

Ticket#
104748662
Client Name
ECI
LOB
JEJE INC
0220476622
PB
Verify & Confirm for JEJE INC
Final Risk Rating
Initial Risk Rating
GCS Report Requested
Presence of Potential High Risk
Indicators
Reason for Adjustment
Comments
Summary of Risk Attributes
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)
Account#
Account Title
Account Type
Initiated Date
Initiator
Initiating Team
03/26/2013 09:47
AM
CHRISTINE
HEWITT
PB FRONT OFFICE
Standard
High
Full
No
Not associated with high risk jurisdictions. No derogatory information found.
Updated
Risk
Previous
Risk
Comment
Security Service Details
Information not confirmed for Jeje Inc (Tax

ID); details included in the attachment.
Information confirmed; details included in the attachment.

No records found.

Internal database search revealed prior GS&I research for J Epstein and Co. 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

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

Yes

No

Yes

No records found.

No records found.

No additional research necessary.

Nothing derogatory found.

No records found.

A search of OFAC did not reveal any matches.

No

No

No

No

No

No

Yes

Further Review Required

Yes

No

No

Yes

This is an entity 100% owned by Jeffrey Epstein.

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

Primary Information

Client Type

Client Status

Confidential Names?

Legal Business Name

Issues are well documented in JE's personal KYC.

Non Individual

Client

No

Front Office Restricted?

Active Indicator

JEGE INC

Country of Primary Domicile UNITED STATES

Primary Country of Assets

Country of Organization

Industry Code (NAIC)

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

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(\$)
03/26/2013
510405649
Email
Entered by
Date of Update Preferred
Phone
Number
Tools
Entered by
Date of
Update
Preferred
City, State,
Postal
Code
ST
THOMAS,
00802
Country
VIRGIN
ISLANDS,
U.S.
Tools
Map it
Entered by Date of
Update
BATCH
Preferred
11/21/2012 Yes
UNITED STATES
Personal Investment
Companies [525997]
Corporation
09/07/2000
Corporation - Certified Articles
of Incorporation
This entity is being phased out,
it currently owns a personal
plane.
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
New York
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
1,000,000.00

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

Sole 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

Self

Entrepreneur

0

Generation

Active Indicator

Marital Status

Primary Domicile State

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

Legal

Notes

Address

6100 RED

HOOK QTRS

STE B3, ,

Phone(s)/Fax(s)

Type

Home

Notes

Phone Number Tools

Verify "Do Not
Call" List

Email(s)

Type

Other

Notes

Email

ap@hbrkassociates.

com

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

Domestic Certified

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
09/18/2006

Entered by
BATCH

Date of Update
03/20/2013
Preferred
Yes

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
Yes

Single

New York

Jeffrey E Epstein

Male

01/20/1953

UNITED STATES

Individuals [999940]

Personal Investment

Companies [525997]

Client

Client Type

JUSTIN D NELSON

002753 - GREENWICH

CHBG (DE) 4

Entity Type

Decision Maker

Individual

Existing JPMorgan Client - Inside LOB

500,000,000.00

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

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

Corporation - For Profit

Yes

Domestic

Private

No

Individual

Jeff Epstein is 100% owner

No

No

JPMC Network

03/26/2013

The entity is 100% owned by Jeffrey Epstein and a complete DDR is on file for Mr. 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

What is the client's current executive management position? (Include any former positions, if significant to source of wealth)

No

For Profit

Executive Management

Epstein managed money for numerous high net worth families and has been an active investor himself.

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.

List the number of years in current position. (Include any former positions, if significant to source of wealth)

Approximate yearly income/salary/bonus/distribution and other compensation history (accumulated earned income)

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?

30

10000000

UNITED STATES

No

1000000.00

Financial Statements

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?

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

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

Funding amount: \$25,000 Other = Wire

The ongoing source of funding will come from Jeff's personal accounts as needed, the money in that account comes from his investment income.

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.

The purpose of this company is to pay for the maintenance of a plane.

Credit

Types of Credit

Anticipated Dollar Amount Totals per

Month

Line of Credit

1,000.00

What is the purpose/intended use of account(s)? Please provide a detailed description of how the Credit will be used by the client.

This entity currently has a corporate credit issued to them. Monthly payments depend on monthly purchases

Additional Client Information

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

Country of Primary Assets: USA

Jeffrey Epstein is an existing client of PB. He is an active brokerage client covered on the GIO desk. Jeff is well known 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 to discuss the relationship and any potential reputational risk concerns. We continue to monitor the situation closely and monitor 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 connect 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 maintains a professional relationship with the PB and integrated team.

Comment History

Stage Name

Low (1-10)

Low (1-10)

\$500,001 TO \$1,000,000

\$500,001 TO \$1,000,000

Expected Activity Levels

Anticipated Dollar Amount Totals

per Month

No

No

No

No

aa. None of the above

No

Creation Date

Entered By
Comment Preview

There are no comments entered at this time.

Approval History

Stage Name

Banker Attestation

Market Manager

Approval

Signoff Date

05/22/2013 02:15

PM

05/22/2013 02:38

PM

DF#@T15#7@1

Owner SID

U008568

U117517

Owner Name

JUSTIN D NELSON

TOWNSEND C SMITH