

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?	No

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.	regularly reviewed by management/reputational risk committee.
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.	Long serving client relationship w/ the Private Bank.
Client known to whom (JPMorgan employees), how well, and how long:	Integrated tea/senior management.
Overall PB/PWM relationship size and type of accounts:	Primarily investments, >\$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?	less than 5 years ago to discuss our Private Banking capabilities and to ensure we were doing everything possible to service 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.).	no material changes
Cash Activity: Summarize client cash activity during the period reviewed and explain the purpose / use of the funds:	No cash activity for the LLC
Wire Activity: Summarize client wire activity during the period reviewed and explain the purpose / use of the funds, including any international/cross border wires:	regular business activity - pay expenses, pay vendors, 3rd parties for services rendered
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	Low (1-10)	<\$10,000
Cash Withdrawals	Low (1-10)	<\$10,000
Check Deposits	Low (1-10)	<\$10,000
Checks Paid	Low (1-10)	<\$10,000
Incoming Wires (Domestic)		
Outgoing Wires (Domestic)		
Incoming Wires (International)		
Outgoing Wires (International)		
ACH Deposits		
ACH Payments		
Internal Transfer (Debits/Credits)	Low (1-10)	\$50,001 TO \$100,000
Asset Purchases/Sales		
What is the initial/ongoing source of funding for the client's Deposit Account(s) ?		
Initial source of funding of \$100 K will be debited from the JPM DDA # 739110438 - Jeffrey Epstein. This will be an internal transfer. Ongoing source of funding will continue to come from A/C # [REDACTED]		
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.		
Household expenses at the 358 El Brillo Way, Palm Beach FL 33480 property.		
Credit		
Types of Credit	Line of Credit	
Anticipated Dollar Amount Totals per Month	1,000.00	
What is the purpose/intended use of account(s)? Please provide a detailed description of how the Credit will be used by the client.		
Neptune LLC currently has a corporate credit card issued to them. Monthly payment depends on monthly charges		