

- PCR did not alert.

Documentation –

- Documentation to verify entity formation and UBO identity was provided.

Expected Activity for the Account/Information from Sales –

- The client is opening an Equities Custody/Margin account for flow trading.

Recommendation –

- From an AML perspective, I approve this account with the condition to mark the relationship as High Risk and the recommendation to be monitored for suspicious activity. However, the material negative information associated with the client's UBO and control person, Jeffrey Edward Epstein, may pose reputational risk to DB. Therefore, I recommend escalating this case to the Americas Reputational Risk Committee for review and decision.

Thanks and regards,
Dmitri

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