
From: Daniel Sabba [REDACTED]
Sent: 2/2/2016 7:39:20 AM
To: Todd Stevens [REDACTED]
Subject: RE: Epstein account opening [I]

It is a report done by kroll report that costs \$800 or so. RRC asked for it. See other email.

-----Original Message-----

From: Todd Stevens
Sent: Tuesday, February 02, 2016 03:51 AM Pacific Standard Time
To: Daniel Sabba
Subject: RE: Epstein account opening [I]

Classification: **Public**

Got it.. what is a ...external enhanced due diligence report?

From: Daniel Sabba
Sent: Tuesday, February 02, 2016 11:38 AM
To: Todd Stevens
Subject: FW: Epstein account opening [I]

-----Original Message-----

From: Daniel Sabba
Sent: Monday, February 01, 2016 12:05 PM Pacific Standard Time
To: Todd Stevens
Subject: RE: Epstein account opening [I]

The issue is that JE was listed as president of Gratitude America Ltd in the entity's original articles of incorporation. Additionally, JE was listed as the source of funds in the initial KYC done by Paul's team.

When Ari reached out to Middle Office, they looked at the KYC and flagged the request as "high risk" and asked us to get AML approval. As you recall, we already went to AML (Wayne Salit) to ask whether the account opening could be done. Wayne was the one who referred us to RRC.

When we went to the RRC, they requested an external updated Enhanced Due Diligence Report. The entire back and forth over the past week is on the request for this report, which is under Paul's review for sign-off.

In summary, first, the KYC does not reflect this is a separate relationship. Second, given the post-facto nature of the changes in the article of incorporation, I think AML/RRC are very likely to still require the due diligence report.

From: Todd Stevens
Sent: Friday, January 29, 2016 4:59 PM
To: Daniel Sabba
Subject: Fwd: Epstein account opening [I]

Thoughts? What is JE's role here?