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Wealth Management
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Mob [REDACTED]

From: Bradley Gillin
Sent: Wednesday, August 01, 2018 7:15 PM
To: Vijay-A Sawant <[REDACTED].m>
Cc: Stewart Oldfield [REDACTED]
Subject: RE: Assistance Required in solving rejection points on KYC Case#01946825 [1]

Classification: **For internal use only**

Hi Vijay,
See responses in blue below:

Reason for Rejection: 7/31

A – Please provide a recent document that will serve as address proof. The IRS document is from September, 2016. – Could you provide latest (July 18) bank statement for this entity? This should resolve this request.

- Attached

B – Nature of Business: What do they do with the artwork? Do they purchase it and re-sell it? Does the trust only hold artwork as assets? – As per constitutional docs, the purpose of Prytane LLC is for engaging in the acquisition, ownership & management of artwork for investment purposes. I had already updated this but it seems they want more info on re-selling part. Could you advise on this please?

- This is hysterical. Private Art collectors are constantly buying and selling art work. They do whatever they please with it...put it on the wall, loan it to museums, keep it in the shipping box it came in. Artwork and cash to purchase the artwork are the only assets.

- Please tell them to call me if they reject this...

- Still laughing

C – Please check to see if there is a memo that was accompanied by Chip Packard’s approval. If there is none, I recommend “refreshing” the approval with current senior management. The current e-mail approval does not address what exactly is being discussed and approved. – Kindly provide this please.

- Recent ExCo approval was obtained and attached. All alerts have been cleared. What do they need here – an updated ExCo approval?

D – The address of employer for Caroline is missing. In addition, please include how long she has been with that company etc. – For Caroline, I have now updated Sotheby’s Switzerland address & already updated that she was appointed there in 2012. Please advise if you have any additional points to add?

- Thank you. No.

E – The “How Was the Client(s) Introduced? How long has the RM personally known the client?” field talks about Zorro Management. Please amend. – Updated as appropriate.

- Jeffrey Epstein met with Stew Oldfield on 3/7/17 to open new acct for other entity. This is in the introduction field. RM has known the client for 4 years

F – New fields were added as part of Dbforce change last weekend. Please ensure those fields are filled out. – Please advise on the following additional points for this case, as appropriate:

L. Special Risk Factors	
Does the account have a Nexus to High risk Countries? <input type="checkbox"/>	Is the account structure unusually complex? <input type="checkbox"/>
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"/>	Is there any indication this could be a prohibited business relationship? <input type="checkbox"/>
Are the bearer shares identified subject to acceptable controls? <input type="checkbox"/>	

High Risk Countries – NO
Shares to 3rd parties – NO
Bearer shares, controls – NO
Structure complex – NO
Prohibited – NO