

KYC Case # : **01791049**

Status : **6. Approved**

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

1. Relationship Details			
Relationship Name:	EPSTEIN, JEFFREY RELATIONSHIP:00000483290	Booking Center:	New York
Relationship Manager:	Stewart Oldfield		
Relationship to PWM:	<input type="checkbox"/> New PWM Relationship <input checked="" type="checkbox"/> Existing PWM Relationship		If existing, please indicate since when the relationship exists, provide reason for new profile and attach old profile: ***This KYC is a periodic review for high risk remediation*** Original KYC1133377
	How Was the Client(s) Introduced? How long has the RM personally known the client?		
How Was the Client(s) Introduced? How long has the RM personally known the client?	<input checked="" type="checkbox"/> Client Referral <input 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.): Stew Oldfield reached out to Rich Kahn and Darren Indyke on 7/7/2017 to confirm material changes to the accounts. Rich Kahn confirms that he is now the sole owner and signor of HBRK Associates. His main source of wealth derives from this company. Darren confirms no material changes to his PLLC	
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"/>	HBRK Associates, Inc- Deposit- [REDACTED]	11/1/2013
2	<input checked="" type="checkbox"/>	Darren K. Indyke PLLC- Deposit- [REDACTED]	11/1/2013
Who is the primary contact person for the RM? (Note: This person needs to have signatory rights and/or information right for the accounts.):		Preferred method of contact (indicate phone no., fax no., e-mail address, etc.):	

One sheet must be established for each account to be opened

2. Account Ownership Summary															
Account Name:			HBRK Associates, Inc- Deposit					Acct. Number (if available):		[REDACTED]					
Account Manager:			stewart oldfield												
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 funds for daily use for the company.															
Indicate from where the assets are expected to arrive?															
<input checked="" type="checkbox"/> DB Group: Same Booking Center (Indicate account number): [REDACTED] <input type="checkbox"/> DB Group: Other Booking Center (Indicate DB location and account details): <input type="checkbox"/> Other Institution – (Indicate name & location): <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)?: 0-15 inflows/outflows between 1k and 6k on a monthly basis															
What is the expected volume of assets and currency for the account approx. 90 days after opening?			100000					Currency		USD					
What is the expected volume of assets and currency for the account approx. one year after opening?			163601.48					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				
Please list all parties related to the account. 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 checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	HBRK Associates, 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 checked="" type="checkbox"/>	Richard D. Kahn	<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"/>	

2. Account Ownership Summary														
Account Name:			Darren K. Indyke PLLC- Deposit						Acct. Number (if available):			[REDACTED]		
Account Manager:			stewart oldfield											
What is the purpose of the account (e.g. portfolio management, advisory account, custody services, long-term investment, payment/expense account)? Checking account for the daily use of the this law firm														
Indicate from where the assets are expected to arrive?														
<input checked="" type="checkbox"/> DB Group: Same Booking Center (indicate account number [REDACTED]) <input type="checkbox"/> DB Group: Other Booking Center (indicate DB location and account details): <input type="checkbox"/> Other Institution – (Indicate name & location): <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)?: 0-15 inflows/outflows between 1k and 15k on a monthly basis														
What is the expected volume of assets and currency for the account approx. 90 days after opening?			100500			Currency			USD					
What is the expected volume of assets and currency for the account approx. one year after opening?			295086.86			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				
Please list all parties related to the account. 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).														
1	Legal Entity	Description of Source of Wealth required	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 checked="" type="checkbox"/>	Darren K. Indyke	<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	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Darren K. Indyke PLLC	<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"/>	

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

3A. Individual Details (for all parties)					
Individual's Name:	Darren K. Indyke - 00000486405		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:	Lawyer		Tax ID / SSN:	[REDACTED]	
Current Employer:	Southern Financial LLC		Position/Title/Rank:		
Address of employer:	575 Lexington Ave, 4th Fl Livingston NY United States 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-recognised 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:
	<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"/>		

<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:	Attorney				
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 checked="" 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.) Darren has been an in-house lawyer for Jeffrey Epstein at Southern Financial LLC for over 15yrs, wherein his main source of income derives from. Southern Financial LLC is a current client of DB. See case 1082293 as a reference. Mr. Indyke also owns his own legal practice called Darren Indyke PLLC, as well as smaller LLCs for his own personal investments.					
Estimated Annual Income(\$):	300,000.00	Estimated amount of investable assets(\$):	\$1 MM - 2 MM		
Estimated Net Worth(\$):	\$2 MM - 5 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:	

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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:	Richard D. Kahn - 00000486407	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 Ave, 4th Fl New York NY United States 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:
	<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"/>		

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:	Accountant		
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 checked="" 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.) Rich Kahn has been an in-house accountant for Jeffrey Epstein for over 10 years. He began HBRK with another in house accountant Harry Beller. Mr. Beller is now retired and Rich has taken over ownership of this entity. Assets come from the rates he charges for his accounting services.			
Estimated Annual Income(\$):	116,000.00	Estimated amount of investable assets(\$):	<\$1 MM
Estimated Net Worth(\$):	<\$1 MM	Amount of assets planned to invest with PWM(\$):	
Other Known Financial Institutions:			
Institution:	DB	Country:	USA
Est. Assets Under Mgt:			
Institution:		Country:	
Est. Assets Under Mgt:			

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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:	Darren K. Indyke PLLC - 00000487220		
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 type="checkbox"/> Private Investment <input type="checkbox"/> Philanthropic/Charitable <input checked="" type="checkbox"/> Commercial
Type of Entity Other (specify):		Purpose of Entity Other (specify):	
Country of Incorporation/registration:	USA	Date of incorporation / registration:	9/5/2008
Volcker Status:	Determination Required	Volcker Flag:	No
Address (city, street, post code):	575 Lexington Avenue New York NY 10022 United States	U.S. TIN/EIN:	30-0503849
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.:			
Single member PLLC with Darren K. Indyke as the sole member and owner			
Please indicate how ownership of the legal entity is reflected: Single member PLLC with Darren K. Indyke as the sole member 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): Single member PLLC with Darren K. Indyke as the sole member 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"/>	
Describe Nature of Entity's Primary Business and Investment Activities			
Nature of the business:	Law practice. This is Darren Indyke's private law firm.		
Countries where business is transacted:	USA		
Number of employees:	1		

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):					
Assets come from the rates he charges clients for his law services					
Estimated gross receipts p.a.(\$):	300,000.00				
Estimated net profit p.a. (\$):	200,000.00				
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:	500,000.00
Institution:		Country:		Est. Assets Under Mgt:	
Institution:		Country:		Est. Assets Under Mgt:	

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

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3C. Legal Entity Details (For all Legal Entities)			
Legal Entity Name:	HBRK Associates, Inc - 00000487223		
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 type="checkbox"/> Private Investment <input type="checkbox"/> Philanthropic/Charitable <input checked="" type="checkbox"/> Commercial
Type of Entity Other (specify):		Purpose of Entity Other (specify):	
Country of Incorporation/registration:	USA	Date of incorporation / registration:	8/29/2008
Volcker Status:	Determination Required	Volcker Flag:	No
Address (city, street, post code):	575 Lexington Avenue, 4th Fl New York NY 10022 United States	U.S. TIN/EIN:	30-0503838
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.: Richard Kahn is 100% owner and signor of this entity.			
Please indicate how ownership of the legal entity is reflected: Richard Kahn 50% owner Harry Beller 50% 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): Richard Kahn is 100% owner and signor of this entity.			
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"/>	
Describe Nature of Entity's Primary Business and Investment Activities			
Nature of the business:	Accounting firm		
Countries where business is transacted:	USA		
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): Rich is an in-house accountant for Jeffrey Epstein. His started this company with Harry Beller who retired. The company assets comes from the fees he charges for this service.					
Estimated gross receipts p.a.(\$):	400,000.00				
Estimated net profit p.a. (\$):	300,000.00				
Estimated investable assets (\$):	<\$1 MM				
Potential Amount to be invested with PWM (\$):	200,000.00				
Other Known Financial Institutions:					
Institution:	DB	Country:	USA	Est. Assets Under Mgt:	200,000.00
Institution:		Country:		Est. Assets Under Mgt:	
Institution:		Country:		Est. Assets Under Mgt:	

DB PWM GLOBAL KYC/NCA: US/LatAm/Int'l **PART B**



Relationship Name	EPSTEIN, JEFFREY 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 type="checkbox"/> High Risk	Yoonsun Chung
(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 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No
PCR checks complete	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	negative results found	<input type="checkbox"/> Yes <input checked="" 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: DARREN K. INDYKE: No negative Media No court cases NEW YORK STRATEGY GROUP, LLC: No negative media No court cases DARREN K. INDYKE PLLC: No negative media No court cases HBRK ASSOCIATES INC: No negative media No court cases D. RICHARD KAHN: Approved KYC #01082293 AML Clearance attached to this KYC Not barred from NYSE Arca and he was cleared twice as seen in the attachments HARRY BELLER: Negative Media: Not our client. All negative media pertains to an environmental microbiologist. Our client is an accountant Court Cases: #1: Disposed in 1987 All other cases are not our client. The other court cases refer to a Dr. Harry Beller. Our client is an accountant JEFFREY EPSTEIN INSURANCE TRUST: No negative media No court cases JEFFREY EPSTEIN: Previously KYC'd and approved in: 01082293 and 01121718			
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.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

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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)?	
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
Is there any indication the client set up a non operating company expressly for the purpose of transferring shares to third parties?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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		
Created By	Date	Comments
Cynthia Rodriguez	7/17/117 1:05 PM	Dated resolution attached
Kshitij Golani	7/18/117 1:01 PM	<p>HBRK Associates Inc and Darren K Indyke PLLC (acountholders) have been clients of DB since 2013. Below are the reasons why we are comfortable with approving this update/high risk review -</p> <ul style="list-style-type: none"> Information and supporting documents required by our AML Policy were provided and reviewed; and as a result, we have an understanding of the structure of the accountholders, their purpose, the purpose of the accounts and expected transaction activity. The account holders' source of wealth and source of funds were sufficiently detailed and appears plausible The account holders' source of wealth is via the company's operations, which is accounting firm/law firm. Our review did not identify any red flags relating to fraudulent ownership hence we believe the true ownership of the accountholder was identified. We performed due diligence searches on all key parties including the client, UBOs and authorized signatories and did not find the names searched to be on any sanctions lists.
Cynthia Rodriguez	7/17/117 1:25 PM	purpose of the accounts and current activities have been reflected on the KYC
Cynthia Rodriguez	7/17/117 1:05 PM	* HBRK
Cynthia Rodriguez	7/17/117 1:04 PM	KBRK Incorporation docs attached to reflect ownership.
Cynthia Rodriguez	7/17/117 1:23 PM	Stew Oldfield reached out to Rich Kahn and Darren Indyke on 7/7/2017 to confirm material changes to the accounts
Cynthia Rodriguez	7/18/117 11:41 AM	tax ownership document attached showing rich kahn as sole owner.

ONSHORE APPROVALS			
Client Facing Professional (CFP):	stewart oldfield	(Signature) stewart oldfield	7/13/2017
Office Director/Business Head:	Andrew F Gallivan	(Signature) Andrew F Gallivan	7/14/2017
Regional Office Director:		(Signature)	
AML Business Risk:		(Signature)	
AML Compliance:	Kshitij Golani	(Signature) Kshitij Golani	7/18/2017
	Yoonsun Chung	(Signature) Yoonsun Chung	7/18/2017

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)	

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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 (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.

Deutsche Bank Americas New York 