Subject: FW: RUSH EXCO Approval Needed: KYC Case 01898372 [I]
From: Cynthia Rodriguez <██████████████████████>
Date: Mon, 12 Feb 2018 16:19:30 -0500
To: Stewart Oldfield <██████████████████████>

Classification: For internal use only

Would you mind asking one more time for me?

Kind regards,

Cynthia Rodriguez

{cid:image001.png@01D0778D.2D49CDD0}

Cynthia Rodriguez
Assistant Vice President

Deutsche Bank Trust Company Americas
Deutsche Bank Wealth Management
345 Park Avenue, 24th Fl 10154-0004 New York, NY, USA
Tel. ████████████
Fax ██████████████████
Email ██████████████████████████

From: Cynthia Rodriguez
Sent: Monday, February 12, 2018 10:50 AM
To: Patrick Campion <████████████████████████████>
Cc: Dana Ponzio <██████████████████████>
Subject: RE: RUSH EXCO Approval Needed: KYC Case 01898372 [I]
Importance: High

Classification: For internal use only

Hi Patrick,

I am following up on the below. Thanks!

Kind regards,

Cynthia Rodriguez

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Cynthia Rodriguez
Assistant Vice President

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From: Cynthia Rodriguez
Sent: Friday, February 09, 2018 3:18 PM
To: Patrick Campion <████████████████████>
Cc: Dana Ponzio <████████████████>
Subject: RUSH EXCO Approval Needed: KYC Case 01898372 [I]
Importance: High

Classification: For internal use only

Hello,

I am requesting Exco Approval for a new account opening for current DB client Jeffrey Epstein.

RM Name

 Stewart Oldfield

Business Line

 US Onshore

GCIS # / KYC #

 575969/ 01898372

New or Existing Relationship?

If yes, please include relationahip since date, approx # of accounts, AUM, etc.)

 Existing relationship since 8/26/2013. A total of 30 deposit accounts and 3 money market accounts for multiple entities, 5 brokerage accounts and 1 custody account. Total AUMs $224mn.

Legal name of Account Holder(s)

  The 2017 Caterpillar Trust

Name of UBO(s)

(Please include UBOs who own 25% and more; If there are multiple layers, please include description of ownership structure)

  Jeffrey Epstein

Description of Type of account being opened with detailed purpose of the accounts

(Please include SOW information/ Geographic location/

For Entity Accounts: Description of the entity and background information on the UBO)

 We are opening a deposit account for The 2017 Caterpillar Trust. The account will be used to pay annual annuity payments

Reason for High Risk

 This relationship is deemed high risk due to multiple court cases on Jeffrey Epstein, involving 22 April 2004 SEC filed a settled civil fraud action for illegal insider trading in three publicly traded Massachusetts banks. Final judgement permanently enjoins him from violating the antifruad provisions and he agreed to pay a total of $72532.06 in disgorgement of trading profits, prejudgment interest and civil penalties. Epstein was sentenced to 21 months in federal prison for three counts of fraud, sexually assaulting a girl and solicitation of prostitution. These alerts were previously approved by senior management and AML Compliance. Prior clearance is attached as a reference

PEP (Y/N)

If yes, include details

 Yes, close affiliation to Bill Clinton and Prince Andrew

Any negative media and/or court cases?

Include ALL negative media & court cases

 Yes

If Yes, please give details

 Aside from the court cases listed in the reason for high risk, all other alerts were false positives and no new court cases or negative media has come up for this client.

Business Justification for the relationship despite High Risk Factors

 All negative media and alerts have been reviewed by AML Compliance and they do not see a reason to discontinue the existing relationship with Jeffrey

Epstein.

Kind regards,

Cynthia Rodriguez

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Cynthia Rodriguez
Assistant Vice President

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