
From: Stewart Oldfield [redacted]
Sent: 11/15/2018 5:55:22 PM
To: Thomas Klemm [redacted]
CC: Andrew Gallivan [redacted]; Emily Craig [redacted]; Daphne Cales [redacted]; Bradley Gillin [redacted]; Richard Iarossi [redacted]
BCC: [redacted]
Subject: RE: Open 2018 HR KYCs

Just spoke to Jeffrey's office. We will get the KYC info we need for the donor to Gratitude. I need to reach out to that person's office tomorrow to start to gather the info. Will report back with a timeline to get that as soon as I make contact.

Thanks

From: Stewart Oldfield
Sent: Monday, November 05, 2018 10:00 AM
To: Thomas Klemm <[redacted]>
Cc: Andrew Gallivan <[redacted]>; Emily Craig <[redacted]>; Daphne Cales <[redacted]>
Subject: RE: Open 2018 HR KYCs

Thanks, and I greatly appreciate your help. We should discuss this one in person. A brief summary of the issue is below:

Gratitude America is a foundation, set up by Jeffrey Epstein to help some of his clients with tax planning. One of his clients made a large donation to the foundation several years ago which is now being deemed SOW for Gratitude. That client is actually one of our clients, with a current KYC, but made the donation through an entity which we have not KYC'd. While we know who the end client is, we are not sure whether Jeffrey or the client want to formally disclose that info to us. They are in discussions with the goal of coming back to us by Nov. 15th.

From: Thomas Klemm
Sent: Monday, November 05, 2018 9:53 AM
To: Stewart Oldfield <[redacted]>
Cc: Andrew Gallivan <[redacted]>; Emily Craig <[redacted]>; Daphne Cales <[redacted]>
Subject: Open 2018 HR KYCs

Dear Stewart,

First, let me thank you for your ongoing efforts to address our HR KYC challenge. Demonstrating our ability to protect the franchise and bring the Americas in line with all other WM regions is pivotal for our growth strategy. For the first time we have a line of sight to closing the year at zero HR overdues. Let me add that it requires AFC approval to count a HR file as completed.

For the following clients of yours, the project team has been informed that the client will either not provide the relevant information by 15 November or did not commit to a due date. Given that the bank would not be in a position to continue business with those clients unless the KYC gets completed, those clients will receive an exit letter after 15 Nov (DBTCA draft attached).