

Cynthia Rodriguez

From: Patrick Campion
Sent: Thursday, January 05, 2017 3:46 PM
To: Cynthia Rodriguez
Cc: Samantha Harmon; Armen Brash
Subject: RE: APPROVAL NEEDED: High Risk KYC Case 01704382 [I]

Classification: **For internal use only**

Approved

Kind regards,
Patrick Campion



Patrick Campion
Managing Director | Head of Wealth Management Americas

Deutsche Bank Trust Company Americas
Wealth Management - Americas
345 Park Avenue, 10154-0004 New York, NY, USA

From: Cynthia Rodriguez
Sent: Thursday, January 05, 2017 1:16 PM
To: Patrick Campion
Cc: Samantha Harmon; Armen Brash
Subject: APPROVAL NEEDED: High Risk KYC Case 01704382
Importance: High

Hello,

I am requesting Exco Approval for a new account opening for current DB client Jeffrey Epstein.

RM Name	Stewart Oldfield
Business Line	US Onshore
GCIS # / KYC #	[REDACTED]
New or Existing Relationship? <i>If yes, please include relationship since date, approx # of accounts, AUM, etc.)</i>	Existing relationship since 8/26/2013. A total of 21 deposit accounts and 3 money market accounts for multiple entities, 5 brokerage accounts and 1 custody account. Total AUMs \$224mn.
Legal name of Account Holder(s)	Prytanee, LLC
Name of UBO(s) <i>(Please include UBOs who own</i>	Jeffrey Epstein and Caroline Lang

25% and more; If there are multiple layers, please include description of ownership structure)	
Description of Type of account being opened with detailed purpose of the accounts <i>(Please include SOW information/ Geographic location/ For Entity Accounts: Description of the entity and background information on the UBO)</i>	We are opening a deposit account for Prytanee LLC. The account will be used to purchase art from up and coming artists.
Reason for High Risk	This relationship is deemed high risk due to multiple court cases on Jeffrey Epstein, involving 22 April 2004 SEC filed a settled civil fraud action for illegal insider trading in three publicly traded Massachusetts banks. Final judgement permanently enjoins him from violating the antifraud provisions and he agreed to pay a total of \$72532.06 in disgorgement of trading profits, prejudgment interest and civil penalties. Epstein was sentenced to 21 months in federal prison for three counts of fraud, sexually assaulting a girl and solicitation of prostitution. These alerts were previously approved by senior management and AML Compliance. Prior clearance is attached as a reference
PEP (Y/N) <i>If yes, include details</i>	No
Any negative media and/or court cases? <i>Include ALL negative media & court cases</i>	Yes
If Yes, please give details	Aside from the court cases listed in the reason for high risk, all other alerts were false positives and no new court cases or negative media has come up for this client.
Business Justification for the relationship despite High Risk Factors	All negative media and alerts have been reviewed by AML Compliance and they do not see a reason to discontinue the existing relationship with Jeffrey Epstein.

Kind regards,

Cynthia Rodriguez



Cynthia Rodriguez
Assistant Vice President

Deutsche Bank Trust Company Americas
Deutsche Asset & Wealth Management
345 Park Avenue, 10154-0004 New York, NY, USA

