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From: Cynthia Rodriguez
Sent: Wednesday, December 14, 2016 2:09 PM
To: Patrick Campion
Cc: Armen Brash; Samantha Harmon
Subject: APPROVAL NEEDED: High Risk RUSH KYC Case 01696913
Importance: High

Hello,

I am requesting Exco Approval for Zorro Management, LLC, under the Jeffrey Epstein relationship. Mr. Epstein has recently created this U.S Virgin Islands entity, and would like to open a checking account before year end.

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)	Zorro Management, LLC
Name of UBO(s) <i>(Please include UBOs who own 25% and more; If there are multiple layers, please include description of ownership structure)</i>	Jeffrey Epstein
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 checking account for new entity, Zorro Management LLC
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