

- **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.

We will proceed to the next stages upon receipt of your confirmation of the above queries, thanks.

Kind Regards,

<image001.gif>

Vijay Sawant

KYC Case Representative
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From: Vijay-A Sawant

Sent: Tuesday, July 31, 2018 6:31 PM

To: Bradley Gillin <[REDACTED]>; Stewart Oldfield <[REDACTED]>

Cc: Mayur Rathod <[REDACTED]>

Subject: 2018 Periodic Review of High Risked Accounts [REDACTED] ([REDACTED]), Butterfly Trust (GCIS#486426) and Neptune, LLC (GCIS#487264) under the SOUTHERN FINANCIAL RELATIONSHIP

Importance: High

Hello Brad/Stewart,

This review relates to above high risked three accounts due for remediation 08/31/2018.

Upon review of the docs available in the repositories, we have completed the attached checklist, main RP's also listed below for reference –

Acct Holder – **Butterfly Trust**

Grantor – **Jeffrey Epstein**

Trustees – **Harry Beller & Erika Kellerhals**

UBO's – [REDACTED]

[REDACTED], **Darren Indyke, Karyna Shuliak, Richard Kahn,** [REDACTED]

Following are list of required items –

- Confirm whether material changes to account or not & RP's identified above are correct?
- Volcker Questionnaire completed reflects this trust as a "Family Trust" but this seems inaccurate. All UBO's have different surnames and some even different nationalities. Please advise if ok to accept? I have attached the questionnaire in this email for reference.
- Depending on the response to above bullet point, we might require CDD form if this trust is deemed to be Corporate trust.