

Subject: FW: ACTION REQUIRED: Issue related to ACUs [I]
From: Paul Morris <[REDACTED]>
Date: Tue, 27 Oct 2015 11:13:13 -0400
To: Amanda Kirby <[REDACTED]>,
Jj Litchford <[REDACTED]>

Classification: For internal use only

Hi, did we finish these?

Paul Morris

Managing Director

Deutsche Bank Private Bank

Office: [REDACTED]

Cell: [REDACTED]

From: Armen Brash
Sent: Tuesday, October 13, 2015 6:37 PM
To: Paul Morris; Amanda Kirby
Subject: ACTION REQUIRED: Issue related to ACUs [I]

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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

██████████

SOUTHERN FINANCIAL RELATIONSHIP

Paul Morris

The 2007 Jeffrey E. Epstein Insurance Trust #3

██████████

SOUTHERN FINANCIAL RELATIONSHIP

Paul Morris

New York Strategy Group, LLC

██████████

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,

EFTA01475449

Armen

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Armen Brash

Director

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