
From: Terri Sohrab [REDACTED]
Sent: 8/23/2018 3:03:16 PM
To: Thomas Klemm [REDACTED]
CC: Daphne Cales [REDACTED]; Emily Craig [REDACTED]; Bradley Gillin [REDACTED];
Richard Iarossi [REDACTED]; Vinita Advani [REDACTED]
BCC: [REDACTED]
Subject: Update : Case management on High Risk accounts [1]

Thomas,

Below please find an update on the pending high risk completions. My recommendation to process more quickly through the cases would be to request the following two exceptions from Compliance/KYC:

- Certificate of Good Standing - COGS should be required every 12-15 months. Requesting this certificate every six months is (1) costly to the client; (2) annoying; and (3) time consuming. What is the rationale behind the 6 month request and how was that period of time chosen for this certification;
- FinCen - Once we provide evidence of requesting the FinCen form from the client, we should move the KYC to the next stage with a 60 day grace period to obtain them.

Updates in red below.

Khullar Relationship

- AMAAN HOLDINGS LLC – Due Date 06/29/2018 – Pending SoS for SAMRA Holdings Ltd (refer attached 1st email)
- HATTAN HOLDINGS LLC – DueDate 06/29/2018 – Pending SoS for SAMRA Holdings Ltd (refer attached 1st email)
- MARSALA HOLDINGS LLC – DueDate 06/29/2018 – Pending SoS for SAMRA Holdings Ltd (refer attached 1st email)
- Response from client, Deepak Khullar, on 8/9/18 – ‘SoS for Samra- letter of good standing will have to be sourced from the registrars - CITCO and could take a week to ten days’

Jefferies Relationship:

- JCP IV QP, LLC – DueDate 06/30/2018 –
- All outstanding KYC Docs received yesterday, pending review.

Cerberus Relationship:

- Cerberus Executive, LLC – DueDate 07/31/2018 – Awaiting docs as per attached 3rd email. I am aware that you have followed up with client on this, so thanks for that.
- Working with Cerberus’ Council. FinCEN Form, Certificate of Good Standings (within 6 months), and constitutional docs from 6 entities were requested.

Sillerman Relationship:

- Aircraft Acquisition Corporation – DueDate 08/03/2018 – Awaiting docs as per 4th email attached.
- Sillerman Investment Company III, LLC – DueDate 08/03/2018 – Awaiting docs as per 4th email attached.
- Tomorrow Foundation – DueDate 08/03/2018 – Pending CDD form as per attached 5th email attached.
- Elderberry X, LLC – DueDate 08/03/2018 – Pending CDD form as per attached 5th email attached.
- Sillerman Investment Corporation – DueDate 08/03/2018 – Awaiting docs as per 4th email attached.
- Requested FinCEN forms from Sillerman – should receive tomorrow/early next week.

Southern Financial/Epstein Relationship:

- Epstein, Jeffrey E. – DueDate 08/08/2018 – Awaiting docs as per attached 5th email attached.
- Southern Financial LLC - DueDate 08/08/2018 – Awaiting docs as per attached 8th email attached.
- Southern Trust Company, Inc. - DueDate 08/08/2018 – Awaiting docs as per attached 5th email attached.
- J. Epstein Virgin Islands Foundation, Inc - DueDate 08/08/2018 – Docs & confirmation required as per attached 10th email
- GoldenTree Asset Management UK LLP- DueDate 08/09/2018 – Docs & confirmation required as per attached 11th email
- Gratitude America Ltd – DueDate 08/16/2018– Awaiting docs as per attached 6th email attached.
- Neptune, LLC – DueDate 08/16/2018 – Docs required as per attached 2nd email
- NES, LLC – DueDate 08/16/2018 – Docs & confirmation required as per attached 9th email.
- LSJE, LLC – DueDate 08/18/2018 – Awaiting docs as per attached 8th email attached.
- Hyperion Air, LLC – DueDate 08/18/2018 – Docs & confirmation required as per attached 10th email
- JEJE, Inc – DueDate 08/18/2018 – Awaiting confirmation & docs as per attached 7th email
- JEJE, LLC – DueDate 08/18/2018 – Awaiting confirmation & docs as per attached 7th email
- Plan D, LLC – DueDate 08/18/2018 – Docs & confirmation required as per attached 9th email.
- Jeepers, Inc - DueDate 08/18/2018 – Awaiting confirmation & docs as per attached 7th email