
From: Vijay-A Sawant [REDACTED]
Sent: 10/4/2018 10:22:35 AM
To: Richard Iarossi [REDACTED]
CC: Bradley Gillin [REDACTED]; Vinita Advani [REDACTED]; Daphne Cales [REDACTED]
Subject: RE: Jeffries KYC Items [I]
Importance: High

Hello Rich/Brad,

Many thanks for arranging all the docs. Upon initial review, following is our assessment –

All revised Fincen Forms and AML Questionnaire's provided require signature verification from yourselves. Additionally section b of ALL Fincen form require to contain "Type of Entity". Kindly have this updated on all Fincen forms provided.

Additionally please note that as per the AML questionnaire completed for JCP IV, LLC, we require **Jefferies Group LLC** to be mentioned as the 3rd UBO under *section c* of the Fincen form for JCP IV, LLC. The form provided only lists 2 of the 3 UBO's.

Similarly, the AML questionnaire completed for Jefferies Capital Partners IV, LP, indicates that 2 UBO's own more than 10% in the entity, however they are missing from section c of the Fincen form. Additionally the AML form is missing complete name for one of the UBO's, it should be **Teachers Insurance and Annuity Association of America**.

Finally we require Fincen form completed for Jefferies Employee Partners IV, LLC. The client has instead provided doc for Jefferies Employee Partners IV, LP.

The above is review of docs received on Monday, 10/01/2018. In addition to this, we have the following pending items for these accounts -

- 1) For **2055 Partners LP**, we require complete partnership agreement. As you can see from the attached doc, we only have the 1st 3 pages and the last page of this doc. This is hampering in determining the ownership interests in this entity. Could we request client to provide Ownership Percentages of all shareholders in this entity, please? If this is a separate doc (pdf), then we require it to be signed and dated by authorized signer. The AML team have advised that any partner owning atleast 27.8% of **2055 Partners LP** would result in a 10% or greater indirect ownership in the account holding entity.
- 2) For **ASF Prince LP**, we require the Partnership Agreement along with the list of ownership interests. We were unable to find this on the repositories and attachments of ALL KYC cases launched under the Jefferies relationship. Kindly provide Annual Gross Income, Net Profit, Estimated Investable/Liquid Assets & Amt of assets planned to invest w/PWM for this entity, please?
- 3) For **Limestone Merger Sub LLC**, kindly provide Annual Gross Income, Net Profit, Estimated Investable/Liquid Assets & Amt of assets planned to invest w/PWM for this entity, please?
- 4) For **Teachers Insurance and Annuity Association of America**, kindly provide Annual Gross Income, Net Profit, Estimated Investable/Liquid Assets & Amt of assets planned to invest w/PWM for this entity, please?

Let me know if any queries, thanks.

Kind Regards,



Vijay Sawant

KYC Case Representative