

M. Case Comments		
Created By	Date	Comments
Kshitij Golani	8/8/117 4:45 PM	This KYC serves as a high risk update for the below listed clients (together "acountholders") – 1. Southern Financial, LLC 2. Southern Trust Company, Inc 3. Jeffrey Epstein 4. J. Epstein Virgin Islands Foundation, Inc Below are the reasons why we are comfortable with approving this KYC: • 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 – - 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	7/7/117 1:50 PM	Verification of Address for Jeffrey Epstein is attached. it is his most recent paycheck from Southern Trust Company Inc.
Cynthia Rodriguez	6/30/117 1:28 PM	google searches for UBO can be found in KYC case [REDACTED]
Cynthia Rodriguez	7/7/117 2:28 PM	client confirmed no material changes on 07/01/2017 via phone
Cynthia Rodriguez	7/7/117 2:17 PM	research for Jean Anne Brennan Wiebracht is attached to kyc case [REDACTED]

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:		(Signature)	
	Kshitij Golani	Kshitij Golani	8/8/2017
	Yoonsun Chung	Yoonsun Chung	8/8/2017

LATAM/INTERNATIONAL APPROVALS			
Client Facing Professional (CFP):		(Signature)	
Account Manager:		(Signature)	
		(Signature)	