Subject: RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]
From: Dmitri Saks <dmitri.saks@db.com>
Date: Tue, 23 Dec 2014 09:31:44 -0500
To: Wayne Salit <wayne.salit@db.com>
Cc: Carlos-A Garcia <carlos-a.garcia@db.com>,
Jan Bornebusch <jan.bornebusch@db.com>

Classification: For internal use only

Hi Wayne,

The correct spelling of Courteney's last name is Fornal. She is Director and Registered Principal for the deal. Courteney is on vacation, but she's checking her email and would be available for a chat. Jan and I actually spoke with her a few days ago on a separate topic. I don't believe she's high enough for our purposes but we could definitely start with her.

The Managing Director for this business is William Shelton. He's out on an MTA and this is his out-of-office message: "I am on my mandatory time away with no access to e-mail. I will be

back in the office on Friday, January 2nd. For immediate assistance, please call the desk at (212) 250-4940. For emergencies, my mobile number is (917) 913-4868."

The ultimate head of the Business is Ted Gonedes, Global Head of Equity Derivatives Sales for CB&S Markets (sits here in NY). He's also on an MTA and will be back next Monday, December 29.

Thanks and regards,
Dmitri

{cid:image002.png@01D01E93.4277AEF0}

Dmitri Saks
AML Compliance Officer

Deutsche Bank Securities Inc.
60 Wall Street, New York, NY 10005-2836

Tel: +1 (212) 250-4760
E-mail: dmitri.saks@db.com

{cid:image002.gif@01CFDCA6.64B2B930}

From: Carlos-A Garcia
Sent: Tuesday, December 23, 2014 8:15 AM
To: Wayne Salit
Cc: Carlos-A Garcia; Dmitri Saks
Subject: FW: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

Hello Wayne,

From the information listed below, it appears that Courteney B Formal is the head for this request.

Kind regards,

Carlos Garcia

From: Carlos-A Garcia On Behalf Of US-CB S-AML
Sent: Tuesday, December 23, 2014 8:13 AM
To: Carlos-A Garcia
Subject: Fw: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

----- Forwarded by Carlos-A Garcia/db/dbcom on 12/23/2014 08:12 AM -----

{cid:image001.png@01D01E88.865A3A30}

From:

{cid:image002.png@01D01E88.865A3A30}
Courteney B Fornal/db/dbcom@DBCOEX

{cid:image001.png@01D01E88.865A3A30}

To:

{cid:image002.png@01D01E88.865A3A30}
Anastasia Pringle/db/dbcom, US-CB S-AML/db/dbcom@DBAMERICAS, Mark Whyman/db/-dbcom,

{cid:image001.png@01D01E88.865A3A30}

Cc:

{cid:image002.png@01D01E88.865A3A30}
Ged Account-Opening/db/dbcom@DBAmericas, Manikandan Muralidharan/db/-dbcom@DBAPAC

{cid:image001.png@01D01E88.865A3A30}

Date:

{cid:image002.png@01D01E88.865A3A30}
12/22/2014 05:42 PM

{cid:image001.png@01D01E88.865A3A30}

Subject:

{cid:image002.png@01D01E88.865A3A30}
Re: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For Internal Use Only

Anastasia, that would be me. What is the issue?
https://ederivatives.db.com/static/disclaimer.html

From: Anastasia Pringle
Sent: Monday, December 22, 2014 05:23 PM
To: US-CB S-AML; Courteney B Fornal; Mark Whyman
Cc: Ged Account-Opening; Manikandan Muralidharan
Subject: RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only
Courteney/Mark,

Who is the head of the business for this request.

Thanks

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

Kind Regards,

Mrs. Anastasia Pringle

Deutsche Bank Securities Inc.
Client Onboarding Equities
5022 Gate Parkway, Suite 500, 32256 Jacksonville, FL, USA
Tel. +1(904)527-6168
Fax (904)746-4889
Email anastasia.pringle@db.com

Please send all GED related emails to: Ged.account-opening@db.com

{https://brandportal.intranet.db.com/img/modules/claim.gif}

From: Dmitri Saks On Behalf Of US-CB S-AML
Sent: Monday, December 22, 2014 5:18 PM
To: Anastasia Pringle
Cc: Ged Account-Opening; Manikandan Muralidharan; US-CB S-AML
Subject: RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

Hello Anastasia,

Could you please help to identify the Head of the Business through which this client is being onboarded. AML Compliance needs to have a discussion prior to approving this account.

Thank you.

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US CB&S AML Compliance
AML Compliance

Deutsche Bank Securities Inc.
Compliance

{cid:image004.gif@01D01E0B.CE2B92A0}

{Inactive hide details for Anastasia Pringle---12/22/2014 10:43:18 AM---Classification: For internal use only Good morning,}Anastasia Pringle---12/22/2014 10:43:18 AM---Classification: For internal use only Good morning,

{cid:image014.png@01D01E0C.039E9630}

From:

{cid:image015.png@01D01E0C.039E9630}
Anastasia Pringle/db/dbcom@DBCOEX

{cid:image014.png@01D01E0C.039E9630}

To:

{cid:image015.png@01D01E0C.039E9630}
US-CB S-AML/db/dbcom@DBAMERICAS,

{cid:image014.png@01D01E0C.039E9630}

Cc:

{cid:image015.png@01D01E0C.039E9630}
Ged Account-Opening/db/dbcom@DBAmericas, Manikandan Muralidharan/db/-dbcom@DBAPAC

{cid:image014.png@01D01E0C.039E9630}

Date:

{cid:image015.png@01D01E0C.039E9630}
12/22/2014 10:43 AM

{cid:image014.png@01D01E0C.039E9630}

Subject:

{cid:image015.png@01D01E0C.039E9630}
RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only
Good morning,

Do we have an update on the below request.

Thanks

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

Kind Regards,

Mrs. Anastasia Pringle

Deutsche Bank Securities Inc.
Client Onboarding Equities
5022 Gate Parkway, Suite 500, 32256 Jacksonville, FL, USA
Tel. +1(904)527-6168
Fax (904)746-4889

Email anastasia.pringle@db.com

Please send all GED related emails to: Ged.account-opening@db.com

{https://brandportal.intranet.db.com/img/modules/claim.gif}

From: Dmitri Saks On Behalf Of US-CB S-AML
Sent: Friday, December 19, 2014 3:03 PM
To: Anastasia Pringle
Cc: Ged Account-Opening; Manikandan Muralidharan; US-CB S-AML
Subject: RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

Anastasia,

The case has been submitted to the next level of approval.

Thank you,

{cid:image003.gif@01D01DD4.0DBF56A0}

US CB&S AML Compliance
AML Compliance

Deutsche Bank Securities Inc.
Compliance

{cid:image004.gif@01D01DD4.0DBF56A0}

{Inactive hide details for Anastasia Pringle---12/19/2014 02:43:57 PM---Classification: For internal use only Hi Dmitri,}Anastasia Pringle---12/19/2014 02:43:57 PM---Classification: For internal use only Hi Dmitri,

{cid:image006.png@01D01DD4.0DBF56A0}

From:

{cid:image007.png@01D01DD4.0DBF56A0}
Anastasia Pringle/db/dbcom@DBCOEX

{cid:image006.png@01D01DD4.0DBF56A0}

To:

{cid:image007.png@01D01DD4.0DBF56A0}

Manikandan Muralidharan/db/dbcom@DBAPAC, Dmitri Saks/db/dbcom,

{cid:image006.png@01D01DD4.0DBF56A0}

Cc:

{cid:image007.png@01D01DD4.0DBF56A0}
Ged Account-Opening/db/dbcom@DBAmericas, US-CB S-AML/db/dbcom@DBAMERICAS

{cid:image006.png@01D01DD4.0DBF56A0}

Date:

{cid:image007.png@01D01DD4.0DBF56A0}
12/19/2014 02:43 PM

{cid:image006.png@01D01DD4.0DBF56A0}

Subject:

{cid:image007.png@01D01DD4.0DBF56A0}
RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only
Hi Dmitri,

Can you please advise on the current status?

Thanks

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

Kind Regards,

Mrs. Anastasia Pringle

Deutsche Bank Securities Inc.
Client Onboarding Equities
5022 Gate Parkway, Suite 500, 32256 Jacksonville, FL, USA
Tel. +1(904)527-6168
Fax (904)746-4889
Email anastasia.pringle@db.com

Please send all GED related emails to: Ged.account-opening@db.com

{https://brandportal.intranet.db.com/img/modules/claim.gif}

From: Manikandan Muralidharan
Sent: Friday, December 19, 2014 10:32 AM
To: Dmitri Saks
Cc: Ged Account-Opening; US-CB S-AML; Anastasia Pringle
Subject: Fw: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

Hi Dmitri,

We have got the alert review for the RDC alert received on Richard Kahn. During the alert review, we have found that these alerts are false positive.

Please refer to the below mail with regard to Alert review for your reference.

Please let us know, if anything is required from our end.

Thanks and Regards,
Manikandan Muralidharan

{cid:image001.gif@01D01B9A.2E284910}

Manikandan Muralidharan
U S - New Client Adoption

DBOI Global Services Private Limited
Block 5, 6, 7, Velankani Tech Park, No.:43, Electronic City, Hosur Road, 560100 Bangalore, India
Tel. +44(207)5411002
Mobile +91 8050027747
Email manikandan.muralidharan@db.com

Backup details -

Ganesh Balaji (ganesh.balaji@db.com)
Bharath-Kumar MS (bharath-kumar.ms@db.com)

For Escalations please contact
Level 1 - Karthik (karthik-x.k@db.com)
Level 2 - Balaji (balaji-k.v@db.com)/Kumud (kumud.sharma@db.com)

{cid:image002.gif@01D01B9A.2E284910}

----- Forwarded by Manikandan Muralidharan/db/dbcom on 12/19/2014 08:53 PM

{cid:image003.png@01D01B9A.2E284910}

From:

{cid:image004.png@01D01B9A.2E284910}
Syed-Anzar Ahmed/db/dbcom

{cid:image003.png@01D01B9A.2E284910}

To:

{cid:image004.png@01D01B9A.2E284910}
Manikandan Muralidharan/db/dbcom@DBAPAC,

{cid:image003.png@01D01B9A.2E284910}

Cc:

{cid:image004.png@01D01B9A.2E284910}
CAGNY NCA/db/dbcom@DBAmericas, Suresh-x Salimath/db/dbcom@DBAMERICAS,
Anantesh Anand/db/dbcom@DBAMERICAS

{cid:image003.png@01D01B9A.2E284910}

Date:

{cid:image004.png@01D01B9A.2E284910}
12/19/2014 08:42 PM

{cid:image003.png@01D01B9A.2E284910}

Subject:

{cid:image004.png@01D01B9A.2E284910}
Re: Fw: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name :

Southern Financial LLC - RDC alert Review - Very Urgent [I]

Classification: For internal use only

Hello All,

Please find the details below:

NO ESCALATION REQUIRED

1) Richard Kahn

Alert #1:

Alert is False Positive. Mismatch Individuals. Our client name is Richard Kahn who is controlling person of Southern Financial LLC. Whereas, Alerted Individual name is Richard Jeffrey Kahn who is Wells Fargo Employee and was fined for unregistered activity.

http://www.bizjournals.com/southflorida/search?-q=%22Jeffrey+Kahn%22&title=%3Fiframe%3Dtrue&width=95%25&height=95%25+title%3-D+title%3D+title%3D+title%3D%20title=

Alert #2:

Alert is False Positive. Mismatch Individuals. Alerted Individual Name is Richard Kahn who violated NYSE Arca Equities Rule by failing to provide testimony as requested by FINRA.

https://www.google.co.in/url?url=https://www.nyse.com/pdfs/12-ARCA-3.pdf&rct=j&frm=1&q=&esrc=s&sa=U&ei=MD6UVIedDsWPuAT924DoCQ&ved=0CBMQFjA-A&usg=AFQjCNH6TerGChaK_BRHqY5DUNOCAX7ziw

Alert #3:

Alert is False Positive. Alerted Individual Richard L Kahn is not related to any entity and is a drug dealer as per internal research. Hence no escalation required.

NOTE: PCR is NO HIT

Kind regards,

{cid:image001.gif@01D01B9A.2E284910}

Syed-Anzar Ahmed
Process Supervisor | COB - RDC LOOKBACK TEAM

DBOI Global Services Private Limited
Global Business Services
VTP,Electronic City, Hosur Road, 560100 Bangalore, India
Tel. +44-20-77795539
Mobile +91 8050736279
Email syed-anzar.ahmed@db.com

{cid:image002.gif@01D01B9A.2E284910}

{Inactive hide details for Manikandan Muralidharan---12/19/2014 08:23:07 PM---Classification: For internal use only Hi Team, Req}Manikandan Muralidharan---12/19/2014 08:23:07 PM---Classification: For internal use only Hi Team, Request you review the RDC hit received on "Richard K

{cid:image003.png@01D01B9A.2E284910}

From:

{cid:image004.png@01D01B9A.2E284910}
Manikandan Muralidharan/db/dbcom

{cid:image003.png@01D01B9A.2E284910}

To:

{cid:image004.png@01D01B9A.2E284910}
CAGNY NCA/db/dbcom@DBAmericas,

{cid:image003.png@01D01B9A.2E284910}

Cc:

{cid:image004.png@01D01B9A.2E284910}
Syed-Anzar Ahmed/db/dbcom@DBAPAC, Suresh-x Salimath/db/dbcom@DBAMERICAS, Jofin Varghese/db/dbcom@DBAMERICAS, Sagar Prakash/db/dbcom@DBAMERICAS, Kameshwaran Ns/db/dbcom@DBAPAC, Anantesh Anand/db/dbcom@DBAMERICAS

{cid:image003.png@01D01B9A.2E284910}

Date:

{cid:image004.png@01D01B9A.2E284910}
12/19/2014 08:23 PM

{cid:image003.png@01D01B9A.2E284910}

Subject:

{cid:image004.png@01D01B9A.2E284910}
Fw: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC - RDC alert Review - Very Urgent [I]

Classification: For internal use only

Hi Team,

Request you review the RDC hit received on "Richard Kahn, one of the board of director of Parent entity, Southern Trust Company Inc.

(See attached file: Additional AML checks on Parent entity, board of director.pdf)

Additional document

(See attached file: 5 - SFLLC UBO.PDF)

Thanks and Regards,
Manikandan Muralidharan

{cid:image001.gif@01D01B9A.2E284910}

Manikandan Muralidharan
U S - New Client Adoption

DBOI Global Services Private Limited
Block 5, 6, 7, Velankani Tech Park, No.:43, Electronic City, Hosur Road,
560100 Bangalore, India
Tel. +44(207)5411002
Mobile +91 8050027747
Email manikandan.muralidharan@db.com

Backup details -
Ganesh Balaji (ganesh.balaji@db.com)
Bharath-Kumar MS (bharath-kumar.ms@db.com)

For Escalations please contact
Level 1 - Karthik (karthik-x.k@db.com)
Level 2 - Balaji (balaji-k.v@db.com)/Kumud (kumud.sharma@db.com)

{cid:image002.gif@01D01B9A.2E284910}

----- Forwarded by Manikandan Muralidharan/db/dbcom on 12/19/2014 08:13 PM

{cid:image003.png@01D01B9A.2E284910}

From:

{cid:image004.png@01D01B9A.2E284910}
Anastasia Pringle/db/dbcom@DBCOEX

{cid:image003.png@01D01B9A.2E284910}

To:

{cid:image004.png@01D01B9A.2E284910}
Dmitri Saks/db/dbcom,

{cid:image003.png@01D01B9A.2E284910}

Cc:

{cid:image004.png@01D01B9A.2E284910}
Ged Account-Opening/db/dbcom@DBAmericas, US-CB S-AML/db/dbcom@DBAMERICAS,
Manikandan Muralidharan/db/dbcom@DBAPAC

{cid:image003.png@01D01B9A.2E284910}

Date:

{cid:image004.png@01D01B9A.2E284910}
12/19/2014 08:01 PM

{cid:image003.png@01D01B9A.2E284910}

Subject:

{cid:image004.png@01D01B9A.2E284910}
RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only
Hello Dmitri,

Please see the background checks for the additional 2 CP’s.

Please give an update to this request as soon as you can.

Thank you

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

Kind Regards,

Mrs. Anastasia Pringle

Deutsche Bank Securities Inc.
Client Onboarding Equities
5022 Gate Parkway, Suite 500, 32256 Jacksonville, FL, USA
Tel. +1(904)527-6168
Fax (904)746-4889
Email anastasia.pringle@db.com

Please send all GED related emails to: Ged.account-opening@db.com

{https://brandportal.intranet.db.com/img/modules/claim.gif}

From: Dmitri Saks
Sent: Thursday, December 18, 2014 1:23 PM
To: Anastasia Pringle
Cc: Ged Account-Opening; US-CB S-AML; Manikandan Muralidharan
Subject: RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only
Anastasia,

Thank you, this is helpful. However, a proof of appointment of the Board of Southern Trust Company, Inc. (Jeffrey Epstein, Darren K. Indyke, Richard Kahn) is still required. This is because they signed the UBO confirmation document stating that Mr. Epstein is the sole shareholder of Southern Trust Company, Inc.

Also, Darren K. Indyke and Richard Kahn need to be identified as control persons in addition to Jeffrey Epstein, and the PCR/RDC checks for them need to be run and documented. This is because they control Southern Trust Company, Inc. which is the sole member of Southern Financial LLC.

Thanks and regards,
Dmitri

{cid:image001.png@01D01AC5.CCEC44A0}

Dmitri Saks
AML Compliance Officer

Deutsche Bank Securities Inc.
60 Wall Street, New York, NY 10005-2836
Tel: +1 (212) 250-4760
E-mail: dmitri.saks@db.com

{cid:image002.gif@01CFDCA6.64B2B930}

From: Anastasia Pringle
Sent: Thursday, December 18, 2014 12:24 PM
To: Manikandan Muralidharan; Dmitri Saks
Cc: Ged Account-Opening
Subject: RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]
Importance: High

Classification: For internal use only
Mani/Dmitri

Please see the attached documents.

Please advise if there is anything additional needed.

Hi Anastasia,

Per your request, please find attached the following:

1) Southern Trust: All incorporation documents
2) Southern Financial: Operating Agreement and incorporation documents

In each document package, please disregard the DB PWM brokerage account documents, as they are not relevant. Please reach out with any further questions. Thank you.

Thanks

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

Kind Regards,

Mrs. Anastasia Pringle

Deutsche Bank Securities Inc.
Client Onboarding Equities
5022 Gate Parkway, Suite 500, 32256 Jacksonville, FL, USA
Tel. +1(904)527-6168
Fax (904)746-4889
Email anastasia.pringle@db.com

Please send all GED related emails to: Ged.account-opening@db.com

{https://brandportal.intranet.db.com/img/modules/claim.gif}

From: Manikandan Muralidharan
Sent: Wednesday, December 17, 2014 2:36 PM
To: Anastasia Pringle
Cc: Ged Account-Opening
Subject: Fw: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

Hi Anastasia,

As advised by AML Compliance in the below mail, we would be requiring a revised ownership confirmation to proceed further with the adoption of the captioned entity, Southern Financial LLC.

Request you to help us obtain the same.

Thanks and Regards,
Manikandan Muralidharan

{cid:image001.gif@01D01ABD.8637A840}

Manikandan Muralidharan
U S - New Client Adoption

DBOI Global Services Private Limited
Block 5, 6, 7, Velankani Tech Park, No.:43, Electronic City, Hosur Road, 560100 Bangalore, India
Tel. +44(207)5411002
Mobile +91 8050027747
Email manikandan.muralidharan@db.com

Backup details -
Ganesh Balaji (ganesh.balaji@db.com)
Bharath-Kumar MS (bharath-kumar.ms@db.com)

For Escalations please contact
Level 1 - Karthik (karthik-x.k@db.com)
Level 2 - Balaji (balaji-k.v@db.com)/Kumud (kumud.sharma@db.com)

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----- Forwarded by Manikandan Muralidharan/db/dbcom on 12/18/2014 01:00 AM -----

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From:

{cid:image004.png@01D01ABD.8637A840}
Dmitri Saks/db/dbcom@DBCOEX

{cid:image003.png@01D01ABD.8637A840}

To:

{cid:image004.png@01D01ABD.8637A840}
Jofin Varghese/db/dbcom@DBAMERICAS,

{cid:image003.png@01D01ABD.8637A840}

Cc:

{cid:image004.png@01D01ABD.8637A840}
CAGNY NCA/db/dbcom@DBAmericas, Manikandan Muralidharan/db/dbcom@DBAPAC, Sujith Shetty/db/dbcom@DBAMERICAS, US-CB S-AML/db/dbcom@DBAMERICAS, Anastasia Pringle/db/dbcom, Kumud Sharma/db/dbcom@DBAPAC

{cid:image003.png@01D01ABD.8637A840}

Date:

{cid:image004.png@01D01ABD.8637A840}
12/17/2014 10:08 PM

{cid:image003.png@01D01ABD.8637A840}

Subject:

{cid:image004.png@01D01ABD.8637A840}
RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

Jofin,

Please note that the provided Board resolution is the document of Southern Trust Company, Inc., and not Southern Financial LLC. Therefore, the following key statements made within the document will need to be validated:

· “Epstein is also the sole shareholder of Corporation” (i.e., Southern Trust Company, Inc.), and
· “the Corporation is the sole member of Southern Financial LLC”

In order to validate the above, please provide the following supporting documentation:

· For Southern Trust Company, Inc.: proof of incorporation/formation and proof of appointment of the board of directors. You will also need to identify the board members as control persons for this account since they would be controlling Southern Financial LLC through Southern Trust Company, Inc. PCR/RDC searches would also be required.
· For Southern Financial LLC: Operating Agreement or other valid proof that Southern Trust Company, Inc. is the sole member of Southern Financial LLC.

Alternatively, as I stated before, you can provide a letter/email from an internal or external legal counsel stating that Mr. Epstein is the sole UBO of Southern Financial LLC.

Thanks and regards,
Dmitri

____

{cid:image006.png@01D019ED.471ED190}

Dmitri Saks
AML Compliance Officer

Deutsche Bank Securities Inc.
60 Wall Street, New York, NY 10005-2836
Tel: +1 (212) 250-4760
E-mail: dmitri.saks@db.com

{cid:image002.gif@01CFDCA6.64B2B930}

From: Jofin Varghese
Sent: Wednesday, December 17, 2014 10:36 AM
To: Dmitri Saks
Cc: CAGNY NCA; Manikandan Muralidharan; Sujith Shetty; US-CB S-AML; Anastasia Pringle; Kumud Sharma
Subject: RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

HI Dmitri,

The UBO is the sole controlling person of our entity however the Board of Directors who executed the operating agreement are the part of the Parent company. We have Considered the confirmation from the BOD of the parent entity which is an independent execution. While the procedure indicated to accept the UBO confirmation provided by the board of director either through an client email or Letter head or formal legal agreements. Kindly provide your view on the same

Kind regards,
Jofin Varghese

Client Onboarding - NY CAG
DBOI Global Services Private Limited
IB operations
Velankani Tech park, No 43, Electronic City, Hosur Road,, 560100 Bangalore, India
Tel. Mobile +91 953853 9721
Email jofin.varghese@db.com
Escalation Point: christy.raj@db.com
Back Up:sagar.prakash@db.com, anantesh.anand@db.com

{Inactive hide details for Dmitri Saks---12/17/2014 08:30:54 PM---Classification: For internal use only Hi Jofin,}Dmitri Saks---12/17/2014 08:30:54 PM---Classification: For internal use only Hi Jofin,

{cid:image007.png@01D019ED.2DECC6A0}

From:

{cid:image016.png@01D019ED.2DECC6A0}

Dmitri Saks/db/dbcom@DBCOEX

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To:

{cid:image016.png@01D019ED.2DECC6A0}
Jofin Varghese/db/dbcom@DBAMERICAS,

{cid:image007.png@01D019ED.2DECC6A0}

Cc:

{cid:image016.png@01D019ED.2DECC6A0}
CAGNY NCA/db/dbcom@DBAmericas, Manikandan Muralidharan/db/dbcom@DBAPAC, Sujith Shetty/db/dbcom@DBAMERICAS, US-CB S-AML/db/dbcom@DBAMERICAS

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Date:

{cid:image016.png@01D019ED.2DECC6A0}
12/17/2014 08:30 PM

{cid:image007.png@01D019ED.2DECC6A0}

Subject:

{cid:image016.png@01D019ED.2DECC6A0}
RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

Hi Jofin,

As stated in the attached, Jeffrey Epstein is the only control person, hence the "conflict of interest supposition" still exists. Besides, the supplied Board of Directors paper is neither notarized/witnessed/certified nor represents a formal filing document. In other words, it is not a strong legal proof. In such cases we recommend requesting a letter/email from an internal or external legal counsel.

Thanks and regards,
Dmitri

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Dmitri Saks
AML Compliance Officer

Deutsche Bank Securities Inc.
60 Wall Street, New York, NY 10005-2836
Tel: +1 (212) 250-4760
E-mail: dmitri.saks@db.com

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From: Jofin Varghese
Sent: Tuesday, December 16, 2014 6:30 PM
To: US-CB S-AML
Cc: CAGNY NCA; Dmitri Saks; Manikandan Muralidharan; Sujith Shetty; US-CB S-AML
Subject: Re: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

HI Dmitri,

The Document is signed by the UBO himself however adding to it there are two more Individuals executed the same doc who are the part of Board of Directors. As per the procedure it states we can not consider the UBO verification confirmed by UBO himself only however considering the execution of the Board of Directors in the operating agreement we have accepted the UBO document. Kindly let us know if you want us to go back

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{cid:image005.gif@01D019D9.DCF81D70}

Kind regards,
Jofin Varghese

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Tel. Mobile +91 953853 9721
Email jofin.varghese@db.com
Escalation Point: christy.raj@db.com
Back Up:sagar.prakash@db.com, anantesh.anand@db.com

{Inactive hide details for US-CB S-AML---12/17/2014 04:31:50 AM---Classification: For internal use only Hello All, Please note t}US-CB S-AML---12/17/2014 04:31:50 AM---Classification: For internal use only Hello All, Please note that the UBO verification document is s

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From:

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US-CB S-AML/db/dbcom

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To:

{cid:image009.png@01D019D9.DCF81D70}
Sujith Shetty/db/dbcom@DBAMERICAS,

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Cc:

{cid:image009.png@01D019D9.DCF81D70}
CAGNY NCA/db/dbcom@DBAMERICAS, Jofin Varghese/db/dbcom@DBAMERICAS, Manikandan Muralidharan/db/dbcom@DBAPAC, US-CB S-AML/db/dbcom@DBAMERICAS

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Date:

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12/17/2014 04:31 AM

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Subject:

{cid:image009.png@01D019D9.DCF81D70}
Re: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

Hello All,

Please note that the UBO verification document is signed by the alleged UBO himself and may not be accepted as such. Please follow the CB&S U.S. AML Due Diligence Requirements to verify ownership:

Obtain information on the organizational structure of the customer to the natural person level (direct or indirect UBOs of 25% or greater). Such information may be obtained through one or more of the following methods:

• Organizational Chart OR
• Letter/e-mail from Internal Counsel, Compliance Officer or Senior Manager (e.g., Control person) OR
• Letter/e-mail from External Counsel OR
• Use of publicly available information (e.g., trusted website) OR
• Use of documentation (e.g., Registry Filing, legal document, etc.)

Should you have any questions, please contact us.

Thank you,

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US CB&S AML Compliance
AML Compliance

Deutsche Bank Securities Inc.
Compliance

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{Inactive hide details for Sujith Shetty---12/15/2014 03:49:38 PM---Classification: For internal use only Hi Team, Attached bel}Sujith Shetty---12/15/2014 03:49:38 PM---Classification: For internal use only Hi Team, Attached below is the EDD Package for RID - ONB - 1

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From:

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Sujith Shetty/db/dbcom

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To:

{cid:image009.png@01D019D9.DCF81D70}
US-CB S-AML/db/dbcom@DBAMERICAS,

{cid:image008.png@01D019D9.DCF81D70}

Cc:

{cid:image009.png@01D019D9.DCF81D70}
Manikandan Muralidharan/db/dbcom@DBAPAC, Jofin Varghese/db/dbcom@DBAMERICAS, CAGNY NCA/db/dbcom@DBAmericas

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Date:

{cid:image009.png@01D019D9.DCF81D70}
12/15/2014 03:49 PM

{cid:image008.png@01D019D9.DCF81D70}

Subject:

{cid:image009.png@01D019D9.DCF81D70}
EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

Hi Team,

Attached below is the EDD Package for RID - ONB - 120902 Southern Financial LLC. Captioned request is principal party set up and it is a Private Investment Vehicle.Request is raised for DBSI- Equity - custody/-Margin (Type 1).

We are escalating the request as Entity is Private Investment Vehicle.

Kameshwaran has reviewed the alerts and the same has been attached for your reference.

"Jofin reviewed and QA'd this EDD escalation package and confirms that all appropriate documentation is being escalated."

The request has been escalated to AML Compliance. Kindly do the needful.

EDD Template and 5 AML answers

[attachment "EDD template and 5 AML answers.pdf" deleted by Dmitri Saks/db/-dbcom]

CIP Document

[attachment "1 - CIP Doc.pdf" deleted by Dmitri Saks/db/dbcom]

Physical Email

[attachment "CIP e-mail.pdf" deleted by Dmitri Saks/db/dbcom]

CP Proof

[attachment "CP Proof.pdf" deleted by Dmitri Saks/db/dbcom]

UBO Proof

[attachment "UBO.PDF" deleted by Dmitri Saks/db/dbcom]

ID Proof

[attachment "5 - UBO - ID.pdf" deleted by Dmitri Saks/db/dbcom]

AML Checks on Entity, CP and UBO

[attachment "3 - AML Checks.pdf" deleted by Dmitri Saks/db/dbcom]

Internal Review

[attachment "Alert Review.pdf" deleted by Dmitri Saks/db/dbcom]

Confirmation on Private investment vehicle

[attachment "Confirmation.pdf" deleted by Dmitri Saks/db/dbcom]

Kind regards,
Sujith Shetty

{cid:image012.gif@01D019D9.DCF81D70}

Sujith Shetty

DBOI Global Services Private Limited
Velankani Tech park, No 43, Electronic City, Hosur Road,, 560100 Bangalore, India
Mobile +0 9980030658
Email sujith.shetty@db.com

{cid:image003.gif@01D019D9.DCF81D70}

[attachment "CP Proof.pdf" deleted by Jofin Varghese/db/dbcom] (See attached file: [Untitled].pdf)