

From: [Janice Franklin](#)
To: [Gwen Hill](#)
Subject: RE: PEP Escalation_Jeffrey E. Epstein
Date: Friday, October 19, 2018 5:15:52 PM
Attachments: [image003.png](#)

Hi Gwen:

I agree with your assessment that Mr. Epstein should be treated as a RCA. Hence, all clients where he is UBO or has a significant controlling role should be automatically risk rated "High"

Regards,
Janice P. Franklin



Janice Franklin, CAMS, CFSA, CFIRS
Vice President | AML Compliance Officer

Deutsche Bank Americas
Regulation, Compliance & Anti-Financial Crime
60 Wall Street, 10005-2836 New York, NY, USA
Tel. [REDACTED]
Email [REDACTED]

From: Gwen Hill
Sent: Friday, October 19, 2018 2:30 PM
To: Janice Franklin <janice.franklin@db.com>
Subject: RE: PEP Escalation_Jeffrey E. Epstein

Hi Janice,

The purpose of this email is to address the PEP status of Jeffrey E. Epstein, an existing Wealth Management client through the Southern Financial Relationship. Although the PEP status was factored into the prior risk calculator, the client was never formally escalated as a PEP.

It has been reported in the media that Mr. Epstein has maintained a close relationship with Prince Andrew, Duke of York and member of the British Royal Family and former US President, Bill Clinton. Several media sources have reported Mr. Clinton and Prince Andrew have used Mr. Epstein's private passenger jet "Lolita Express" on numerous occasions.

The relationship is currently "High" Risk. Although Mr. Epstein was treated as an honorary PEP in the past, he was never formally escalated as a PEP. BLAFC-WM reached out to the business and they

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agreed he should remain a PEP. Please let us know if you agree that Mr. Epstein should be treated as a Relative or Close Associate (RCA) of a PEP due to his connections to Prince Andrew and Bill Clinton.

Kind regards,
Gwen Hill



Gwen Hill
AVP | AML Compliance Officer

DB USA Core Corporation
Regulation, Compliance and Anti-Financial Crime
Anti-Financial Crime
5201 Gate Parkway, 2nd Floor, 32256 Jacksonville, USA
Tel. [REDACTED]
Email [REDACTED]