

KYC Case # : **01147850**

Status : **6. Approved**

**One sheet must be established per relationship - list all accounts included in the relationship**

1. Relationship Details			
Relationship Name:	SOUTHERN FINANCIAL RELATIONSHIP: [REDACTED]	Booking Center:	New York
Relationship Manager:	Paul Morris		
Relationship to PWM:	<input type="checkbox"/> New PWM Relationship <input type="checkbox"/> Existing PWM Relationship		
	If existing, please indicate since when the relationship exists, provide reason for new profile and attach old profile:		
How Was the Client(s) Introduced? How long has the RM personally known the client?	<input type="checkbox"/> Client Referral <input checked="" type="checkbox"/> RM Prospect <input type="checkbox"/> Intermediary/FIM <input type="checkbox"/> Other Source (CIB, etc.)		
	Please provide details (e.g. name of referral source, how many years RM personally has known client, etc.): Jeffrey Epstein is a current client of the Bank. Wants to open a new account. Introduction details of Paul and Jeffrey: Jeffrey Epstein was a client of Paul's at JP Morgan. Paul and Jeffrey Epstein had a mutual friend/colleague who introduced them while Paul was at JPMorgan. Over the course of a few meetings Paul was able to get Jeffrey to bring some of his funds over to Deutsche Bank		
Does Deutsche Bank pay a retrocession or similar compensation to a third party for the introduction of this relationship?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	(If Yes, describe):		
List all existing and new accounts involved in this relationship			
	Legal Entity Account(s)	Account Name / Number	Opening Date (intended/actual)
1	<input checked="" type="checkbox"/>	Mort, Inc	11/12/2013
2	<input checked="" type="checkbox"/>	Mort, Inc -- Money Market	11/12/2013
Who is the primary contact person for the RM? (Note: This person needs to have signatory rights and/or information right for the accounts.):	Harry Beller		Preferred method of contact (indicate phone no., fax no., e-mail address, etc.): [REDACTED]

**One sheet must be established for each account to be opened**

2. Account Ownership Summary														
Account Name:				Mort, Inc				Acct. Number (if available):						
Account Manager:				Paul Morris										
What is the purpose of the account (e.g. portfolio management, advisory account, custody services, long-term investment, payment/expense account)? Checking account to hold assets for the company.														
Indicate from where the assets are expected to arrive?														
<input type="checkbox"/> DB Group: Same Booking Center (Indicate account number): <input type="checkbox"/> DB Group: Other Booking Center (Indicate DB location and account details): <input checked="" type="checkbox"/> Other Institution (Indicate name & location): JPMorgan. New York <input type="checkbox"/> Physical Deposits (specify cash, securities, cheques, ...):														
What is the expected size and frequency of regular inflows and outflows for the account (indicate estimated number and volume per month)? Roughly 10 inflows and outflows per month ranging from \$1,000 to \$10,000														
What is the expected volume of assets and currency for the account approx. 90 days after opening?				50000		Currency		USD						
What is the expected volume of assets and currency for the account approx. one year after opening?				50000		Currency		USD						
Does/will the client have Assets Under Management (AuM) within DB under Eur. 3M?				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No										
<b>Please list all parties related to the account.</b> For each party: • Check if a source of wealth description is required for the party. • Check the appropriate box to describe the relationship of the party to this account (> 1 can be selected). • If none of the check boxes apply, describe the party's relation to the account in the "Other" column. • Always describe the relationship between the parties in the last column. • Please drill down to the ultimate/underlying Beneficial Owner(s).														
Legal Entity	Description of Source of Wealth required	Parties related to this account	Account Holder	PIC Owner	Settlor of Trust / Founder of Foundation	Ultimate Beneficial Owner	Signatory or Full POA	Limited POA	Financial Intermediary (FIM)	Significant Shareholder (> = 25% Non-PIC entity (indicate ownership %))	Legal Representative	Grantor/Settlor	Founding Donor	Other (please describe other roles and/or indicate relationship between parties)
1	<input type="checkbox"/>	<input type="checkbox"/>	Harry Beller	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Mort, Inc	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Jeffrey Epstein	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

2. Account Ownership Summary															
Account Name:			Mort, Inc -- Money Market						Acct. Number (if available):						
Account Manager:			Paul Morris												
What is the purpose of the account (e.g. portfolio management, advisory account, custody services, long-term investment, payment/expense account)? Money Market account to hold assets for the company and to earn interest.															
Indicate from where the assets are expected to arrive?															
<input type="checkbox"/> DB Group: Same Booking Center (indicate account number): <input type="checkbox"/> DB Group: Other Booking Center (indicate DB location and account details): <input checked="" type="checkbox"/> Other Institution (Indicate name & location): JPMorgan, New York <input type="checkbox"/> Physical Deposits (specify cash, securities, cheques, ...):															
What is the expected size and frequency of regular inflows and outflows for the account (indicate estimated number and volume per month)?: Roughly 1-3 inflows and outflows per month ranging from \$1000 to \$10,000															
What is the expected volume of assets and currency for the account approx. 90 days after opening?										50000	Currency	USD			
What is the expected volume of assets and currency for the account approx. one year after opening?										50000	Currency	USD			
Does/will the client have Assets Under Management (AuM) within DB under Eur. 3M?											<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
<b>Please list all parties related to the account.</b> For each party: • Check if a source of wealth description is required for the party. • Check the appropriate box to describe the relationship of the party to this account (> 1 can be selected). • If none of the check boxes apply, describe the party's relation to the account in the "Other" column. • Always describe the relationship between the parties in the last column. • Please drill down to the ultimate/underlying Beneficial Owner(s).															
	Legal Entity	Description of Source of Wealth required	Parties related to this account	Account Holder	PIC Owner	Settlor of Trust / Founder of Foundation	Ultimate Beneficial Owner	Signatory Full POA	Limited POA	Financial Intermediary (FIM)	Significant Shareholder (>=25%) Non-PIC entity (indicate ownership %)	Legal Representative	Grantor/Settlor	Founding Donor	Other (please describe other roles and/or indicate relationship between parties)
1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Mort, Inc	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2	<input type="checkbox"/>	<input type="checkbox"/>	Harry Beller	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Jeffrey Epstein	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**One sheet must be established for EACH INDIVIDUAL PARTY in Section 2. Account Ownership Summary**

3A. Individual Details (for all parties)					
Individual's Name:	Jeffrey Epstein - [REDACTED]	Date of Birth:	[REDACTED]		
Country of Residence:	USVI	Country of Citizenship:	USA		
Address of primary residence:	Litte Saint James Saint Thomas 00802 US Virgin Islands	Has client resided outside of his/her country of nationality for 5 years or more?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Profession/Occupation:	Self Employed	Tax ID / SSN:	[REDACTED]		
Current Employer:	Southern Financial LLC	Position/Title/Rank:	President		
Address of employer:	6100 Red Hook Quarter B3 St. Thomas USVI 00802				
Does the person work as senior executive of a DB-recognized regulated entity in the financial industry? or an entity listed on a DB-recognized exchange? (Not applicable for operating entities)		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Is the individual a Politically Exposed Person (PEP)? (if Yes, describe)		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
To the best of your knowledge, is the individual related to an employee of the DB group? (if Family or Friendship, describe)		<input type="checkbox"/> Family <input type="checkbox"/> Friendship <input checked="" type="checkbox"/> None			
To the best of your knowledge, is the individual party to a non-banking relationship with Deutsche Bank (e.g., external legal counsel, client referral source, supplier of goods or services)? (if Yes, describe)		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If applicable, indicate which bank officers have met the person:		Indicate where and when the client meeting(s) took place:			
Bank Officer Name(s)	Bank Office:	Client Private Domicile:	Client Place of Business:	Other Location (specify):	Date:
Paul Morris	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		10/22/2013
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

<input type="checkbox"/> Wealth Details for this individual are not filled in, because they are the same as for the following person:					
3B. Wealth Details (Only for parties requiring source of wealth description as indicated in Section 2)					
Nature of the Individual's Business:	Private investments				
Primary Country of source of wealth/source of Funds?					
Primary industry of source of Wealth/Source of Funds?					
Summarize Source of Wealth:	<input checked="" type="checkbox"/> Business Owner <input type="checkbox"/> Salary/Earnings <input checked="" type="checkbox"/> Investment <input type="checkbox"/> Inheritance/Gifts <input type="checkbox"/> Other:				
Further Describe Source of Wealth /Detail the history of wealth for each of the sources: (e.g. For trusts, how did settlor accumulate wealth? For inheritance, how did family accumulate wealth?For business owners, how long in business, how many employees, level of profitability? Indicate type of business, countries of major activities, important business partners.) Epstein began his financial career in 1976 as an options trader at Bear Stearns and became a partner in 1980. In 1982, Epstein founded his own financial management firm, J. Epstein & Co., managing the assets of clients with more than a billion in net worth. In 1996, Epstein changed the name of his firm to The Financial Trust Company and based it on the island of St. Thomas in the US Virgin Islands. All of his clients were anonymous except for the very wealthy businessman Leslie Wexner. His wealth has come from his days at Bear Stearns and his financial management firms					
Estimated Annual Income(\$):	10,000,000.00	Estimated amount of investable assets(\$):	\$50 MM - 100 MM		
Estimated Net Worth(\$):	\$100 MM - 500 MM	Amount of assets planned to invest with PWM(\$):			
Other Known Financial Institutions:					

Institution:		Country:		Est. Assets Under Mgt:	
Institution:		Country:		Est. Assets Under Mgt:	
Institution:		Country:		Est. Assets Under Mgt:	
Please indicate the family situation of the individual (marital status, other family members, etc.):					

One sheet must be established for EACH INDIVIDUAL PARTY in Section 2. Account Ownership Summary

3A. Individual Details (for all parties)					
Individual's Name:	Harry Beller - [REDACTED]		Date of Birth:	[REDACTED]	
Country of Residence:	USA		Country of Citizenship:	USA	
Address of primary residence:	[REDACTED]		Has client resided outside of his/her country of nationality for 5 years or more?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Profession/Occupation:	Accountant		Tax ID / SSN:	[REDACTED]	
Current Employer:	HBRK Associates, Inc		Position/Title/Rank:		
Address of employer:	575 Lexington Avenue, 4th Floor Monsey NY USA 10022				
Does the person work as senior executive of a DB-recognized regulated entity in the financial industry? or an entity listed on a DB-recognized exchange? (Not applicable for operating entities)			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is the individual a Politically Exposed Person (PEP)? (if Yes, describe)			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
To the best of your knowledge, is the individual related to an employee of the DB group? (if Family or Friendship, describe)			<input type="checkbox"/> Family <input type="checkbox"/> Friendship <input checked="" type="checkbox"/> None		
To the best of your knowledge, is the individual party to a non-banking relationship with Deutsche Bank (e.g., external legal counsel, client referral source, supplier of goods or services)? (if Yes, describe)			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If applicable, indicate which bank officers have met the person:		Indicate where and when the client meeting(s) took place:			
Bank Officer Name(s)	Bank Office:	Client Private Domicile:	Client Place of Business:	Other Location (specify):	Date:
Paul Morris	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		11/4/2013
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

Wealth Details for this individual are not filled in, because they are the same as for the following person:

3B. Wealth Details (Only for parties requiring source of wealth description as indicated in Section 2)					
Nature of the Individual's Business:					
Primary Country of source of wealth/source of Funds?					
Primary industry of source of Wealth/Source of Funds?					
Summarize Source of Wealth:			<input type="checkbox"/> Business Owner <input type="checkbox"/> Salary/Earnings <input type="checkbox"/> Investment <input type="checkbox"/> Inheritance/Gifts <input type="checkbox"/> Other:		
Further Describe Source of Wealth /Detail the history of wealth for each of the sources: (e.g. For trusts, how did settlor accumulate wealth? For inheritance, how did family accumulate wealth?For business owners, how long in business, how many employees, level of profitability? Indicate type of business, countries of major activities, important business partners.)					
Estimated Annual Income(\$):		Estimated amount of investable assets(\$):			
Estimated Net Worth(\$):		Amount of assets planned to invest with PWM(\$):			
Other Known Financial Institutions:					
Institution:		Country:		Est. Assets Under Mgt:	
Institution:		Country:		Est. Assets Under Mgt:	

Institution:		Country:		Est. Assets Under Mgt:	
Please indicate the family situation of the individual (marital status, other family members, etc.):					

**One sheet must be established for EACH LEGAL ENTITY in Section 2. Account Summary**

3C. Legal Entity Details (For all Legal Entities)			
Legal Entity Name:	Mort, Inc [REDACTED]		
Type of Entity:	<input type="checkbox"/> Foundation/Association <input type="checkbox"/> Trust <input checked="" type="checkbox"/> Company <input type="checkbox"/> Estate <input type="checkbox"/> Partnership	Purpose of Entity:	<input checked="" type="checkbox"/> Private Investment <input type="checkbox"/> Philanthropic/Charitable <input type="checkbox"/> Commercial
Type of Entity Other (specify):		Purpose of Entity Other (specify):	
Country of incorporation/registration:	USVI	Date of incorporation / registration:	4/12/2011
Volcker Status:		Volcker Flag:	
Address (city, street, post code):	6100 Red Hook Quarter, B3 St, Thomas 00802 USVI	U.S. TIN/EIN:	[REDACTED]
Provide a description of the entity's organizational structure, its ownership structure and its Top Management. For trusts/foundations, include information about revocability, settlor and beneficiaries, etc.:			
Corporation with 1000 issued. All issued shares are owned by Jeffrey Epstein. Jeffrey Epstein is the President and sole shareholder and owner.			
Please indicate how ownership of the legal entity is reflected: Corporation with 1000 issued. All issued shares are owned by Jeffrey Epstein. Jeffrey Epstein is the President and sole shareholder and owner.			
<input type="checkbox"/> Special attention: Bearer Shares - Indicate where shares are custodied:			
Describe the chain from the direct owner of the entity to the ultimate beneficial owner (if not the same persons): Corporation with 1000 issued. All issued shares are owned by Jeffrey Epstein. Jeffrey Epstein is the President and sole shareholder and owner.			
To the best of your knowledge, is the entity party to a non-banking relationship with Deutsche Bank (e.g. external legal counsel, client referral source, supplier of goods or services)?:		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>Describe Nature of Entity's Primary Business and Investment Activities</b>			
Nature of the business:	Investment holding company. A private company that is used to hold investments that the sole owner, Jeffrey, would like to keep separate from other investments		
Countries where business is transacted:	USVI		
Number of employees:	2		

3D. Wealth Profile (Only for parties requiring source of wealth description as indicated in Section 2)	
Primary Country of source of wealth/source of Funds?	
Primary industry of source of Wealth/Source of Funds?	
Provide Evidence of Corporate Assets (e.g. balance sheet or equivalent summary of assets/liabilities): Capital contribution of \$1000 from Jeffrey Epstein	
Estimated gross receipts p.a.(\$):	
Estimated net profit p.a. (\$):	
Estimated investable assets (\$):	<\$1 MM
Potential Amount to be invested with PWM (\$):	100,000.00
Other Known Financial Institutions:	
Institution:	JPMorgan
Country:	USA
Est. Assets Under Mgt:	100,000.00
Institution:	
Country:	
Est. Assets Under Mgt:	

Institution:		Country:		Est. Assets Under Mgt:	
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DB PWM GLOBAL KYC/NCA: US/LatAm/Int'l **PART B**



Relationship Name	SOUTHERN FINANCIAL RELATIONSHIP				
Risk Rating Comments:					
Booking Center	<input checked="" type="checkbox"/> NY	<input type="checkbox"/> NY/Offshore	<input type="checkbox"/> Offshore	<input type="checkbox"/> Moderate Risk	<input checked="" type="checkbox"/> High Risk
Gwen Hill					
(Compliance Signature)					
<input type="checkbox"/> DB Employee	<input type="checkbox"/> DB Managed PIC	<input type="checkbox"/> DB is Trustee/Co-Trustee		<input type="checkbox"/> Bearer Shares	

4. Attachments			
A. Type of Photo ID Provided	<input checked="" type="checkbox"/> Drivers License	<input checked="" type="checkbox"/> Passport	<input type="checkbox"/> National/State ID <input type="checkbox"/> Other
B. Checklist of names (individuals and/or entities) that were submitted for database searches is attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
C. Please indicate the results of the database searches performed			
RDC searches complete	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	negative results found	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
PCR checks complete	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	negative results found	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
OFAC checks complete	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	negative results found	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
BIS searches complete (Lexis/Nexis, Factiva, Reuters, Dow Jones, D&B)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	negative results found	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Denial Orders checks complete	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	negative results found	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Martindale-Hubbell searched (Lawyers/Law Firms only)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	negative results found	<input type="checkbox"/> Yes <input type="checkbox"/> No
Please summarize any negative results from the database searches indicated above: JEFFREY EPSTEIN: KYC Approved and all pertaining documents in case #:1121718 and 01082293			
HARRY BELLER: D. KYC approved in case #:01133377 and 01133624			
MORT INC: All negative media does not pertain to our client. All court cases do not pertain to our client			
E. To the best of your knowledge, has the client ever been convicted of a criminal offense?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
F. To the best of your knowledge, has the customer ever been involved in any past litigation against Deutsche Bank AG or any of its subsidiaries or is the customer threatening litigation against Deutsche Bank AG or any of its subsidiaries? (If Yes, provide details below and contact Quality Mgt. (LatAm/Int'l) or the Regulatory Control Group and notify Compliance immediately)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
G. Does the client or related party have any financial or other association / interactions within countries or regimes sanctioned by the Office of Foreign Assets Control (OFAC)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
H. Does the client or related party have any financial or other association/ interactions within high risk countries?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I. Corporate Documentation Attached (Legal Entities Only)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable		
J. Undisclosed Principal Form Complete (Intermediaries Only)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable		
K. If Lexis/Nexis Search Results, Corporate Documents or Other Supporting Documentation is not in English, please provide an English summary of the nature/contents of the non-English Documentation:			
L. Special Risk Factors			
Does the account have Nexus to Special Risk Countries?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is the account structure unusually complex?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

Is there any indication the client set up a non operating company expressly for the purpose of transferring shares to third parties?	
Is there any indication this could be a prohibited business relationship?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the bearer shares identified subject to acceptable controls?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

M. Case Comments			
No records to display.			

ONSHORE APPROVALS			
Client Facing Professional (CFP):	Paul Morris	(Signature) Paul Morris	11/5/2013
Office Director/Business Head:	Brian M. Biggar	(Signature) Brian M. Biggar	11/5/2013
Regional Office Director:		(Signature)	
AML Business Risk:		(Signature)	
AML Compliance:	Janice Franklin	(Signature) Janice Franklin	11/12/2013
	Gwen Hill	(Signature) Gwen Hill	11/12/2013

LATAM/INTERNATIONAL APPROVALS			
Client Facing Professional (CFP):		(Signature)	
Account Manager:		(Signature)	
Global Market Team Head (GMTH)/Sub-Market Team Head (SMTH):		(Signature)	
AML Business Risk:		(Signature)	
AML Compliance:		(Signature)	

**PRIVATE WEALTH MANAGEMENT POLICY STATEMENT:** Deutsche Bank Private Wealth Management (PWM) worldwide is committed to professionally serve the interests of its clients. To do so, Client Facing Professionals<sup>1</sup>(1) (CFP's) should establish and maintain business relationships only with persons who satisfy our high standards of suitability, background and character. Due diligence obtained on the client must be appropriately documented by the CFP. It is the responsibility of CFP's to demonstrate that they know their client both at the inception of a relationship and on an ongoing basis.

**DECLARATION FOR ALL SIGNERS OF THIS FORM:** To the best of my knowledge and belief the above information is correct and up to date. I confirm that I have no suspicions relating to the money laundering or unethical activities on the part of the client(s) and that I have followed all the procedures relating to account opening as described in the PWM Americas Procedures and the PWM Global KYC Policy

(1) Client Facing Professionals (CFP's) include: Relationship Managers, Wealth Advisors, Product Officers, Brokers, Client Managers, etc.

