

Ticket#	104526245	Account#	Initiated Date	02/07/2013 02:06 PM
Client Name	SOUTHERN TRUST COMPANY, INC	Account Title	Initiator	CHRISTINE HEWITT
ECI		Account Type	Initiating Team	PB FRONT OFFICE
LOB	PB			

Verify & Confirm for SOUTHERN TRUST COMPANY, INC	
Final Risk Rating	High
Initial Risk Rating	High
GCS Report Requested	Full
Presence of Potential High Risk Indicators	No
Comments	Negative information on Jeffrey Epstein and offshore financial services company
Summary of Risk Attributes	

Risk Updated History				
Creation Date	Entered by	Updated Risk	Previous Risk	Comment

GCS Grid		
Search Type	Security Service Details	Further Review Required
Company Information	Information not confirmed for "SOUTHERN TRUST COMPANY, INC " (Address); details included in the attachment.	Yes
Corporate Records	No research was conducted.	No
Other Database Searches (RDC/MIS/Factiva)	No records found.	No
Internal Database Search (CSSS/FPS)	<p>Internal database search revealed prior GS&amp;I research for Jeffrey E Epstein and the following derogatory information was reported.</p> <p>Several newspaper articles were found that detail the indictment of Jeffrey Epstein in Florida on felony charges of soliciting underage prostitutes. Jeffrey Epstein served 13 months in jail. Numerous articles detail various law enforcement agencies investigating Jeffrey Epstein for allegedly participating in child trafficking and molesting underage girls. Jeffrey Epstein is required to register as a sex offender. Jeffrey Epstein has settled a dozen civil lawsuits out of court from his victims regarding solicitation for an undisclosed amount.</p> <p>Internal database search revealed prior GS&amp;I research for J. Epstein &amp; Co and nothing derogatory to report.</p>	Yes
State Court Searches	No research was conducted.	No
Federal Court Searches	No research was conducted.	No
Personal Particulars	No additional research necessary.	No
Publications	Nothing derogatory found.	No
Regulatory Sanctions	No records found.	No
OFAC/Control List Search	A search of OFAC did not reveal any matches.	No
Negative or Inconsistent Information		Yes

GCS Red Dot	
Has this been identified as Red Dot KYC?	No
Negative Information Found	Yes

Banker Attestation Details	
As the client sponsor, I understand that I am primarily responsible for protecting the firm's reputation from inappropriate business relationships, as well as from fraud and money laundering. By approving this KYC, I am sponsoring this client as to their character and reputation and from a legal/regulatory standpoint.	Yes
Please state your rationale for conducting business with this client	This account is merging with Financial Trust Company, which is Jeffrey's new USVI entity. Jeffrey, while a US citizen, now resides in the USVI.