Subject: Re: USA Patriot Act Customer Identification Program Notification
From: Richard Kahn <[redacted]>
Date: Mon, 11 Jun 2018 14:18:06 -0400
To: Stewart Oldfield <[redacted]>

ok thank you also curious how limits would work in comparison to $1,000 here in USA
thanks

Richard Kahn
HBRK Associates Inc.
575 Lexington Avenue 4th Floor
New York, NY 10022
tel[redacted]
fax
cel

On Jun 11, 2018, at 2:12 PM, Stewart Oldfield <[redacted]> wrote:

It should work, but when we know people are traveling we notify the fraud team so nothing gets blocked. Let me see if we can do something more general for him

Thanks

From: Richard Kahn [mailto:[redacted]]
Sent: Monday, June 11, 2018 2:11 PM
To: Stewart Oldfield <[redacted]>
Subject: Re: USA Patriot Act Customer Identification Program Notification

thank you
france dates not yet certain

was thinking of a more regular ongoing vs particular dates..

thanks

Richard Kahn
HBRK Associates Inc.
575 Lexington Avenue 4th Floor

New York, NY 10022
tel [redacted]
fax
cel

On Jun 11, 2018, at 2:08 PM, Stewart Oldfield <[redacted]>
wrote:

I'm guessing it's generated from the global markets accounts we reactivated recently, but let me confirm. Please also send me JEE's dates for France.

Thanks

From: Richard Kahn [mailto:[redacted]]
Sent: Monday, June 11, 2018 1:40 PM
To: Stewart Oldfield <[redacted]>
Subject: Fwd: USA Patriot Act Customer Identification Program Notification

do you know what this relates to?

Richard Kahn
HBRK Associates Inc.
575 Lexington Avenue 4th Floor
New York, NY 10022
tel [redacted]
fax
cel

Begin forwarded message:

From: Nathan Head <[redacted]>

Subject: USA Patriot Act Customer Identification Program Notification

Date: June 11, 2018 at 1:35:47 PM EDT

To: 'Richard Kahn' <[redacted]>

Cc: Joshua Chin-Sang <[redacted]>

<image001.png>

Dear Client – Southern Financial, LLC

Subject: USA PATRIOT Act Section 326 Customer Identification Program & Regulation GG

<image002.png>

IMPORTANT INFORMATION ABOUT PROCEDURES FOR OPENING A NEW ACCOUNT

USA PATRIOT Act Section 326 Customer Identification Program

To help the government fight the funding of terrorism and money laundering activities, pursuant to Federal regulations that became effective on October 1, 2003, Section 326 of the USA PATRIOT Act requires all financial institutions to obtain, verify, and record information that identifies each person or legal entity that opens an account.

What this means for you: When you open an account, we will ask for your

name, address, and other information that will allow us to identify you. We may also ask you to provide other identifying documents, such as articles of incorporation, an offering memorandum, or other identifying documents.

In addition, please find attached Deutsche Bank's BCM Program's Client Disclosure letter for your reference.

The Following Applies to Non-US Correspondent Banks Only
Pursuant to U.S. regulations issued under section 311 of the USA PATRIOT Act, see 31 CFR 1010.658, Deutsche Bank is required to notify you that we are prohibited from establishing, maintaining, administering, or managing a correspondent account for, or on behalf of the following which are defined collectively as “311 designated banks”:

Banco Delta Asia or any of its subsidiaries (including, but not limited to, Delta Asia Credit Limited, and Delta Asia Insurance Limited).
Commercial Bank of Syria or any of its subsidiaries (including Syrian Lebanese Commercial Bank)
FBME Bank Ltd (f.k.a. Federal Bank of the Middle East Ltd.) or any of its subsidiaries
Halawi Exchange Co. or any of its subsidiaries
Kassem Rmeiti & Co. For Exchange or any of its subsidiaries

The regulations also require us to notify you that your correspondent account with our financial institution may not be used to provide the 311 designated banks with access to our financial institution. If we become aware any of the 311 designated banks are indirectly using the correspondent account you hold at our financial institution, we will be required to take appropriate steps to prevent such access, including terminating your account.

Regulation GG

Pursuant to the Unlawful Internet Gambling Enforcement Act of 2006 (“UIGEA”) and implementing regulations issued by Federal regulatory authorities (“Regulation GG”), the U.S. subsidiaries and affiliates of Deutsche Bank (“DBUS”) are, where applicable, required to develop policies and procedures that are reasonably designed to prevent payments in connection with unlawful Internet gambling (such payments are deemed to be “restricted transactions”). As part of Deutsche Bank’s compliance with Regulation GG, we will be enhancing our customer due diligence to identify risks of unlawful Internet gambling, submitting required notices and rejecting ALL restricted transactions attempted to be processed through any account you maintain with a DBUS entity.

A Restricted Transaction means any of the following transactions or transmittals involving any credit, funds, instrument, or proceeds that the UIGEA prohibits any person engaged in the business of betting or wagering

(which does not include the activities of a financial transaction provider, or any interactive computer service or telecommunications service) from knowingly accepting, in connection with the participation of another person in unlawful Internet gambling:

· Credit, or the proceeds of credit, extended to or on behalf of such other person (including credit extended through the use of a credit card);

· An electronic fund transfer, or funds transmitted by or through a money transmitting business, or the proceeds of an electronic fund transfer or money transmitting service, from or on behalf of such other person; or

· Any check, draft, or similar instrument that is drawn by or on behalf of such other person and is drawn on or payable at or through any financial institution.

Please assist us in this endeavor by refraining to submit to any DBUS entity any U.S. dollar transaction involving directly or indirectly Internet gambling activity.

Sincerely,

<image003.gif>

Client Data Services

Deutsche Bank USA Core Corporation
5201 Gate Parkway

Jacksonville, FL 32256 USA

Email: [redacted]

Lee Joyner - [redacted]

Jacob Goss - [redacted]

Jesse Cruz- [redacted]

Jacob Brandenburg - [redacted]

Yonette Carrington - [redacted]

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