

Subject: RE: Southern Financial - KYC Docs. [I]
From: Martin Zeman <[REDACTED]>
Date: Thu, 19 Apr 2018 10:54:04 -0400
To: Zack Bunimovich <[REDACTED]>,
Nina Tona <[REDACTED]>
Cc: Liam Osullivan <[REDACTED]>,
Davide-A Sferrazza <[REDACTED]>,
Xavier Avila <[REDACTED]>,
Joshua Shoshan <[REDACTED]>

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Zack,

See attached the FATCA + CRS form. Three follow-up questions from the client:

- 1. Can we clarify the definition of 'Active NFE – other' versus 'Passive NFE' under Part 2 (b). The definition is not very clear to the client. They believe they are 'Active NFE – other' but want clarification
- 2. Can you say what happens with the information in this form? What does DB do with it and who is it reported to?
- 3. Do US Virgin Islands also fall under this reporting requirement?

On the other points, note the DOB of their legal reps are:

Darren Indyke [REDACTED]

Richard Kahn [REDACTED]

(see confirmation of this in the attached email from Richard Kahn)

Thanks

Martin

From: Zack Bunimovich
Sent: Wednesday, April 11, 2018 5:50 PM

To: Martin Zeman <[REDACTED]>; Nina Tona <[REDACTED]>
Subject: RE: Southern Financial - KYC Docs. [I]

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Hi Martin,

Verification asked for two more points of information – see below.

- DOB for the Legal Reps
 - o Darren K. Indyke
 - o Richard Kahn
- Clarification of the NOB.
 - o The NOB provided in the Articles of Organization and Operating Agreement is too vague. Please provide more detailed explanation of NOB.

Thanks,

Zack

From: Martin Zeman
Sent: Tuesday, April 10, 2018 1:28 PM
To: Zack Bunimovich <[REDACTED]>; Nina Tona <[REDACTED]>
Subject: RE: Southern Financial - KYC Docs. [I]

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Zack

See the attached email chain where we established that a FATCA form was not needed.

Martin

From: Zack Bunimovich
Sent: Monday, April 09, 2018 11:47 AM
To: Martin Zeman <[REDACTED]>; Nina Tona <[REDACTED]>
Subject: FW: Southern Financial - KYC Docs. [I]

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Hey Martin / Nina,

Southern Financial is with Verification but they noticed that we do not have a CRS Self Certification form on file anymore from previous onboardings. We are usually looking for something similar to the attached format, but it's possible that the client has provided this before and has their own template. Can this be requested from the client?

Thanks,

Zack

From: Anthony Lentini
Sent: Monday, April 09, 2018 10:51 AM
To: Zack Bunimovich <[REDACTED]>
Subject: Southern Financial - KYC Docs. [I]

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Hi Zack,

An update on Southern Financial, it is with Verification and they are reviewing right now. While they were going through their review they noticed that the CRS Self Cert file from a previous onboarding is no longer on file/- in the system.

Could you please send over a new CRS Self Cert so they can proceed with their review?

Apologies for the inconvenience.

Kind Regards,

{cid:1__=0FBBF1B8DFF0A9818f9e8a93df9386909@db.com}

Anthony Lentini

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