

----- Forwarded by Manikandan Muralidharan/db/dbcom on 12/18/2014 01:00 AM -----

From: Dmitri Saks [REDACTED]
To: Jofin Varghese [REDACTED]
Cc: CAGNY NCA [REDACTED], Manikandan Muralidharan [REDACTED], Sujith Shetty [REDACTED], US-CB S-AML [REDACTED], Anastasia Pringle [REDACTED], Kumud Sharma [REDACTED]
Date: 12/17/2014 10:08 PM
Subject: RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: **For internal use only**

Jofin,

Please note that the provided Board resolution is the document of Southern Trust Company, Inc., and not Southern Financial LLC. Therefore, the following key statements made within the document will need to be validated:

- "Epstein is also the sole shareholder of Corporation" (*i.e.*, *Southern Trust Company, Inc.*), and
- "the Corporation is the sole member of Southern Financial LLC"

In order to validate the above, please provide the following supporting documentation:

- For Southern Trust Company, Inc.: proof of incorporation/formation and proof of appointment of the board of directors. You will also need to identify the board members as control persons for this account since they would be controlling Southern Financial LLC through Southern Trust Company, Inc. PCR/RDC searches would also be required.
- For Southern Financial LLC: Operating Agreement or other valid proof that Southern Trust Company, Inc. is the sole member of Southern Financial LLC.

Alternatively, as I stated before, you can provide a letter/email from an internal or external legal counsel stating that Mr. Epstein is the sole UBO of Southern Financial LLC.

Thanks and regards,
Dmitri

