

Andrew – please confirm that you remain comfortable with the business risk here.

Kim – please forward as necessary

Summary of situation:

This was a frivolous lawsuit that was quickly withdrawn by the plaintiff attorneys upon response from Epstein's lawyers. The person ultimately behind the lawsuit was Steven Hoffenberg, who was convicted of fraud and served a long jail sentence.

Hoffenberg was called "unstable" and "manic" by the judge that sentenced him. He repeatedly filed lawsuits against the government from jail and against other people (including his lawyers), all of which were dismissed.

He convinced the plaintiffs to file this suit as a class action. That way Hoffenberg wouldn't be the plaintiff himself.

The original matter here was thoroughly investigated by the SEC and others and Hoffenberg was the only person deemed to have been involved.

If you Google Hoffenberg, it's easy to find the full history here. I think we should accept this matter as closed on our side.

Thanks

From: Richard Iarossi

Sent: Thursday, October 18, 2018 5:22 PM

To: Kimberly Hart <kimberly.hart@db.com>

Cc: Bradley Gillin <bradley.gillin@db.com>; Stewart Oldfield <stewart.oldfield@db.com>

Subject: RE: Epstein - negative media [I]

Classification: **For internal use only**

Hi Kim,

AML Compliance (Yoonsun) has requested that we receive your approval to move forward on all Southern Financial/Epstein KYC remediation's.

As per your discussions with Stew regarding the latest lawsuit against Jeffrey, please find the attached 'Notice of Dismissal' dated 10/5/18.

As this occurred after your approval on 10/2/17, please confirm again that we are comfortable moving forward.

Thank You,

Rich

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From: Kimberly Hart

Sent: Tuesday, October 09, 2018 12:15 PM

To: Stewart Oldfield <stewart.oldfield@db.com>