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**From:** Martin Zeman [REDACTED]  
**Sent:** 10/2/2017 6:02:55 PM  
**To:** Kimberly Hart [REDACTED]  
**Subject:** RE: Southern Financial LLC update [I]

Classification: **For internal use only**

Thank you, Kim.

Martin

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**From:** Kimberly Hart  
**Sent:** Monday, October 02, 2017 4:53 PM  
**To:** Martin Zeman <[REDACTED]>; Keith Buckholz <[REDACTED]>  
**Cc:** Stewart Oldfield <[REDACTED]>; Xavier Avila <[REDACTED]>; Daniel-E Kaiser <[REDACTED]>  
**Subject:** RE: Southern Financial LLC update [SC]

Classification: **Strictly Confidential**

Jeffrey Epstein has been a client since 2013 and we have a number of open active accounts for him and his related entities including Southern Financial LLC. At the time he was onboarded, the potential reputational risk concerns were escalated to regional management by Chip Packard, Head WM Americas, including John Caruso, Head AML Compliance Americas. Chip was given the go ahead to proceed "so long as nothing further is identified through KYC and AML client adoption". A number of KYC updates have been processed for Mr. Epstein since 2013 – the latest in August 2017. All the KYCs have been approved and all alerts have been cleared.

If there are new concerns regarding the client, please let me know so I can escalate. If the concerns are regarding his previous convictions, I just want to confirm that they have been disclosed and cleared by AML Compliance.

Regards,  
Kim



**Kimberly Hart**  
Managing Director | Regional Control Officer  
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**From:** Martin Zeman  
**Sent:** Monday, October 02, 2017 11:22 AM  
**To:** Kimberly Hart <[REDACTED]>