

Account Holder Name	J. Epstein Virgin Islands Foundation Inc										
GCIS #		Regular Review									
Case #											
Product(s)	Brokerage										
additional products											
Account Value	\$272,458										
Enter Country	Virgin Islands, US										
Entity Type	Foundation (NonProfit)										
comments											
Ownership											
other:											
Legal Existence	Certificate of Good Standing										
other:											
Signing Authority											
Entity Powers / Structure											
other:											

Name	Account Holder	Founder (if Any)	Member (if Any)	Full POA	Limited POA	Other Signatory	Source of Wealth	TIN/SSN/Identifying#	DOB	Street Address	Photo ID	FaceSoft	RDC	BIS	Google/Internet Search
J. Epstein Virgin Islands Foundation Inc (formerly Enhanced Education)	X							X	X	X			X	X	X
Jeffrey E. Epstein (100% owner)		X	X				X	X	X	X	X	X	X	X	X
Darren Indyke				X				X	X	X	X	X	X	X	X
Paul S. Barrett (Limited Trading Authority)					X			X	X	X	X	X	X	X	X
Erika Kellerhals (Non-Signatory Legal Rep)								X	X	X	X	X	X	X	X

- 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 8/30/17 - 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