

345 Park Avenue, 10154-0004 New York, NY, USA

Tel. [REDACTED]

Fax [REDACTED]

Mobi [REDACTED]

Email [REDACTED]

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**From:** Stewart Oldfield

**Sent:** Wednesday, November 07, 2018 5:12 PM

**To:** Andrew Gallivan [REDACTED]; Kimberly Hart [REDACTED]

**Cc:** Bradley Gillin [REDACTED]; Richard Iarossi [REDACTED]

**Subject:** FW: Epstein - negative media [I]

I have more info as outlined below based on a conversation with Jeffrey's lawyer.

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This was a frivolous lawsuit that was quickly withdrawn by the plaintiff attorneys upon response from Epstein's lawyers.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

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**From:** Richard Iarossi

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

**To:** Kimberly Hart [REDACTED]

**Cc:** Bradley Gillin [REDACTED]; Stewart Oldfield [REDACTED]

**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.