

Before answering the following question please review the Annual Account History Activity Summary Report that has been attached in the Summary tab. Did the actual transaction activity appear reasonable, normal, and expected for the type of business or industry in which the client engages?	Yes
Was the nature, value, and volume of actual transaction activity consistent with expected transaction activity?	Yes
Was any unusual or potentially suspicious transaction activity detected?	No
Additional Comments	N/A

Expected Activity		
Deposit Account(s)		
Transaction Types	Expected Activity Levels	Anticipated Dollar Amount Totals per Month
Cash Deposits		
Cash Withdrawals		
Check Deposits	Low (1-10)	<\$10,000
Checks Paid	Low (1-10)	<\$10,000
Incoming Wires (Domestic)	Low (1-10)	\$50,001 TO \$100,000
Outgoing Wires (Domestic)	Low (1-10)	\$50,001 TO \$100,000
Incoming Wires (International)		
Outgoing Wires (International)		
ACH Deposits	Low (1-10)	<\$10,000
ACH Payments	Low (1-10)	<\$10,000
Internal Transfer (Debits/Credits)	Low (1-10)	<\$10,000
Asset Purchases/Sales		
<b>What is the initial/ongoing source of funding for the client's Deposit Account(s) ?</b>		
Initial funding was a 200k wire. Ongoing funding will come from Mr. Epstein's personal accounts which are funded from his personal investment returns.		
<b>What is the purpose/intended use of account(s)? Please provide a detailed description of how the Deposit Account(s) will be used by the client.</b>		
The purpose/intended purpose of this account is receipt and distribution of consulting fees and operational activity to support a small office.		
<b>Review the activity for the period overall and explain how the client's transaction profile agrees with or doesn't agree with expectations for the client based on the client relationship (purpose of accounts, occupation, business activity, etc.):</b>		
The activity has lowered since the account opened.		
<b>Was expected activity for the client modified in the transaction activity section of the KYC ticket?</b>		
Yes		
<b>If modified, explain.</b>		
The activity has lowered since the account opened. It has a low activity.		

Additional Client Information
<b>Please include any additional information that would further explain your knowledge of the client (family tree/history, public information, websites, etc.)</b>
Jeffrey Epstein is a longstanding client. He has dissolved his family office (New York Strategy Group) and has split it in two: HBRK Associates Inc. and Darren K Indyke PLLC. HBRK provides consulting services to Mr. Epstein.

Comment History			
Stage Name	Creation Date	Entered By	Comment Preview
Market Manager Approval	12/06/2013 02:34 PM	TOWNSEND C SMITH	We are exiting this relationship
CEO Approval	12/15/2013 07:01 PM	JOHN R DUFFY	approved to facilitate closing of relationship

Approval History			
Stage Name	Signoff Date	Owner SID	Owner Name
Banker Attestation	11/25/2013 06:50 PM	U008568	JUSTIN D NELSON
Market Manager Approval	12/06/2013 02:34 PM	U117517	TOWNSEND C SMITH
Regional Director Approval	12/06/2013 03:41 PM	U095563	WILLIAM M SHERIDAN
CEO Approval	12/15/2013 07:01 PM	U093971	JOHN R DUFFY