

M. Case Comments		
Created By	Date	Comments
Kshitij Golani	8/8/117 4:45 PM	<p>This KYC serves as a high risk update for the below listed clients (together "acountholders") –</p> <ol style="list-style-type: none"> <li>1. Southern Financial, LLC</li> <li>2. Southern Trust Company, Inc</li> <li>3. Jeffrey Epstein</li> <li>4. J. Epstein Virgin Islands Foundation, Inc</li> </ol> <p>Below are the reasons why we are comfortable with approving this KYC:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• There are a few risk factors associated with the accountholders –                             <ul style="list-style-type: none"> <li>SOW: The UBOs (Jeffrey Epstein) is the founder of Southern Trust Company Inc, which manages clients assets. SOW verification was obtained.</li> <li>Negative Media &amp; 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.</li> </ul> </li> <li>• Our review did not identify any red flags and thus there was no need to escalate this case further.</li> <li>• We performed due diligence searches on all parties and did not find the names searched to be on any sanctions lists</li> </ul>
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 01790820
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 01790820

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

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