

Subject: RE: High Risk KYC Request: Southern Financial, LLC - CRDS ID: 1007406812 [I]
From: Todd Stevens [REDACTED]
Date: Mon, 14 Nov 2016 08:49:10 -0500
To: Vahe Stepanian <[REDACTED]>,
Daniel Sabba <[REDACTED]>,
Stewart Oldfield <[REDACTED]>
Cc: Darlene Zong [REDACTED]

Classification: For internal use only

Tell them we are discussing internally this week. We need 2 more weeks.

From: Vahe Stepanian
Sent: Monday, November 14, 2016 8:36 AM
To: Todd Stevens; Daniel Sabba
Cc: Darlene Zong
Subject: FW: High Risk KYC Request: Southern Financial, LLC - CRDS ID: 1007406812 [I]

Classification: For internal use only

Todd / Daniel – can we please discuss this week? Would like to be responsive to our GM colleagues.

Thanks,

Vahe

From: Michael Valencia On Behalf Of kyc outreachteam
Sent: Monday, November 14, 2016 8:34 AM
To: Vahe Stepanian
Cc: Daniel Sabba; Darlene Zong
Subject: RE: High Risk KYC Request: Southern Financial, LLC - CRDS ID: 1007406812 [I]

Classification: For internal use only

Hello All,

Do you an update on below, is there an ETA that you can provide? Thank you.

Best Regards,

{cid:image001.png@01D21346.38E69640}

Michael Valencia
KYC Outreach Analyst

Deutsche Bank - Jacksonville

5201 Gate Parkway, Jacksonville, FL, 32256, USA

Tel: [REDACTED]

Email [REDACTED]

From: Vahe Stepanian

Sent: Wednesday, November 09, 2016 5:04 PM

To: kyc outreachteam [REDACTED]

Cc: Daniel Sabba <[REDACTED]>; Darlene Zong [REDACTED]

Subject: RE: High Risk KYC Request: Southern Financial, LLC - CRDS ID: 1007406812 [I]

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Acknowledged, and adding the main coverage team here. We'll be back to you.

From: Michael Valencia On Behalf Of kyc outreachteam

Sent: Wednesday, November 09, 2016 5:00 PM
To: Vahe Stepanian
Subject: High Risk KYC Request: Southern Financial, LLC - CRDS ID: 1007406812 [I]

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Dear Vahe,

Please acknowledge within 24hrs and/or complete within 48hrs:

In accordance with Deutsche Bank's ongoing 'Know Your Client' [KYC] requirements, I am writing to you in relation to completing a KYC review for the below entity:

Southern Financial, LLC – Internal DB Ref: [REDACTED]

Client On-boarding (COB) was able to complete a percentage of the KYC Regular Review from existing records as well as information from approved public sources, however, there is still some information which we require from yourself or from the client.

Please refer to the below questions and respond to the best of your knowledge.

N.B. A delay in response will result in escalation to Regional Business Leads and may initiate account closure proceedings. If you received this message in error and are not the appropriate contact person please advise, and if known, provide an appropriate contact person for this client.

Client Contact Information

Sales Response

1. Please provide the following details of a client contact to whom we can reach out to for KYC documentation:

- a) Name
- b) Email address
- c) Telephone number

2. Please confirm if you are happy for us to contact the above client directly for KYC documents.

Purpose of Relationship, Business Restrictions & Prohibited Relationships

Sales Response

3. Describe the Purpose of Relationship in respect to the products / activities / services used by the client. Do the DB products used by the client make sense, considering the nature of their business and investment profile? e.g.: Is the client a guarantor?

4. Do any Business Restrictions apply to the client relationship? (If 'Yes' please describe)

For example, restrictions on trading certain products, types of transactions, or transacting for a specific period of time.

5. Does the client present any prohibited business factors? (If 'Yes' please describe) Examples may include anonymous accounts, shell banks or Pay-through accounts, certain business activities in Special Risk Countries - SRC).

Nature of Relationship

Sales Response

6. Does the client engage in business with other areas of DB? (If 'Yes' please describe) Include DB division, location and business areas.

7. If known, how was the relationship originally established? Choose one:

- Intermediary-agent (please detail)
- DB group referral
- Targeted business
- Unsolicited approach by client (including non-DB referrals/-introducers).

8. What was the client's rationale for establishing the relationship? Why did the client open their account with DB?

Bearer Shares

Sales Response

9. Are you aware if the client, or any entity in the client's ownership chain, currently has the ability to issue Bearer Shares?

- The latest version of the M&A document(s) will state whether the entity has the ability to issue bearer shares. Only certain countries have

laws that permit the use of Bearer shares. e.g: BVI, Bahamas, Cayman Islands, Panama, Switzerland. There is No requirement to explicitly confirm with the Legal Entity that it has issued Bearer Shares. However in the course of establishing the ownership structure and identifying UBOs the presence of Bearer Shares may be identified.

Source of Funds & Future Source of Funds

Sales Response

10. Based on your existing knowledge of the client what is the Source of Funds provided? Please answer stating 'A' or 'B'.

A) Ongoing business activities or

B) 'One off' event or activities other than normal business activities

11. Please describe in-detail the activities as described above.

12. Are funds being received from a party other than the client or a group company? If 'Yes', who is the party providing the funds on behalf of the client and what is the rationale as to why the party does not establish a relationship in its own name?

13. Please confirm to the best of your knowledge, are future Source of Funds known to be different from the Source of Funds at the date of review? If yes, please provide further detail.

Source of Wealth

Sales Response

14. Based on your existing knowledge of the client, where an individual(s) holds > 10% interest, please complete the below. Please list additional owners, if applicable.

Identify the source of wealth as one or more of the following:

- Business Owner
- Salary/Earnings
- Investment Activity
- Inheritance
- Gifts
- Betting / Lotteries
- Other (please specify)

For each identified source, describe the activity(ies) which contributed to the individual's wealth.

Confidentiality & Non-Disclosure Agreements (NDA's) (If applicable)

Sales Response

15. Are you aware or know of any Confidentiality Agreements or Non-Disclosure Agreements (NDA's) which prevent the client's data being shared between DB Locations? (If 'Yes' please describe the requirements).

Regulatory Status (Level 3 or Level 4 regulated entity)

Sales Response

16. Are you aware if any changes have been made in the last 12/36/60 months, to your Client's regulatory status or any country or jurisdiction the Client is connected to? If yes, please provide the name of the regulator and the regulatory reference number as well as details of the specific changes.

Politically Exposed Person (PEP) & Adverse Information

Sales Response

17. To the best of your knowledge are you aware of any new material adverse information or new PEP relationship linked to the Client and/or its Connected Parties or affiliates, which could pose a reputational risk to DB?

If you have any questions please feel free to contact me directly. We may reach out to you if any further information is required.

We will be reaching out to the client for the required documentation, please let me know if you have any concerns with this (see the attached spreadsheet for more details).

Best Regards,

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Michael Valencia
KYC Outreach Analyst

Deutsche Bank - Jacksonville

5201 Gate Parkway, Jacksonville, FL, 32256, USA

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Email