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**From:** Stewart Oldfield

**Sent:** Friday, August 31, 2018 5:52 PM

**To:** Vijay-A Sawant <[REDACTED]>

**Cc:** Richard Iarossi <[REDACTED]>; Mayur Rathod <[REDACTED]>; Bradley Gillin <[REDACTED]>

**Subject:** Re: 2018 Periodic Review of High Risked Accounts [REDACTED] Ann ([REDACTED]), Butterfly Trust ([REDACTED]) and Neptune, LLC ([REDACTED]) under the SOUTHERN FINANCIAL RELATIONSHIP [I]

Butterfly is a personal trust.

For Neptune, any reason not to just add Rich as an RP? We've already KYC'd him for other accounts, correct?

Will call you at 9 or so.

Thanks

Stewart Oldfield, CFA, CAIA  
Director

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On Aug 31, 2018, at 7:21 AM, Vijay-A Sawant <[REDACTED]> wrote:

Hi Stewart,

Please see pending confirmations required in KYC Case#01977698 for Butterfly & Neptune, below –

- Butterfly trust – Kindly confirm if this is a Personal Trust and NOT Corporate Trust? After reviewing the trust agreement, we noticed that the UBO's seem not related to the grantor. The reason for this request is to evaluate whether we require CDD form for this account or not. NOTE: we require CDD form ONLY in case of Corporate Trusts.
- Neptune LLC – Please note that Richard Kahn has been added as manager as per Operating Agreement even though he was NOT added as an RP in the previously approved KYC Case#01790739.

Kindly advise on the above so we can complete this case and submit to AML for approval, thanks.

Kind Regards,