

To: Todd Stevens

Subject: FW: Jeffrey Epstein/Southern Financial LLC - Rep Risk Approval [C]

Todd - please see below from Jan Ford/Wayne Salit on the reputational risk committee's assessment of this client situation early last year. Jeffrey Epstein's CFO (Rich Kahn) has requested the opening of a new account on Tuesday (email attached). Per the determination made by the committee (below), this would require the account opening to be brought to reputational risk committee for approval. Please advise us on how to proceed. Thank you, Daniel

From: Wayne Salit

Sent: Monday, March 30, 2015 12:38 PM

To: Daniel Sabba

Subject: Jeffrey Epstein/Southern Financial LLC - Rep Risk Approval [C]

Classification: **Confidential**

Dan –

Here is the e-mail (dated 2/6/2015 from Jan Ford you requested (see below).

This e-mail is confidential and must not be shared with any third party (including the client) or anyone internally - other than your direct management chain (e.g. Caroline, etc.) as required.

Please let me know if you require any additional information.

Kind Regards,
Wayne Salit

From: Jan Ford

Sent: Friday, February 06, 2015 8:16 AM

To: Stuart Clarke; Carol Saracco

Cc: Jan Bornebusch; Wayne Salit

Subject: RE: Jeff Epstein [I]

Classification: **For internal use only**

Hi Stuart and Carol,

As you know, we agreed last week at RRC to continue business as usual with Jeff Epstein based upon Chip Packard's due diligence visit with him. I want to make sure the minutes for the RRC meeting accurately reflect what we agreed, so I asked AML to help re-construct the direction we had given the business. Subject to everyone's agreement, I believe the guidance was, and should continue to be, as follows (but anyone can jump in to correct this):

1. The client may continue to conduct trades and transactions in existing accounts without Compliance pre-approval, provided that the business has determined these transactions do not involve any unusual and/or suspicious activity or are in a size that is unusually significant or a novel structure.
2. Consistent with this, CB&S may also "open" accounts to facilitate activity as a booking matter where the activity has already been approved in AWM.
3. In addition, the business will need to monitor for any further developments in connection with the reputational risk of this client relationship and to review transaction/activity conducted in the accounts for any activity, size or structure as described in #1 above.

Many thanks, Jan