

---

**From:** Michael Vila [REDACTED]  
**on behalf of** PWMUS AMLKYC [REDACTED]  
**Sent:** 9/4/2013 4:28:36 PM  
**To:** Amanda Kirby [REDACTED]  
**CC:** Andrea Klingenberg [REDACTED]; Paul Morris [REDACTED]; PWM BIS-Research [REDACTED]; PWMUS AMLKYC [REDACTED] Urvashi Lavania [REDACTED]  
**Subject:** CLEARED\_Richard D Kahn rdc alert [I]  
**Attachments:** Richard D Kahn rdc alert.pdf; Richard D Kahn rdc alert\_1.pdf

Classification: For internal use only

Hi Amanda -

As per our conversation, AML Compliance clears the below alert - this is a POSITIVE hit - this alert was generated regarding the trustee of the perspective client, a trust for Jeffrey Espstien, who is a current DB Client. The trustee is an account, who is named in an NYSE ARCA, Inc regulatory proceeding dated April 20, 2012. It appears that the 21 defendants are/were in violation of NYSE ARCA Equities Rule 10.2(d) for filing to provide testimony as request by FINRA. AML Compliance clears this alert, as 1) this is an account who will be the trustee of the a perspective client, 2) the settlor (Jeffery Epstien) is not related to the FINRA proceeding, and 3) there is no other negative media pertaining to Mr. Kahn. As such this is CLEARED from an AML Pespective.

Best, Michael

**From:** Amanda Kirby/db/dbcom  
**To:** PWMUS AMLKYC/db/[REDACTED], Andrea Klingenberg/db/[REDACTED]  
**Cc:** Urvashi Lavania/db/[REDACTED], PWM BIS-Research/db/[REDACTED] Paul Morris/db/[REDACTED]  
**Date:** 09/04/2013 11:09 AM  
**Subject:** Re: Richard D Kahn rdc alert [I]

Classification: For internal use only

Hi,

The below RDC alerts do pertain to our client. Richard D Kahn is the person in question. However, he will not be a client of the bank. We are opening an account for a trust, for which he is a trustee. It does not seem that he would pose any risk (reputational or otherwise) to the bank. Please approve

(See attached file: Richard D Kahn rdc alert.pdf) (See attached file: Richard D Kahn rdc alert\_1.pdf)

**From:** PWM BIS-Research/db/dbcom@DBAPAC