

Subject: Re: 2018 Periodic Review of High Risked Accounts [REDACTED]
[REDACTED] ([REDACTED]), Butterfly Trust (GCIS#486426) and Neptune, LLC
(GCIS#487264) under the SOUTHERN FINANCIAL RELATIONSHIP [I]
From: Stewart Oldfield <[REDACTED]>
Date: Wed, 05 Sep 2018 09:14:44 -0400
To: Vijay-A Sawant <[REDACTED]>
Cc: Richard Iarossi <[REDACTED]>,
Mayur Rathod <[REDACTED]>,
Bradley Gillin <[REDACTED]>

Thanks. Will submit this afternoon.

Stewart Oldfield, CFA, CAIA
Director

Deutsche Bank Trust Company Americas
Deutsche Bank Wealth Management
345 Park Avenue, New York, NY 10154
Tel. [REDACTED]
Mobile [REDACTED]
Email [REDACTED]

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On Sep 5, 2018, at 9:05 AM, Vijay-A Sawant <[REDACTED]> wrote:

> Good Morning Stewart,

We have completed KYC Case#01977698 for the above high risked accounts and re-assigning this case to you for your approval.

Request you to kindly advise if any discrepancies, or else forward to the AML team for final approval, thanks.

Kind Regards,

<image001.gif>

Vijay Sawant

KYC Case Representative

Deutsche CIB Centre Private Limited - Deutsche Bank Group

Wealth Management

B1, DB Centre Mumbai, Nirlon Knowledge Park, Western Express Highway

Goregaon East, Mumbai - 400063 , India

Tel. [REDACTED]

Mobile [REDACTED]

From: Vijay-A Sawant

Sent: Friday, August 31, 2018 6:04 PM

To: Stewart Oldfield <[REDACTED]>

Cc: Richard Iarossi <[REDACTED]>; Mayur Rathod

<[REDACTED]>; Bradley Gillin <[REDACTED]>

Subject: RE: 2018 Periodic Review of High Risked Accounts [REDACTED]

[REDACTED] ([REDACTED]), Butterfly Trust (GCIS#486426) and Neptune, LLC

(GCIS#487264) under the SOUTHERN FINANCIAL RELATIONSHIP [I]

Importance: High

Hi Stewart,

Thanks for the confirmation on Butterfly Trust. We confirm that we do not require CDD form for this account & everything ok with this acct.

For Neptune, we agree that we have all docs for Richard Kahn. The only reason we clarified below is because he was missing as RP, from the previously approved KYC (01790739). However as per documentation evidence, we confirm he needs to be added.

Anyways, we will be submitting this case by Monday when all searches are complete.

EFTA01435780

I am available for another hour today, are you free for a call now?

Kind Regards,

<image001.gif>

Vijay Sawant

KYC Case Representative
Deutsche CIB Centre Private Limited - Deutsche Bank Group
Wealth Management
B1, DB Centre Mumbai, Nirlon Knowledge Park, Western Express Highway
Goregaon East, Mumbai - 400063 , India
Tel. [REDACTED]
Mobile +91 [REDACTED]
[REDACTED]

From: Stewart Oldfield
Sent: Friday, August 31, 2018 5:52 PM
To: Vijay-A Sawant <[REDACTED]>
Cc: Richard Iarossi <[REDACTED]>; Mayur Rathod
<[REDACTED]>; Bradley Gillin <[REDACTED]>
Subject: Re: 2018 Periodic Review of High Risked Accounts [REDACTED]
[REDACTED] ([REDACTED]), Butterfly Trust (GCIS#486426) and Neptune, LLC
(GCIS#487264) under the SOUTHERN FINANCIAL RELATIONSHIP [I]

Butterfly is a personal trust.

For Neptune, any reason not to just add Rich as an RP? We've already KYC'd him for other accounts, correct?

Will call you at 9 or so.

Thanks

Stewart Oldfield, CFA, CAIA

Director

Deutsche Bank Trust Company Americas

Deutsche Bank Wealth Management

345 Park Avenue, New York, NY 10154

Tel. [REDACTED]

Mobile [REDACTED]

Email [REDACTED]

Securities offered through Deutsche Bank Securities Inc.

On Aug 31, 2018, at 7:21 AM, Vijay-A Sawant <[REDACTED]> wrote:

Hi Stewart,

Please see pending confirmations required in KYC Case#01977698 for Butterfly & Neptune, below –

Butterfly trust – Kindly confirm if this is a Personal Trust and NOT Corporate Trust? After reviewing the trust agreement, we noticed that the UBO's seem not related to the grantor. The reason for this request is to evaluate whether we require CDD form for this account or not. NOTE: we require CDD form ONLY in case of Corporate Trusts.
Neptune LLC – Please note that Richard Kahn has been added as manager as per Operating Agreement even though he was NOT added as an RP in the previously approved KYC Case#01790739.

Kindly advise on the above so we can complete this case and submit to AML for approval, thanks.

Kind Regards,

<image001.gif>

Vijay Sawant

KYC Case Representative
Deutsche CIB Centre Private Limited - Deutsche Bank Group
Wealth Management
B1, DB Centre Mumbai, Nirlon Knowledge Park, Western Express Highway
Goregaon East, Mumbai - 400063, India
Tel. [REDACTED]
Mobile +91 [REDACTED]

[REDACTED]

From: Vijay-A Sawant
Sent: Friday, August 24, 2018 2:39 PM
To: Stewart Oldfield <[REDACTED]>; Richard Iarossi
<[REDACTED]>
Cc: Mayur Rathod <[REDACTED]>; Bradley Gillin
<[REDACTED]>
Subject: RE: 2018 Periodic Review of High Risked Accounts [REDACTED]

█ (█), Butterfly Trust (GCIS#486426) and Neptune, LLC
(GCIS#487264) under the SOUTHERN FINANCIAL RELATIONSHIP [I]
Importance: High

Hello Richard,

We have received material change confirmation from Brad on below accounts as per attached email. So following are list of items pending on these accounts

· Butterfly trust – Kindly confirm if this is a Personal Trust and NOT Corporate Trust? After reviewing the trust agreement, we noticed that the UBO's seem not related to the grantor. The reason for this request is to evaluate whether we require CDD form for this account or not. NOTE: we require CDD form ONLY in case of Corporate Trusts.

· Neptune LLC – Please note that Richard Kahn has been added as manager as per Operating Agreement even though he was NOT added as an RP in the previously approved KYC Case#01790739.

We will proceed to the next stages upon receipt of your confirmation of the above queries, thanks.

Kind Regards,

<image001.gif>

Vijay Sawant

KYC Case Representative
Deutsche CIB Centre Private Limited - Deutsche Bank Group
Wealth Management
B1, DB Centre Mumbai, Nirlon Knowledge Park, Western Express Highway
Goregaon East, Mumbai - 400063 , India
Tel. █
Mobile +91 █

[REDACTED]

From: Vijay-A Sawant
Sent: Tuesday, July 31, 2018 6:31 PM
To: Bradley Gillin <[REDACTED]>; Stewart Oldfield
<[REDACTED]>
Cc: Mayur Rathod <[REDACTED]>
Subject: 2018 Periodic Review of High Risked Accounts [REDACTED]
([REDACTED]), Butterfly Trust (GCIS#486426) and Neptune, LLC (GCIS#487264)
under the SOUTHERN FINANCIAL RELATIONSHIP
Importance: High

Hello Brad/Stewart,

This review relates to above high risked three accounts due for remediation 08/31/2018.

Upon review of the docs available in the repositories, we have completed the attached checklist, main RP's also listed below for reference –

Acct Holder – Butterfly Trust

Grantor – Jeffrey Epstein

Trustees – Harry Beller & Erika Kellerhals

UBO's – [REDACTED], [REDACTED], [REDACTED],
[REDACTED], Irina [REDACTED], [REDACTED], [REDACTED], Celina
Dubin, Darren Indyke, Karyna Shuliak, Richard Kahn, [REDACTED] &
[REDACTED]

Following are list of required items –

- Confirm whether material changes to account or not & RP's

identified above are correct?

- Volcker Questionnaire completed reflects this trust as a "Family Trust" but this seems inaccurate. All UBO's have different surnames and some even different nationalities. Please advise if ok to accept? I have attached the questionnaire in this email for reference.

- Depending on the response to above bullet point, we might require CDD form if this trust is deemed to be Corporate trust.

Acct Holder – Neptune LLC

Sole Member & Shareholder – Jeffrey Epstein

Manager – Richard Kahn

Authorized Signers – Harry Beller & Darren Indyke

Following are list of required items –

- Confirm whether material changes to account or not & RP's identified above are correct?

- Fincen CDD form required, attached blank form for reference

Acct Holder & Authorized Signatory – [REDACTED]

Joint Acct Holder & Authorized Signatory – Karyna Shuliak

SOW Company (for Karyna Shuliak) – JSC Interiors LLC

Following are the list of required items –

· Confirm whether material changes to account or not?

Kindly advise at the earliest on the above so I can launch KYC for all accounts and begin remediation, thanks.

Kind Regards,

<image001.gif>

Vijay Sawant

KYC Case Representative
Deutsche CIB Centre Private Limited - Deutsche Bank Group
Wealth Management
B1, DB Centre Mumbai, Nirlon Knowledge Park, Western Express Highway
Goregaon East, Mumbai - 400063 , India
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