

Subject: RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name :  
Southern Financial LLC [I]  
From: Michael Koplowitz [REDACTED]  
Date: Wed, 07 Jan 2015 10:08:14 -0500  
To: Wayne Salit [REDACTED]  
Cc: John Juul <[REDACTED]>

Classification: For internal use only

Hi,

I reached out to Ted Gonedes who is at home in London. His wife gave birth last week. According to his email, Ted is concerned with regard to reputational risk and would like to have a conversation with Courtney Fornal upon his return next Tuesday. Please see attached. I am told that this client was previously on boarded with CB&S and has open trades across several asset classes. In the interim, I am trying to track down the scope of these trades. Thanks.

Regards,

Mike

From: Wayne Salit  
Sent: Tuesday, January 06, 2015 6:11 PM  
To: Michael Koplowitz  
Cc: John Juul  
Subject: FW: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name :  
Southern Financial LLC [I]

Classification: For internal use only

Michael –

Here is the latest e-mail from the business.

Please let me know if you have been able to reach Ted Gonedes on this matter. In addition, I cc'd you on an e-mail I sent to WM recommending that

this matter be discussed at the Americas Rep Risk Committee. However, I have not heard back from WM.

Would you mind if I told Courtney that neither you nor I are comfortable from a Rep Risk perspective and asked you to reach out to Ted for his view on this matter.

Let me know.

Kind Regards,

Wayne Salit

From: Dmitri Saks  
Sent: Monday, January 05, 2015 12:01 PM  
To: Courteney B Fornal  
Cc: Ged Account-Opening; Manikandan Muralidharan; US-CB S-AML; Mark Whyman; Anastasia Pringle  
Subject: RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

Courtney,

This requires a discussion between the AML and the Business Senior management. The delay is due to the challenge in coordinating this effort because of the Holiday schedule.

Thanks and regards,  
Dmitri

---

{cid:image003.png@01D028DF.3B7C14F0}

Dmitri Saks  
AML Compliance Officer

Deutsche Bank Securities Inc.  
60 Wall Street, New York, NY 10005-2836  
Tel: +1 [REDACTED]  
E-mail: [REDACTED]

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

From: Courteney B Fornal  
Sent: Monday, January 05, 2015 10:37 AM  
To: Dmitri Saks; Anastasia Pringle  
Cc: Ged Account-Opening; Manikandan Muralidharan; US-CB S-AML; Mark Whyman  
Subject: RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name :  
Southern Financial LLC [I]

Classification: For internal use only

Dmitri-

Can you tell us why this is taking so long? It's been with AML with several weeks now, correct?

---

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

Courteney Fornal

Global Markets Complex Equity

Deutsche Bank Securities Inc.

60 Wall Street

New York, NY 10005-2836

Direct [REDACTED]

Desk [REDACTED]

Fax + [REDACTED]

Email [REDACTED]

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

eDisclaimer

<http://onn.theocc.com/publications/risks/riskstoc.pdf>

From: Dmitri Saks

Sent: Monday, January 05, 2015 10:33 AM

To: Anastasia Pringle

Cc: Ged Account-Opening; Manikandan Muralidharan; Courteney B Fornal; US-CB S-AML; Mark Whyman

Subject: RE: EDD package for the RID : ONB-120902 LKYCUS-3443 Party name : Southern Financial LLC [I]

Classification: For internal use only

Hi Anastasia,

Yes, it is still pending. I should be able to provide a more definite answer tomorrow.

EFTA01419762

Thanks and regards,  
Dmitri

---

{cid:image002.png@01D028D2.F7DE5250}

Dmitri Saks  
AML Compliance Officer

Deutsche Bank Securities Inc.  
60 Wall Street, New York, NY 10005-2836  
Tel: +1 [REDACTED]  
E-mail: [REDACTED]

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

From: Anastasia Pringle  
Sent: Monday, January 05, 2015 10:27 AM  
To: Dmitri Saks; Courteney B Fornal; US-CB S-AML; 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]  
Importance: High

Classification: For internal use only

Dmitri,

Please advise on the status of this, is this request still pending with AML?

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. [REDACTED]  
Fax ( [REDACTED]  
Email [REDACTED]

Please send all GED related emails to: [Ged.account-opening@db.com](mailto:Ged.account-opening@db.com)

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

From: Anastasia Pringle  
Sent: Monday, December 22, 2014 5:44 PM  
To: Courteney B Fornal; US-CB S-AML; 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]  
Importance: High

Classification: For internal use only

Dmitri,

Please speak with Courteney as she would be the responsible party 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. [REDACTED]  
Fax ( [REDACTED]  
Email [REDACTED]

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

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

From: Courteney B Fornal  
Sent: Monday, December 22, 2014 5:42 PM  
To: Anastasia Pringle; US-CB S-AML; 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

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. [REDACTED]  
Fax ( [REDACTED]  
Email [REDACTED]

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

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{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, [REDACTED]

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

To:

{cid:image015.png@01D01E0C.039E9630}  
US-CB S-AML [REDACTED]

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

Cc:

{cid:image015.png@01D01E0C.039E9630}  
Ged Account-Opening [REDACTED] Manikandan Muralidharan/db/-  
[REDACTED]

{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]

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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. [REDACTED]  
Fax [REDACTED]  
Email [REDACTED]

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,

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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/[REDACTED]

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

To:

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

Manikandan Muralidharan/

Dmitri Saks

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

Cc:

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

Ged Account-Opening,

US-CB S-AML

{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  
Financial LLC [I]

LKYCUS-3443 Party name : Southern

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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. [REDACTED]  
Fax ( [REDACTED]  
Email [REDACTED]

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

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{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. + [REDACTED]  
Mobile [REDACTED]  
Email [REDACTED]

Backup details - [REDACTED]  
Ganesh Balaji [REDACTED]  
Bharath-Kumar MS [REDACTED]

For Escalations please contact  
Level 1 - [REDACTED]  
Level 2 - [REDACTED]

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

----- Forwarded by Manikandan Muralidharan [REDACTED] on 12/19/2014 08:53 PM  
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{cid:image003.png@01D01B9A.2E284910}

From:

{cid:image004.png@01D01B9A.2E284910}  
Syed-Anzar Ahmed [REDACTED]

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

To:

{cid:image004.png@01D01B9A.2E284910}  
Manikandan Muralidharan [REDACTED]

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

Cc:

{cid:image004.png@01D01B9A.2E284910}  
CAGNY NCA [REDACTED], Suresh-x Salimath [REDACTED]

Anantesh Anand 

{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

EFTA01419773

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%3D+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&usq=AFQjCNH6TerGChaK\\_BRHqY5DUNOCAX7ziw](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&usq=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. + [REDACTED]  
Mobile [REDACTED]  
Email [REDACTED]

{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 [REDACTED]

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

To:

{cid:image004.png@01D01B9A.2E284910}  
CAGNY NCA, [REDACTED]

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

Cc:

{cid:image004.png@01D01B9A.2E284910}  
Syed-Anzar Ahmed, [REDACTED] Suresh-x Salimath, [REDACTED]  
Jofin Varghese, [REDACTED] Sagar Prakash, [REDACTED]  
Kameshwaran Ns, [REDACTED] Anantesh Anand, [REDACTED]

{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]

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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 UB0.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. + [REDACTED]  
Mobile [REDACTED]  
Email [REDACTED]

Backup details -  
Ganesh Balaji [REDACTED]

Bharath-Kumar MS [REDACTED]

For Escalations please contact

Level 1 - [REDACTED]

Level 2 - [REDACTED]

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

----- Forwarded by Manikandan Muralidharan [REDACTED] on 12/19/2014 08:13 PM

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

From:

{cid:image004.png@01D01B9A.2E284910}

Anastasia Pringle [REDACTED]

{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 [REDACTED] US-CB S-AML [REDACTED]

Manikandan Muralidharan [REDACTED]

{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]

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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. [REDACTED]  
Fax ( [REDACTED]  
Email [REDACTED]

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

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

Dmitri Saks  
AML Compliance Officer

Deutsche Bank Securities Inc.  
60 Wall Street, New York, NY 10005-2836  
Tel: [REDACTED]  
E-mail: [REDACTED]

{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. [REDACTED]  
Fax [REDACTED]  
Email [REDACTED]

Please send all GED related emails to: [Ged.account-opening@db.com](mailto: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. [REDACTED]

Mobile [REDACTED]

Email [REDACTED]

Backup details -

Ganesh Balaji [REDACTED]

Bharath-Kumar MS [REDACTED]

For Escalations please contact

Level 1 - [REDACTED]

Level 2 - [REDACTED]

{cid:image002.gif@01D01ABD.8637A840}

----- Forwarded by Manikandan Muralidharan [REDACTED] on 12/18/2014 01:00 AM

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

From:

{cid:image004.png@01D01ABD.8637A840}

Dmitri Saks [REDACTED]

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

To:

{cid:image004.png@01D01ABD.8637A840}

Jofin Varghese [REDACTED],

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

Cc:

{cid:image004.png@01D01ABD.8637A840}

CAGNY NCA [REDACTED] Manikandan Muralidharan [REDACTED]

Sujith Shetty [REDACTED] US-CB S-AML [REDACTED]

Anastasia Pringle [REDACTED] Kumud Sharma [REDACTED]

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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

---

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Dmitri Saks  
AML Compliance Officer

Deutsche Bank Securities Inc.  
60 Wall Street, New York, NY 10005-2836  
Tel: +1 [REDACTED]  
E-mail: [REDACTED]

{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 [REDACTED]  
Email [REDACTED]  
Escalation Point: [REDACTED]  
Back Up [REDACTED]

{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,

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From:

{cid:image016.png@01D019ED.2DECC6A0}  
Dmitri Saks [REDACTED]

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To:

{cid:image016.png@01D019ED.2DECC6A0}  
Jofin Varghese [REDACTED]

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

Cc:

{cid:image016.png@01D019ED.2DECC6A0}  
CAGNY NCA [REDACTED], Manikandan Muralidharan [REDACTED]  
Sujith Shetty [REDACTED] US-CB S-AML [REDACTED]

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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]



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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

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 [REDACTED]  
Email [REDACTED]  
Escalation Point: [REDACTED]  
Back Up: [REDACTED]

{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

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

To:

{cid:image009.png@01D019D9.DCF81D70}  
Sujith Shetty [REDACTED]

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

Cc:

{cid:image009.png@01D019D9.DCF81D70}  
CAGNY NCA [REDACTED] Jofin Varghese [REDACTED]  
Manikandan Muralidharan [REDACTED] US-CB S-AML [REDACTED]

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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]

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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:

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

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

To:

{cid:image009.png@01D019D9.DCF81D70}  
US-CB S-AML [REDACTED]

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

Cc:

{cid:image009.png@01D019D9.DCF81D70}  
Manikandan Muralidharan [REDACTED] Jofin Varghese [REDACTED]  
CAGNY NCA [REDACTED]

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Date:

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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

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Sujith Shetty

DBOI Global Services Private Limited  
Velankani Tech park, No 43, Electronic City, Hosur Road,, 560100 Bangalore,  
India  
Mobile [REDACTED]  
Email [REDACTED]

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

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