

- **List of Legal representatives**

- o Per attachment "Southern Financial Operating Agreement" (pages 16)
- Jeffrey Epstein, Darren K. Indyke, Richard Kahn

- **Annual report**

- o See attachments "Southern Financial LLC Financials June 2017" and "Southern Trust Company Inc. Financials June 2017" for latest financial statements

Thank you

Nina Tona

From: Zack Bunimovich

Sent: Tuesday, March 13, 2018 11:16 AM

To: Martin Zeman [REDACTED]; Xavier Avila [REDACTED]

Cc: Nina Tona [REDACTED]; Rita Shteynberg [REDACTED]; Mathew Negus

[REDACTED]; Jitan Patel [REDACTED]; Alastair Mackinlay [REDACTED]; Davide-

A Sferrazza [REDACTED]; Anthony Lentini [REDACTED]

Subject: RE: SF [I] [C]

Classification: **Confidential**

Hi Martin,

I just received the finalized KYC review yesterday. Even though the entity is opened for other products, it is outside of its KYC review date and is triggering a high risk rating. In order to approve the account, the team will need the following:

- Ownership - Broken down to 10% (Org chart with %'s of ownership or confirmation from Senior Client Rep explaining the ownership breakdown)
- Legal Reps – Identify and Verify
- UBO's - Identify and Verify
- Source of Funds – Identification & Verification (Annual Report)
- Source of Wealth – Identify and Verify
- Client Contact for Patriot Act disclosure email
- Formation Document (Cert of Incorporation, etc)
- Nature of Business Doc

Thanks,

Zack

From: Martin Zeman

Sent: Monday, March 12, 2018 10:19 AM

To: Zack Bunimovich [REDACTED]; Xavier Avila [REDACTED]

Cc: Nina Tona [REDACTED]; Rita Shteynberg [REDACTED]; Mathew Negus

[REDACTED]; Jitan Patel [REDACTED]; Alastair Mackinlay [REDACTED]; Davide-

A Sferrazza [REDACTED]; Zach Price [REDACTED]

Subject: RE: SF [I] [C]

Classification: **Confidential**

Morning Zack,