

<p>account being opened with detailed purpose of the accounts</p> <p><i>(Please include SOW information/ Geographic location/ For Entity Accounts: Description of the entity and background information on the UBO)</i></p>	<p>purchase art from up and coming artists.</p>
<p>Reason for High Risk</p>	<p>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</p>
<p>PEP (Y/N)</p> <p><i>If yes, include details</i></p>	<p>No</p>
<p>Any negative media and/or court cases?</p> <p><i>Include ALL negative media & court cases</i></p>	<p>Yes</p>
<p>If Yes, please give details</p>	<p>Aside from the court cases listed in the reason for high risk, all other alerts were false positives and no new court cases or negative media has come up for this client.</p>
<p>Business Justification for the relationship despite High Risk Factors</p>	<p>All negative media and alerts have been reviewed by AML Compliance and they do not see a reason to discontinue the existing relationship with Jeffrey Epstein.</p>

Kind regards,

Cynthia Rodriguez



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