

M. Case Comments		
Created By	Date	Comments
Dimitra Manley	8/17/17 0:36 AM	<p>This KYC serves as a high risk update for the below listed clients (together "acountholders") -</p> <ol style="list-style-type: none"> 1. Gratitude America, Ltd 2. Neptune, LLC 3. NES, LLC <p>Below are the reasons why we are comfortable with approving this KYC:</p> <ul style="list-style-type: none"> • Information and supporting documents required by our AML Policy were provided and reviewed; and as a result, we have an understanding of the structure of the accountholders, their purpose, the purpose of the accounts and expected transaction activity. • There are a few risk factors associated with the accountholders - <ul style="list-style-type: none"> SOW: The UBOs (Jeffrey Epstein) is the founder of Southern Trust Company Inc. which manages clients assets. SOW verification was obtained. Negative Media & PEP: There is some negative media against Mr Epstein and he is also maintains a close relationship with Bill Clinton and Prince Andrew. Please see risk calculator for more information. Appropriate approval was obtained. • Our review did not identify any red flags and thus there was no need to escalate this case further. • We performed due diligence searches on all parties and did not find the names searched to be on any sanctions lists
Cynthia Rodriguez	8/16/17 11:02 PM	Client confirmed on a call that there were no changes to these accounts on 7/26/2017.
Cynthia Rodriguez	7/13/17 7:35 PM	Haze Trust and Butterfly trust have been removed from this remediation kyc and added to kyc case 01804531 as beneficiary information is still pending.
Cynthia Rodriguez	7/10/17 9:29 PM	Source of Wealth for Jeffrey Epstein is attached.

ONSHORE APPROVALS			
Client Facing Professional (CFP):	stewart oldfield	(Signature) stewart oldfield	7/5/2017
Office Director/ Business Head:	Andrew F Gallivan	(Signature) Andrew F Gallivan	7/6/2017
Regional Office Director:		(Signature)	
AML Business Risk:		(Signature)	
AML Compliance:	D. Manley obo Kshitij Golani	(Signature) D. Manley obo Kshitij Golani	8/16/2017
	Yoonsun Chung	Yoonsun Chung	8/16/2017

LATAM/INTERNATIONAL APPROVALS			
Client Facing Professional (CFP):		(Signature)	
Account Manager:		(Signature)	
Global Market Team Head (GMTH)/Sub-Market Team Head (SMTH):		(Signature)	
AML Business Risk:		(Signature)	