
From: Morgan Trichel [REDACTED]
Sent: 7/30/2018 9:42:31 AM
To: Vijay-A Sawant [REDACTED]
CC: Stewart Oldfield [REDACTED]; Bradley Gillin [REDACTED]
Subject: RE: Clarification Required on CDD Form - Section C
Attachments: FW_ FinCen query - Address fields [1] (11.5 KB).msg
Flag: Follow up

Dear Vijay,

From what I have observed and heard from compliance it seems as long as we can tie the address from the individual to the entity it should suffice.

See attached email from KG from compliance, although not the same situation similar to the approach.

Hope his helps.

Kind Regards,



Morgan Trichel
AML Business Risk Analyst
Deutsche Bank Trust Company, National Association
Deutsche Bank Wealth Management
[REDACTED]

From: Vijay-A Sawant
Sent: Monday, July 30, 2018 6:21 AM
To: Morgan Trichel <[REDACTED]>
Cc: Stewart Oldfield <[REDACTED]>; Bradley Gillin <[REDACTED]>
Subject: Clarification Required on CDD Form - Section C
Importance: High

Good Morning Morgan,

I have a query regarding attached CDD forms that I have received from the bankers recently. Note all the accounts included are from the same relationship.

Under Section c, the legal address for the UBO – Jeffrey Epstein is same as the entity address. Please advise if this is acceptable? Or should the address be same as his personal address indicated in his driver's license, also attached for reference.

Kindly advise, so I can ask for changes to ALL of the CDD forms accordingly, thanks.

Kind Regards,



Vijay Sawant