

<p>service debts, cover operating losses, gamble in the foreign exchange markets, and support the stock of his publicly held companies. The agency is also looking into a complaint from Swiss Bank Corp., which says it did not receive collateral for a \$100 million loan to a small private Maxwell company.</p> <p>Newspaper article dated 12/01/2000, which stated that "Ghislaine Maxwell's source of wealth is being classified as something of a mystery."</p> <p>Newspaper article dated 08/09/1996 detailing the arrest of Ghislaine Maxwell on DWI charges.</p> <p>Numerous newspaper articles detailing the criminal fraud charges brought against Kevin and Ian Maxwell (sons of Robert Maxwell).</p> <p>The following information was previously reported to Mary Reith on 10/20/2005 under the account Forums, LLC (DDR # 11374/04):</p> <p>Newspaper article dated 6/23/2005 detailing Robert Maxwell misappropriated funds from the companies under his control. According to the newspaper article, "He pledged assets as security for additional loans", but instead of delivering the assets to the lender, he would simply sell the assets for cash. "For example, Berlitz language school was supposedly sold to a Japanese publishing company, but the shares had previously been pledged as security for loans from Swiss Volksbank and Lehman Brothers."</p>		
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Expense No.: 99/31167

Total Costs: \$0.00

Signed by: Rohit Mehra

Dated: 03/11/2010 01:28:14 PM

Background Checks conducted in addition to Security Services

Background Check	Date (Required If Check Carried Out)	Comments (Required If Check Carried Out)
<input checked="" type="checkbox"/> Morgan Network	05/13/2009	<p>Ms. Maxwell is an existing client with a DDR on file. She was referred by Jeffrey Epstein, an existing client with a complete DDR on file. Ghislaine Maxwell is a close friend of Jeffrey Epstein and he referred her to us. She had also met with Jes Staley around this same time in 2003. She is a high profile person given her family background (Robert Maxwell, who had been accused of fraud in the UK for allegedly using pension funds for personal debts, among other issues) and the circumstances surrounding her father's death. Because she had no involvement in her father's company or affairs, we do not feel that this is an issue for PB.</p> <p>She also has authority jointly with Jeffrey Epstein on several accounts. Please note that Mr. Epstein does not have authority on Air Ghislaine, Inc. Jeffrey Epstein is an existing client of PB. In years past, Mr. Epstein was an active brokerage client, particularly in foreign exchange, and as of this year he is a custody-only client. Formerly, Jeffrey Epstein was a money manager to high net worth individuals, most notably Leslie Wexner. Wexner was a JPM client and then retained Epstein in the late 90s. Mr. Wexner terminated his relationship with Epstein in 02/2008.</p> <p>Mr. Epstein was convicted of a felony charge in 2008 and served an 18-month prison sentence.</p>
<input type="checkbox"/> TRW/CIC		
<input type="checkbox"/> Lexis Nexis		