

Has an employee of JP Morgan Wealth Management met the client in person?	Yes
What independent background check, in addition to the Global Corporate Security ("GCS") background check, has been carried out? Check all that apply and provide the date in which the background check was conducted. (at least 1 must be selected)	JPMC Network
JPMC Network Date	02 Feb 2010
JPMC Network Comments	Darren Indyke is the longstanding internal counsel to Jeffrey Epstein (JPM client).

Politically Exposed Person	
Is the client a current or former Senior United States or Non-USA Official / also known as a Politically Exposed Person (PEP), related to a PEP, or closely associated with a PEP?	No

Source of Wealth/Financial Information	
Source of Wealth- identify the clients source of wealth from the following list of options	Employment
Which country(ies) is(are) the Clients primary Source of Wealth or Income derived?	UNITED STATES
What is the client's current position? (Include any former positions, if significant to source of wealth)	<p>Darren Indyke (SSN: [REDACTED] DOB: [REDACTED] US Citizen) is Jeffrey Epstein's attorney. 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 and accounting services to Mr. Epstein.</p> <p>Jeffrey Epstein is an existing client of PB. He is an active brokerage client across asset classes currently covered by the Firm's GIO desk. Jeffrey Epstein has been an investment advisor for numerous high net worth clients and also a personal investor. Jeffrey is very accessible and well known to the team. We have advised him on investments as well as estate planning opportunities. Jeffrey has continues to be well connected across business channels.</p> <p>Epstein is well known to several JPM PB employees and senior management including Jes Staley. Also, Mr. Epstein was convicted of a felony charge in 2008. Jes Staley conferred with Stephen Cutler and the decision was made to keep Mr. Epstein as a PB client. Mr. Epstein completed his sentence and probation in 2010. The relationship has been reviewed with senior management and compliance/legal on a few occasions over the past year as news stories of Jeffrey's past are picked up. No new claims or stories have surfaced recently.</p>
List the number of years in current position. (Include any former positions, if significant to source of wealth)	16
Approximate yearly income/salary/bonus/distribution and other compensation history (accumulated earned income)	1.7MM
Client Net Worth \$	1000000.00
Documentation/Information obtained to confirm stated net worth of Client:	Financial Statements

Business Case	
Please specify why you are comfortable with this client given the identified risk factor(s). Your answer is your "business case" and should detail all mitigating factors.	The client is in the process of moving the entire relationship at the request of senior management (John Duffy).
Provide client history/detail, including when the relationship was established, how it came to be in PB/PWM, client's association with other JPM LOBS, etc.	Relationship history dates back to referral from former JPM senior executive (Jes Staley).
Client known to whom (JPMorgan employees), how well, and how long:	Senior JPM exec Jes Staley.
Overall PB/PWM relationship size and type of accounts:	Active GIO client.
Is this a shared client, what other LOB has a relationship with the client? Provide relationship manager name (if known), client of other LOB since (date), and relationship size?	No
When was the last time you met the client? What was the reason for the meeting?	Previous bankers, GIO investors and Jes Staley. Last conversation with with John Duffy when request was made to exist the relationship.
Describe any significant changes in the client's information or material events that may have occurred over the last year (Examples: address changes, change in authorized persons on accounts, change in account type, change in business, change in net worth, etc.).	See above
Cash Activity: Summarize client cash activity during the period reviewed and explain the purpose / use of the funds:	Client is in process of moving entire relationship.
Wire Activity: Summarize client wire activity during the period reviewed and explain the purpose / use of the funds, including any international/cross border wires:	Client is in the proces of moving the entire relationship from the firm.
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