

Ticket#	102745698	Account#	Initiated Date	01/03/2012 10:50 AM
Client Name	NEPTUNE LLC	Account Title	Initiator	ELIZABETH M CAMPBELL
ECI	0391309309	Account Type	Initiating Team	PB FRONT OFFICE
LOB	PB			

Verify & Confirm for NEPTUNE LLC	
Final Risk Rating	High
Initial Risk Rating	High
GCS Report Requested	Full
Presence of Potential High Risk Indicators	No
Comments	
Summary of Risk Attributes	

Risk Updated History				
Creation Date	Entered by	Updated Risk	Previous Risk	Comment

GCS Grid		
Search Type	Security Service Details	Further Review Required
Company Information	Information not confirmed for Neptune LLC; details included in the attachment. (TAX ID and Address)	Yes
Corporate Records	Information confirmed; details included in the attachment.	No
Other Database Searches (RDC/MIS/Factiva)	No records were found.	No
Internal Database Search (CSSS/FPS)	Internal database search revealed prior GS&I research for Jeffrey E Epstein and the following derogatory information was reported: Several newspaper articles were found that detail the indictment of Jeffrey Epstein in Florida on felony charges of soliciting underage prostitutes. Jeffrey Epstein served 13 months in jail. Numerous articles detail various law enforcement agencies investigating Jeffrey Epstein for allegedly participating in child trafficking and molesting underage girls. Jeffrey Epstein is required to register as a sex offender. Jeffrey Epstein has settled a dozen civil lawsuits out of court from his victims regarding solicitation for an undisclosed amount.	Yes
State Court Searches	No records were found.	No
Federal Court Searches	No records were found.	No
Personal Particulars	No additional research necessary.	No
Publications	Publications revealed nothing derogatory.	No
Regulatory Sanctions	No records were found.	No
OFAC/Control List Search	No records were found.	No
Negative or Inconsistent Information		Yes

GCS Red Dot	
Has this been identified as Red Dot KYC?	No
Negative Information Found	No

Banker Attestation Details	
As the client sponsor, I understand that I am primarily responsible for protecting the firm's reputation from inappropriate business relationships, as well as from fraud and money laundering. By approving this KYC, I am sponsoring this client as to their character and reputation and from a legal/regulatory standpoint.	Yes
Please state your rationale for conducting business with this client	existing client of the Private Bank.
Please respond to any issue(s) identified in the GS&I grid that either needs further review, or red dot which is not already covered in a Business Case within this KYC	regularly reviewed by management and risk committee.
Comments	