

Please provide additional explanation: Jeffery Epstein began his financial career in 1976 as an options trader at Bear Stearns and became a partner in 1980. In 1982, Epstein founded his own financial management firm, J. Epstein & Co., managing the assets of clients with more than a billion in net worth. In 1996, Epstein changed the name of his firm to The Financial Trust Company and based it on the island of St. Thomas in the US Virgin Islands, which merged into Southern Financial LLC. All of his clients were anonymous except for the very wealthy businessman Leslie Wexner. His wealth has come from his days at Bear Stearns and his financial management firms.

Due Diligence Level

Specify the level of due diligence being performed Enhanced Due Diligence

EDD Summary

Is EDD Applicable? Yes

Have Source of Funds been verified? Yes

What verification has been performed on the Source of Funds explanation received The annual report provides the evidence for SOF for Southern Financial LLC

What evidence has been obtained which supports the Source of Funds activity? The annual report provides the evidence for SOF for Southern Financial LLC

Does the evidence obtained satisfy reliability and independence criteria?(Source of Funds) Yes

Have Source of Wealth been verified? Yes

What verification has been performed on the Source of Wealth explanation received o Jeffery Epstein began his financial career in 1976 as an options trader at Bear Stearns and became a partner in 1980. In 1982, Epstein founded his own financial management firm, J. Epstein & Co., managing the assets of clients with more than a billion in net worth. In 1996, Epstein changed the name of his firm to The Financial Trust Company and based it on the island of St. Thomas in the US Virgin Islands, which merged into Southern Financial LLC. All of his clients were anonymous except for the very wealthy businessman Leslie Wexner. His wealth has come from his days at Bear Stearns and his financial management firms.

What evidence has been obtained which supports the Source of Wealth Business Activity? SCR confirmation

Does the evidence obtained satisfy reliability and independence criteria? Yes

Confirm all UBO(s) with an ownership of 10% or more (directly or indirectly) been identified & verified and the requirements obtained? Yes

Internet Searches / NLS Yes

Did the internet searches /NLS uncover any adverse media? Yes

Please provide detail RDC Alert on the sole owner of Southern Financial.

Has the use of a External vendors been used as directed by the Business? No

Please provide a detailed explanation N/A.

Has the EDD Memo been completed and appended to the KYC file? Yes

Bearer Shares

Are you aware of the presence of Bearer Shares? No

Nature of Business