

Subject: FW: Assistance Required in Resolving Rejection Points KYC # -  
[I]  
From: Bradley Gillin <[REDACTED]>  
Date: Tue, 11 Sep 2018 13:07:06 -0400  
To: Daphne Cales <[REDACTED]>

Classification: For internal use only

Daphne,

See below.

Regards,  
Brad

From: Vijay-A Sawant  
Sent: Tuesday, September 11, 2018 10:00 AM  
To: Bradley Gillin <[REDACTED]>; Stewart Oldfield  
<[REDACTED]>  
Cc: Richard Iarossi <[REDACTED]>; Mayur Rathod  
<[REDACTED]>  
Subject: RE: Assistance Required in Resolving Rejection Points KYC # -  
[I]  
Importance: High

Hi Brad,

As discussed, following is the excerpt regarding treatment of major donors in Foundation entities as per our latest KOP –

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As discussed, this donation was received in 2015, and there have been 2 KYC cases approved since then (2016 & 2017) which did not identify this donor, so we are checking internally on why is this EDR required now? I am waiting

for feedback from Daphne and I will get back to once I hear from her on this, thanks.

Kind Regards,

{cid:1\_\_=C7BBF707DF9B04F18f9e8a93df9386909@db.com}

Vijay Sawant

KYC Case Representative  
Deutsche CIB Centre Private Limited - Deutsche Bank Group  
Wealth Management  
B1, DB Centre Mumbai, Nirlon Knowledge Park, Western Express Highway  
Goregaon East, Mumbai - 400063 , India  
Tel. [REDACTED]  
Mobile + [REDACTED]  
[REDACTED]

From: Bradley Gillin  
Sent: Tuesday, September 11, 2018 6:23 PM  
To: Vijay-A Sawant <[REDACTED]>; Stewart Oldfield  
<[REDACTED]>  
Cc: Richard Iarossi <[REDACTED]>; Mayur Rathod  
<[REDACTED]>  
Subject: RE: Assistance Required in Resolving Rejection Points KYC # -  
[REDACTED] [I]

Classification: For internal use only

Hi Vijay,

Please send the KYC policy, specifically for a Foundation, regarding below.  
Thanks.

Kindly confirm whether this donation constitutes 10% or more of the Gratitude's total assets? If yes, we would require constitutional docs for BV70, LLC (i.e constitutional docs, formation docs, ownership details, etc)

Regards,  
Brad

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Bradley Gillin  
Vice President  
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345 Park Avenue, 24th Fl  
New York, NY 10154  
Tel. [REDACTED]  
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Email [REDACTED]

Securities offered through Deutsche Bank Securities Inc.

From: Vijay-A Sawant  
Sent: Monday, September 10, 2018 8:21 AM  
To: Stewart Oldfield <[REDACTED]>  
Cc: Bradley Gillin <[REDACTED]>; Richard Iarossi <[REDACTED]>; Mayur Rathod <[REDACTED]>  
Subject: Assistance Required in Resolving Rejection Points KYC # - [REDACTED]  
Importance: High

Good Morning Stewart,

We are in receipt of following rejection points for Gratitude America Ltd, see my comments in red fonts -

Your KYC has been rejected.

Case #: [REDACTED]

Relationship: SOUTHERN FINANCIAL RELATIONSHIP Customer Name: Gratitude America Ltd Customer Number: [REDACTED] Reason for Rejection: The case was not reviewed in its entirety due to the below issues. Once this has been resolved, we will review the case. This will now be treated as an EDR.

- 1) As per the 2015 Form 990 (attached to the KYC by AFC), BV70 LLC donated \$10MM to this foundation and thus making them a "significant Donor". We need to fully KYC this entity. Please provide the required documentation and information. – As per attached Form 990 (from 2015), we can see that entity BV70, LLC donated \$10 million to Gratitude. Kindly confirm whether this donation constitutes 10% or more of the Gratitude's total assets? If yes, we would require constitutional docs for BV70, LLC (i.e constitutional docs, formation docs, ownership details, etc)
- 2) Please provide ExCo approval as this is now an EDR. – Please provide since this is an EDR.
- 3) Please provide the FinCEN form. – If BV70, LLC is to be considered as UBO as per point 1, then revised CDD form required with updated section c.

To view the KYC click here [https://dbforcepb.my.salesforce.com/-\[REDACTED\]](https://dbforcepb.my.salesforce.com/-[REDACTED])

Thanks & Regards

{cid:1\_\_=C7BBF707DF9B04F18f9e8a93df9386909@db.com}

Vijay Sawant

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[REDACTED]

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Mayur Rathod

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