Account Holder Name	Zorro Management LLC
GCIS #	550331
Case #	1977695

Select reason for KYC	Regular Review

Product(s)	Banking
additional products	
Account Value	<$1MM
Enter Country of Citizenship	USVI
Enter Country of Residence	USVI
Entity Type	LLC
comments	
Ownership	Operating Agreement
other:	
Legal Existence	
other:	Certificate of Existence
Signing Authority	LLC Resolution_House Accoun████
	LLC Resolution 2016
Entity Powers / Structure	Articles of Association/Inc./Org.
other:	

Name	Account Holder	Member ≥ 25%	Member < 25%	Managing Member	Manager	Other Signatory	Source of Wealth (a)	TIN/SSN/Identifying#	DOB	Street Address	Photo ID	FircoSoft (b)	RDC (b)	BIS (b)	Google/Internet Searches (b)	Panama Paper Search (b)	PEP (Y/N) (c)	AIF Flag	Account Details (d)	Client Meetings (e)
Zorro Management LLC	x					x	x	x	x	NA	x	x	x	x	x		NA	x		
Jeffrey Epstein (Sole Member & Sole Shareholder)		x				x	x	x	x	1	x	4	x	x	x	x	Y	NA		x
Darren K Indyke						x		x	x	x	2	5	x	x	x	x		NA		
██████████						x		x	x	x	x	x	4	x	x	x		NA		
██████████						x		x	x	x	x	x	x	x	x		NA		

Comments (1) (2) (3)
1) ID for Jeffrey Epstein attached in the case.
2) ID for Darren Indyke can be found in "Repository" of GCIS████
3) ID for ██████ be found in "Notes & Attachments" of GCIS ██████
4) RDC hit found on Jeffrey Epstein ████ clearances attached in the case.
5) Fircosoft hit found on Darren Indyke - clearance attached in the case.

Required Approvals/Documents include but not limited to:

☐ ABR Approval: non-US clients with indicia of US status *(non-US client changing status to become a US person/US client changing status to become a Non –US person/POA or authorized signatory is non-U.S. but has a U.S. address)*

☐ AFC Reputational Risk Approval *(gambling nexus)*

☐ AML Compliance & BRM Approval for US persons with an offshore PIC

☐ Client and/or UBO from EU (refer to Tab 3 - EU Country List) - add note to client profile

☐ Client Risk Program (CRP) Form for all new loans (CRP forms are required at KYC stage because loans do not go through India - NON US CLIENTS ONLY.

☐ Cross Border Approval

☐ CRP Escalation Body Approval - Exceptions to local exit country list permitted. **NO EXCEPTIONS for Global exit countries**

☐ ExCo Approval *(High Risk KYCs For New Clients AND clients downgraded from low/medium to HIGH AND all Event Driven Reviews)*

☐ FinCEN's CDD Rule Form

☐ German Bank Separation Act (GBSA) Questionnaire - required for ALL new clients (GBSA determination made for clients existing as of 6/30/17 - But NEEDS to be requested for their 50%+ indirect owners) and any in between entities that indirectly own 50% or more of

☐ Group Sustainability Approval *(environmental/social risk)*

☐ Industry Rep Risk Escalation (https://npa.risk.intranet.db.com/ars/app/App.html) - defense industry

☐ MD Approval *(New adoptions Only - all risk ratings)*** Subject to upcoming BSM approval changes - this may be removed.

☐ Non-target market Approval

☐ PEP/negative media escalation Approvals - Head WM AML Compliance

☐ Venezuela: Line of business Approval to commence KYC adoption process

☐ RATIONALE MEMO stating basis for approving KYC

General Notes:

(1) Indicate in comments if information is not found in current KYC or Customer Profile (enter number in fields E15:W26 and reference to that number in the comments), explain in which KYC Case or where in the Repository the information can be found

(2) Indicate if information is missing

(3) If the account holder is a non US individual and has a US individual as POA, tax experts, Pema Sherpa and Rich Iarosi, need to be informed as this is considered a US indicia

Footnotes:

(a) State Occupation, Employer's Name and Address, Estimated Income, Net Worth

(b) If there is any negative news, assure to summarize it in DBforce.

(c) Make sure the PEP determination captured accurately.

(d) Make sure the account details are completed (i.e. account manager, account type, currency, purpose of the account)

(e) Make sure the client meeting information is entered in DB Force. Are the booking center, referral source, introduction detail and payment retrocession question related to this client entered in DBforce?

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