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**From:** Wayne Salit [REDACTED]  
**Sent:** 1/16/2015 4:31:08 PM  
**To:** Jan Bornebusch [REDACTED]  
**CC:** Carlos-A Garcia [REDACTED]; Kerrian Gordon [REDACTED]; Alina Amanci [REDACTED]; John-A Lynch [john-a.lynch@db.com]; Peggy McGarvey [REDACTED]; Dmitri Saks [REDACTED]  
**Subject:** FW: Southern Financial LLC - EDD [C]

Classification: **Confidential**

**Conditional Approval** - I approve this EDD with the condition that it be reviewed by yourself.

Jan - As with the Global Markets Enhanced Due Diligence procedures, the EDD of Southern Financial LLC requires both yours and my approval from an AML perspective as the entity is a Private Investment Vehicle, which is High Risk. In addition, **negative information was identified regarding Jeffrey Epstein, the sole UBO of Southern Financial LLC.**

The EDD was performed by Dmitri Saks. The EDD consisted of the use of various electronic databases [e.g. Lexis/Nexis, Google, Factiva and RDC (which includes an OFAC scan)] and a review of received documents that satisfy USA PATRIOT and 3rd EU MLD requirements. **Use of third party vendors did not alert any items for attention outside of identifying the negative information regarding Jeffrey Epstein as described in the EDD below.**

**The Epstein Relationship:**

Mr. Epstein currently has numerous existing account relationships with DB for himself as well as entities where he is a controlling party. However, based on the negative information described below, AML Compliance and Compliance Advisory have recommended that the **entire** DB relationship with Mr. Epstein in both AWM and CB & S be presented to the Americas Reputational Risk Committee (and possibly a Global Reputational Risk Committee, if necessary) for additional review.

**However, AML Compliance has determined that until the DB relationship with Mr. Epstein and his entities has been fully reviewed by DB Senior Management in the Reputational Risk Committee, the existing Epstein relationship can continue to conduct trades and transactions in existing accounts as long as the relationship does not expand beyond its current level. Although a new account in CB & S will need to be opened for the client, based on the size and scope of the client's existing relationship, this new account will not effectively "expand" the relationship beyond its current level of trading and transactional activity.**

Therefore, from an AML perspective, I conditionally approve the EDD of **Southern Financial LLC**, awaiting your second level approval. If the EDD is approved, CB & S AML will send an e-mail to the respective BM advising that they should review transaction/activity conducted in the account for any possible unusual activity.

In addition, as set forth above, despite this EDD approval, AML Compliance and Compliance Advisory have recommended that the **entire** DB relationship with Mr. Epstein in both AWM and CB & S be presented to the Americas Reputational Risk Committee (and possibly a Global Reputational Risk Committee, if necessary) for additional review.

**Please advise if you agree.**

Thanks

Kind regards,  
Wayne Salit

**From:** Dmitri Saks  
**Sent:** Friday, December 19, 2014 11:17 AM  
**To:** Wayne Salit  
**Subject:** Southern Financial LLC - EDD [C]