

Business Line	US Onshore
GCIS # / KYC #	575969/ 01898372
New or Existing Relationship? <i>If yes, please include relationship since date, approx # of accounts, AUM, etc.)</i>	Existing relationship since 8/26/2013. A total of 30 deposit accounts and 3 mon market accounts for multiple entities, 5 brokerage accounts and 1 custody acco Total AUMs \$224mn.
Legal name of Account Holder(s)	The 2017 Caterpillar Trust
Name of UBO(s) <i>(Please include UBOs who own 25% and more; if there are multiple layers, please include description of ownership structure)</i>	Jeffrey Epstein
Description of Type of account being opened with detailed purpose of the accounts <i>(Please include SOW information/ Geographic location/ For Entity Accounts: Description of the entity and background information on the UBO)</i>	We are opening a deposit account for The 2017 Caterpillar Trust. The account used to pay annual annuity payments
Reason for High Risk	This relationship is deemed high risk due to multiple court cases on Jeffrey Eps involving 22 April 2004 SEC filed a settled civil fraud action for illegal insider tra three publicly traded Massachusetts banks. Final judgement permanently enjoir from violating the antifraud provisions and he agreed to pay a total of \$72532.0 disgorgement of trading profits, prejudgment interest and civil penalties. Epstein sentenced to 21 months in federal prison for three counts of fraud, sexually ass a girl and solicitation of prostitution. These alerts were previously approved by s management and AML Compliance. Prior clearance is attached as a reference
PEP (Y/N) <i>If yes, include details</i>	Yes, close affiliation to Bill Clinton and Prince Andrew
Any negative media and/or court cases? <i>Include ALL negative media &amp; court cases</i>	Yes
If Yes, please give details	Aside from the court cases listed in the reason for high risk, all other alerts were positives and no new court cases or negative media has come up for this client
Business Justification for the relationship despite High Risk Factors	All negative media and alerts have been reviewed by AML Compliance and the not see a reason to discontinue the existing relationship with Jeffrey Epstein.