

Subject: ACTION REQUIRED: Issue related to ACUs [I]

From: Armen Brash <[REDACTED]>

Date: Tue, 13 Oct 2015 18:36:40 -0400

To: Paul Morris <[REDACTED]>,
Amanda Kirby <[REDACTED]>

Classification: For internal use only

Paul and Amanda,

As you may know, per the AML Procedures manual, certain clients are excluded from ACUs. An issue has been identified in dbforce where High Risk clients are given an ACU Auto Exemption for Retail Banking, however, per Policy, this exception does NOT apply to High Risk clients.

Unfortunately, the code in dbforce exempting high risk clients with only deposit accounts under \$250K from the ACU when it should not be—the code will be fixed ASAP, but in the meanwhile, while the ACUs listed below don't appear as overdue, they must be completed by year end.

Customer Name

Customer #

Relationship

Primary Officer

ACU Completed Date

Butterfly Trust

[REDACTED]

SOUTHERN FINANCIAL RELATIONSHIP

Paul Morris

The 2007 Jeffrey E. Epstein Insurance Trust #3

[REDACTED]

SOUTHERN FINANCIAL RELATIONSHIP

Paul Morris

New York Strategy Group, LLC

[REDACTED]

SOUTHERN FINANCIAL RELATIONSHIP

Paul Morris

Plan D, LLC

[REDACTED]

SOUTHERN FINANCIAL RELATIONSHIP

Paul Morris

HBRK Associates, Inc

[REDACTED]

SOUTHERN FINANCIAL RELATIONSHIP

Paul Morris

Hyperion Air, LLC

[REDACTED]

SOUTHERN FINANCIAL RELATIONSHIP

Paul Morris

JEGE, Inc

[REDACTED]

SOUTHERN FINANCIAL RELATIONSHIP

Paul Morris

Neptune, LLC

[REDACTED]

SOUTHERN FINANCIAL RELATIONSHIP

Paul Morris

[REDACTED]

[REDACTED]

SOUTHERN FINANCIAL RELATIONSHIP

Paul Morris

Zorro Development Corp.

[REDACTED]

SOUTHERN FINANCIAL RELATIONSHIP

Paul Morris

Gratitude America

[REDACTED]

SOUTHERN FINANCIAL RELATIONSHIP

Paul Morris

Please let me know if you have any questions and please let me know when this has been completed.

Best,
Armen

Armen Brash

Director

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