

Ticket#
105258633
Client Name
ECI
LOB
JEEPERS, INC.
0241857215
PB
Account#
Account Title
Account Type
Initiated Date
Initiator
Initiating Team
07/13/2013 07:22
AM
JUSTIN D NELSON
PB FRONT OFFICE
Verify & Confirm for JEEPERS, INC.
Final Risk Rating
Initial Risk Rating
GCS Report Requested
Presence of Potential High Risk
Indicators
Reason for Adjustment
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)
No changes on activity at this time.
High
High
Full
No
Derogatory information - Jeffrey Epstein personally is flagged as High Risk
due to felony
conviction.
Updated
Risk

Previous

Risk

Comment

Security Service Details

No records found.

Further Review Required

No

No records found.

Information confirmed; details included in the attachment.

- 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

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

No

No

No

No

Yes

No

Yes

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

Jeffrey Epstein was asked to exit the firm in August of 2013. The accounts are in the process of moving to another bank and should be closed out by year-end.

Jeffrey Epstein was asked to exit the firm in August of 2013. The accounts are in the process of moving to another bank and should be closed out by year-end.

Non Individual

Client

No

Front Office Restricted?

Active Indicator

JEEPERS, INC.

Country of Primary Domicile UNITED STATES

Primary Country of Assets VIRGIN ISLANDS, U.S.

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?

UNITED STATES

Personal Investment

Companies ██████████

Corporation

08/18/2003

Corporation - Certified Articles of Incorporation

The purpose of this entity is personal investments on behalf of Jeffrey Epstein.

Is the entity a Personal

Holding Company (PHC) or

Personal Investment

Company (PIC) located in an offshore jurisdiction?

PHC/PIC Questions

Are shares registered or in bearer form

List the total number of
shares that have been issued
High Risk Jurisdiction
Address(es)

Type

Legal

Notes

Address

6100 RED

HOOK

QUARTER

B3

Phone(s)/Fax(s)

Type

Work

Notes

Phone

Number

[REDACTED]

Tools

Verify "Do Not
Call" List

Email(s)

Type

Other

Notes

Email

Entered by

[REDACTED] EILEEN MORIARTY 02/19/2013

Cost Center & Hierarchy

Client Status

Client Sponsor

Cost Center

Client Service Team

GIO

Trust Advisor

Decision Maker

Date of Update Preferred

Yes

Entered by

SYSTEM

Date of

Update

12/08/2011

Preferred

Yes

City, State,

Postal

Code

ST

THOMAS,

00802
Country
VIRGIN
ISLANDS,
U.S.
Tools
Map it
Entered by Date of
Update
BATCH
Preferred
12/22/2011 Yes
Registered
1000.0
Yes
What is the authorized
capital(This information is
usually found in the Board
Resolution and/or minutes)
1000.0
Yes
Insider Code (Reg. 0)
Primary Domicile State
WebSite
Organization State
Secondary Industry Code
(NAIC)
Client Category
Virgin Islands
NAIC NOT PROVIDED []
Profit
Normal
Yes
Virgin Islands
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
[REDACTED]
Non Individual
Existing
Entity

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
ECI
Party Type Party Name Last
Completed
Search Date
██████████ Individual
Jeffrey E
Epstein
04/18/2013
KYC Status Report Type Relation
Type
Completed
Full
Sole Owner
Powers
Percent
Owned
100.0
12/08/2011
██████████
Existing JPMorgan Client - Inside LOB
50,000,000.00
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
E
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
Other
Notes
Email

[REDACTED].
[REDACTED]

Cost Center & Hierarchy
Client Status
Client Sponsor
Cost Center
Client Service Team
Identification
Withholding Federal Status
Withholding SSN/TIN
Certification Date
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
INDIVIDUALS [REDACTED]
Personal Investment
Companies [REDACTED]
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

SSN/TIN/EIN

[REDACTED]

Form of government issued
identification obtained for the
files

Primary Identification Number

Date Issued

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

Issued By

Expiration Date

Introduction

Non Individual Entity Type

For Profit?

Locations Served?

a. If International or both, please describe:

Corporation - For Profit

Yes

Both

To conduct its business in the Virgin Islands and elsewhere in the
United States and foreign countries and to have offices within or
outside the Virgin Islands and to hold, purchase, mortgage and
convey real and personal property within or outside the Virgin
Island.

Public or Private

Are beneficial owners/principal shareholders associated with
this business?

Who owns this entity?

Please Provide ownership details

Private

Yes

Individual

Jeffrey Epstein is the sole owner of the corporation -

Jeffrey Epstein

DOB: 01/20/1953

SSN: [REDACTED]

Citizen: United States

Govt ID: US Virgin Islands - CI [REDACTED] - Issued 1/15/2010 -

Expires - 1/20/2015

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

No

No

JPMC Network

12/08/2011

This is another part of an existing client relationship with Jeffrey Epstein.

An ECI was created for this entity in the Retail Bank but no account number was ever assigned. We are moving this ECI from Retail to Private Bank to open an asset/brokerage account.

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

For Profit

Other

Provide detailed and specific information.

The source of wealth will derive from the personal assets of Jeff Epstein. Jeff Epstein is self-employed investor/entrepreneur. Jeffrey Epstein (SSN: [REDACTED] 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?

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?

Is the PHC/PIC managed by JPMC? (Trustees of the entity are JPMC employees, e.g., PHC managed in Nassau/Geneva/Delaware)

PHC/PIC Location

Did the client confirm with you that the beneficial ownership is as stated within this KYC?

Did the client confirm that he/she would inform you if beneficial ownership changes?

Was the "Confirmation of Beneficial Ownership" document received from the beneficial owner? Please attach the J.P. Morgan Confirmation of Beneficial Ownership document to the KYC.

List the number of shares that have been issued

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:

Jeffrey Epstein was asked to exit the firm in August of 2013. The accounts are in the process of moving to another bank and should be closed out by year-end.

Jeffrey has been a client for over 10 years.

Senior management, including Mary Erdoes, knows Jeffrey.

>\$100 million

No

I met with the client in June of 2013.

Jeffrey Epstein was asked to exit the firm in August of 2013. The accounts are in the process of moving to another bank and should be closed out by year-end.

All accounts are in the process of transitioning to Deutsche Bank, so all cash is moving out.

All accounts are in the process of transitioning to Deutsche Bank, so wire activity has diminished.

1000.00

UNITED STATES

No

50000000.00

Financial Statements

No

No

No

No

aa. None of the above

Yes

No

Have you received copies of the shares or listing of shares? Yes

Are the shares registered or in bearer form?

Registered

VIRGIN ISLANDS, U.S.

Yes

Yes

Yes

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

Expected Activity

Client Directed Asset / Brokerage 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)

<\$10,000

What is the initial/ongoing source of funding for the client's Client Directed Asset / Brokerage Account(s) ?

The initial source of funding will be from an external wire transfer of funds from First Bank Virgin Islands Bank in the amount of \$800.

Any ongoing source of funding will also be from First Bank Virgin Islands Bank from returns on various investments.

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

The purpose of the account is to purchase securities for future wealth accumulation.

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.):

This account continues to have low activity.

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.)

Jeffrey Epstein (SSN: [REDACTED] 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.

Comment History

Stage Name

Market Manager Approval

CEO Approval

Low (1-10)

<\$10,000

Expected Activity Levels

Anticipated Dollar Amount Totals
per Month

Yes

Yes

No

N/A

Creation Date

Entered By

12/06/2013 02:35 PM

12/15/2013 07:02 PM

TOWNSEND C SMITH

JOHN R DUFFY

Comment Preview

We are exiting this relationship
approved to facilitate exit of
client from jpm

Approval History

Stage Name

Banker Attestation

Market Manager

Approval

Regional Director

Approval

CEO Approval

Signoff Date

11/15/2013 06:03

PM

12/06/2013 02:35

PM
12/06/2013 03:40
PM
12/15/2013 07:02
PM
DF#@T15#7@1
Owner SID
U008568
U117517
U095563
U093971
Owner Name
JUSTIN D NELSON
TOWNSEND C SMITH
WILLIAM M SHERIDAN
JOHN R DUFFY