

Account Holder Name	Southern Trust Company Inc/Zorro Management LLC/Jeffrey Epstein																																																																																																																																																																	
GCIS #	483883/550331/483289	Regular Review																																																																																																																																																																
Case #	1977895																																																																																																																																																																	
Product(s)	Banking	<table border="1"> <thead> <tr> <th>Name</th> <th>Account Holder</th> <th>Owner ≥ 25%</th> <th>Owner < 25%</th> <th>Full POA</th> <th>Limited POA</th> <th>Other Signatory</th> <th>Source of Wealth</th> <th>TIN/SSN/Identifying#</th> <th>DOB</th> <th>Street Address</th> <th>Photo ID</th> <th>Finco-Soft</th> <th>RDC</th> <th>BIS</th> <th>Google/Internet Search</th> </tr> </thead> <tbody> <tr> <td>Southern Trust Company Inc</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> </tr> <tr> <td>Zorro Management LLC</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> </tr> <tr> <td>Jeffrey Epstein (Sole owner of Southern Trust Company Inc and Zorro Management LLC)</td> <td>X</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Harry Beller</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Darren K. Indyke</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>1</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Jean Anne Brennan Wiebracht</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>2</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>[REDACTED]</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>3</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Brice M Gordon</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>3</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Paul S. Barrett</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> </tbody> </table>	Name	Account Holder	Owner ≥ 25%	Owner < 25%	Full POA	Limited POA	Other Signatory	Source of Wealth	TIN/SSN/Identifying#	DOB	Street Address	Photo ID	Finco-Soft	RDC	BIS	Google/Internet Search	Southern Trust Company Inc	X							X	X	X				X	X	Zorro Management LLC	X							X	X	X				X	X	Jeffrey Epstein (Sole owner of Southern Trust Company Inc and Zorro Management LLC)	X	X					X	X	X	X	X	X	X	X	X	Harry Beller							X	X	X	X	X	X	X	X	X	Darren K. Indyke							X	X	X	X	1	X	X	X	X	Jean Anne Brennan Wiebracht							X	X	X	X	2	X	X	X	X	[REDACTED]							X	X	X	X	3	X	X	X	X	Brice M Gordon							X	X	X	X	3	X	X	X	X	Paul S. Barrett					X		X	X	X	X	X	X	X	X	X
Name	Account Holder		Owner ≥ 25%	Owner < 25%	Full POA	Limited POA	Other Signatory	Source of Wealth	TIN/SSN/Identifying#	DOB	Street Address	Photo ID	Finco-Soft	RDC	BIS	Google/Internet Search																																																																																																																																																		
Southern Trust Company Inc	X								X	X	X				X	X																																																																																																																																																		
Zorro Management LLC	X								X	X	X				X	X																																																																																																																																																		
Jeffrey Epstein (Sole owner of Southern Trust Company Inc and Zorro Management LLC)	X		X					X	X	X	X	X	X	X	X	X																																																																																																																																																		
Harry Beller								X	X	X	X	X	X	X	X	X																																																																																																																																																		
Darren K. Indyke								X	X	X	X	1	X	X	X	X																																																																																																																																																		
Jean Anne Brennan Wiebracht								X	X	X	X	2	X	X	X	X																																																																																																																																																		
[REDACTED]								X	X	X	X	3	X	X	X	X																																																																																																																																																		
Brice M Gordon								X	X	X	X	3	X	X	X	X																																																																																																																																																		
Paul S. Barrett						X		X	X	X	X	X	X	X	X	X																																																																																																																																																		
Account Value	\$5.5MM																																																																																																																																																																	
Enter Country	US Virgin Islands																																																																																																																																																																	
Entity Type	Corporation/Company																																																																																																																																																																	
Ownership																																																																																																																																																																		
Legal Existence	Secretary of State Printout																																																																																																																																																																	
Signing Authority																																																																																																																																																																		
Entity Powers / Structure																																																																																																																																																																		

1) See GCIS 488405
 2) See GCIS 550331
 3) See GCIS 487647

- 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**
 - Evidence of source of wealth
 - Evidence of source of funds
 - 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 client
 - Google/Internet searches: Client and UBO - at a minimum
 - Group Sustainability Approval (environmental/social risk)
 - ICIJ Offshore Leaks Database (ensure client, UBO, in-between entities, signatories are not listed in the Panama Papers database)
 - Industry Rep Risk Escalation (<https://mpa.risk.intranet.db.com/ars/app/App.html>) - defense industry
 - MD Approval (New adoptions Only - all risk ratings)
 - Non-target market Approval
 - PEP/negative media escalation Approvals - Head WM AML Compliance
 - Venezuela: Line of business Approval to commence KYC adoption process
- [YES] RATIONALE MEMO stating basis for approving KYC