

Ticket#

105258611

Client Name

ECI

LOB

Account#

THE HAZE TRUST Account Title

PB

Verify & Confirm for THE HAZE TRUST

Final Risk Rating

Initial Risk Rating

GCS Report Requested

Presence of Potential High Risk

Indicators

Comments

Summary of Risk Attributes

Convicted Felon - 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.

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)

No other changes made.

High

High

Full

No

Account Type

Initiated Date

Initiator

Initiating Team

07/13/2013 07:22

AM

JUSTIN D NELSON

PB FRONT OFFICE

Updated

Risk

Previous

Risk

Comment

Security Service Details

No records found.

Further Review Required

No

No records found.

No records found.

Internal database search revealed prior GS&I research for Jeffrey Edward Epstein and the 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

Yes

No records found.

No records found.

No records found.

Nothing derogatory found.

No records found.

A search of OFAC did not reveal any matches.

No

No

Yes

No

No

No

No

No

No

Yes

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

Primary Information

Client Type

Client Status

Confidential Names?

Legal Business Name

Client has been asked to exit the firm and is in process of doing so now.

Client has been asked to exit the firm and is in process of doing so now.

Non Individual

Client

No

Front Office Restricted?

Active Indicator

THE HAZE TRUST

Country of Primary Domicile UNITED STATES

Primary Country of Assets

Country of Organization

Industry Code (NAIC)

UNITED STATES

UNITED STATES

Personal & Testamentary Trusts

[525921]

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

3407752525
Tools
Verify "Do Not
Call" List
Email(s)
Type
Other
Notes
Email
harrybeller@gmail.c
om
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
10/14/2013
137185414
Entered by
FRANCIS G
MCCLURE JR
Date of Update Preferred
09/25/2012
Yes
Entered by
SYSTEM
Date of
Update
05/09/2011
Preferred
Yes
City, State,
Postal
Code
ST
THOMAS,
00802
Country
VIRGIN
ISLANDS,

U.S.
Tools
Map it
Entered by Date of
Update
BATCH
Preferred
04/23/2010 Yes
Trust
02/09/1999
Trust - Trust Agreement/other
governing document
establishing the Trust
This is a Trust set up as part of
Jeffrey Epstein's Estate
Planning.
Yes
Estate Trust
Revocable Trust
Insider Code (Reg. 0)
Primary Domicile State
WebSite
Organization State
Secondary Industry Code
(NAIC)
New York
NAIC NOT PROVIDED []
Normal
Yes
New York
Client
Client Type
WILLIAM M SHERIDAN
143360 - USPB UHNW NYC
TRI STATE EXEC
CHBG (DE) 4
Paul S Barrett
JEFFREY E EPSTEIN
Entity Type
Portfolio Manger
Investor
DM ECI
9710670708
Entity
New or Existing Client
Non Individual
Existing
Existing JPMorgan Client - Inside LOB

Net Worth of client(\$)
10,000,000.00
Additional Party Information
ECI
Party Type Party Name Last
Completed
Search Date
0221165201 Individual
DARREN
INDYKE
01/15/2010
KYC Status Report Type Relation
Type
Completed
Beneficiary
Powers
Percent
Owned
100.0
Primary Information for DARREN INDYKE
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
DARREN
INDYKE
UNITED STATES
Darren K. Indyke PLLC
Lawyer
6
High Risk Jurisdiction
Industry Code (NAIC)
Secondary Industry Code
(NAIC)
Address(es)
Type

Legal
Notes
Address
2 KEAN
COURT, ,
City, State,
Postal Code
LIVINGSTON
, New Jersey,
07039
Phone(s)/Fax(s)
Type
Other
Notes
Phone Number Tools
8624856315
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
Decision Maker
Identification
Withholding Federal Status
Form of government issued
identification obtained for the
files
Date Issued
Domestic not certified
SSN/TIN/EIN
Passport
Primary Identification Number 112637684
03/10/2002
Introduction & Wealth
Issued By
Expiration Date
UNITED STATES
03/10/2012
000000000
Email
Entered by
Date of Update
Preferred
Entered by
SYSTEM

Date of Update Preferred

02/12/2013

Yes

Country

UNITED

STATES

Tools

Map it

Entered by Date of

Update

BATCH

Preferred

10/07/2009 Yes

Individuals [999940]

Generation

Active Indicator

Marital Status

Primary Domicile State

Insider Code (Reg. 0)

Full Name

Gender

Date of Birth

Primary Country of Assets

Yes

Married

New Jersey

DARREN INDYKE

Male

02/19/1965

UNITED STATES

Client

Client Type

WILLIAM M SHERIDAN

143360 - USPB UHNW NYC

TRI STATE EXEC

CHBG (DE) 4

JEFFREY E EPSTEIN

Entity Type

Entity

Individual

Introduction Type
Net Worth of client(\$)
Existing JPMorgan Client - Inside LOB
1,000,000.00
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
04/18/2013
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
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
2127509895
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
Issued By

Expiration Date
VIRGIN ISLANDS, U.S.
01/20/2015
Withholding SSN/TIN
Certification Date
SSN/TIN/EIN
09/18/2006
090443348
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
WILLIAM M SHERIDAN
143360 - USPB UHNW NYC
TRI STATE EXEC
CHBG (DE) 4

Entity Type
Decision Maker
Individual

Introduction & Wealth

Introduction Type

Net Worth of client(\$)

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

Select Trust Type

Is this an existing JPM trust or external trust?

Is JPM Sole Trustee?

Comments

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

Trust

N/A

Existing

No

Darren K. Indyke is a trustee (SSN: 098-54-8596 DOB: 02/19/1965 US Citizen)

Jeffrey E. Epstein is the Grantor of this Trust (SNN: [REDACTED] DOB: 01-20-1953 US Citizen)

Yes

JPMC Network

22 Apr 2010

Jeffrey Epstein is an existing client. Darren Indyke is the attorney for Jeffrey Epstein and an existing client.

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

Trust/Estate

Other

The source of wealth derives from distributions, funding from other sources - personal investments.

Jeffrey Epstein (SSN: 090-44-3348 DOB: 01/20/1953 US Citizen) is an existing client of PB. He is an active brokerage client across asset classes currently covered by the Firm's GIO desk. Jeffrey Epstein has been an investment advisor for numerous high net worth clients and also a personal investor. Jeffrey is very accessible and well known to the team. We have advised him on investments as well as estate planning opportunities. Jeffrey has continues to be well connected across business channels. Epstein is well known to several JPM PB employees and senior management including Jes Staley. Also, Mr. Epstein was convicted of a felony charge in 2008. Jes Staley conferred with Stephen Cutler and the decision was made to keep Mr. Epstein as a PB client. Mr. Epstein completed his sentence and probation in 2010. The relationship has been reviewed with senior management and compliance/legal on a few occasions over the post year as news stories of Jeffrey's past are picked up. No new claims or stories have surfaced recently.

Which country(ies) is(are) the Client's primary Source of Wealth or Income derived?

Total Net Worth \$

What was the total net worth based on?

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 has been asked to exit the firm by senior mgmt (John Duffy). This is now in progress for all of his accounts.

Client has been asked to exit the firm - in progress.

UNITED STATES

10000000.00

Financial Statements

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

Client has been asked to exit the firm - in progress.

Client has been asked to exit the firm - in progress.

Client has been asked to exit this firm - in progress.

Client has been asked to exit the firm - in progress.

Client has been asked to exit the firm - in progress.

Client has been asked to exit the firm - in progress.

Client has been asked to exit the firm - in progress.

Yes

Yes

No

Client activity related to exiting assets and accounts from JPM PB at request of sr mgmt.

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)

\$50,001 TO \$100,000

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

Initial funding amount: 10,000,000 wire and the ongoing will come from his personal account at the the PB.

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 is to have a checking account for trust to pay any expenses the trust incurs.

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.):

Low monthly activity.

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

Yes

If modified, explain.

Lowered the expected activity level.

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 is another part of an existing client relationship with Jeffrey Epstein. The client has requested the opening of a checking account for trust. This trust is for the benefit of Jeffrey Epstein.

Comment History

Stage Name

CEO Approval

Approval History

Stage Name

Expected Activity Levels

Low (1-10)

Low (1-10)

Low (1-10)

Low (1-10)

Low (1-10)

Low (1-10)

Anticipated Dollar Amount Totals

per Month

<\$10,000

<\$10,000

\$10,000 TO \$50,000

\$10,000 TO \$50,000

\$50,001 TO \$100,000

\$50,001 TO \$100,000

Creation Date

Entered By

11/27/2013 11:03 AM

JOHN R DUFFY

Comment Preview

approved to facilitate client exit

Signoff Date

Owner SID

Owner Name

Banker Attestation
Market Manager
Approval
Regional Director
Approval
CEO Approval
10/30/2013 11:54
AM
11/26/2013 06:43
PM
11/27/2013 07:06
AM
11/27/2013 11:03
AM
DF#@T15#7@1
U095563
WILLIAM M SHERIDAN
U005734
U963678
U093971
ALMA DEMETROPOLIS
VINCENT A LA PADULA
JOHN R DUFFY