

Case #	
Customer #	
Customer Name	Jeffrey E. Epstein/Southern Trust Company, Inc/Zorro Management, LLC

	1	3	5	7		Comments
I. Client Reputational Risk						
Media Reports, Media Notoriety, Business Practice & Reputation						
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)	
Category Sub-Total					24 7.20	20%

II. Source of Wealth / Account Holder Type						
Where is the Source of Wealth derived from						
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 > Estate > 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	>50% of assets or annual income derived from high-risk industry
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)	
Category Sub-Total					16 4.80	30%

III Geographic Risk						
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)
Category Sub-Total					10 2.00	20%

IV Political Profile / Public Figure Status						
Public Figure Status						(PLEASE CHOOSE FROM THE DROPDOWN BELOW)

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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	25		
12	Does the client have political aspirations for senior office (media reported)	No		Yes		1		
Category Sub-Total						26	Max. Score	12
						4.42		17%

V Products & Services								
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	3		
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	1		
Category Sub-Total						11	Max. Score	21
						0.55		9%

PEP: Jeffrey Epstein maintains a close relationship with Bill Clinton and Prince Andrew.
 Negative Media: Jeffrey Epstein is a registered sex offender. In June 2008, under a plea deal, he was sentenced to 18 months for soliciting a minor. He served 13 months. See approval from Chip Packard and Kim Hart under this KYC. In addition, there are still civil lawsuits ongoing and/or pending that were filed against Mr. Epstein in relation to the above event.
 SOW: Founder of Southern Trust Company Inc, which manages client's assets. As per the new industry list, Investment Advisors are considered a "low risk financial institution", however, due to the secretive nature of Southern Trust Company Inc clients, AFC recommends tagging this entity as a "High risk financial Institution".

Total	19.00	100%
Final Score	19.00	
Ranking	High	
Prime Risk Class Level	6	
Low Risk Score Range	0.00	0.259
Medium Risk Score Range	0.26	0.399
High Risk Score Range	0.40	1.00
Prime Risk Class 1	0	0.1999
Prime Risk Class 2	0.2	0.2599
Prime Risk Class 3	0.26	0.2999
Prime Risk Class 4	0.3	0.3599
Prime Risk Class 5	0.36	0.3999
Prime Risk Class 6	0.4	

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