

Provide detailed and specific information.	The source of wealth will derive from the personal assets of Jeff Epstein. Jeff Epstein is self-employed investor/entrepreneur.  Jeffrey Epstein (SSN: [REDACTED] DOB: [REDACTED] US Citizen) 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.  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.
Which country(ies) is(are) the Client's primary Source of Wealth or Income derived?	UNITED STATES
Is this an Operating Company?	No
Total Net Worth \$	50000000.00
What was the total net worth based on?	Financial Statements
Is this client a Professional Service Provider acting as a financial intermediary (Gatekeeper/Financial Liaison), with assets held on behalf of one or more unidentified underlying clients unknown to the bank?	No
Is this entity a Private Equity Fund (Venture Capital Fund or Leveraged Buyout)?	No
Is this a Hedge Fund? (Pooled investment vehicles (often partnerships) that primarily invest financial capital of third party investors in enterprises that are too risky for the standard capital markets or bank loans.)	No
Is this a Cash Intensive business? (Cash-intensive businesses/entities exist in various industry sectors and include, but are not limited to convenience stores, grocery stores, restaurants, bars, retail stores, liquor stores, cigarette distributors, privately owned ATMs, vending machine operators and parking garage operators.)	No
Is this entity any of the following business types?	aa. None of the above
Is the Entity a Personal Holding Company (PHC) or Personal Investment Company (PIC) located in an offshore jurisdiction?	Yes
Is the PHC/PIC managed by JPMC? (Trustees of the entity are JPMC employees, e.g., PHC managed in Nassau/Geneva/Delaware)	No
Have you received copies of the shares or listing of shares?	Yes
Are the shares registered or in bearer form?	Registered
PHC/PIC Location	VIRGIN ISLANDS, U.S.
Did the client confirm with you that the beneficial ownership is as stated within this KYC?	Yes
Did the client confirm that he/she would inform you if beneficial ownership changes?	Yes
Was the "Confirmation of Beneficial Ownership" document received from the beneficial owner? Please attach the J.P. Morgan Confirmation of Beneficial Ownership document to the KYC.	Yes
List the number of shares that have been issued	1000.00

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.	Jeffrey Epstein was asked to exit the firm in August of 2013. The accounts are in the process of moving to another bank and should be closed out by year-end.
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.	Jeffrey has been a client for over 10 years.
Client known to whom (JPMorgan employees), how well, and how long:	Senior management, including Mary Erdoes, knows Jeffrey.
Overall PB/PWM relationship size and type of accounts:	>\$100 million
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?	I met with the client in June of 2013.
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.).	Jeffrey Epstein was asked to exit the firm in August of 2013. The accounts are in the process of moving to another bank and should be closed out by year-end.
Cash Activity: Summarize client cash activity during the period reviewed and explain the purpose / use of the funds:	All accounts are in the process of transitioning to Deutsche Bank, so all cash is moving out.
Wire Activity: Summarize client wire activity during the period reviewed and explain the purpose / use of the funds, including any international/cross border wires:	All accounts are in the process of transitioning to Deutsche Bank, so wire activity has diminished.