

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		
Client Directed Asset / Brokerage Account(s)		
Transaction Types	Expected Activity Levels	Anticipated Dollar Amount Totals per Month
Cash Deposits		
Cash Withdrawals		
Check Deposits		
Checks Paid		
Incoming Wires (Domestic)		
Outgoing Wires (Domestic)		
Incoming Wires (International)	Low (1-10)	<\$10,000
Outgoing Wires (International)		
ACH Deposits		
ACH Payments		
Internal Transfer (Debits/Credits)		
Asset Purchases/Sales	Low (1-10)	<\$10,000
What is the initial/ongoing source of funding for the client's Client Directed Asset / Brokerage Account(s) ?		
The initial source of funding will be from an external wire transfer of funds from First Bank Virgin Islands Bank in the amount of \$800. Any ongoing source of funding will also be from First Bank Virgin Islands Bank from returns on various investments.		
What is the purpose/intended use of account(s)? Please provide a detailed description of how the Client Directed Asset / Brokerage Account(s) will be used by the client.		
The purpose of the account is to purchase securities for future wealth accumulation.		
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.):		
This account continues to have low activity.		
Was expected activity for the client modified in the transaction activity section of the KYC ticket?		
No		

Additional Client Information
Please include any additional information that would further explain your knowledge of the client (family tree/history, public information, websites, etc.)
Jeffrey Epstein (SSN: [REDACTED] DOB: 01/20/1953 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 continued 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.

Comment History			
Stage Name	Creation Date	Entered By	Comment Preview
Market Manager Approval	12/06/2013 02:35 PM	TOWNSEND C SMITH	We are exiting this relationship
CEO Approval	12/15/2013 07:02 PM	JOHN R DUFFY	approved to facilitate exit of client from jpm

Approval History			
Stage Name	Signoff Date	Owner SID	Owner Name
Banker Attestation	11/15/2013 06:03 PM	[REDACTED]	JUSTIN D NELSON
Market Manager Approval	12/06/2013 02:35 PM	[REDACTED]	TOWNSEND C SMITH
Regional Director Approval	12/06/2013 03:40 PM	[REDACTED]	WILLIAM M SHERIDAN
CEO Approval	12/15/2013 07:02 PM	[REDACTED]	JOHN R DUFFY