

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 Epstein has been a client of the Private Bank for over ten years. Jeffrey's felony offense is well documented and he complete his sentence and probation two years ago. No material developments or issues with client relationship over the past twelve months.
Client known to whom (JPMorgan employees), how well, and how long:	Integrated team, sr. management (see notes). Known for ten years. Regular dialogue with client.
Overall PB/PWM relationship size and type of accounts:	Jeffrey maintains a brokerage trading relationship across multiple entities (>\$100 million) and also maintain numerous checking accounts for personal and business working capital.
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, as of now Jeffrey works with the U.S. Private Bank
When was the last time you met the client? What was the reason for the meeting?	May 2012, investments/T&E. regular investments discussion.
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.).	Nothing material to note over past twelve months.
Cash Activity: Summarize client cash activity during the period reviewed and explain the purpose / use of the funds:	cash activity has been as expected. Jeffrey travels extensively overseas and on occasion has to pay cash for fuel in certain countries. Jeffrey maintains numerous estate around the world.
Wire Activity: Summarize client wire activity during the period reviewed and explain the purpose / use of the funds, including any international/cross border wires:	Nothing additional to note and within expectations.
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 TO \$50,000
Cash Withdrawals	Low (1-10)	\$10,000 TO \$50,000
Check Deposits	Low (1-10)	\$10,000 TO \$50,000
Checks Paid	Low (1-10)	\$10,000 TO \$50,000
Incoming Wires (Domestic)	Low (1-10)	\$10,000 TO \$50,000
Outgoing Wires (Domestic)	Low (1-10)	\$10,000 TO \$50,000
Incoming Wires (International)		
Outgoing Wires (International)		
ACH Deposits		
ACH Payments		
Internal Transfer (Debits/Credits)	Low (1-10)	\$10,000 TO \$50,000
Asset Purchases/Sales		
What is the initial/ongoing source of funding for the client's Deposit Account(s) ?		
This is a annual review. The account has already been funded. Any ongoing source of funding will be from assets obtained through personal investments and from internal transfer of funds from personal account held at JPMorgan.		
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.		
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; not unusual for the client to pull cash out up to \$50K. 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)		