

Account Holder Name		LSJE LLC & Southern Financial LLC												
GCIS #	499733 & 483882	Select reason for KYC						Regular Review						
Case #	1977703													
Product(s)	Banking Brokerage													
additional products														
Account Value	LSJE LLC - < \$1 MM Southern Financial LLC - > \$1 MM													
Enter Country of Citizenship	USVI													
Enter Country of Residence	USVI													
Entry Type	LLC													
comments														
Ownership	Operating Agreement													
other:	For Southern Financial LLC & LSJE LLC													
Legal Existence														
other:	Certificate of Existence (Southern Financial LLC & LSJE LLC)													
Signing Authority	LLC Corporate Resolution 2017, POA & LPOA (DBSI) (Southern Financial LLC) LLC Corporate Resolution 2015 (LSJE LLC)													
other:	Articles of Association/Inc./Org. Operating Agreement													

- 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?