

Subject: RE: APPROVAL NEEDED: High Risk KYC Case 01651789 [I]  
From: Patrick Campion <[REDACTED]>  
Date: Fri, 14 Oct 2016 17:02:20 -0400  
To: Cynthia Rodriguez <[REDACTED]>  
Cc: Armen Brash <[REDACTED]>

Classification: For internal use only

Approved. Just to be accurate, the client was presented to RRC and cleared.

Kind regards,  
Patrick Campion

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{<https://brandportal.intranet.db.com/img/modules/logo.gif>}

Patrick Campion  
Managing Director | Head of Wealth Management Americas

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Wealth Management - Americas  
345 Park Avenue, 10154-0004 New York, NY, USA  
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From: Cynthia Rodriguez  
Sent: Friday, October 14, 2016 4:43 PM  
To: Patrick Campion  
Cc: Armen Brash  
Subject: APPROVAL NEEDED: High Risk KYC Case 01651789

Hello,

I am requesting Exco Approval for the Butterfly Trust, an existing trust here at DB, under the Jeffrey Epstein relationship. Mr. Epstein has replaced the beneficiaries to this trust, which is the reason for this KYC update.

RM Name

Stewart Oldfield

Business Line

US Onshore

GCIS # / KYC #

483290/ 01651789

New or Existing Relationship?

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

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.

Legal name of Account Holder(s)

Butterfly Trust

Name of UBO(s)

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

Jeffrey Epstein

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)

We are updating the beneficiaries to this existing trust account where Jeffrey Epstein is the grantor.

#### 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

No

Any negative media and/or court cases?

Include ALL negative media & court cases

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.

Kind regards,

Cynthia Rodriguez

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