents in an electronic format, please contact me as soon as possible and in any event before producing documents.

In your cover letter(s) accompanying the production of responsive documents, please enclose a list briefly describing each item you send. The list should state to which paragraph(s) in the attachment each item responds. Please also state in the cover letter(s) whether you believe Harbor has met its obligations under the document request by searching carefully and thoroughly for everything called for by the request, and sending it all to us. Correspondence should reference case number, case name and my name.

Please also provide a narrative description describing what was done to identify and collect documents responsive to the request. At a minimum, the narrative should describe:

- who searched for documents;
- who reviewed documents found to determine whether they were responsive;
- which custodians were searched;
- what sources were searched (e.g., computer files, CDs, DVDs, thumb drives, flash drives, online storage media, hard copy files, diaries, datebooks, planners, filing cabinets, storage facilities, home offices, work offices, voice mails, home email, webmail, work email, backup tapes or other media);
- what search terms, if any, were employed to identify responsive documents;
- what firms and/or persons, if any, assisted in analyzing the data collected;
- what third parties, if any, were contacted to obtain responsive documents (e.g., phone companies for phone records, brokerage firms for brokerage records); and
- where the original electronic and hardcopy documents are maintained and by whom.

If the document production contains Bank Secrecy Act materials, please segregate and label those materials within the production.

In addition, for any documents that qualify as records of regularly conducted activities under Federal Rule of Evidence 902(11), please have the appropriate representative(s) of Harbor complete a business records certification (a sample of which is enclosed) and return it with the document production.

Please note that, in any matter in which enforcement action is ultimately deemed to be warranted, the Division of Enforcement will not recommend any settlement to the Commission unless the party wishing to settle certifies, under penalty of perjury, that all documents responsive to Commission subpoenas and formal and informal document requests in this matter have been produced.

This investigation is a non-public, fact-finding inquiry. The investigation does not mean that we have concluded that your client or anyone else has violated the law. Also, the investigation does not mean that we have a negative opinion of any person, entity, or security. Enclosed is a copy of the Commission's Form 1662. Form 1662 explains how we may use the information provided to the Commission and has other important information.

If you have any questions or would like to discuss this matter, you may call me at (b)(6);(b)(7)(C)

Sincerely,

(b)(6);(b)(7)(C)

Division of Enforcement

Enclosures: Attachment A
SEC Data Delivery Standards
SEC Form 1662
Business Records Certification

ATTACHMENT A FOR ESTATE OF JEFFREY E. EPSTEIN
September 25, 2019
In the Matter of Financial Trust Co. (HO-13814)

A. Definitions

As used in this document request, the words and phrases listed below shall have the following meanings:

1. "Epstein" shall mean the person known as Jeffrey E. Epstein who was born on January 20, 1953, and any estate or trust resulting from the death of Jeffrey E. Epstein, which occurred on August 10, 2019.

2. "Epstein Related-Entity" shall mean any Entity through which Epstein provided services and any Entity previously owned or controlled by Epstein, including but not limited, J. Epstein & Co., Inc., New York Strategy Group, HBRK Associates, Southern Trust Company, Inc., Southern Financial LLC, Liquid Funding Ltd, Financial Trust Company, Inc., Community Interest Trust, C.O.U.Q. Foundation, Inc., Gratitude America Ltd., J. Epstein Virgin Island Foundation (a/k/a Enhanced Education), J. Epstein & Company, Financial Strategy Group, Inc., Ghislane Corp., Financial Trustees, Inc., Buffalo Management Enterprises, Inc., Heritage Interest Trust, Heritage Interest Financial Trust, Little St. James, and American Yacht Harbor, and any parents, subsidiaries, affiliates, predecessors, successors, officers, directors, employees, agents, general partners, limited partners, partnerships and aliases, code names, or trade or business names used by any of the foregoing.

3. "Entity" means a firm, association, organization, partnership, business, trust, corporation, bank or any other private or public entity

4. "Person" means a natural person or Entity.

5. The "Relevant Period" means September 1, 2013 through the present.

6. A "Representative" of a Person means any present or former family members, officers, executives, partners, joint-venturers, directors, trustees, employees, consultants, accountants, attorneys, agents, or any other representative acting or purporting to act on behalf of the Person.

7. "Document" shall include, but is not limited to, any written, printed, or typed matter including, but not limited to all drafts and copies bearing notations or marks not found in the original, letters and correspondence, interoffice communications, slips, tickets, records, worksheets, financial

records, accounting documents, bookkeeping documents, memoranda, reports, manuals, telephone logs, telegrams, facsimiles, messages of any type, telephone messages, voice mails, tape recordings, notices, instructions, minutes, summaries, notes of meetings, file folder markings, and any other organizational indicia, purchase orders, information recorded by photographic process, including microfilm and microfiche, computer printouts, spreadsheets, and other electronically stored information, including but not limited to writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations that are stored in any medium from which information can be retrieved, obtained, manipulated, or translated.

8. "Communication" means any correspondence, contact, discussion, e-mail, instant message, or any other kind of oral or written exchange or transmission of information (in the form of facts, ideas, inquiries, or otherwise) and any response thereto between two or more Persons or entities, including, without limitation, all telephone conversations, face-to-face meetings or conversations, internal or external discussions, or exchanges of a Document or Documents.

9. "Concerning" means directly or indirectly, in whole or in part, describing, constituting, evidencing, recording, evaluating, substantiating, concerning, referring to, alluding to, in connection with, commenting on, relating to, regarding, discussing, showing, analyzing or reflecting.

10. An "Agreement" means any actual or contemplated (i) written or oral Agreement; (ii) term or provision of such Agreement; or (iii) amendment of any nature or termination of such Agreement. A request for any Agreement among or between specified parties includes a request for all Documents Concerning (i) any actual or contemplated Agreement among or between such parties, whether or not such Agreement included any other Person; (ii) the drafting or negotiation of any such Agreement; (iii) any actual or contemplated demand, request or application for any such Agreement, and any response thereto; and (iv) any actual or contemplated objection or refusal to enter into any such Agreement, and any response thereto.

11. The terms "Reviewed" means examined, assessed, considered, analyzed or evaluated.

12. The term "you" and "your" means the Person or entity to whom this request was issued.

13. To the extent necessary to bring within the scope of this request any information or Documents that might otherwise be construed to be outside its scope:

a. the word "or" means "and/or";
b. the word "and" means "and/or";
c. the functional words "each," "every" "any" and "all" shall each be deemed to include each of the other functional words;
d. the masculine gender includes the female gender and the female gender includes the masculine gender; and
e. the singular includes the plural and the plural includes the singular.

B. Instructions

1. Unless otherwise specified, the Document request calls for production of the original Documents and all copies and drafts of same. Documents responsive to this request may be in electronic or paper form. Electronic Documents such as email should be produced in accordance with the attached document entitled SEC Data Delivery Standards. All electronic Documents responsive to the Document request, including all metadata, should also be produced in their native software format.

2. For Documents in paper format, you may send the originals, or, if you prefer, you may send copies of the originals. The Commission cannot reimburse you for the copying costs. If you are sending copies, the staff requests that you scan (rather than photocopy) hard copy Documents and produce them in an electronic format consistent with the SEC Data Delivery Standards. Alternatively, you may send us photocopies of the Documents in paper format. If you choose to send copies, you must secure and retain the originals and store them in a safe place. The staff may later request or require that you produce the originals.

3. Whether you scan or photocopy Documents, the copies must be identical to the originals, including even faint marks or print. Also, please note that if copies of a Document differ in any way, they are considered separate Documents and you must send each one. For example, if you have two copies of the same letter, but only one of them has handwritten notes on it, you must send both the clean copy and the one with notes.

4. In producing a photocopy of an original Document that contains post-it(s), notation flag(s), or other removable markings or attachments which may conceal all or a portion of the markings contained in the original Document, photocopies of the original Document both with and without the relevant post-it(s), notation flag(s), or removable markings or attachments should be produced.

5. Documents should be produced as they are kept in the ordinary course of business or be organized and labeled to correspond with the categories in

this request. In that regard, Documents should be produced in a unitized manner, *i.e.*, delineated with staples or paper clips to identify the Document boundaries.

6. Documents should be labeled with sequential numbering (bates-stamped).

7. The scope of any given request should not be limited or narrowed based on the fact that it calls for Documents that are responsive to another request.

8. You are not required to produce exact duplicates of any Documents that have been previously produced to the Securities and Exchange Commission staff in connection with this matter. If you are not producing Documents based upon a prior production, please identify the responsive Documents that were previously produced.

9. For any Documents that qualify as records of regularly conducted activities under Federal Rule of Evidence 902(11), please have the appropriate representative(s) of your firm complete a business records certification (a sample of which is enclosed) and return it with the Document production.

10. **If the Document production contains Bank Secrecy Act materials, please segregate and label those materials within the production.**

11. This request covers all Documents in or subject to your possession, custody or control, including all Documents that are not in your immediate possession but that you have the effective ability to obtain, that are responsive, in whole or in part, to any of the individual requests set forth below. If, for any reason – including a claim of attorney-client privilege – you do not produce something called for by the request, you should submit a list of what you are not producing. The list should describe each item separately, noting:

    a. its author(s);
    b. its date;
    c. its subject matter;
    d. the name of the Person who has the item now, or the last Person known to have it;
    e. the names of everyone who ever had the item or a copy of it, and the names of everyone who was told the item's contents;
    f. the basis upon which you are not producing the responsive Document;
    g. the specific request in the request to which the Document relates;
    h. the attorney(s) and the client(s) involved; and

i. in the case of the work product doctrine, the litigation for which the Document was prepared in anticipation.

12. If Documents responsive to this request no longer exist because they have been lost, discarded, or otherwise destroyed, you should identify such Documents and give the date on which they were lost, discarded or destroyed.

C. **Documents to be Produced**

1. Documents sufficient to identify whether Epstein or any Epstein-Related Entity provided brokerage services to Persons during the Relevant Period, including effecting any transactions in, or inducing or attempting to induce the purchase or sale of, any security for or on behalf of others.

2. Documents sufficient to identify whether Epstein or any Epstein-Related Entity provided investment advisory services to Persons during the Relevant Period, including but not limited to advising others as to the value of securities or the advisability of investing in, purchasing, or selling securities.