

Case #	1946925
Customer #	[REDACTED]
Customer Name	Prytanes, LLC

					1	3	5	7	Comments	
<b>I. Client Reputational Risk</b>										
<b>Media Reports, Media Notoriety, Business Practice &amp; Reputation</b>										
1	Is there any negative media surrounding the Client, his/her source of wealth and/or his/her parties on the KYC	No negative media	Media Allegations that are impugning reputation	Any media report/allegation related to civil violation	Any media report/allegation related to criminal violation					
2	How recent was the negative media coverage	No negative media	More than 10 years ago	Between 5-10 years ago	Within last 5 years					
3	Has the client, his/her source of wealth and/or his/her parties on the KYC, ever been party to any civil litigation or investigated or charged with a crime in court of law	None	Criminal Investigation (more than 10 years ago) Civil Investigation (more than 5 years ago) Party to civil litigation (within last 5 years)	Civil Investigation (within the last 5 years) Criminal Investigation (5-10 years ago)	Criminal Investigation (within the last 5 years)					
4	Has the client, his/her source of wealth and/or his/her parties on the KYC, ever been convicted of a serious crime/civil judgement or ever been censured for unethical professional activity and/or improper business activity	None	Civil non-monetary sanction or censure	Criminal Conviction (more than 10 years ago) Civil Monetary Penalty (more than 5 years ago)	Criminal Conviction (within the last 10 years) Civil Monetary Penalty (within the last 5 years)					
<b>Category Sub-Total</b>										
					20	Max. Score	20			
					7.28		36%			
<b>II. Source of Wealth / Account Holder Type</b>										
<b>Where is the Source of Wealth derived from</b>										
5	When was the wealth obtained	More than 5 years ago	Between 3-5 years ago	Between 1-3 years ago	Within the last 1 year					
6	Are any of the client's known Sources of wealth derived from a high risk industry (see worksheet tabs below) or other sensitive business	<10% of assets or annual income derived from high-risk industry	≥10% but <25% of assets or annual income derived from high risk industry	≥25% but <50% of assets or annual income derived from high risk industry	>50% of assets or annual income derived from high-risk industry					
7	For account holders, please select the account holder type  ** PLEASE ENTER "3" FOR INDIVIDUAL ACCOUNT HOLDERS**	> DB Managed Trust > Publicly-traded entity (including subsidiaries) > Mutual fund (registered securities)	> Partnership (where there are 10+ General Partners) > DB Managed PIC > Individuals > Non DB Managed Trust > Nonprofit relying primarily on payments for services or governmental funding > Personal/family foundation > Estates > Retirement plans (ERISA, etc.)	> Supporting organization for personal or family foundation > Non-publicly traded entity > Nonprofit relying primarily on donations from general public	> Non DB Managed PIC					
8	For account holders that are entities, does the ultimate beneficial owner own/control the entity directly or indirectly (through 1 or more other entities/individuals)?	Directly Owned/Controlled	Medium Complexity (1-2 layers)	Medium Complexity (3-4 layers)	Complex Ownership Structure (4+ layers)					
<b>Category Sub-Total</b>										
					10	Max. Score	20			
					4.80		24%			>50% of assets or annual income derived from high-risk industry
<b>III Geographic Risk</b>										
9	Country of citizenship/incorporation (USE DROPDOWN BOX TO SELECT COUNTRY)	Low Risk Country	Medium I Risk Country	Medium II Risk Country	High Risk Country					(PLEASE CHOOSE FROM THE DROPDOWN BELOW)
10	Country of residence/headquarters* * For PICs, trusts & other nonoperating entities, use country of principal beneficial owner(s).	Low Risk Country	Medium I Risk Country	Medium II Risk Country	High Risk Country					VIRGIN ISLANDS (US) VIRGIN ISLANDS (US)
<b>Category Sub-Total</b>										
					10	Max. Score	14			
					2.00		14%			
<b>IV Political Profile / Public Figure Status</b>										
<b>Public Figure Status</b>										
11	Is or was the Client a PEP? (PEP includes any close associate or family member of a PEP, or a company formed by or on behalf of a PEP, or the head of a state-owned business).	None	High Profile Individual	Level II PEP	Level I PEP					(PLEASE CHOOSE FROM THE DROPDOWN BELOW)
										Client / UBO = PEP
					25					

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12	Does the client have political aspirations for senior office (media reported)	No	Yes		1		
<b>Category Sub-Total</b>					26	Max. Score	12
					4.42		17%
<b>V Products &amp; Services</b>							
13	What products are intended for the client?	> Investment advisory/management > Custody	> Time Deposit	> Securities brokerage > MHA > Lending	> Checking	7	
14	Frequency of expected transactions	0-10 transaction per month	11-25 transaction per month	26-50 transaction per month	> 50 transaction per month	1	
15	Volume of expected transactions	Funds transfers less than \$100M per month	Funds transfers between \$100M and \$250M per month	Funds transfers exceeding \$250M per month	Funds transfers to high-risk country exceeding \$100M per month	8	
<b>Category Sub-Total</b>					13	Max. Score	21
					0.65		5%

PEP Status: Due to his friendship with Prince Andrew, Duke of York (United Kingdom) and he maintains a close relationship with Bill Clinton.

Negative Media: Epstein is a registered sex offender. In 2008, he was convicted for solicitation of prostitutes, for which he served 13 months in prison. The negative media was previously escalated and approved by senior management. There are several civil lawsuits that were subsequently dismissed.

<b>Total</b>	<b>19.15</b>	<b>100%</b>
<b>Final Score</b>		
<b>Ranking</b>		<b>High</b>
<b>Prime Risk Class Level</b>		<b>5</b>
<b>Low Risk Score Range</b>	0.00	0.259
<b>Medium Risk Score Range</b>	0.26	0.399
<b>High Risk Score Range</b>	0.40	1.00
<b>Prime Risk Class 1</b>	0	0.1999
<b>Prime Risk Class 2</b>	0.2	0.2999
<b>Prime Risk Class 3</b>	0.26	0.2999
<b>Prime Risk Class 4</b>	0.3	0.3999
<b>Prime Risk Class 5</b>	0.36	0.3999
<b>Prime Risk Class 6</b>	0.4	

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