| Account Holder Name | | | J. Epstein Virgin Islands Foundation Inc |
|---|---|---|---|
| GCIS # | 486427 | | Select reason for KYC — Regular Review |
| Case # | 1977699 | | |

| Product(s) | Brokerage |
|---|---|
| additional products | |
| Account Value | <$1 MM |
| Enter Country of Citizenship | USVI |
| Enter Country of Residence | USVI |
| Entity Type | Foundation (NonProfit) |
| comments | |
| Ownership | Articles of Association/Inc./Org. |
| other: | |
| Legal Existence | Certificate of Good Standing |
| other: | |
| Signing Authority | |
| | Signing Auth_Unanimous Consent of The Board of Trustees (J. Epstein Virgin Islands Foundation Inc) |
| Entity Powers / Structure | Articles of Association/Inc./Org. |
| other: | |

| Name | Account Holder | Founder (if Any) | Member (if Any) | Full POA | Limited POA | Other Signatory | Source of Wealth (a) | TIN/SSN/Identifying# | DOB | Street Address | Photo ID | FircoSoft (b) | RDC (b) | BIS (b) | Google/Internet Searches (b) | Panama Paper Search (b) | PEP (Y/N) (c) | AIF Flag | Account Details (d) | Client Meetings (e) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| J. Epstein Virgin Islands Foundation Inc | x | | | | | | x | x | x | x | NA | x | x | x | x | x | N | NA | x | NA |
| Jeffrey Edward Epstein (Sole Member & Auth Signor) | | | x | | | | x | x | x | x | 2 | x | 3 | x | x | x | Y | NA | NA | x |
| Darren Indyke | | | | | | x | x | x | x | x | 4 | x | x | x | x | x | N | NA | NA | NA |
| Erika Kellerhals (Legal Rep) | | | | | | | x | x | x | x | 2 | x | x | x | NR | NR | N | NA | NA | NA |
| Paul S Barrett (Trading Auth limited to Purchase & Sales of Securities) | | | | | x | | x | x | x | x | 2 | x | 3 | x | x | x | N | NA | NA | NA |
| Southern Trust Company Inc | | | | | | | x | | | | | x | x | x | NR | NR | | | | |
| The Financial Trust Company | | | | | | | x | | | | | x | x | x | NR | NR | | | | |

**Comments (1) (2) (3)**
1) ID for Darren Indyke can be found in "Repository" of GCIS # 486405.
2) ID for Jeffrey Epstein, Paul S Barrett & Erika Kellerhals are attached in the KYC # 1977699.
3) RDC hit found on Jeffrey Epstein & Paul S Barrett - clearances attached in KYC # 1977699.
4) Fircosoft hit found on Darren Indyke - clearance attached in KYC # 1977699

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**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://npa.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?