

October 15, 2019

BY ELECTRONIC MAIL

[REDACTED]
Assistant United States Attorney
One Saint Andrew's Plaza
New York, New York 10001

Re: Hyperion Air, LLC

Dear AUSA Moe:

I am writing to briefly follow up on our conversation this afternoon. As I told you, I represent a client who has been in negotiations to purchase a Keystone (Sikorsky) model S-76C helicopter from a U.S. Virgin Islands entity called Hyperion Air, LLC. The agreed-upon purchase price for the aircraft is \$3.5 million, with a \$100,000 deposit that my client has already paid into escrow. The parties are currently negotiating a final purchase agreement, and the seller – who as I mentioned is being represented by Darren K. Indyke – is pushing for a November 15, 2019 closing for the transaction.

We have recently come to understand that Hyperion Air, LLC is an entity associated with Jeffrey Epstein. We therefore wanted to advise your Office of this transaction before it is finalized. Although my client has no reason to believe that the aircraft may be subject to forfeiture – it was not identified in the forfeiture language of the charging instruments against Epstein, it was not acquired by Hyperion Air until long after the charged conduct, and we have no reason to believe that it was purchased with criminally-derived funds or is otherwise potentially subject to forfeiture – we of course wanted to give the Office the opportunity to take any action that it may deem appropriate, including blocking the transaction or ensuring that the proceeds are deposited into escrow.

As we discussed, we look forward to hearing back from the Office. As I mentioned when we spoke, in the absence of guidance from the Office, it is my client's intention to proceed with the transaction. If we do not hear back from you before then, I will check back in before my client signs the purchase agreement.

Respectfully,

/s/ Matthew L. Schwartz
Matthew L. Schwartz