

Request for Research Enhanced Due Diligence

Please read carefully before proceeding with the request

Terms of Use

Prior to submission of the REDD request the sponsor(s) must demonstrate that existing internal Bank enquires and processes have been followed e.g. KYC and/or an event driven reviews.

Reports must not be released to potential investors or third parties
Submission of the request does not automatically initiate a request to a vendor

On receipt of the request the CSBC case officer will assess against internal criteria

As part of this process, further contact with the sponsor(s) may be necessary

On receipt of the final vendor report, it is strongly advised that the sponsor makes contact with the case officer as soon as practical to discuss any additional related requirements

Follow on requests must be submitted at least 7 days prior to the due date

Definitions

Category 1: Research Enhanced Due Diligence – this level of research is primarily focused on open source internet and public records that may be available depending on the territory. In some cases, internet searches may be limited.

Category 2: Research Enhanced Due Diligence – This level of research includes the previous level and may in some cases require physical inquiries at public records offices. This may require engagement with an external vendor.

Category 3: Research Enhanced Due Diligence – This level of research will involve elements of the above categories in addition to enhanced inquiries by the Due Diligence vendor. Due to the nature of this research and the requirement to be fully compliant with local laws, legal oversight is necessary. It is strongly advised that the sponsor discusses their requirements prior to moving to this level of research. This should involve engagement with the local legal office, together with a robust justification.

Sponsor to Complete

Section 1 – About the Sponsor

Primary contact for request

Name Paul Morris
Office Telephone Number [REDACTED]
Email Address [REDACTED]
Line Manager Andrew Gallivan
Business Unit Wealth Management
Country United States
City New York

Secondary contact for request

Name Click here to enter text.
Office Telephone Number Click here to enter text.
Email Address Click here to enter text.
Line Manager Click here to enter text.
Business Unit Click here to enter text.
Country Click here to enter text.
City Click here to enter text.

Section 2 – About the Subject

Request : Choose an item.

Category 2: Research Enhanced Due Diligence

Business Approval Levels:

- x Category 1 - Director (D) and above
- Category 2 - Director (D) and above
- Category 3 –Managing Director (MD)

Business justification:

The sponsor should clearly state why the request is 'proportionate, necessary and legal'

Check required by Americas Reputational Risk Committee in order to open new account

Business / Other DB references:

-
Cost Centre to charge:
6420128841

Is this request linked to a previous REDD request: No
Reference Number: Type Here
Subject(s)

Subjects / entities to the REDD request
Provide a complete set of information as laid out below

Number of Subject(s) 2

Subject / Entity Name Jeffrey Epstein
Subject Date of Birth 1/20/1953
Subject Nationality USA
Subject Company Name Southern Financial LLC
Known business influence / exposure Type Here
Location - Country Virgin Islands
Location - City St. Thomas
Location - Address 6100 Red Hook QTRS STE B-3

Subject / Entity Name Gratitude America, LTD
Subject / Entity Alias(s) Type Here
Subject Date of Birth Incorporated 4/25/2012
Subject Nationality Type Here
Subject Company Name Type Here
Known business influence / exposure Type Here
Location - Country U.S. Virgin Islands
Location - City Port of Sale
Location - Address 9100 Havensight

Subject / Entity Name Type Here
Subject / Entity Alias(s) Type Here
Subject Date of Birth Type Here
Subject Nationality Type Here
Subject Company Name Type Here
Known business influence / exposure Type Here
Location - Country Type Here
Location - City Type Here
Location - Address Type Here

Scope

Does the Subject have a current business relationship with the Bank?
Yes, Jeffrey Epstein is a Wealth Management Client. Jeffrey founded Gratitude America LTD, a foundation, which also has an account opened in the Private Bank

If Yes, please specify with whom?

Paul Morris, Daniel Sabba

Please provide details of the existing KYC findings for this relationship
KYC attached

What is the nature of the proposed transaction with the Subject(s)?

Jeffrey Epstein has requested we open a brokerage account for Gratitude America LTD

Is this request in relation to a perceived adverse matter?

The Americas Reputational Risk Committee has requested the check

If Yes, please detail the known or perceived adverse matter

Type Here

Please detail how the information became known to the business

Type Here

Have any of the subjects been made aware of or provided consent in relation to this request?

No

Please provide details of where this is recorded and provide a copy

Type Here

Are there any special or sensitive circumstances surrounding this request?

Type Here

Please outline the scope of the request

Type Here

Approval

Business Requestor Name Requestor

Business Approver Name Approver

Please attach any supporting documents with this request

Acceptance of Conditions (All levels – Cat 3 must be Managing Director Level)

Please note – only category 3 requests require consent of the subject / entity (dependant on the territory data protection laws and views of the local legal authority), however it is strongly advised to check whether the subject / entity has provided consent generally when they engaged with the business. This may prevent delays at a later stage, specifically where a Cat 1 request escalates to a Cat 3.

“I confirm that the information provided is accurate and relation to lawful business purposes. As the sponsor I confirm that enquiries have been made to identify and / or obtain documents to support this request, specifically any authority provided by the subject(s) and / or entities in relation to the Bank conducting such research in relation to them.

Where the request is for Category 3, I can confirm that the necessary consent has been provided by the subject of the research and documents are available to be reviewed as part of the pre-screening process.

I am aware of my obligations in relation to security of information and the non-release of any product / research outside of the Bank. I can confirm that the request is necessary in the interest of Deutsche Bank and I am aware of my obligations in relation to data privacy and compliance with local laws that may span multiple territories. Breach of country laws may expose the Bank to reputational damage and / or pose a risk of fine and / or imprisonment.

It is strongly advised that the sponsor / requestor engages with their legal counsel prior to submission of a CAT 3 request particularly where the matter relates to a complex transaction and / or spans multiple jurisdictions.

Please attach the electronic approval from the subject with this request

I have read the above statements and confirm this to be true and correct

Next Steps: Save this document and sent it to the relevant CSBC contact

For CSBC use only

Internal Ref [Click here to enter text.](#)

Internal Audit

Have all mandatory areas been completed with sufficient and accurate detail?
Choose an item.

Have internal checks been completed and evidenced that justify request for REDD. (KYC, etc)?
Choose an item.

Have all electronic copies of notifications been included with the request:
Choose an item.

Have all approvals been obtained, and are they appropriately indicated on the request (and are they accompanied by the relevant electronic email approvals)?
Choose an item.

Has business reconciled outstanding PO's
Choose an item.

Referred to RISAG:
Choose an item.

Referral Date / Time [Click here to enter a date.](#)
Persons Referred To [Click here to enter text.](#)

Evidence (electronic copy of email)

Next Steps: Save this document and send it to the appropriate authority

FOR RISAG USE ONLY

Part 1

Approver [Click here to enter text.](#)

Date [Click here to enter a date.](#)

Limitations / conditions

[Click here to enter text.](#)

Request Approval Status:
Choose an item.

Justification (Required)
[Click here to enter text.](#)

Part 2

Exceptional requirements post results
[Click here to enter text.](#)

For internal use only

For internal use only

For internal use only

As part of this process it may be necessary to consult with your local legal office to fully understand any data privacy and / or local law limitations. A Category 3 check will automatically generate a Legal check through an established process.

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