

Customer #	[REDACTED]
Case #	[REDACTED]
Customer Name	Southern Financial LLC & Southern Trust Company, Inc.

	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					28 7.84	28 28%
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 > Estates > Retirement plans (ERISA, etc.)	> Supporting organization for personal or family foundation > DB Managed PIC > Non-publicly traded entity > Nonprofit relying primarily on donations from general public	> Non DB Managed PIC	
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					8 2.40	28 30%
III Geographic Risk						
9	Country of citizenship/incorporation (USE DROPDOWN BOX TO SELECT COUNTRY)	Low Risk Country	Moderate I Risk Country	Moderate II Risk Country	High Risk Country	
10	Country of residence/headquarters* <small>* For PICs, trusts & other nonoperating entities, use country of principal beneficial owner(s).</small>	Low Risk Country	Moderate I Risk Country	Moderate II Risk Country	High Risk Country	(PLEASE CHOOSE FROM THE DROPDOWN BELOW) US VIRGIN ISLANDS US VIRGIN ISLANDS
Category Sub-Total					6 1.20	14 20%
IV Political Profile / Public Figure Status						
Public Figure Status						
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	Honorary PEP	Level II PEP	Level I PEP	
Category Sub-Total					5	

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12 Does the client have political aspirations for senior office (media reported) No Yes

1		
4	Max. Score	14
0.68		17%

Category Sub-Total

V Products & Services

13 What products are intended for the client? > Investment advisory/management > Custody > Time Deposit > Securities brokerage > MMA > Lending > Checking

14 Frequency of expected transactions 0-10 transaction per month 11-25 transaction per month 26-50 transaction per month > 50 transaction per month

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

7		
1		
1		
9	Max. Score	21
0.45		9%

Category Sub-Total



Total	12.57	100%
Final Score	3.14	
Ranking	High	
Prime Risk Class Level	6	
Low Risk Score Range	0.00	0.259
Moderate 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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