

From: Cynthia Rodriguez [REDACTED]
Sent: 2/9/2018 3:17:40 PM
To: Patrick Campion [REDACTED]
CC: Dana Ponzio [REDACTED]
Subject: RUSH EXCO Approval Needed: KYC Case [REDACTED] [1]
Importance: High

Classification: **For internal use only**

Hello,

I am requesting Exco Approval for a new account opening for current DB client Jeffrey Epstein.

RM Name	Stewart Oldfield
Business Line	US Onshore
GCIS # / KYC #	[REDACTED]
New or Existing Relationship? <i>If yes, please include relationship since date, approx # of accounts, AUM, etc.)</i>	Existing relationship since 8/26/2013. A total of 30 deposit accounts and 3 money market accounts for multiple entities, 5 brokerage accounts and 1 custody account. Total AUMs \$224mn.
Legal name of Account Holder(s)	The 2017 Caterpillar Trust
Name of UBO(s) <i>(Please include UBOs who own 25% and more; If there are multiple layers, please include description of ownership structure)</i>	Jeffrey Epstein
Description of Type of account being opened with detailed purpose of the accounts <i>(Please include SOW information/ Geographic location/ For Entity Accounts: Description of the entity and background information on the UBO)</i>	We are opening a deposit account for The 2017 Caterpillar Trust. The account will be used to pay annual annuity payments
Reason for High Risk	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
PEP (Y/N) <i>If yes, include details</i>	Yes, close affiliation to Bill Clinton and Prince Andrew
Any negative media and/or court cases? <i>Include ALL negative media & court cases</i>	Yes
If Yes, please give details	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