

Operational/household checking accounts and custody account to hold money market funds. Epstein has a checking account in personal name and a large trading account for his company, Financial Trust Company LLC. Account is used for maintenance of his various homes and lifestyle expenses. Personal accts. are primarily funded from Mr. Epstein's personal investment entity (which invests mostly in JPM MM Funds).

Checking account is used for personal investments and to pay everyday and monthly expenses.

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.):

Compliance reviews activity regularly.

Was expected activity for the client modified in the transaction activity section of the KYC ticket?

Yes

If modified, explain.

Activity modified to reflect client's current transaction 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)		
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) ?

This is an annual review. The account has already been funded. Any ongoing source of funding will be from investment growth and dividends.

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 for investments, trading and 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.):

Compliance review activity regularly.

Was expected activity for the client modified in the transaction activity section of the KYC ticket?

Yes

If modified, explain.

The activity was updated to reflect the client's current transaction activity.

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 is an existing client of PB. He is an active brokerage client covered on the GIO desk. Jeff is well know to the integrated team and senior management. Jeffrey Epstein has been a money manager for high net worth individuals, entrepreneur and personal investor. the team has regular discussion with Mr. Epstein and he remains very accessible.

Mr. Epstein is well known to several JPM PB employees.

6-18-10: Mr. Epstein completed serving out his house arrest. We have met regularly with compliance and legal do discuss the relationship and any potential reputational risk concerns. We continue to monitor the situation closely and monitoring the occasional news stories regarding Mr. Epstein and civil lawsuits and monitor closely money movement. Mr. Epstein is managing his own personal wealth.

January 27, 2011 update: A few news stories during 2010 connects Jeffrey Epstein to human trafficking. The coverage team along with Catherine Keating and William Langford all met to discuss the situation and agreed to enhance monitoring and document a discussion with the client. Jes Staley discussed the topic with Jeffrey Epstein who replied there was no truth to the allegations, no evidence and was not expecting any problems. We will continue to monitor the accounts and cash usage closely going forward.

We continue to monitor the relationship closely and no additional stories or allegations have surfaced recently and Jeffrey maintain a professional relationship with the PB and integrated team.

Comment History

Stage Name	Creation Date	Entered By	Comment Preview
There are no comments entered at this time.			

Approval History

Stage Name	Signoff Date	Owner SID	Owner Name
Banker Attestation	04/26/2013 11:04 AM		JUSTIN D NELSON
Market Manager Approval	05/01/2013 11:53 AM		TOWNSEND C SMITH