

Subject: RE: Epstein account opening [I]
From: Vahe Stepanian <[REDACTED]>
Date: Mon, 01 Feb 2016 08:57:39 -0500
To: Daniel Sabba <[REDACTED]>
Cc: Ariane Dwyer <[REDACTED]>

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Updated per your request:

Jeffrey E. Epstein was listed as initial president of Gratitude America Ltd, therefore, we wanted to make sure to go through the proper channels such that risk is mitigated from the bank's perspective. As per guidance from Wayne Salit (in AML) – the Southern Financial relationship can transact in existing accounts. If a new account is requested, our understanding is that we must bring the request to his team's attention for approval. Separately, when we reached out to PCS Middle Office to open the new Gratitude Pershing account, they flagged the request as "high risk" – ultimately requiring AML approval. Therefore, Wayne recommended a review by Reputational Risk Committee (RRC), who requested the updated Enhanced Due Diligence Report. The request for this report was sent to Paul for his signoff as Relationship Manager for Southern Financial LLC.

-----Original Message-----

From: Daniel Sabba
Sent: Friday, January 29, 2016 05:00 PM Eastern Standard Time
To: Vahe Stepanian; Ariane Dwyer
Subject: RE: Epstein account opening [I]

Please articulate an answer for me to send since you are in the weeds.

-----Original Message-----

From: Todd Stevens
Sent: Friday, January 29, 2016 01:59 PM Pacific Standard Time
To: Daniel Sabba
Subject: Fwd: Epstein account opening [I]

Thoughts? What is JE's role here?

Begin forwarded message:

From: Paul Morris <[REDACTED]>
Date: January 29, 2016 at 2:03:59 PM EST
To: Todd Stevens <[REDACTED]>
Subject: FW: Epstein account opening [I]

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Todd, so why are we doing this? This should be separate relationship

Paul Morris

Managing Director

Deutsche Bank Private Bank

[REDACTED]

[REDACTED]

From: Ariane Dwyer
Sent: Friday, January 29, 2016 1:59 PM
To: Paul Morris; Daniel Sabba
Cc: Todd Stevens; Vahe Stepanian; Mark Frankel
Subject: RE: Epstein account opening [I]

Hi Paul,

That is correct.

Best,

Ari

From: Paul Morris
Sent: Friday, January 29, 2016 1:54 PM
To: Ariane Dwyer; Daniel Sabba
Cc: Todd Stevens; Vahe Stepanian; Ariane Dwyer; Mark Frankel
Subject: RE: Epstein account opening [I]

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So Ari we confirmed that JE is not an officer and not source of funding of this foundation correct? I'll look at form you sent over now. thx

From: Daniel Sabba
Sent: Tuesday, January 26, 2016 1:18 PM
To: Paul Morris
Cc: Todd Stevens; Vahe Stepanian; Ariane Dwyer; Mark Frankel
Subject: RE: Epstein account opening [I]

Paul, thank you for your note. We just double checked and Gratitude America's formation docs lists JE as president and the entity's KYC lists JE as source of funds. Please complete the request form whenever possible – Ari can help. Thank you, Daniel

From: Paul Morris
Sent: Tuesday, January 26, 2016 12:59 PM
To: Daniel Sabba
Cc: Todd Stevens; Vahe Stepanian; Ariane Dwyer; Mark Frankel
Subject: RE: Epstein account opening [I]

Daniel, isn't Gratitude America a 501-3c? Epstein is not an officer of this and don't think was funded with his \$. I'll be back in NY Thursday. If we still need to do the external due diligence on this one let me know and I can do over the phone with Ari and you can submit. Thanks

-----Original Message-----

From: Daniel Sabba
Sent: Monday, January 25, 2016 04:40 PM Eastern Standard Time
To: Daniel Sabba; Paul Morris

Cc: Todd Stevens; Vahe Stepanian; Ariane Dwyer; Mark Frankel
Subject: RE: Epstein account opening [I]

Hi Paul – I hope all is well. We wanted to circle back on this form. Thank you, Daniel

From: Daniel Sabba
Sent: Thursday, January 21, 2016 3:37 PM
To: Paul Morris
Cc: Todd Stevens; Vahe Stepanian; Ariane Dwyer; Mark Frankel
Subject: RE: Epstein account opening [I]

Paul – I am CCing Mark Frankel, who is the best person to answer any questions on this document, as it was produced by his division.

Mark, can you please connect with Paul Morris with regards to his questions?

Best regards,

Daniel

From: Paul Morris
Sent: Thursday, January 21, 2016 3:13 PM
To: Daniel Sabba
Cc: Todd Stevens; Vahe Stepanian; Ariane Dwyer
Subject: RE: Epstein account opening [I]

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Daniel, can you or Todd please call me to explain this document? Thanks

Paul Morris

Managing Director

Deutsche Bank Private Bank

[REDACTED]

[REDACTED]

From: Daniel Sabba
Sent: Thursday, January 21, 2016 11:03 AM
To: Paul Morris
Cc: Todd Stevens; Vahe Stepanian; Ariane Dwyer
Subject: Epstein account opening

Paul,

Per our conversation, the reputational risk committee has requested an external due diligence report as a step towards the approval for opening an account for Gratitude America. This report takes about eight business days to be completed, but we need you to please complete the attached request form to get it started.

The committee has informed us DB personnel cannot disclose to the client this matter is being evaluated for reputation matters. They have asked that, when inquired, we communicate to the client "we are in the process of internal due diligence to review the opening of this account, as it is done with all new accounts".

Ari can help fill in any information you need in this form.

Thank you in advance,

Daniel

Daniel Sabba

Deutsche Bank Securities Inc.

[REDACTED]

[REDACTED]

Email [REDACTED]