

Ticket#  
103141514  
Client Name  
ECI  
LOB  
Account#  
HYPERION AIR INC Account Title  
0220476583  
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  
This entity belongs to Jeffrey Epstein. He typically will take large cash  
withdrawals from  
the account for fuel expenses when travelling to foreign countries.  
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)  
High  
High  
Full  
Yes  
Account Type  
Initiated Date  
Initiator  
Initiating Team  
03/28/2012 04:05  
PM  
BONNIE K PERRY  
PB FRONT OFFICE  
Updated  
Risk  
Previous  
Risk  
Comment  
Security Service Details  
Information not confirmed on HYPERION  
AIR INC (Tax ID/Address)

Information confirmed; details included in the attachment.

No records were found.

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.

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

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.

Please state your rationale for conducting business with this client

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

Comments

Yes

No

No

No records were found.

No records were found.

Information not confirmed for Harry Beller (Address).

A search of OFAC did not reveal any matches.

No

No

Yes

Publications revealed nothing derogatory. No records were found.

No

No

Yes

Further Review Required

Yes

No

No

Yes

Long term client of the Private Bank and relationship reviewed regularly with legal/compliance and sr. management.

Professional relationship with Epstein and no negative developments to note in recent history.

Jeffrey's conviction and related news continues to appear in the press from time to time but no new allegations.

Primary Information  
Client Type  
Client Status  
Confidential Names?  
Legal Business Name  
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  
457  
MADISON  
AVENUE  
4TH FL  
Phone(s)/Fax(s)  
Type  
Notes  
Phone address not available  
Email(s)  
Type  
Notes  
Email address not available  
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(\$)  
Additional Party Information  
04/12/2012  
133621632  
Email  
Entered by  
Date of Update Preferred  
Phone  
Number  
Tools  
Entered by  
Date of  
Update  
Preferred  
City, State,  
Postal  
Code  
NEW YORK,  
New York,  
10022  
Country  
UNITED  
STATES  
Tools  
Map it  
Entered by Date of  
Update  
BATCH  
Preferred  
09/08/2007 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  
Delaware  
Client  
Client Type  
PAUL V MORRIS  
008634 - CHBG  
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

ECI  
Party Type Party Name Last  
Completed  
Search Date  
9710670708 Individual  
Jeffrey E  
Epstein  
03/07/2011  
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  
ATTN

DARREN K  
INDYKE, 301  
EAST 66TH  
STREET,  
SUITE 10B,  
Phone(s)/Fax(s)  
Type  
Home  
Notes  
Phone Number Tools  
2127509790  
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  
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  
090443348  
Email  
Entered by  
Date of Update  
Preferred  
Entered by  
BATCH  
Date of Update Preferred  
05/12/2011  
Yes

City, State,  
Postal Code  
NEW YORK,  
New York,  
10065  
Country  
UNITED  
STATES  
Tools  
Map it  
Entered by Date of  
Update  
BATCH  
Preferred  
09/08/2007 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  
2123270131  
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  
Introduction Type  
Domestic Certified  
None  
Withholding SSN/TIN  
Certification Date  
SSN/TIN/EIN  
04/13/2012  
081-52-0727  
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

05/09/1956

Individuals [999940]

Prospect

Client Type

PAUL V MORRIS

008634 - CHBG

Entity Type

Individual

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  
03/07/2011  
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  
ATTN  
DARREN K  
INDYKE, 301  
EAST 66TH  
STREET,  
SUITE 10B,  
Phone(s)/Fax(s)  
Type  
Home  
Notes  
Phone Number Tools  
2127509790  
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  
Drivers License  
Primary Identification Number 0000025874  
Issued By  
VIRGIN ISLANDS, U.S.  
Withholding SSN/TIN  
Certification Date  
SSN/TIN/EIN  
090443348  
Email  
Entered by  
Date of Update  
Preferred  
Entered by  
BATCH  
Date of Update Preferred  
05/12/2011  
Yes  
City, State,  
Postal Code  
NEW YORK,

New York,  
10065  
Country  
UNITED  
STATES  
Tools  
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Primary Domicile State  
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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

Date Issued

01/15/2010

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

Expiration Date

01/20/2015

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: 090-44-3348

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

Provide detailed and specific information.

No

No

Yes

JPMC Network

04/12/2012

For Profit

Other

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

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?

a. Please describe:

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?

If yes, explain:

Additional Comments

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)

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

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.

May 2012, investments/estate planning.

Nothing material to note.

UNITED STATES

No

300000000.00

Other

Accounts held at JPM; knowledge of ownership of certain assets; public articles

No  
No  
No  
No  
aa. None of the above  
No  
Jeffrey travels extensively overseas and on occasion pays cash  
for fuel.  
nothing additional to note.  
Yes  
Yes  
Yes  
Large cash withdrawals but discussion with cleitn revealed for fuel  
purchases.  
N/A

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.

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.

\$50,001 TO \$100,000

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

Creation Date

Entered By

There are no comments entered at this time.

Approval History

Stage Name

Banker Attestation

Market Manager

Approval

Regional Director

Approval

CEO Approval

Comment Preview

Signoff Date

06/19/2012 10:09

AM

06/20/2012 09:14

AM

06/21/2012 01:17

PM

06/26/2012 02:00

PM

DF#@T15#7@1

Owner SID

N256838

U043917

U095563

U234588

Owner Name

PAUL V MORRIS

MARY C CASEY

WILLIAM M SHERIDAN

BONNIE K PERRY