

Account Holder Name		Southern Trust Company Inc & Jeffrey Epstein																				
GCIS #	483883 & 483289	Select reason for KYC							Regular Review													
Case #	1977695	Name	Account Holder	Owner > 25%	Owner < 25%	Full POA	Limited POA	Other Signatory	Source of Wealth (a)	TIN/SSN/Identity/Inf	DOB	Street Address	Photo ID	Ficrossoft (b)	RDC (b)	BIS (b)	Google/Internet Searches (b)	Panama Paper Search (b)	PEP (Y/N) (c)	AIP Flag	Account Details (d)	Client Meetings (e)
Product(s)	Banking Brokerage Custody	Southern Trust Company Inc	x						x	x	x	x	NA	x	x	x	x	x	N	NA	x	NA
additional products		Jeffrey Epstein - >\$1MM Southern Trust Company Inc - >\$1MM																				
Account Value	Jeffrey Epstein - >\$1MM Southern Trust Company Inc - >\$1MM	Jeffrey Epstein (Sole Shareholder, Director & Auth Signor of Southern Trust Company Inc)	x	x				x	x	x	x	1	x	4	x	x	x	x	Y	NA	x	x
Enter Country of Citizenship	USVI, Jeffrey Epstein (US)	Darren K. Indyke (Auth Signor & Director for Southern Trust Company Inc & POA for Jeffrey Epstein)				x			x	x	x	2	5	x	x	x	x	x	N	NA	NA	NA
Enter Country of Residence	USVI, Jeffrey Epstein (USVI)	Jeanne Brennan (Auth Signor for Southern Trust Company Inc)						x	x	x	x	3	x	x	x	x	x	x	N	NA	NA	NA
Entity Type	Corporation/Company	Harry Beller (Auth Signor for Jeffrey Epstein)						x	x	x	x	1	x	x	x	x	x	x	N	NA	NA	NA
comments	Individual (Jeffrey Epstein)	Financial Infomatics Inc (Former name of Southern Financial LLC)												x	x	x	x	x	N	NA	NA	NA
Ownership		Richard Kahn (Director of Southern Trust Company Inc)							x	x	x	2	x	4	x	x	x	x	N	NA	NA	NA
other:	Consent of the Board of Directors	Paul Barrett (LPOA for Southern Trust Company Inc - A/C N4G023812)				x			x	x	x	1	x	4	x	x	x	x	N	NA	NA	NA
Legal Existence	Certificate of Good Standing	Comments (1) (2) (3)																				
other:		(1) ID for Jeffrey Epstein, Harry Beller & Paul Barrett attached in the case. (2) ID for Darren Indyke & Richard Kahn can be found in "Repository" of GCIS # 486405. (3) ID for Jean Anne can be found in "Repository" of GCIS # 487647. (4) RDC hit found on Jeffrey Epstein, Richard Kahn & Paul Barrett- clearances attached in the case. (5) Ficrossoft hit found on Darren Indyke - clearance attached in the case.																				
Signing Authority	Corporate Resolution 2017 (Southern Trust Company Inc) POA & Signing Authority Letter (Jeffrey Epstein)																					
Entity Powers / Structure	Articles of Association/Inc./Org.																					
other:																						

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
- Group Sustainability Approval (environmental/social risk)
- Industry Rep Risk Escalation (<https://mpa.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?