Subject: RE: URGENT - THIRD REQUEST!!!!! RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]
From: Stewart Oldfield <[redacted]>
Date: Tue, 20 Dec 2016 10:11:00 -0500
To: Vahe Stepanian <[redacted]>,
    Amlcompliance Inquiries <[redacted]>,
    Zbynek Kozelsky <[redacted]>,
    Cynthia Rodriguez <[redacted]>,
    PWM AMLCompliance <[redacted]>
Cc: Joshua Shoshan <[redacted]>,
    Donald Summer <[redacted]>,
    Cherie Quigley <[redacted]>

Classification: For internal use only

Client is a billionaire. It's not like this is a specific $6mm of his. Most of his wealth comes from investments and advisory fees.

From: Vahe Stepanian
Sent: Tuesday, December 20, 2016 10:09 AM
To: Amlcompliance Inquiries; Zbynek Kozelsky; Cynthia Rodriguez; PWM AMLCompliance; Stewart Oldfield
Cc: Joshua Shoshan; Donald Summer; Cherie Quigley
Subject: RE: URGENT - THIRD REQUEST!!!!! RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]

Classification: For internal use only

We don't know the answer. Are we supposed to reach out to client about this?

Thanks,

Vahe

From: Danya Friedman On Behalf Of Amlcompliance Inquiries
Sent: Tuesday, December 20, 2016 9:39 AM
To: Zbynek Kozelsky; Cynthia Rodriguez; PWM AMLCompliance; Stewart Oldfield; Vahe Stepanian
Cc: Joshua Shoshan; Donald Summer; Cherie Quigley; Amlcompliance Inquiries
Subject: RE: URGENT - THIRD REQUEST!!!!! RE: Inquiry Regarding THE HAZE

TRUST, Account# [redacted], Alert# [redacted] [I]
Importance: High

Classification: For internal use only

Good Morning:

From the initial response below, it appears that a response was given on a different wire in the amount of $23 mil between brokerage and the private bank. Can anyone answer the inquiry regarding the wire from HSBC?

{cid:image002.png@01D24EEF.D60AFBC0}

Incoming:

10/27/2016, $6,186,980.68, HSBC SECURITIES SERVICES (IRELAND) DAC at HSBC BANK USA, NATIONAL ASSOCIATION

1. Who is the ultimate originator of these funds (i.e. if this is investment income, please give the name of the investment that the funds originate)?

Best Regards/Mit freundlichen Grüßen,

PWM AML Compliance
Deutsche Bank
60 Wall St., 23 Floor
New York, NY 10005 - 2836
[redacted]
Fax: [redacted]

From: Zbynek Kozelsky

Sent: Tuesday, December 20, 2016 8:34 AM
To: Cynthia Rodriguez <[redacted]>; PWM AMLCompliance <[redacted]>; Stewart Oldfield <[redacted]>; Vahe Stepanian <[redacted]>
Cc: Joshua Shoshan <[redacted]>; Donald Summer <[redacted]>; Cherie Quigley <[redacted]>; Amlcompliance Inquiries <[redacted]>
Subject: RE: URGENT - THIRD REQUEST!!!!! RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]

Classification: For internal use only

Dear AML,

Please let us know what else you need regarding this HSBC wire so we close the loop.

Happy holidays.

Ziggy

{cid:image003.png@01CFFD0A.6F882F50}

Zbynek "Ziggy" Kozelsky
Director | Branch Administrative Manager

Key Client Partners - Americas
Deutsche Bank Securities Inc.
Deutsche Asset & Wealth Management
345 Park Avenue, 26th Floor
New York, NY 10154
Tel. [redacted]
Email: [redacted]

All trade execution information contained herein is being provided as an accommodation at your request in advance of your receipt of the official trade confirmation(s). Additional trade detail information available upon request. The terms of the trade(s) may be subject to change prior to settlement, and therefore the official trade confirmation(s) and account statements issued by Deutsche Bank shall govern. Deutsche Bank is not responsible for any discrepancy between the informal execution report and the official trade confirmation(s) or account statements.

From: Cynthia Rodriguez
Sent: Tuesday, December 20, 2016 8:32 AM
To: PWM AMLCompliance; Zbynek Kozelsky; Stewart Oldfield; Vahe Stepanian
Cc: Joshua Shoshan; Donald Summer; Cherie Quigley; Amlcompliance Inquiries
Subject: RE: URGENT - THIRD REQUEST!!!!! RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]

Vahe/Donald/Ziggy,

Do you need anything from Stew and I for the below request? We provided as much information as we could, but the transaction in question came into the brokerage account from HSBC and not from the private bank. Let us know if you need anything from us in order to complete the below. Thanks!

Kind regards,

Cynthia Rodriguez

____

{cid:image001.png@01D0778D.2D49CDD0}

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: Danya Friedman On Behalf Of PWM AMLCompliance
Sent: Tuesday, December 20, 2016 8:01 AM
To: Cynthia Rodriguez; Zbynek Kozelsky; Stewart Oldfield; Vahe Stepanian
Cc: Joshua Shoshan; Donald Summer; Cherie Quigley; Amlcompliance Inquiries
Subject: URGENT - THIRD REQUEST!!!!! RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]
Importance: High

Classification: For internal use only

Good Morning:

I am writing to follow up on the inquiry below. Please note that this is the 3rd request for information. Please respond ASAP.

Best Regards/Mit freundlichen Grüßen,

PWM AML Compliance
Deutsche Bank
60 Wall St., 23 Floor
New York, NY 10005 - 2836
[redacted]
Fax: [redacted]

From: Danya Friedman On Behalf Of Amlcompliance Inquiries
Sent: Wednesday, December 14, 2016 8:56 AM
To: Cynthia Rodriguez <[redacted]>; Zbynek Kozelsky <[redacted]>; Stewart Oldfield <[redacted]>; Vahe Stepanian <[redacted]>
Cc: Joshua Shoshan <[redacted]>; Donald Summer <[redacted]>; Cherie Quigley <[redacted]>; Amlcompliance Inquiries <[redacted]>
Subject: RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]
Importance: High

Classification: For internal use only

Good Morning:

I am writing to follow up on my inquiry below.

Thank you.

Best Regards/Mit freundlichen Grüßen,

PWM AML Compliance
Deutsche Bank
60 Wall St., 23 Floor
New York, NY 10005 - 2836
[redacted]
Fax: [redacted]

From: Danya Friedman On Behalf Of Amlcompliance Inquiries
Sent: Monday, December 05, 2016 12:05 PM
To: Cynthia Rodriguez <[redacted]>; Zbynek Kozelsky <[redacted]>; Stewart Oldfield <[redacted]>; Vahe Stepanian <[redacted]>
Cc: Joshua Shoshan <[redacted]>; Donald Summer

<[redacted]>; Cherie Quigley <[redacted]>;
Amlcompliance Inquiries <[redacted]>
Subject: RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]
Importance: High

Classification: For internal use only

Thank you for the response Cynthia.

Team, this is not the wire I am asking about. Please see the incoming wire listed below from HSBC. I see the $23,000,000.00 incoming wire from the Private Bank account and that is not/was never in question. I need to know where these funds originate.

10/27/2016, $6,186,980.68, HSBC SECURITIES SERVICES (IRELAND) DAC at HSBC BANK USA, NATIONAL ASSOCIATION

Best Regards/Mit freundlichen Grüßen,

PWM AML Compliance
Deutsche Bank
60 Wall St., 23 Floor
New York, NY 10005 - 2836
[redacted]
Fax: [redacted]

{cid:image002.png@01D24EEF.D60AFBC0}

From: Cynthia Rodriguez
Sent: Monday, December 05, 2016 11:32 AM
To: Amlcompliance Inquiries <[redacted]>; Zbynek Kozelsky <[redacted]>; Stewart Oldfield <[redacted]>; Vahe Stepanian <[redacted]>
Cc: Joshua Shoshan <[redacted]>; Donald Summer <[redacted]>
Subject: RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]

All,

The originating wire came from the client's account called Southern Trust Company, Inc account number 44129244. This wire was not submitted through HSBC but through Bank of New York in order to be placed into their N4G account for the art purchase. The beneficiary is our client Jeffery Epstein as the originating party and the art purchaser. Please let me know if you need anything else.

Kind regards,

Cynthia Rodriguez

{cid:image001.png@01D0778D.2D49CDD0}

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: Danya Friedman On Behalf Of Amlcompliance Inquiries
Sent: Friday, December 02, 2016 11:36 AM
To: Zbynek Kozelsky; Amlcompliance Inquiries; Stewart Oldfield; Vahe Stepanian
Cc: Joshua Shoshan; Donald Summer; Cynthia Rodriguez
Subject: RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]

Classification: For internal use only

Please specify the originating account so that I can confirm this transaction, after searching PRIME and [redacted] FORCE (our PB systems, I am unable to locate the transaction). Also, any idea as to why, if this is an internal transfer, that funds are being sent through HSBC?

Best Regards/Mit freundlichen Grüßen,

PWM AML Compliance
Deutsche Bank
60 Wall St., 23 Floor
New York, NY 10005 - 2836
[redacted]
Fax: [redacted]

From: Zbynek Kozelsky
Sent: Friday, December 02, 2016 11:23 AM
To: Amlcompliance Inquiries <[redacted]>; Stewart Oldfield <[redacted]>; Vahe Stepanian <[redacted]>
Cc: Joshua Shoshan <[redacted]>; Donald Summer <[redacted]>; Cynthia Rodriguez <[redacted]>
Subject: RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]

Classification: For internal use only

Just to clarify, the funds came in from client’s Private bank account (in house – from DBTCA account/PB into his DBSI account).

Thanks

{cid:image003.png@01CFFD0A.6F882F50}

Zbynek "Ziggy" Kozelsky

Director | Branch Administrative Manager

Key Client Partners - Americas
Deutsche Bank Securities Inc.
Deutsche Asset & Wealth Management
345 Park Avenue, 26th Floor
New York, NY 10154
Tel. [redacted]
Email: [redacted]

From: Danya Friedman On Behalf Of Amlcompliance Inquiries
Sent: Friday, December 02, 2016 11:21 AM
To: Stewart Oldfield; Vahe Stepanian; Zbynek Kozelsky; Amlcompliance Inquiries
Cc: Joshua Shoshan; Donald Summer; Cynthia Rodriguez
Subject: RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]

Classification: For internal use only

Good Morning and thank you for the quick response. Just to clarify, the below response is only answering my questions regarding the Outgoing Transfers and both of these transfers were towards the purchase of art? We will need the ultimate originator for the Incoming Transfer. Also, once again, just to clarify, we have the KYC on the HAZE TRUST, we need the source of wealth for the beneficiaries if available.

Thanks again! I hope everyone has a great weekend!

Best Regards/Mit freundlichen Grüßen,

PWM AML Compliance
Deutsche Bank
60 Wall St., 23 Floor
New York, NY 10005 - 2836
[redacted]
Fax: [redacted]

From: Stewart Oldfield
Sent: Friday, December 02, 2016 11:17 AM
To: Vahe Stepanian <[redacted]>; Zbynek Kozelsky <[redacted]>; Amlcompliance Inquiries <[redacted]>
Cc: Joshua Shoshan <[redacted]>; Donald Summer <[redacted]>; Cynthia Rodriguez <[redacted]>
Subject: RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]

Classification: For internal use only

Cynthia is back Monday and will send all of the docs then. Thanks

From: Vahe Stepanian
Sent: Friday, December 02, 2016 11:11 AM
To: Zbynek Kozelsky; Amlcompliance Inquiries
Cc: Joshua Shoshan; Donald Summer; Stewart Oldfield
Subject: RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]

Classification: For internal use only

Adding Stewart Oldfield, primary relationship manager who can confirm the below.

1. What is the purpose of the Outgoing Transfer?

Purchase of Art.

2. What is the relationship between Beneficiary and Client?

Per our conversation with client – the beneficiary in this situation is an escrow account in which the cash will be held until art is delivered.

3. Please provide the source of wealth for these entities.

Stewart – can you please add here the Private Bank KYC, which I believe includes the SOW for this client? Thank you.

Best,

Vahe

From: Zbynek Kozelsky
Sent: Friday, December 02, 2016 11:03 AM
To: Amlcompliance Inquiries
Cc: Vahe Stepanian; Daniel Sabba; Joshua Shoshan; Donald Summer
Subject: RE: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]

Classification: For internal use only

Vahe,

Please follow up.

Reason – purchase of art.

Thanks

{cid:image003.png@01CFFD0A.6F882F50}

Zbynek "Ziggy" Kozelsky
Director | Branch Administrative Manager

Key Client Partners - Americas
Deutsche Bank Securities Inc.
Deutsche Asset & Wealth Management
345 Park Avenue, 26th Floor
New York, NY 10154
Tel. [redacted]
Email: [redacted]

From: Danya Friedman On Behalf Of Amlcompliance Inquiries
Sent: Friday, December 02, 2016 11:01 AM
To: Zbynek Kozelsky
Cc: Dcarla Oliveira; Tatiana Dominguez; Maurice Abitbol; Amlcompliance Inquiries
Subject: Inquiry Regarding THE HAZE TRUST, Account# [redacted], Alert# [redacted] [I]

Classification: For internal use only

Good Morning:

As a part of the anti-money laundering monitoring program, the Actimize system is used to automatically identify transactions that meet certain high risk transaction patterns. When transactions occur which mimic those patterns, the activity must be researched to confirm that it is legitimate.

In a small percentage of these cases, Compliance must contact the Wealth Advisor for additional information about the transaction(s) in order to conclude the research process. Your response is required for the Bank to comply with federal guidelines for concluding the research of these matters in a timely fashion. Your complete response must be received within 7 business days.

To the best of your ability, please provide details regarding the item(s) below:

Incoming:

10/27/2016, $6,186,980.68, HSBC SECURITIES SERVICES (IRELAND) DAC at HSBC BANK USA, NATIONAL ASSOCIATION

1. Who is the ultimate originator of these funds (i.e. if this is investment income, please give the name of the investment that the funds originate)?

Outgoing:

11/23/2016, $25,000,000.00, AP NARROWS HOLDING LP/BMO TRUSTEE at CDEC CLEARING ACCOUNT through BANK OF AMERICA, N.A., NY

11/23/2016, $5,000,000.00, LDB 2011 LLC/BMO TRUSTEE at CDEC CLEARING ACCOUNT through BANK OF AMERICA, N.A., NY

1. What is the purpose of the Outgoing Transfer?
2. What is the relationship between Beneficiary and Client?
3. Please provide the source of wealth for these entities.

Thank you in advance for your prompt attention to this matter.

Best Regards/Mit freundlichen Grüßen,

PWM AML Compliance
Deutsche Bank
60 Wall St., 23 Floor
New York, NY 10005 - 2836
[redacted]
Fax: [redacted]

PLEASE NOTE: YOU ARE BEING CONTACTED BECAUSE YOU ARE LISTED AS THE PRIMARY OFFICER FOR THIS ACCOUNT ON GCIS. IF YOU ARE NOT THE CURRENT PRIMARY OFFICER, PLEASE LET ME KNOW IMMEDIATELY, SO THAT I MAY FORWARD THIS EMAIL TO

THE APPROPRIATE PARTY.

Do not forward this e-mail or any attachment directly to the client.