

Ticket#		Account#	Initiated Date	03/28/2012 04:05 PM
Client Name	HYPERION AIR INC	Account Title	Initiator	BONNIE K PERRY
ECI		Account Type	Initiating Team	PB FRONT OFFICE
LOB	PB			

Verify & Confirm for HYPERION AIR INC	
Final Risk Rating	High
Initial Risk Rating	High
GCS Report Requested	Full
Presence of Potential High Risk Indicators	Yes
Comments	
Summary of Risk Attributes	This entity belongs to Jeffrey Epstein. He typically will take large cash withdrawals from the account for fuel expenses when travelling to foreign countries.

Risk Updated History				
Creation Date	Entered by	Updated Risk	Previous Risk	Comment

GCS Grid		
Search Type	Security Service Details	Further Review Required
Company Information	Information not confirmed on HYPERION AIR INC (Tax ID/Address)	Yes
Corporate Records	Information confirmed; details included in the attachment.	No
Other Database Searches (RDC/MIS/Factiva)	No records were found.	No
Internal Database Search (CSSS/FPS)	Internal database search revealed prior GS&I research for Jeffrey E. Epstein and the following derogatory information was reported: Several newspaper articles were found that detail the indictment of Jeffrey Epstein in Florida on felony charges of soliciting underage prostitutes. Jeffrey Epstein served 13 months in jail. Numerous articles detail various law enforcement agencies investigating Jeffrey Epstein for allegedly participating in child trafficking and molesting underage girls. Jeffrey Epstein is required to register as a sex offender. Jeffrey Epstein has settled a dozen civil lawsuits out of court from his victims regarding solicitation for an undisclosed amount.	Yes
State Court Searches	No records were found.	No
Federal Court Searches	No records were found.	No
Personal Particulars	Information not confirmed for Harry Beller (Address).	Yes
Publications	Publications revealed nothing derogatory.	No
Regulatory Sanctions	No records were found.	No
OFAC/Control List Search	A search of OFAC did not reveal any matches.	No
Negative or Inconsistent Information		Yes

GCS Red Dot	
Has this been identified as Red Dot KYC?	No
Negative Information Found	No

Banker Attestation Details	
As the client sponsor, I understand that I am primarily responsible for protecting the firm's reputation from inappropriate business relationships, as well as from fraud and money laundering. By approving this KYC, I am sponsoring this client as to their character and reputation and from a legal/regulatory standpoint.	Yes
Please state your rationale for conducting business with this client	Long term client of the Private Bank and relationship reviewed regularly with legal/compliance and sr. management. Professional relationship with Epstein and no negative developments to note in recent history.
Please respond to any issue(s) identified in the GS&I grid that either needs further review, or red dot which is not already covered in a Business Case within this KYC	Jeffrey's conviction and related news continues to appear in the press from time to time but no new allegations.
Comments	