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**From:** Armen Brash [REDACTED]  
**Sent:** 8/14/2013 4:44:36 PM  
**To:** Amanda Kirby [REDACTED]  
**Subject:** Your KYC has been rejected

Your KYC has been rejected.

Case #: 01082293

Relationship: EPSTEIN, JEFFREY RELATIONSHIP

Customer Name: Epstein, Jeffrey

Customer Number: [REDACTED]

Reason for Rejection: 1. Please change account opening dates; these are in the past. RESOLVED

2. Please mark the accounts legal entity/corporate accounts. RESOLVED

3. Please give a more substantial explanation of how the client was introduced; how did Paul meet Jeffrey in the first place. RESOLVED

4. The source of wealth description is not sufficient; please give a more detailed bio/narrative on his source of wealth with employer names/positions held, salaries, etc. The SOW description should include an explanation of how he got started, and how he got to where he is today. RESOLVED

5. For the entities, please give a better description of exactly what they do...the purpose of entity/nature of business provided is not sufficient. NOT RESOLVED; description is still not sufficient; we need a better understanding of what these companies do.

6. Please attach full searches on the previous name of the company. RESP;VED

7. According to the shareholder info attachment; Southern Trust Company Inc is the sole member of Southern Financial LLC; and Jeffrey is the sole shareholder of Southern Trust Company Inc. Therefore, the KYC hasn't been set up correctly to reflect this set up. NOT RESOLVED; THE PARTY ROLES FOR SOUTHERN FINANCIAL LLC ACCOUNT NEED TO BE ADJUSTED.

8. Please attach the LLC operating agreement for Southern Financial LLC; this should also include proof of ownership/control. RESOLVED

9. Please attach the articles of incorporation and if available, bylaws for Southern Trust Company Inc. RESOLVED

10. Please also attach full searches on Financial Trust Company Inc; which merged into Southern Financial LLC. NOT RESOLVED

11. Please attach all alerts and alert clearances. RESOLVED

Some issues above were not resolved and there is a new issue below:

1. Please attach full searches on J. Epstein & Co. as this was a company started and controlled by Mr. Epstein.

To view the KYC click here <https://na4.salesforce.com/5006000000qah5L>