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FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/23/2021

AMANDA KIRBY[KIRBY], date of birth (DOB) [REDACTED] was interviewed via WEBEX conference by FBI Special Agents [REDACTED] and [REDACTED] and [REDACTED] of the United States Attorneys Office. Also present for the interview were Barry Pollack and Carolyn Forstein, of ROBBINS RUSSELL. After being advised of the identity of the interviewers and the nature of the interview, KIRBY provided the following information:

KIRBY'S Background information:

KIRBY worked at Universal Music group as an assistant to the CFO of corporate finance prior to starting at DEUTSCHE BANK [DB]. KIRBY eventually wanted to leave that role and applied to DB. KIRBY never worked at a bank prior to starting at DB.

KIRBY could not recall the precise details regarding the training she received when she started at DB. KIRBY recalled attending an onboarding session that included an overview of the bank when she started. Regulations required that KIRBY take a bunch of tests every year. KIRBY had training on the KYC process.

KIRBY was on a private banking team within the Private Wealth Management Division of DB. She was a junior person. KIRBY's official job title was relationship coordinator. KIRBY worked with private bankers and helped with due diligence for new and current clients. KIRBY would interface with them on the phone. KIRBY also worked on KYCs, which were part of the regulations when you had to onboard a client.

When KIRBY first joined DB, she was on a team where there were two private bankers. Their names were PATRICIA JANCO [JANCO] and BECKY CRIVAN [CRIVAN]. KIRBY believed she worked with them for about three or four

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by [REDACTED]

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years. KIRBY left JANCO'S and CRIVAN'S team to work PAUL MORRIS [MORRIS], a private banker, when MORRIS joined DB. KIRBY eventually asked to leave MORRIS'S team around 2015 and began working with HEATHER KIRBY [HEATHER KIRBY].

Structure of the private banking teams at DB:

DB private banking was set up to include a main banker, a junior banker, and other junior people. There were approximately five or six people on KIRBY'S private banking team when she worked with JANCO and CRIVAN. Work was distributed in a way that involved KIRBY taking assignments from the lead banker. Distribution of work depended on who had capacity at the time and what was needed on any given day.

KYC at DB:

KIRBY understood that KYC was a standard process of every step taken at the bank. KYC required obtaining information on the clients' sources of wealth, identification, and other information. KYC was a regimented process where you had to follow certain steps. This was KIRBY'S first time working in KYC or due diligence. KIRBY had to take annual online KYC training. There may have been some training that was required every six months.

KIRBY'S responsibilities as a relationship coordinator:

If there was a new client coming through, the banker would tell KIRBY that they were going to be onboarding something. KIRBY would then start compiling original signed copies of account opening documentation. KIRBY would also start to request KYC documents from the client. KIRBY also input wires for the team's clients but did not approve them. KIRBY would assist in conducting research whenever ongoing due diligence issues came up. KIRBY sometimes attended client meetings but never went out to get her own book of business.

KIRBY'S work with MORRIS:

JEFFREY EPSTEIN [EPSTEIN] was MORRIS'S only client during the time KIRBY worked under MORRIS. On a monthly basis, there was a tab/document sent to all the banking teams showcasing who closed the most business in a given month. KIRBY recalled that, for a while, MORRIS was not very high up there

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in comparison to other private bankers. KIRBY recalled doing some research and preparing documents to open an account for LEON BLACK [BLACK]. KIRBY'S experience working with MORRIS was not great. MORRIS'S and KIRBY'S personalities did not sync. KIRBY did not like MORRIS. KIRBY thought MORRIS was insecure and a back-handed manipulator. KIRBY genuinely did not like MORRIS as a person. KIRBY did not believe there was anything unsavory that MORRIS did in regards to EPSTEIN. KIRBY just did not like MORRIS. MORRIS was not a yeller. MORRIS came across as an amicable and jovial guy. As time went on, KIRBY could tell he was not a great person. There was nothing necessarily illegal that he did. MORRIS was just a sneaky person.

KIRBY interacted with MORRIS on a daily basis. Oftentimes, MORRIS would not show up for the day. KIRBY would always let MORRIS know if she was not going to be in the office. KIRBY was very proactive in communication because MORRIS and KIRBY did not always see eye to eye. In one case, KIRBY sent MORRIS an email that she was running late. MORRIS responded "ok, great". KIRBY was later called into one of the managing directors' offices for a meeting to discuss KIRBY'S tardiness issues.

KIRBY moved from MORRIS'S team to HEATHER KIRBY'S team because KIRBY just could not stand the man. KIRBY tried her hardest to communicate with him and started to realize that MORRIS did not value KIRBY as part of his team. MORRIS would invite other people to meetings and not KIRBY. KIRBY then went to HR and described how she didn't like MORRIS as a person and was uncomfortable working with MORRIS'S only client. The woman in HR looked at KIRBY and asked, "you feel uncomfortable doing the job you were hired to do?". The HR person KIRBY communicated this to was MICHELLE KIRSHCENBAUM [KIRSCHENBAUM] (phonetic spelling). KIRBY was uncomfortable working with MORRIS'S only client.

KIRBY never met EPSTEIN. KIRBY had spoken with EPSTEIN on the phone for the purpose of confirming wires and other regulatory things that required her speaking to the account holder. KIRBY had to do all the KYC for EPSTEIN. EPSTEIN was a despicable person. EPSTEIN was found guilty of underage prostitution. EPSTEIN engaged in sex with underage girls and got them to come to his house to be a sex slave for other people. These were things that KIRBY discovered through third party media accounts and through her work on the due diligence process on EPSTEIN'S account. KIRBY compiled this

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information into a file for DB. KIRBY felt this way from day one of EPSTEIN being onboarded as a client.

EPSTEIN was not a MORRIS client when KIRBY first started working under MORRIS. When MORRIS joined the bank, it was just KIRBY working with MORRIS. KIRBY was still working with JANCO and CRIVAN but was allowed to help MORRIS. The main private banker team was based on the client's needs. There were anywhere between two to four people on a team.

KIRBY'S process to research EPSTEIN:

KIRBY compiled information based on what KIRBY believed were facts found through google searches. There was a document KIRBY created where she compiled all the information from Internet searches and the actual charges against EPSTEIN. It was open-source Internet research done on the client. To KIRBY'S knowledge, this was the only research background document that KIRBY had to create.

[Agent note: At this point in the interview, KIRBY was shown a series of documents. Thereafter, KIRBY provided the following details:]

Bates number 103224:

CHIP PACKARD [PACKARD] held a senior role within the private bank. MORRIS reported to PACKARD. Pat was PATRICK HARRIS [HARRIS]. HARRIS was very senior and was maybe the Head of Risk.

Bates number 103225:

This was the research memo that KIRBY compiled for MORRIS to present to PACKARD and HARRIS. KIRBY did not remember if she was given guidance on what to include or exclude from the memo. KIRBY was prompted to include criminal charges in the research memo because EPSTEIN was not a client. MORRIS was looking to bring EPSTEIN in as a client. When you did KYC, all this information came out. MORRIS wanted to stay ahead of that. KIRBY wanted to include everything she could find that was relevant and not try to keep anything off there that was relevant. KIRBY found this information through google searches but also may have tried to link the searches to actual legal documents. KIRBY could not recall MORRIS'S reactions to EPSTEIN'S criminal charges. MORRIS was aware of EPSTEIN'S background.

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When KIRBY wrote "we would not be opening personal accounts for Mr. Epstein...", she was referencing the fact that there would be EPSTEIN accounts under two companies that EPSTEIN owned. Whenever business accounts were opened, KYCs had to be done on the owners of the companies. KIRBY did not remember if, at the time, it was significant to note if the accounts would be personal accounts. KIRBY's current personal opinion was that it may have been an effort to get higher ups comfortable with the account.

There was also a reputation risk analysis performed by the bank which included looking at the client as a whole. Based on this document, the fact that the account would not be opened in EPSTEIN'S name would help risk feel more comfortable that the accounts were opened in another business name. KIRBY believed that MORRIS wanted the line regarding the accounts not being opened in EPSTEIN'S name to be included.

This was not an account opening document but rather a memo on the accounts they would be opening and other accounts. KIRBY gave this information to MORRIS and the information was shared with PACKARD and HARRIS. KIRBY did not recall being present in any meetings where this memo was discussed.

Bates number 43810:

ARMEN BRASH [BRASH] was high up on the KYC team. KIRBY did not recall BRASH'S title. BRASH was one of the approvers on the team that was doing fact checking and KYC approvals. Once KIRBY compiled KYC information, it went through a number of check points through different people. The KYC team had their own assessment process and KIRBY'S team could not really sway them in any way. EPSTEIN and his accounts were high risk. EPSTEIN was a felon. If a KYC was assigned to you, it meant your KYC got rejected. BRASH was letting KIRBY know that BRASH needed to have a conversation with HARRIS. When KIRBY wrote "Sorry I've been slightly moronic on this KYC. Clearly I've been out of practice with the overhauls of the last year...", she was referring to the overhauls and a corporate turn that occurred that included a round of layoffs. JANCO and CRIVAN had been let go. KIRBY was still at DB when they had been let go. KIRBY had been out of practice in the sense that she had not done a KYC in a very long time. Based on this email, KIRBY had forgotten

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a few items.

Bates number 105591:

Jeanne was JEANNE BRENNAN [BRENNAN]. BRENNAN was an assistant on the EPSTEIN team with whom KIRBY would interface with and exchange emails. She was an assistant that helped gather information. RICHARD KAHN [KAHN] was EPSTEIN'S accountant.

Bates number 105592:

This document looks as if was the list of accounts that EPSTEIN opened. KIRBY was compiling them all in one place. Every time you opened a new account, you had to go through the KYC process again. These accounts were opened because EPSTEIN wanted different company accounts for different purposes. KIRBY could not recall the purpose for the accounts. There was due diligence performed for each of the entities on the EPSTEIN account. The open-source research that KIRBY had done was not done for other clients. KIRBY only did the open-source research on EPSTEIN because he was a high-risk individual. For the accounts shown in the attachment, there was other non-open source, research used to do KYC. The person who created a KYC was almost always a junior member of a private banking team, such as KIRBY. KIRBY did not remember specifics about each of the various entities referenced in the document. Some of the entities most likely were related to a number of different properties. Some of the accounts were used for upkeep and wages of the different homes that EPSTEIN owned. Understanding the purpose of the accounts was important to KIRBY'S job. KIRBY'S understanding of the purpose of the account was that KIRBY was important in inputting certain wires. It was not part of KIRBY'S daily job description to compare the outgoing wires to the overall nature of the account. The initial high risk rating to EPSTEIN was also applied to other accounts opened in the relationship. A high-risk indication affected account openings because there was much more scrutiny. On the back-end with KYC, there were more approvals and due diligence required. Throughout KIRBY'S time, KYC got stricter and a new KYC was required each year.

Bates number 50182:

KIRBY did not remember who MELISA VENEGAS [VENEGAS] was. Based on the

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document, it appeared she worked on the KYC side. From KIRBY'S perspective, this was not a high-risk account. KIRBY did not recall how the risk calculator functioned. Creating this was a stress for KIRBY because high risk clients always took much longer for KYCs. The EPSTEIN team, who were the people that worked for EPSTEIN, wanted everything done yesterday. It was stressful knowing things would take longer due to the high risk relationship. When KIRBY said "please work your magic" she was not asking for any type of override. KIRBY did not remember why she clarified that the two women mentioned in the email were married. The women were married to each other. KIRBY was not asking for them to downgrade any of the EPSTEIN accounts. She was asking for the two women to be downgraded. KIRBY did not understand the fact that, because they fell under the EPSTEIN umbrella, they were automatically assigned as high risk.

Bates number 50206:

KIRBY had no recollection of what the acronyms "RDC" and "PCR" stood for. "PWM" stood for Private wealth Management. KIRBY did not recall what "BIS" stood for. After receiving an email like this with regard to the EPSTEIN relationship, KIRBY would have to open up the alert and read it. KIRBY then would respond whether or not the individual mentioned in the alert was their client. KIRBY did not remember what happened after confirming if an individual mentioned in an alert was their client. KIRBY treated all alerts the same way. KIRBY would not change her stance based on the project. KIRBY was just inputting information and getting information to help the compliance team make their own decision. If the accounts were in EPSTEIN'S name, there would be a reputation risk for the bank based on EPSTEIN'S prior criminal conduct and charges. Based on the attachment from PACKARD, the two company accounts did not pose a reputation risk despite EPSTEIN owning them. Reputation risk also considered the relationship between the bank and the client.

Bates number 000000028:

VAHE STEPANIAN [STEPANIAN] was on the brokerage team that had accounts with EPSTEIN. STEPANIAN did not report to MORRIS. STEPANIAN was junior on the brokerage side and interacted with KIRBY a lot. KIRBY understood that she wasn't to refer to these accounts by EPSTEIN'S name because part of the

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training she received was that you had to keep client confidentiality. There may have been sensitivity regarding EPSTEIN'S criminal past and not referring to the account as EPSTEIN'S account. KIRBY did not remember how MORRIS was brought into DB. KIRBY did not remember how long it was before MORRIS brought on EPSTEIN as a client. KIRBY recalled that you did not hire bankers from another bank without them having a book a business. You hired someone with the expectation that they were bringing on a book of business. KIRBY did not recall why she reminded STEPANIAN not to mention EPSTEIN as being related to the accounts. It could have been because MORRIS had insecurities and wanted to highlight the fact that he had a bigger client.

THE BUTTERFLY TRUST (No document shown):

THE BUTTERFLY TRUST was part of the EPSTEIN relationship managed by KIRBY'S team. KIRBY did not remember the purpose of the trust.

Bates number 105470:

To a certain point, this document refreshed KIRBY'S memory on what the purpose of THE BUTTERFLY TRUST was. Based on this, KIRBY was giving MORRIS an update on where they were with KYC. Research on the beneficiaries was included as part of the standard procedures for trust accounts.

Bates number 39435:

ANDREW KISZ [KISZ] was someone in the AML compliance world. KIRBY could not recall who MICHAEL VILA [VILA] was. [REDACTED] [REDACTED] was one of the beneficiaries of THE BUTTERFLY TRUST. KIRBY did not remember what she knew about [REDACTED] at the time. KIRBY recently read articles about [REDACTED]. The RDC alerts were generated and sent to KIRBY. KIRBY then determined whether the individual named in the alert was her client or not.

Based on this email, KIRBY assumed that the alert that was attached was in reference to [REDACTED] being listed as a co-conspirator. That was KIRBY'S best guess as to why that was included. KIRBY was just stating the facts and information. If [REDACTED] had been convicted, KIRBY would have stated that. KIRBY always ended her emails with "please clear this alert" or something along those lines. This was just as much information as KIRBY could provide and they would do the rest. KIRBY did not have any concerns at the time that

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an alleged co-conspirator was listed as a beneficiary for the trust account. KIRBY did not remember where she got the information that [REDACTED] was never going to have a personal account with the bank. When KIRBY received simple alerts like an incorrect initial, for example, she would respond right away. For something like this, KIRBY most likely included MORRIS. KIRBY did not remember. KIRBY did not remember if she ever had an alert that was not cleared during her time at DB. KIRBY felt pressure to clear alerts for EPSTEIN in the sense that EPSTEIN'S team expected things to be done quickly. There was not pressure that KIRBY had to get something cleared. There was just pressure to provide a timely response. It was KIRBY'S experience that clients of this magnitude got what they wanted right away.

Bates number 00000038:

When KIRBY mentioned "12 year olds" she was referring to the article where EPSTEIN had been accused of misconduct with girls as young as 12 years old. KIRBY was disgusted by it. KIRBY was disgusted when she read the articles. KIRBY did not remember if she spoke to anyone else about the articles. KIRBY did not remember if this would be something that she should have brought up to MORRIS. KIRBY did not remember specifically how this changed about the way she felt about working with EPSTEIN. It may have made KIRBY think EPSTEIN got to an even more horrible level than he was previously on.

Bates number 70625:

TROY D WILLIAMS [WILLIAMS] was part of the risk management team. KIRBY did not remember receiving this email. An updated KYC may have been part of negative media that came out. You may have had to do an updated KYC to make sure there was no new information. KIRBY would have been tasked with doing the updated KYC. KIRBY did not remember doing the updated KYC. KIRBY did not recall any discussions with MORRIS regarding the article. KIRBY did not recall if she had conversations regarding other open source allegations regarding EPSTEIN. KIRBY did not recall if the bank's posture toward EPSTEIN changed after this article came out. Given what KIRBY presently knew, KIRBY was shocked that things were not escalated further with regards to EPSTEIN.

Bates number 51034:

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KIRBY did not remember who MONIFA CRAWFORD [CRAWFORD] was. Based on this email, it appeared that KIRBY had already performed a KYC on [REDACTED]. This email was not KIRBY making a recommendation. It was just KIRBY providing them with information so that they could make a determination. KIRBY did not remember if she did any research after confirming whether a client was hers or not. KIRBY did not believe that they would not clear the alert. KIRBY believed they would clear the alert because they did so previously.

Approval and clearing of wires (no document shown):

Oftentimes, there was a form that clients sent in with a signature when requests came in for external wires from EPSTEIN'S accounts. The form listed the account information and beneficiary information. It was KIRBY'S duty to confirm the signature on the form matched those of the signatory on the account. KIRBY would have to speak with the authorized signer to confirm it was them who requested the wire to be sent when wires were above a certain threshold. There would then be additional approvals on KIRBY'S side to confirm that she had a conversation with the authorized signatory. Requests for wires would be in an email directly to KIRBY and would have additional team members copied.

Wires were generally just KIRBY'S responsibility. Sometimes someone on the same level as KIRBY would assist. KIRBY did not recall what her role would have been in determining who was receiving EPSTEIN wires. There were times where KIRBY requested information on the beneficiary of EPSTEIN wires. Once KIRBY input the wire, the wire team would perform further review. KIRBY would sometimes get requests for additional information from the wire team. KIRBY would reach out to the client or MORRIS to obtain that additional information. Generally speaking, the clients would state the purpose of the wire on the wire request form. KIRBY would then review the purpose to see if that fell within the scope of the client's business. KIRBY did not remember how many wires she handled on a given week for the EPSTEIN account. KIRBY'S first half of working on the team dealt more with working with KYC.

KIRBY did not recall specifics on how the high risk relationship factored into the handling of wires. KIRBY input wires which then went through additional checkpoints. KIRBY was trained on how to identify suspicious wire transactions. Some of the training suggested looking at wires to countries

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that were on OFAC lists, wires that were out of the ordinary, and wires with certain keywords. It was out of the ordinary for EPSTEIN relationship wires if there was a new name or amount that KIRBY was not used to seeing. If KIRBY saw something out of the ordinary, KIRBY would reach out to the client to verify whether the client sent the specific request to the name and the account. KIRBY did not recall if she ever flagged any EPSTEIN wires as suspicious.

Bates number 45599:

HARRY BELLER [BELLER] was also one of EPSTEIN'S accountants. Wire requests would generally come in from KAHN, who was EPSTEIN'S accountant. KAHN would at least be CC'd on all requests. It was not very often for KIRBY to be required to reach out to EPSTEIN for approval. It was always on the telephone and never in person.

Bates number 45600:

KIRBY did not recall who SUSAN M. HANBLIN [HANBLIN] was.

Bates number 45602:

This was another wire request. This was just a formalized way that KIRBY sent them. The fact that this document said "SWIFT" says that this was an international wire. KIRBY remembered the name [REDACTED] but did not remember more than that. BELLA KLEIN [KLEIN] was an assistant to KAHN. If KIRBY ever needed more information, she would reach out to KLEIN, KAHN, or BELLER. It did not seem like they put in a specific reason for this wire. KIRBY did not recall if she had to input the purpose of wires whenever she had to input a wire. If there was, she would follow up. KIRBY had a general recollection of requesting additional information on the background of certain wires. As a front-line person, it was part of your role to understand the purpose of the transaction. There were times where the KYC team would flag wires and request that KIRBY request additional information from the customer.

Bates number 45604:

KIRBY did not know who [REDACTED] [REDACTED] was.

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KIRBY did not recall who the entity MC2 MODEL MANAGEMENT was. KIRBY did not remember if seeing transactions to women, women overseas, and other entities raised a red flag. Maybe during this timeframe KIRBY was still getting to know that client

Bates number 44380:

KIRBY did not recall who [REDACTED] was. KIRBY remembered the name. KIRBY confirmed her signature was at the bottom of the authorization. KIRBY believed that based on the amount of the wire, she had to signature verify. KIRBY did not recall the threshold. KIRBY did not recall who KARYNA SHULLAK [SHULLAK] was but recalled her name in the context of the EPSTEIN relationship.

The High Risk Media Callback Verification stamp was a callback verification. These were required for wires above a certain amount, maybe \$50,000 and above. KIRBY would receive the wire request, print it out, and make certain that she made a call back to the approved signer via the approved phone number. She had to verify that she did everything included in the boxes of the stamp. The stamp required two people to confirm the details within the stamp. The "transaction consistent with expected activity" box was in regards to your specific knowledge of the account. KIRBY did not recall what the purpose of THE BUTTERFLY TRUST was.

Bates number 44383:

KIRBY did not recall if any of the transactions of THE BUTTERFLY TRUST triggered AML alerts or requests.

Bates number 50560:

This transaction did not ring any bells. Transactions to women were consistent with the activity of the EPSTEIN account.

Bates number 57814:

There were no additional steps above the callback stamp for wires of this amount. MORRIS was not required to review large amounts but KIRBY would make

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him aware. There was no regulatory requirement for MORRIS to review these.

Bates number 61576:

KIRBY did not recall CHERIE QUIGLEY'S [QUIGLEY] name. KIRBY did not recall the PRIME system. It was KIRBY'S job to find the information and provide it to MORRIS so that he could respond to the questions. KIRBY would not have conducted open source research to obtain answers to questions. She would have reached out to the client, which it appears she did not do here in this instance. KIRBY did not recall if the reference to several women that received wires raised any red flags given what she knew about EPSTEIN'S allegations. KIRBY did not recall if she was ever required to obtain supporting documents such as invoices for wires. WAYNE SALIT [SALIT] may have been in charge of the AML team. That was just a guess and SALIT'S name rang a bell.

Document number 31709:

KIRBY believed DAPHNE CALES [CALES] was on the team in charge of running the branch that was in the basement of the 345 Park Avenue office. KIRBY remembered sending this email because she had gone over it over the past year. KIRBY was referring to DARREN INDYKE [INDYKE], who was a power of attorney.

LEON BLACK relationship [no document shown]:

KIRBY did not believe BLACK'S relationship was managed under the EPSTEIN umbrella. BLACK may have been onboarded as a client at one point. KIRBY remembered having conversations about him but did not remember whether it was in regards to working on the account or just background information on him. KIRBY believed MORRIS was looking to be introduced to BLACK.

Bates number 0131011:

KIRBY did not remember who SAAM YOUSSEFI-RAD was. When KIRBY wrote, by "very important client", KIRBY just wanted to know the information that was necessary to allow the wire to go through. KIRBY was not trying to get him to avoid any procedures or skirt anything. KIRBY recalled the pressure she felt that there was pressure to get an answer. KIRBY understood what reading this email looks like from the outside and it appeared to be extremely

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obnoxious.

KIRBY'S base salary was very little. AK did not recall what the bonus structure at DB was. This email was not based on any compensation. The performance management structure at DB included mid year reviews. The banking team would provide a bonus based on their revenue. To the best of KIRBY'S knowledge, people were looking into the articles regarding EPSTEIN. Nothing about the \$250,000 raised KIRBY'S suspicions. KIRBY was just exhausted at this point because there was nothing unsavory about the recipient of the wire. KIRBY did not remember having discussions with MORRIS regarding this email. However, after reading the email, KIRBY does not think she would have written this email with MORRIS. One of the additional four clients was BLACK. KIRBY did not remember the other three. KIRBY would not have mentioned the four additional clients unless she was instructed to do so.

Miscellaneous information:

KIRBY worked for MORRIS'S team from approximately 2013 through 2015. KIRBY'S discussion with the HR office occurred before KIRBY left MORRIS'S team. KIRBY was asking to leave the team.

KIRBY did not remember if she ever expressed concerns with the EPSTEIN account with MORRIS. If KIRBY ever discussed news articles, it would have been at a high level. KIRBY did not ever observe anyone violating bank policy with respect to the EPSTEIN relationship. There were colleagues on KIRBY'S level that she could talk about her work with but KIRBY does not recall who they were specifically. KIRBY did not believe that MORRIS met with EPSTEIN frequently. KIRBY did not believe that MORRIS got trips paid for by EPSTEIN. There were no colleagues that voiced concerns over some of their clients at DB. KIRBY did not know Mr. Trump was a client at DB.

With regards to some of the names the interview team asked about, KIRBY was probably like "what in the heck is this" at the time. KIRBY thought she was doing the best that she could and doing what she was told to do.

KIRBY thought she was paying people off based on inappropriate relationships EPSTEIN had in the past. Those wires would have been vetted at much higher levels. From KIRBY'S vantage point, it was triggered in KIRBY'S

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mind that some of the payments may have been related to the misconduct in 2007 or 2008. People who were more senior and focused on the issue were going to review these wires. KIRBY did not believe that, during her time there, the payments were for things that were currently happening. KIRBY would have contacted KAHN or INDYKE to get follow up information regarding the women compliance asked KIRBY to follow up on. KIRBY did not remember.

KIRBY was not working at the time of the August 10, 2021 interview with the FBI and USAO.

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