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**From:** Stewart Oldfield [REDACTED]  
**Sent:** 11/5/2018 9:59:41 AM  
**To:** Thomas Klemm [REDACTED]  
**CC:** Andrew Gallivan [REDACTED]; Emily Craig [REDACTED] Daphne Cales  
[REDACTED]  
**BCC:** [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.

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**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).

If the missing information will be provided in time, those names will of course be removed from the list. Otherwise a letter must be send.

If the client has already provided the information and the list below would not be up-to-date, please reach out to Emily Craig or Daphne and please ensure that the file we be handed over to AFC in time. Please feel also free to contact me if need be.

Kind regards,  
Thomas

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**Stewart Oldfield**  
Gratitude America Ltd