

Subject: Update : Case management on High Risk accounts [I]

From: Terri Sohrab <[REDACTED]>

Date: Thu, 23 Aug 2018 15:03:16 -0400

To: Thomas Klemm <[REDACTED]>

Cc: Daphne Cales <[REDACTED]> ,

Emily Craig <[REDACTED]> ,

Bradley Gillin <[REDACTED]> ,

Richard Iarossi <[REDACTED]> ,

Vinita Advani <[REDACTED]>

Bcc: [REDACTED] ,

Thomas,

Below please find an update on the pending high risk completions. My recommendation to process more quickly through the cases would be to request the following two exceptions from Compliance/KYC:

- Certificate of Good Standing - COGS should be required every 12-15 months. Requesting this certificate every six months is (1) costly to the client; (2) annoying; and (3) time consuming. What is the rational behind the 6 month request and how was that period of time chosen for this certification;

- FinCen - Once we provide evidence of requesting the FinCen form from the client, we should move the KYC to the next stage with a 60 day grace period to obtain them.

Updates in red below.

Khullar Relationship

- AMAAN HOLDINGS LLC – Due Date 06/29/2018 – Pending SoS for SAMRA Holdings Ltd (refer attached 1st email)

- HATTAN HOLDINGS LLC – DueDate 06/29/2018 – Pending SoS for SAMRA Holdings Ltd (refer attached 1st email)

- MARSА HOLDINGS LLC – DueDate 06/29/2018 – Pending SoS for SAMRA Holdings Ltd (refer attached 1st email)

- o Response from client, Deepak Khullar, on 8/9/18 – ‘SoS for Samra-

letter of good standing will have to be sourced from the registrars - CITCO and could take a week to ten days'

Jefferies Relationship:

- JCP IV QP, LLC – DueDate 06/30/2018 –
- o All outstanding KYC Docs received yesterday, pending review.

Cerberus Relationship:

- Cerberus Executive, LLC – DueDate 07/31/2018 – Awaiting docs as per attached 3rd email. I am aware that you have followed up with client on this, so thanks for that.
- o Working with Cerberus' Council. FinCEN Form, Certificate of Good Standings (within 6 months), and constitutional docs from 6 entities were requested.

Sillerman Relationship:

- Aircraft Acquisition Corporation – DueDate 08/03/2018 – Awaiting docs as per 4th email attached.
- Sillerman Investment Company III, LLC – DueDate 08/03/2018 – Awaiting docs as per 4th email attached.
- Tomorrow Foundation – DueDate 08/03/2018 – Pending CDD form as per attached 5th email attached.
- Elderberry X, LLC – DueDate 08/03/2018 – Pending CDD form as per attached 5th email attached.
- Sillerman Investment Corporation – DueDate 08/03/2018 – Awaiting docs as per 4th email attached.
- o Requested FinCEN forms from Sillerman – should receive tomorrow/early next week.

Southern Financial/Epstein Relationship:

- Epstein, Jeffrey E. – DueDate 08/08/2018 – Awaiting docs as per attached 5th email attached.

- Southern Financial LLC - DueDate 08/08/2018 – Awaiting docs as per attached 8th email attached.
- Southern Trust Company, Inc. - DueDate 08/08/2018 – Awaiting docs as per attached 5th email attached.
- J. Epstein Virgin Islands Foundation, Inc - DueDate 08/08/2018 – Docs & confirmation required as per attached 10th email
- GoldenTree Asset Management UK LLP- DueDate 08/09/2018 – Docs & confirmation required as per attached 11th email
- Gratitude America Ltd – DueDate 08/16/2018– Awaiting docs as per attached 6th email attached.
- Neptune, LLC – DueDate 08/16/2018 – Docs required as per attached 2nd email
- NES, LLC – DueDate 08/16/2018 – Docs & confirmation required as per attached 9th email.
- LSJE, LLC – DueDate 08/18/2018 – Awaiting docs as per attached 8th email attached.
- Hyperion Air, LLC – DueDate 08/18/2018 – Docs & confirmation required as per attached 10th email
- JEGE, Inc – DueDate 08/18/2018 – Awaiting confirmation & docs as per attached 7th email
- JEGE, LLC – DueDate 08/18/2018 – Awaiting confirmation & docs as per attached 7th email
- Plan D, LLC – DueDate 08/18/2018 – Docs & confirmation required as per attached 9th email.
- Jeepers, Inc - DueDate 08/18/2018 – Awaiting confirmation & docs as per attached 7th email
- Mort, Inc - DueDate 08/18/2018 – Awaiting docs as per attached 6th email attached.
- Zorro Management, LLC - DueDate 08/18/2018 – Awaiting docs as per attached 5th email attached.
- o [REDACTED] – DueDate 07/27/2018 – Docs required as per attached 2nd email
- o Certificate of Good Standing (within 6 months) requested for all above referenced entities.

From: Vinita Advani
Sent: Thursday, August 23, 2018 11:51 AM
To: Terri Sohrab <[REDACTED]>
Cc: Thomas Klemm <[REDACTED]>; Daphne Cales <[REDACTED]>;
Emily Craig <[REDACTED]>
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Classification: For internal use only

Hi Terri,

Trust you are doing well.

We were in a meeting with Thomas today. I thank you for sharing your feedback on Vijay.

The team is currently focusing on all High Risk cases due 2018 and have been instructed to complete all high risk cases due for the rest of the year.

Overview for your list of clients:

· Total High Risk Cases due 2018:	91	
· Work in progress:		52*
· Cases yet to be started:	27	

*52 cases – this is a mix of KYC's where we are awaiting information and rejected cases.

Considering volumes and to be able to meet targeted dates, I have reallocated these cases amongst other case managers within the team.

Along with Vijay these cases are now reassigned between 5 more Case managers (Alka, Mayur, Krupa, Priyanka and Lezal). They will be working closely with Vijay and will be reaching out for case reviews.

We thank you for your partnership and look forward to your support to complete these KYC's. Please feel free to reach out for any clarifications and information.

Have a great day!!!

Kind regards,

{cid:1__=C7BBF707DF9B04F18f9e8a93df9386909@db.com}

Vinita Advani

KYC Case Representative Manager

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