

Cynthia Rodriguez

From:
Sent:
To:
Cc:
Subject:
Approved

Sent from my BlackBerry 10 smartphone.

From: Cynthia Rodriguez

Sent: Thursday, December 15, 2016 11:43 AM

To: Patrick Campion

Cc: Armen Brash; Samantha Harmon

Subject: RE: APPROVAL NEEDED: High Risk RUSH KYC Case 01696913

Hello,

I am follow up on the below. Thanks for your help!

Kind regards,

Cynthia Rodriguez

Patrick Campion

Thursday, December 15, 2016 2:57 PM

Cynthia Rodriguez

Armen Brash; Samantha Harmon

Re: APPROVAL NEEDED: High Risk RUSH KYC Case 01696913

Cynthia Rodriguez

Assistant Vice President

Deutsche Bank Trust Company Americas

Deutsche Asset & Wealth Management

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

Tel. [REDACTED]

Fax [REDACTED]

Email [REDACTED]

From: Cynthia Rodriguez

Sent: Wednesday, December 14, 2016 2:09 PM

To: Patrick Campion

Cc: Armen Brash; Samantha Harmon

Subject: APPROVAL NEEDED: High Risk RUSH KYC Case 01696913

Importance: High

Hello,

I am requesting Exco Approval for Zorro Management, LLC, under the Jeffrey Epstein relationship. Mr.

Epstein has

recently created this U.S Virgin Islands entity, and would like to open a checking account before ye

ar end.

1

RM Name

Business Line

GCIS # / KYC #

New or Existing

Relationship?

If yes, please include relationship since date, approx # of accounts, AUM, etc.)

Legal name of Account

Holder(s)

Name of UBO(s)

(Please include UBOs who own 25% and more; If there are multiple layers, please include description of ownership structure)

Description of Type of account being opened with detailed purpose of the accounts

(Please include SOW information/ Geographic location/

For Entity Accounts: Description of the entity and background information on the UBO)

Reason for High Risk

This relationship is deemed high risk due to multiple court cases on Jeffrey Epstein, involving 22 April 2004 SEC filed a settled civil fraud action for illegal insider trading in three publicly traded Massachusetts banks. Final judgement permanently enjoins him from violating the antifraud provisions and he agreed to pay a total of \$72532.06 in disgorgement of trading profits, prejudgment interest and civil penalties. Epstein was sentenced to 21 months in federal prison for three counts of fraud, sexually assaulting a girl and solicitation of prostitution. These alerts were previously approved by senior management and AML Compliance. Prior clearance is attached as a reference

PEP (Y/N)

If yes, include details

Any negative media and/or court cases?

Include ALL negative media & court cases

No

Yes

If Yes, please give details Aside from the court cases listed in the reason for high risk, all other alerts were false positives and no new court cases or negative media has come up for this client.

Business Justification

for the relationship

despite High Risk

Factors

All negative media and alerts have been reviewed by AML Compliance and they do not see a reason to discontinue the existing relationship with Jeffrey Epstein.

Stewart Oldfield

US Onshore

483290/ 01651789

Existing relationship since 8/26/2013. A total of 21 deposit accounts and 3 money market accounts for multiple entities, 5 brokerage accounts and 1 custody account.

Total AUMs \$224mn.

Zorro Management, LLC

Jeffrey Epstein

We are opening checking account for new entity, Zorro Management LLC

2

Kind regards,
Cynthia Rodriguez

Cynthia Rodriguez
Assistant Vice President
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3