

Subject: Discussion : Gratitude America Ltd [I]
From: Vinita Advani <[REDACTED]>
Date: Wed, 12 Sep 2018 04:40:46 -0400
To: Daphne Cales <[REDACTED]>,
Bradley Gillin <[REDACTED]>,
Vijay-A Sawant <[REDACTED]>

Classification: For internal use only

Vijay,

Can you please set some time for all of us to discuss tomorrow? I received some clarity from the ABR team. Thank you.

Kind regards,
Daphne Cales

Daphne Cales
Director | Banking Services & Branch Manager

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From: Vijay-A Sawant
Sent: Tuesday, September 11, 2018 9:29 AM
To: Daphne Cales <[REDACTED] <mailto:[REDACTED]> >
Cc: Vinita Advani <[REDACTED] <mailto:[REDACTED]> >
Subject: FW: Rejection Points KYC # - 01977700 [I]
Importance: High

Hi Daphne,

As discussed on call today, following are case rejections we have received from KG. Point 1 identifies the donor as UBO and this info can be verified from Pg 53 of the US Addendum, relevant paragraph provided below for reference. Also attached in this email are the Form 990's for year's 2014, 2015 & 2016. You can see that the \$10mn donation was received in 2015. Previously approved KYC Case01790739 was approved in Aug 2017 where this donor was not identified. Why is this an EDR now? Please advise how to

proceed with this?

Case #: 01977700

Relationship: SOUTHERN FINANCIAL RELATIONSHIP Customer Name: Gratitude America Ltd Customer Number: 00000499760 Reason for Rejection: The case was not reviewed in its entirety due to the below issues. Once this has been resolved, we will review the case. This will now be treated as an EDR.

1) As per the 2015 Form 990 (attached to the KYC by AFC), BV70 LLC donated \$10MM to this foundation and thus making them a "significant Donor". We need to fully KYC this entity. Please provide the required documentation and information.

2) Please provide ExCo approval as this is now an EDR.

3) Please provide the FinCEN form.

Thanks in advance for helping with this.

Kind Regards,

Vijay Sawant

KYC Case Representative

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