

M. Case Comments		
Created By	Date	Comments
Cynthia Rodriguez	9/6/117 12:05 AM	recent research and google searches for Erika Kellerhals can be found in approved case 01790655.
Cynthia Rodriguez	9/6/117 12:09 AM	ID for Erika Kellerhals can be found in approved case 01344537
Kshitij Golani	9/6/117 3:22 PM	<p>This KYC serves as a high risk update for the below listed clients (together "acountholders") –</p> <ol style="list-style-type: none"> <li>1. The Haze Trust</li> <li>2. Butterfly Trust</li> <li>3. The 2007 Jeffrey E. Epstein Insurance Trust #3</li> </ol> <p>Below are the reasons why we are comfortable with approving this KYC:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• There are a few risk factors associated with the accountholders – <ul style="list-style-type: none"> <li>▫ SOW: The UBO (Jeffrey Epstein) is the founder of Southern Trust Company Inc, which manages client's assets. SOW verification was obtained.</li> <li>▫ Negative Media &amp; PEP: There is some negative media against Mr Epstein and he is also maintains a close relationship with Bill Clinton and Prince Andrew. Please see risk calculator for more information. Appropriate approval was obtained.</li> </ul> </li> <li>• Our review did not identify any red flags and thus there was no need to escalate this case further.</li> <li>• We performed due diligence searches on all parties and did not find the names searched to be on any sanctions lists.</li> </ul>
Cynthia Rodriguez	8/24/117 5:25 PM	<p>No material changes confirmed by the client via phone on 08/22/2017.</p> <p>No GBSA forms required as determination is already noted on the system.</p> <p>Beneficiaries are all added as parties with DOB, SSN/Passport #s, address &amp; IDs</p>

ONSHORE APPROVALS			
Client Facing Professional (CFP):	Chuck Walker	(Signature) Chuck Walker	8/25/2017
Office Director/Business Head:	Steven Mattus	(Signature) Steven Mattus	8/29/2017
Regional Office Director:		(Signature)	
AML Business Risk:		(Signature)	
AML Compliance:	Kshitij Golani	(Signature) Kshitij Golani	9/6/2017
	Yoonsun Chung	(Signature) Yoonsun Chung	9/6/2017

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)	