

Ticket#

104671828

Client Name

ECI

LOB

Account#

HYPERION AIR INC Account Title

PB

Verify & Confirm for HYPERION AIR INC

Final Risk Rating

Initial Risk Rating

GCS Report Requested

Presence of Potential High Risk

Indicators

Comments

Summary of Risk Attributes

Please summarize any material changes

which have occurred with the client

within the past 12 months:

Creation

Date

Risk Updated History

Entered by

GCS Grid

Search Type

Company Information

Corporate Records

Other Database Searches

(RDC/MIS/Factiva)

Internal Database Search (CSSS/FPS)

This entity belongs to Jeffrey Epstein. He typically will take large cash withdrawals from

the account for fuel expenses when travelling to foreign countries.

No material changes at this time.

High

High

Full

Yes

Account Type

Initiated Date

Initiator

Initiating Team

03/09/2013 04:20

AM

JUSTIN D NELSON

PB FRONT OFFICE

Updated

Risk

Previous

Risk

Comment

Security Service Details

No additional research necessary.

No additional research necessary.

No additional research necessary.

Internal database search revealed prior GS&I research for Hyperion Air Inc and J Epstein and Co, and Harry Beller and nothing derogatory to report. Internal database search revealed prior GS&I research for Jeffrey Edward 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.

State Court Searches

Federal Court Searches

Personal Particulars

Publications

Regulatory Sanctions

OFAC/Control List Search

Negative or Inconsistent Information

GCS Red Dot

Has this been identified as Red Dot KYC?

Negative Information Found

Banker Attestation Details

You are about to approve a high risk client. Have you included sufficient information to satisfy High Risk Enhanced Due Diligence regulatory requirements (Section 312 of the USA Patriot Act)?

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

Yes

No

No

No additional research necessary.
No additional research necessary.
No additional research necessary.
A search of OFAC did not reveal any matches.

Further Review Required

No

No

No

No

No

No

No

Publications revealed nothing derogatory. No

No records were found.

No

No

No

Please state your rationale for conducting business with this client

Comments

Primary Information

Client Type

Client Status

Confidential Names?

Legal Business Name

Hyperion Air is the entity that owns Jeffrey's plane. Issues on him are well documented on his own KYC.

Non Individual

Client

No

Front Office Restricted?

Active Indicator

HYPERION AIR INC

Country of Primary Domicile UNITED STATES

Primary Country of Assets

Country of Organization

Industry Code (NAIC)

UNITED STATES

UNITED STATES

Personal Investment

Companies [525997]

Client Legal Entity Type

Date of Incorporation/Situs

(Date of Trust)

Documentary Evidence

What is the nature/purpose of this entity?

High Risk Jurisdiction

Address(es)

Type

Legal

Notes

Address

6100 RED

HOOK

QUARTER

B3

Phone(s)/Fax(s)

Type

Other

Notes

Phone

Number

2123270131

Tools

Verify "Do Not

Call" List

Email(s)

Type
Other
Notes
Email


Cost Center & Hierarchy

Client Status

Client Sponsor

Cost Center

Client Service Team

GIO

Trust Advisor

Decision Maker

Identification

Withholding Federal Status

Domestic Certified

Withholding SSN/TIN

Certification Date

SSN/TIN/EIN

Introduction & Wealth

Introduction Type

Net Worth of client(\$)

04/18/2012

133621632

Entered by

MARLON A LEWIS 04/18/2012

Date of Update Preferred

Yes

Entered by

SYSTEM

Date of

Update

04/18/2012

Preferred

Yes

City, State,

Postal

Code

ST.

THOMAS,

00802

Country

VIRGIN

ISLANDS,

U.S.

Tools

Map it

Entered by Date of

Update

BATCH

Preferred
07/24/2012 Yes
Corporation
07/18/1991
Corporation - Certified Articles
of Incorporation
Maintenance and upkeep of the
client's personal airplane
Yes
Is the entity a Personal
Holding Company (PHC) or
Personal Investment
Company (PIC) located in an
offshore jurisdiction?
No
Insider Code (Reg. 0)
Primary Domicile State
WebSite
Organization State
Secondary Industry Code
(NAIC)
Client Category
Delaware
NAIC NOT PROVIDED []
Profit
Normal
Yes
Delaware
Client
Client Type
JUSTIN D NELSON
002753 - GREENWICH
CHBG (DE) 4
Paul S Barrett
JEFFREY E EPSTEIN
New or Existing Client
Entity Type
Portfolio Manger
Investor
DM ECI
9710670708
Non Individual
Existing
Entity
Existing JPMorgan Client - Inside LOB
300,000,000.00

Additional Party Information

ECI

Party Type Party Name Last

Completed

Search Date

9710670708 Individual

Jeffrey E

Epstein

05/29/2012

KYC Status Report Type Relation

Type

Completed

Full

Signer

Powers

Full

Percent

Owned

0.0

Primary Information for Jeffrey E Epstein

Client Type

Client Status

Front Office Restricted?

Confidential Names?

First Name

Middle Name

Last Name

Suffix

PreviousName/MMN/Alias

Citizenship

Employer Name

Occupation

Years at Occupation

Individual

Client

Normal

No

Country of Primary Domicile UNITED STATES

Prefix/Title

Jeffrey

Epstein

UNITED STATES

High Risk Jurisdiction

Industry Code (NAIC)

Secondary Industry Code

(NAIC)

Address(es)

Type

Legal

Notes

Address

6100 RED
HOOK QTRS
STE B3, ,
Phone(s)/Fax(s)
Type
Home
Notes
Phone Number Tools

[REDACTED]
Verify "Do Not
Call" List
Email(s)
Type
Notes
Email address not available
Cost Center & Hierarchy
Client Status
Client Sponsor
Cost Center
Client Service Team
Identification
Withholding Federal Status
Form of government issued
identification obtained for the
files
Date Issued
Drivers License
Primary Identification Number [REDACTED]
01/15/2010
Introduction & Wealth
Introduction Type
Net Worth of client(\$)
Issued By
Expiration Date
VIRGIN ISLANDS, U.S.
01/20/2015
Withholding SSN/TIN
Certification Date
SSN/TIN/EIN
[REDACTED]

Email
Entered by
Date of Update
Preferred
Entered by
BATCH
Date of Update Preferred
02/22/2013
Yes
City, State,
Postal Code

ST
THOMAS, ,
00802
Country
VIRGIN
ISLANDS,
U.S.
Tools
Map it
Entered by Date of
Update
BATCH
Preferred
08/03/2012 Yes
Individuals [999940]
Personal Investment
Companies [525997]
Generation
Active Indicator
Marital Status
Primary Domicile State
Insider Code (Reg. 0)
Full Name
Gender
Date of Birth
Primary Country of Assets
Jeffrey E Epstein
Male
01/20/1953
UNITED STATES
Yes
Single
Client
Client Type
PAUL V MORRIS
008634 - CHBG
CHBG (DE) 4
Entity Type
Decision Maker
Individual

Source Of Wealth / Financial Information Details

Source Of Wealth -Identify the Clients Source of Wealth from following list of options

ECI

Party Type Party Name Last

Completed

Search Date

0241469053 Individual

HARRY

BELLER

Primary Information for HARRY BELLER

Client Type

Client Status

Front Office Restricted?

Confidential Names?

Country of Primary Domicile

Prefix/Title

First Name

Middle Name

Last Name

Suffix

PreviousName/MMN/Alias

Citizenship

Employer Name

Occupation

Years at Occupation

HARRY

BELLER

UNITED STATES

HBRK Associates

Financial Advisor

Individual

Prospect

Normal

No

Other

KYC Status Report Type Relation

Type

Full

Signer

Powers

Full

Percent

Owned

0.0

Generation

Active Indicator

Marital Status

Insider Code (Reg. 0)

Full Name

Gender

Date of Birth
Primary Country of Assets
High Risk Jurisdiction
Industry Code (NAIC)
Secondary Industry Code
(NAIC)

Address(es)

Type

Work

Notes

Address

301 E 66TH
ST APT 10B,

,
Phone(s)/Fax(s)

Type

Work

Notes

Phone Number Tools

[REDACTED]

Verify "Do Not
Call" List

Email(s)

Type

Notes

Email address not available

Cost Center & Hierarchy

Client Status

Client Sponsor

Cost Center

Client Service Team

Identification

Withholding Federal Status

Form of government issued
identification obtained for the
files

Introduction & Wealth

Domestic Certified

None

Withholding SSN/TIN

Certification Date

SSN/TIN/EIN

04/13/2012

[REDACTED]

Email

Entered by

Date of Update

Preferred

Entered by

SYSTEM

Date of Update Preferred

04/13/2012

Yes

City, State,
Postal Code

NEW YORK,

New York,

100656298

Country

UNITED

STATES

Tools

Map it

Entered by Date of

Update

DEBRA

WHITE

Preferred

04/13/2012 Yes

HARRY BELLER

Male

[REDACTED]
Individuals [999940]

Prospect

Client Type

PAUL V MORRIS

008634 - CHBG

Entity Type

Individual

Introduction Type
Net Worth of client(\$)
Source Of Wealth / Financial Information Details
Source Of Wealth -Identify the Clients Source of Wealth from
following list of options
ECI
Party Type Party Name Last
Completed
Search Date
9710670708 Individual
Jeffrey E
Epstein
05/29/2012
Executive Management
KYC Status Report Type Relation
Type
Completed
Full
Owner
Powers
Percent
Owned
100.0
Primary Information for Jeffrey E Epstein
Client Type
Client Status
Front Office Restricted?
Confidential Names?
First Name
Middle Name
Last Name
Suffix
PreviousName/MMN/Alias
Citizenship
Employer Name
Occupation
Years at Occupation
Individual
Client
Normal
No
Country of Primary Domicile UNITED STATES
Prefix/Title
Jeffrey
Epstein
UNITED STATES
High Risk Jurisdiction
Industry Code (NAIC)
Secondary Industry Code
(NAIC)
Address(es)

Type
Legal
Notes
Address
6100 RED
HOOK QTRS
STE B3, ,
Phone(s)/Fax(s)

Type
Home
Notes
Phone Number Tools
[REDACTED]

Verify "Do Not
Call" List
Email(s)

Type
Notes
Email address not available
Cost Center & Hierarchy
Client Status
Client Sponsor
Cost Center
Client Service Team
Identification
Withholding Federal Status
Form of government issued
identification obtained for the
files
Date Issued
Drivers License
Primary Identification Number 0000025874
01/15/2010
Issued By
Expiration Date
VIRGIN ISLANDS, U.S.
01/20/2015
Withholding SSN/TIN
Certification Date
SSN/TIN/EIN
[REDACTED]

Email
Entered by
Date of Update
Preferred
Entered by
BATCH
Date of Update Preferred
02/22/2013
Yes
City, State,

Postal Code
ST
THOMAS, ,
00802
Country
VIRGIN
ISLANDS,
U.S.
Tools
Map it
Entered by Date of
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BATCH
Preferred
08/03/2012 Yes
Individuals [999940]
Personal Investment
Companies [525997]
Generation
Active Indicator
Marital Status
Primary Domicile State
Insider Code (Reg. 0)
Full Name
Gender
Date of Birth
Primary Country of Assets
Jeffrey E Epstein
Male
01/20/1953
UNITED STATES
Yes
Single
Client
Client Type
PAUL V MORRIS
008634 - CHBG
CHBG (DE) 4
Entity Type
Decision Maker
Individual

Introduction & Wealth

Introduction Type

Net Worth of client(\$)

Source Of Wealth / Financial Information Details

Source Of Wealth -Identify the Clients Source of Wealth from following list of options

Other

Introduction

Non Individual Entity Type

For Profit?

Locations Served?

Public or Private

Are beneficial owners/principal shareholders associated with this business?

Who owns this entity?

Please Provide ownership details

Corporation - For Profit

Yes

Domestic

Private

Yes

Individual

Jeffrey Epstein is the sole owner of the entity -

Jeffrey Epstein

DOB: 01/20/1953

SSN: [REDACTED]

Citizen: USA

Harry Beller is an authorized signer along with Jeff Epstein on the account -

Harry Beller

DOB: 05/09/1956

SSN: 081-52-0727

Citizen: US

Ownership is not equal to 100%?

Are there any authorized signers or any other individuals with authority over the entity?

What independent background check, in addition to the Global Corporate Security ("GCS") background check, has been carried out? Check all that apply and provide the date in which the background check was conducted. (at least 1 must be selected)

JPMC Network Date

JPMC Network Comments

This entity is 100% owned by Jeffrey Epstein.

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.

Politically Exposed Person

Are any of the beneficial owners/authorized signers or other individuals with authority over this entity a current or former Senior United States or Non-USA Political Official / also known as a Politically Exposed Person (PEP) or related to one?

Source of Wealth/Financial Information

Client Category(for SOW)

Source of Wealth- identify the clients source of wealth from the following list of options

No

No

Yes

JPMC Network

03/12/2013

For Profit

Other

Provide detailed and specific information.

Jeffrey Epstein is a private investor. Jeff Epstein was a money manager - made his wealth managing the money of wealthy individuals.

Epstein began his financial career in 1976 as an options trader at Bear Stearns. He specialized in mathematical models such as the Black-Scholes option-pricing model and later worked in the special products division, advising high net worth clients on tax strategies. In 1980, Epstein became a partner at Bear Stearns. In 1982, Epstein founded his own financial management firm, J. Epstein & Co., managing the assets of clients with more than a billion in net worth. In 1987, Leslie Wexner, founder and chairman of the Columbus, Ohio-based Limited chain of women's-clothing stores became a well-known client. In 1996, Epstein changed the name of his firm to The Financial Trust Company and based it in the US Virgin Islands.

In 2003, Epstein publicly bid for New York Magazine, along with advertising executive, Donny Deutsch, investor Nelson Peltz, publishing mogul and owner of The Daily News, Mortimer Zuckerman and film producer Harvey Weinstein. They were ultimately out bid by longtime wall street investor Bruce Wasserstein for \$55 million. In 2004, Epstein and Mortimer Zuckerman, committed to finance up to \$25 million to back Radar, a celebrity and pop culture magazine and Maer Roshan, its editor in chief and founder. Epstein and Zuckerman were equal partners in the venture, and Mr. Roshan retained a small ownership stake. Which country(ies) is(are) the Client's primary Source of Wealth or Income derived?

Is this an Operating Company?

Total Net Worth \$

What was the total net worth based on?

Is this client a Professional Service Provider acting as a financial intermediary (Gatekeeper/Financial Liaison), with assets held on behalf of one or more unidentified underlying clients unknown to the bank?

Is this entity a Private Equity Fund (Venture Capital Fund or Leveraged Buyout)?

Is this a Hedge Fund? (Pooled investment vehicles (often partnerships) that primarily invest financial capital of third party investors in enterprises that are too risky for the standard capital markets or bank loans.)

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.)

Is this entity any of the following business types?

Is the Entity a Personal Holding Company (PHC) or Personal Investment Company (PIC) located in an offshore jurisdiction?

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.

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.

Client known to whom (JPMorgan employees), how well, and how long:

Overall PB/PWM relationship size and type of accounts:

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?

When was the last time you met the client? What was the reason for the meeting?

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.).

Cash Activity: Summarize client cash activity during the period reviewed and explain the purpose / use of the funds:

Wire Activity: Summarize client wire activity during the period reviewed and explain the purpose / use of the funds, including any international/cross border wires:

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?

Was the nature, value, and volume of actual transaction activity consistent with expected transaction activity?

Was any unusual or potentially suspicious transaction activity detected?

Additional Comments

Long term client of the PB, well known to senior management and relationship monitored closely with regular reviews. No material events or developments over past twelve months.

Jeffrey Epstein has been a client of the PB for over 10 years. Jeffrey's felony offense is well documented and he completed his sentence and probation two years ago. No material developments or issues with client relationship over past twelve months.

Integrated team, sr. management. Well developed dialogue with client.

Jeffrey maintains a brokerage relationship across entities >\$100 million and also maintain checking accounts for personal and business purposes.

No, as of now Jeffrey works with the Private Bank.

Met with him a month ago and seeing him this week.

He is a US citizen but is now officially a Virgin Islands resident.

UNITED STATES

No

300000000.00

Financial Statements

No

No

No

No

aa. None of the above

No

Nothing unusual -- income comes from fees he collects from clients.

Nothing unusual.

Yes

Yes

No

N/A

Expected Activity
Deposit Account(s)
Transaction Types
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)

What is the initial/ongoing source of funding for the client's Deposit Account(s) ?

Ongoing funding comes from Mr. Epstein's personal accounts. The money in that account comes from his fees for managing clients personal funds.

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.

Managing payments for operational expenses of personal aircraft (operational and maintenance).

Please note that it is not unusual for the client to withdraw \$20K to \$40K in cash to pay for fuel expenses when he travels to foreign countries.

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.):

There was no material change to this account.

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

No

Additional Client Information

Please include any additional information that would further explain your knowledge of the client (family tree/history, public information, websites, etc.)

This entity is 100% owned by Jeffrey Epstein.

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 has

served his 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.

Comment History

Stage Name

CEO Approval

\$50,001 TO \$100,000

Expected Activity Levels

Low (1-10)

Low (1-10)

Anticipated Dollar Amount Totals

per Month

\$10,000 TO \$50,000

\$10,000 TO \$50,000

Creation Date

Entered By

06/10/2013 10:02 AM

BONNIE K PERRY

Comment Preview

Duffy, as part of continued due diligence, met with Jeffrey Epstein on April 24, 2013 at his residence. The purpose of the meeting was to discuss his current business activities and his related account activity with us. Mr. Epstein is a felon. His current work involves advising clients of substantial wealth on broad issues or specific goals/transactions. As an example he was recently involved with advising Leon Black of Apollo during the purchase and financing of a prized work of art at auction (\$140MM). Mr. Epstein routinely advises clients and prospects of the private bank. Mr. Epstein agreed to another meeting to further discuss his business. His demeanor was transparent and open. Subsequent to this meeting Donna Dellosso inquired regarding our account activity with Mr. Epstein. She spoke with Phil DiIorio, and will speak

with Mary Erdoes. We will discuss Mr. Epstein and Risk Committee meeting in the near future.

Approval History
Stage Name
Banker Attestation
Market Manager
Approval
Regional Director
Approval
CEO Approval
Signoff Date
06/03/2013 10:04
AM
06/03/2013 06:26
PM
06/06/2013 04:40
PM
06/10/2013 10:02
AM
DF#@T15#7@1
Owner SID
U008568
U117517
U095563
U234588
Owner Name
JUSTIN D NELSON
TOWNSEND C SMITH
WILLIAM M SHERIDAN
BONNIE K PERRY