

USCG Due Diligence Report - Corporation

DDR Name: Air Ghislaine, Inc. ~

DDR Status: Process Completed

Banker Information

Banker:

Mary C Casey/JPMCHASE

LE/OU:

Banker SID:

Banker BAC:

Banker FNEN:

Banker History:

DM ID Link Information

The DM for this DDR is DM Name -JEFFREY E. EPSTEIN CAS ID - 9710670708.

The following DDR's are associated with this Decision Maker .

DDR Name

Banker

116 East 65th St., LLC

Air Ghislaine, Inc.

Air Ghislaine, Inc.

Darren K. Indyke PLLC

Epstein, Jeffrey

Epstein, Jeffrey

Epstein, Jeffrey

Epstein, Jeffrey

Epstein, Jeffrey

Epstein, Jeffrey

Freedom Air International, Inc.

HBRK Associates Inc.

Hyperion Air, Inc.

I-Correct.com LLC

Jege, Inc.

LYN & JOJO LLC

MAX Foundation

Maxwell, Ghislaine

Plan D, Inc.

The 2007 Jeffrey E Epstein Insurance Trust

#2 - November 1, 2007

The 2007 Jeffrey E Epstein Insurance Trust

#3 dtd November 1, 2007

The 2007 Jeffrey E. Epstein Insurance

Trust #1 Dtd November 1, 2007

The Haze Trust

Corporation Name/Contact Information

Casey, Mary C

Morris, Paul V

Morris, Paul V

Morris, Paul V
Morris, Paul V
Morris, Paul V
Casey, Mary C
Morris, Paul V

99/31167

U043917

8634--CHBG

01

Security Services Search Date

02/02/2009

02/05/2009

02/05/2009

10/17/2008

05/21/2003

12/10/2008

12/10/2008

04/16/2010

04/16/2010

03/07/2011

03/11/2010

10/17/2008

02/03/2009

01/30/2009

02/03/2009

07/31/2006

12/10/2009

03/31/2005

01/30/2009

12/01/2008

12/02/2008

11/25/2008

Only Select "New Client" if this entity will be a PCN.

Full Legal Corporate

Name:

Air Ghislaine, Inc.

(No P.O. Box address. Must be a physical address.)

JPMC Internal Use Only

Primary Corporate Address

Name:

Attention:

Address Line 1:

Address Line 2:

City:

State:

Province:

Postal/Zip Code:

Country:

Tax ID # :

Business Phone:

State of Domicile:

Where is the Company

Incorporated?

What document did you obtain to
evidence state of domicile?

Articles of Incorporation,
Partnership Agreement, etc

10065

UNITED STATES

Air Ghislaine, Inc.

HBRK Associates

301 East 66th St., Suite 10B

New York

NY

134109791

Remember to collect W-8's or other applicable tax forms for each
jurisdiction.

()DE

Certificate

of Incorporation

Introduction / Financial Information

Introduction Type:

Related Client A/C

Specific Information:

Have you met with the Principal/Authorized
Individual?

Legal Entity:

Corporation

Jeffrey Epstein introduced Ghislaine Maxwell to the firm.

(Please identify referral source, etc.)

Corporation

What is the nature of the business operations?

(Describe products and services offered, how
long in business, etc. If this is an operating
company, indicate appx. number of locations
and appx. number of employees, list a website
if available)

Public or Privately owned? (if public, where
traded?)

Locations served?

Is this a cash intensive business or a business that uses cash as it's principal activity? (e.g. convenience store, restaurants, retail stores, liquor stores, cigarette distributor, vending machine operator, parking garage, any other business in which cash is its principal activity)

Principal Shareholder(s):

Identify the principal shareholders. If the entity is owned by an intermediate legal structure (e.g. LLC or Partnership), please list the ultimate individual shareholder(s) on whose behalf the account is maintained.

Last Name:

First Name:

Maxwell

Ghislaine

% of Ownership:

100

SSN

[REDACTED]
S-corporation that holds private aircraft.

Private

DOB

Form of Govt

[REDACTED]
Issued ID Obtained

Driver's License

Is this an operating company?

Entity/Client Net Worth:

\$ 20.00 (USD millions)

Documentation/ Information obtained to confirm stated net worth of the Entity/Client:

Industry Code:

The Business Type is the industry in which the client derives the majority of its income.

Transaction Profile/Expected Account Activity

What is the purpose/intended use of this account?

What is the expected source of account funding ?

Approximate \$ amount to fund the account

:

To manage operational expenses related to personal aircraft.

Other

If "Other" please describe

Transfer in from Ms. Maxwell's personal account

\$50,000

Please select each "Product Type" that applies. Within each product type, please check ALL transaction types that apply and provide a description of expected account activity. (document expected sources of inflows and destinations of

transfers,countries, and types of payors/payees.Include where is the money coming from - example : A specific bank or

firm and purpose of specific transactions, if known)

Product Type - Select all that apply

Transaction Types - Select all that apply and expected activity level (L = 1-5, M = 6-12, H =>12 transactions per month)

Deposit/Current Accounts

(Checking, Savings, Money Market)

Cash (withdrawals/deposits) -

Check deposits / Check paid -

Wire Incoming & Outgoing

-

Internal Transfers

Other

Please describe in detail expected account activity for this product :

Investment Products

(Custody,Brokerage,Agency,Margin)

Fiduciary

(Investment Mgmt. / Trust)

Credit type facilities

(Line of Credit, Mortgage, Letter of Credit)

Required Security Services Checks

Security Search Type:

Note for Security Services:

Please list any specific search

requests/instructions to Security

Services here

Security Services Information

A Security Services Check is REQUIRED for New Clients and Prospects

This section to be completed by the Security Services Group:

List Individuals and Corporate Entities Investigated:

Attachment:

Please Note: All research is subject to the availability of electronic database resources.

-
-

Operational account
for maintenance of
aircraft.

Anticipated \$

Amount Totals per

month – Please

provide at least an
estimate

Client's liquid assets at JPM plus value of her personal real estate.

PRIVATE HOUSEHOLDS

NAIC Code: 814100

Below \$1MM

Full

DDR originally created in ICG. Last report signed off by Security Services
on 2/1/08.

Search Type

Is

Security Service Details:

Further

Review

by

Banker

Require

d?

Company Information

Corporate Records

Other Database Searches

(RDC/CDC/MIS)

Internal Database Search

(CSSS/FPS)

State Court Searches

No

No

No

No

No

Federal Court Searches No

Personal Particulars

Publications

Regulatory Sanctions

No

No

No

OFAC/Control List Search No

No records were found.

Information confirmed;details included in the attachment.

No additional research necessary.

Information confirmed;details included in the attachment.

No records were found.

No records were found.

No additional research necessary.

Publications revealed nothing derogatory.

No records were found.

No records were found.

Has this been identified as a Red Dot DDR? :

Expense No.:

Total Costs:

Signed by:

Dated:

99/31167

\$0.00

Camila X Lopez

02/05/2009 11:31:44 AM

Banker

Response:

Background Checks conducted in addition to Security Services

Background Check

Date

(Required If Check Carried
Out)

05/13/2009

Comments

(Required If Check Carried Out)

Ms. Maxwell is an existing client with a DDR on file. She was referred by Jeffrey Epstein, an existing client with a complete DDR on file. Ghislaine Maxwell is a close friend of Jeffrey Epstein and he referred her to us. She had also met with Jes Staley around this same time in 2003. She is a high profile person given her family background (Robert Maxwell, who had been accused of fraud in the UK for allegedly using pension funds for personal debts, among other issues) and the circumstances surrounding her father's death. Because she had no involvement in her father's company or affairs, we do not feel that this is an issue for PB.

She also has authority jointly with Jeffrey Epstein on several accounts. Please note that Mr. Epstein does not have authority on Air Ghislaine, Inc. Jeffrey Epstein is an existing client of PB. In years past, Mr. Epstein was an active brokerage client, particularly in foreign exchange, and as of this year he is a custody-only client. Formerly, Jeffrey Epstein was a money manager to high net worth individuals, most notably Leslie Wexner. Wexner was a JPM client and then retained Epstein in the late 90s. Mr. Wexner terminated his relationship with Epstein in 02/2008.

Epstein is well known to several JPM PB employees and to Jes Staley. Mr. Epstein was convicted of a felony charge in 2008 and is currently serving an 18-month prison sentence. Jes Staley conferred with Stephen Cutler and the decision was made to keep Mr. Epstein as a PB client. Staley and PB then decided that his PB relationship will be for banking and custody only. We no longer provide brokerage execution capabilities for Mr. Epstein's accounts. Bear Stearns will hold the brokerage relationship with Mr. Epstein.

Summary

Summary Of Findings:

Ghislaine Maxwell is a close friend of Jeffrey Epstein and he referred her to us. She had also met with Jes Staley around this same time in 2003. She is a high profile person given her family background (Robert Maxwell, who had been accused of fraud in the UK for allegedly using pension funds for personal debts, among other issues) and the circumstances surrounding her father's death. Because she had no involvement in her father's company or affairs, we do not feel that this is an issue for PB. She also has authority jointly with Jeffrey Epstein on several accounts. Please note that Mr. Epstein does not have authority on Air Ghislaine, Inc. Jeffrey Epstein is an existing client of PB. In years past, Mr. Epstein was an active brokerage client, particularly in foreign exchange, and as of this year he is a custody-only client. Formerly, Jeffrey Epstein was a money manager to high net worth individuals, most notably Leslie Wexner. Wexner was a JPM client and then retained Epstein in the late 90s. Mr. Wexner terminated his relationship with Epstein in 02/2008. Epstein is well known to several JPM PB employees and to Jes Staley. Mr. Epstein was convicted of a felony charge in 2008 and is currently serving an 18-month prison sentence. Jes Staley conferred with Stephen Cutler and the decision was made to keep Mr. Epstein as a PB client. Staley and PB then decided that his PB relationship will be for banking and custody only. We no longer provide brokerage execution capabilities for Mr. Epstein's accounts. Bear Stearns will hold the brokerage relationship with Mr. Epstein.

Anticipated Product(s)

Others

Client Hierarchy Assignments

GRAY SHADED AREA CONTAINS SPN/CAS ID ASSIGNMENT INFORMATION

Banker SID

U043917

Banker BAC:

FNEN:

8634--CHBG

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Does the DDR have Multiple Entities?

Client Hierarchy and Additional Entity Assignment:

Name

Air Ghislaine, Inc.

Linked to DM Name

JEFFREY E. EPSTEIN

Date of Birth

.

Tax ID

Existing

CAS Id

134109791

SPN No

7704674

Contact Information for each entity named within the Client Hierarchy Table:

Associated Entity

Government issued

I.D Obtained

Air Ghislaine, Inc.

Do any of the above entities require a joint SPN?

Select Yes, if multiple entities will share the same account (OMNI, CASII or Olympic)

Tax ID #

134109791

.

0220476436

Linking to

DM Id

9710670708

CAS ID

0220476436

Citizenship

Does the DDR have Multiple Owners?

Name

Government issued

I.D Obtained

Attention

State

Citizenship

Address Line 1

Zip

Tax ID #

Date of Birth

Address Line 2

City

Province

Country

Approval Information

Public/High Profile Figure

No

High Risk Jurisdiction

High Risk Business

Is this a Foreign Bank?

"Foreign Bank" as defined in the USA
PATRIOT Act.

Banker:

LE/OU:

Senior Manager:

Mary C Casey/JPMCHASE

99/31167

Marcus Sheridan/JPMCHASE

No

No

No

Annual / Periodic Review Information

Annual/Periodic Review

Due in:

36 months

Periodic Review Comments :

Banker Approval Information

Sponsorship affirmation -

Based on my due diligence and the information provided , I approve and
accept sponsorship of Air Ghislaine, Inc. ~ as
a Client from inception and throughout the client relationship.

Mary C Casey 05/19/2009 11:08:36 AM

Senior Manager Approval Information

Based on the information provided and the approval granted by Mary C Casey,
I approve the acceptance of Air Ghislaine,
Inc. ~ as a Client.

Marcus Sheridan 05/19/2009 01:35:24 PM

Quality Reviewer Information

1st Quality Review Comment:

2nd Quality Review Comment:

3rd Quality Review Comment:

4th Quality Review Comment:

5th Quality Review Comment:

Admin Comments

Bonnie K Perry on 6/12/2009 3:01:32 PM Comments : Ok to approve. Client is being redocumented on USCG. Previous DDR within ICG DDR Database.

Admin Comments:

By:
Date:
Admin Comments History :
Document History
Created: 01/23/2009
Last Modified: 10/30/2009
Submitted: 05/19/2009 01:35:24 PM
Audit History
10. Input/Update High Profile figure set to 'No' performed by: Bonnie K Perry on: 10/30/2009 03:59:35 PM
9. 'Area Head Approval' performed by: Catherine Keating on: 06/15/2009 04:18:25 PM
8. Quality Review performed by: Bonnie K Perry on: 06/12/2009 03:02:29 PM
7. 'Senior Manager Approval' performed by: Marcus Sheridan on: 05/19/2009 01:35:27 PM
6. 'Banker Approval' performed by: Mary C Casey on: 05/19/2009 11:08:34 AM
5. Assign SPN/CAS ID/Tax ID performed by: Bonnie K Perry on: 02/11/2009 03:03:39 PM
4. Submitted for Banker Approval SS Type = Full performed by: Camila X Lopez on: 02/05/2009 11:31:44 AM
3. Button: 'Flag: Security Check has begun' performed by: Ligaya X Felismino-Stesner on: 01/23/2009 01:25:38 PM
2. Button: 'Print' performed by: Ligaya X Felismino-Stesner on: 01/23/2009 01:19:41 PM
1. Submitted for Security Services Approval performed by: Maria A. Couto on: 01/23/2009 12:37:03 PM
Converted Tracking Document History:
Removed flag - Sonar alerts only
Bonnie K Perry/JPMCHASE
10/30/2009 03:58:28 PM
By: Maria A. Couto
By: Bonnie K Perry
By: Marcus Sheridan
CN=Sharad Jajoo/0=JPMCHASE: 1369906B.doc
CN=Sharad Jajoo/0=JPMCHASE: 108208B.doc
CN=Sharad Jajoo/0=JPMCHASE: 250609B.doc