

FINRA

Is the client FINRA 2111 suitable? FINRA 2111 is not applicable for all products, please refer to Key Operating Procedures N/A

Market Participant Identifier

Is the client a broker/dealer No

Escalation

Have you come across any other reason for escalation to AML Compliance? No

Enhanced Due Diligence

Is Enhanced Due Diligence required ? Yes

What type of account is the client opening with CIB? Equities - Custody/Margin

Who is their Registered Supervisor? Courteney Formal

What is the client's source of funds? 100% money of Jeff Epstein from his work in the financial industry. Source of funds for Southern Financial LLC is that of Jeffrey Epstein. 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 is the client's line of business? Private Investor

What is their expected activity? Flow trading

Foreign Financial Institution

Is an account being opened for a foreign financial institution* ("FFI") registered and/or domiciled in either a Level 3 or 4 Country ? * Foreign financial institutions as defined within Section 312 of the USA PATRIOT Act are Non-U.S banks, broker dealers, futures commission merchants, Introducing brokers in commodities, mutual funds, money transmitters or currency exchangers and private banking accounts. No

AFC Escalation Form For United Kingdom**General Information**

Entity Legal Name: Southern Financial, LLC

KYC Type Private Entity

Nace Code 6713003

Nace Description Activities auxiliary to financial intermediation n.e.c.

Global risk rating HIGH

Local risk rating HIGH

Entity Role Contracting Party