

Account Holder Name	LSJE LLC, Southern Financial LLC	
GCIS #	[REDACTED]	Regular Review
Case #	[REDACTED]	
Product(s)	Banking Brokerage	
additional products		
Account Value	≥\$1 MM	
Enter Country	US Virgin Islands	
Entity Type	LLC	
comments		
Ownership		
other:		
Legal Existence		
other:	Certificate of Existence	
Signing Authority		
Entity Powers / Structure		
other:		

Name	Account Holder	Member ≥ 25%	Member < 25%	Managing Member	Manager	Other Signatory	Source of Wealth	TIIESS/Identifying#	DOB	Street Address	Photo ID	Fire-Soft	RDC	BIS	Google/Internet Search
LSJE LLC	x														
Southern Financial LLC	x														
Southern Trust Company Inc sole member of Southern Financial LLC			x						x	x	x		x	x	x
Jeffrey E. Epstein sole member of LSJE and UBO of Southern Financial LLC		x							x	x	x	1	x	x	x
Harry Beller							x		x	x	x	1	x	x	x
Darren K. Indyke							x		x	x	x	1	x	x	x
Jean Anne Brennan Wiebracht							x		x	x	x	1	x	x	x
Paul S. Barrett LPOA for Southern Trust Company Brokerage account									x	x	x	x	x	x	x

Legend:
(1) See KYC [REDACTED]

- 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://npa.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
- RATIONALE MEMO stating basis for approving KYC