

Ticket#  
102745698  
Client Name  
ECI  
LOB  
NEPTUNE LLC  
0391309309  
PB  
Account#  
Account Title  
Account Type  
Initiated Date  
Initiator  
Initiating Team  
01/03/2012 10:50  
AM  
ELIZABETH M  
CAMPBELL  
PB FRONT OFFICE  
Verify & Confirm for NEPTUNE LLC  
Final Risk Rating  
Initial Risk Rating  
GCS Report Requested  
Presence of Potential High Risk  
Indicators  
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)  
High  
High  
Full  
No  
Updated  
Risk  
Previous  
Risk  
Comment  
Security Service Details  
Information not confirmed for Neptune LLC;  
details included in the attachment. (TAX ID  
and 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.

No additional research necessary.

No records were found.

No

No

No

Publications revealed nothing derogatory. No

No records were found.

No

No

Yes

Further Review Required

Yes

No

No

Yes

existing client of the Private Bank.

regularly reviewed by management and risk committee.

Primary Information  
Client Type  
Client Status  
Confidential Names?  
Legal Business Name  
Non Individual  
Client  
No  
Front Office Restricted?  
Active Indicator  
NEPTUNE LLC  
Country of Primary Domicile UNITED STATES  
Primary Country of Assets  
Country of Organization  
Industry Code (NAIC)  
UNITED STATES  
UNITED STATES  
LESSORS OF OTHER REAL  
ESTATE PROPERTY [531190]  
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  
301 E 66TH  
ST APT 10F  
City, State,  
Postal  
Code  
NEW YORK,  
New York,  
100656216  
Phone(s)/Fax(s)  
Type  
Work  
Notes  
Phone  
Number  
6464147584  
Tools  
Verify "Do Not  
Call" List  
Email(s)  
Type

Work  
Notes  
Email  
richardkahn12@gma  
il.com  
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 Entities  
No additional entities available at this time  
12/28/2011  
45-4093384  
Entered by  
BATCH  
Date of Update Preferred  
01/03/2012  
Yes  
Entered by  
SYSTEM  
Date of  
Update  
01/03/2012  
Preferred  
Yes  
Country  
UNITED  
STATES  
Tools  
Map it  
Entered by Date of  
Update  
BATCH  
Preferred  
01/03/2012 Yes  
Limited Liability Company  
12/21/2011  
LLC - State Certificate

A household account to pay expenses for property upkeep and maintenance  
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  
Profit  
Delaware  
Normal  
Yes  
Florida  
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

Additional Party Information

ECI

Party Type Party Name Last

Completed

Search Date

9710670708 Individual

Jeffrey E

Epstein

03/07/2011

KYC Status Report Type Relation

Type

In Progress 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

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  
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

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  
0390552637 Individual  
HARRY  
BELLER  
Primary Information for HARRY BELLER  
Client Type  
Client Status  
Front Office Restricted?  
Prefix/Title  
First Name  
Middle Name  
Last Name  
Suffix  
PreviousName/MMN/Alias  
Citizenship  
Employer Name  
Occupation  
Years at Occupation  
Individual  
Client  
Normal  
Confidential Names?  
Country of Primary Domicile UNITED STATES  
HARRY  
BELLER  
KYC Status Report Type Relation  
Type  
Full  
Signer  
Powers  
Full  
Percent  
Owned  
0.0  
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

Work

Notes

Address

301 E 66TH  
ST APT 10B,

Phone(s)/Fax(s)

Type

Work

Notes

Phone Number Tools

6468624817

Verify "Do Not  
Call" List

Email(s)

Type

Work

Notes

Email

harrybeller@gmail.c  
om

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 628679340

05/09/1956

Issued By

Expiration Date

UNITED STATES

New York

05/09/2019

Withholding SSN/TIN

Certification Date

SSN/TIN/EIN

081520727

Entered by

ROSALIA  
CRACCHIOLO  
Date of Update  
05/12/2011  
Preferred  
Yes  
Entered by  
SYSTEM  
Date of Update Preferred  
05/12/2011  
Yes  
City, State,  
Postal Code  
NEW YORK,  
New York,  
100656298  
Country  
UNITED  
STATES  
Tools  
Map it  
Entered by Date of  
Update  
SYSTEM  
Preferred  
05/12/2011 Yes  
HARRY BELLER  
Male  
05/09/1956  
Yes  
Single  
Client  
Client Type  
118313 - IVT OT CENTER  
Entity Type  
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  
ECI  
Party Type Party Name Last  
Completed  
Search Date  
0244658617 Individual  
JANUSZ  
BANASIAK  
Primary Information for JANUSZ BANASIAK  
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  
Prospect  
Normal  
No  
Country of Primary Domicile UNITED STATES  
Prefix/Title  
JANUSZ  
BANASIAK  
UNITED STATES  
High Risk Jurisdiction  
Industry Code (NAIC)  
Secondary Industry Code  
(NAIC)  
Address(es)  
Type  
Home  
Notes  
Address  
358 EL  
BRILLO  
WAY, ,  
City, State,  
Postal Code  
PALM

BEACH,  
Florida,  
334804730  
Phone(s)/Fax(s)  
Type  
Other  
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  
Domestic not certified  
SSN/TIN/EIN  
096-64-8809  
Email  
Entered by  
Date of Update  
Preferred  
Entered by  
SYSTEM  
Date of Update Preferred  
01/04/2012  
Yes  
Country  
UNITED  
STATES  
Tools  
Map it  
Entered by Date of  
Update  
ELIZABETH  
M  
CAMPBELL  
Preferred  
01/04/2012 Yes  
INDIVIDUALS [999940]  
Other  
KYC Status Report Type Relation  
Type  
Full

Signer  
Powers  
Administrative  
Percent  
Owned  
0.0  
Generation  
Active Indicator  
Marital Status  
Primary Domicile State  
Insider Code (Reg. 0)  
Full Name  
Gender  
Date of Birth  
Primary Country of Assets  
Florida  
JANUSZ BANASIAK  
Male  
04/07/1953  
UNITED STATES  
Prospect  
Client Type  
PAUL V MORRIS  
008634 - CHBG  
Entity Type  
Individual

Form of government issued  
identification obtained for the  
files  
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  
Drivers License  
Primary Identification Number B522420531270  
08/09/2005  
Issued By  
Expiration Date  
UNITED STATES  
Florida  
04/07/2012  
Introduction  
Non Individual Entity Type  
For Profit?  
Locations Served?  
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  
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  
Limited Liability Company - For Profit  
Yes  
Domestic

No

Individual

Jeffrey E. Epstein is the sole owner of this account.

No

Yes

JPMC Network

01/03/2012

Mr. Jeffrey Epstein is an exiting client of the Private Bank.

For Profit

Other

Jeffrey Epstein is an existing client of PB. In years past, he was an active brokerage client.

Formerly, Jeffrey Epstein was a money manager for high net worth individuals, most

notably Leslie Wexner. Wexner was a JPM client and then retained Epstein as his advisor

in the late 90s.

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.)

UNITED STATES

No

300000000.00

Other

Jeffrey Epstein is an existing client of the Private Bank

No

No

No

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?

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)

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) ?

Initial source of funding of \$100 K will be debited from the JPM DDA # 739110438 – Jeffrey Epstein. This will be an internal transfer.

Ongoing source of funding will continue to come from A/C # 739110438

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.

Household expenses at the 358 El Brillo Way, Palm Beach FL 33480 property.

Additional Client Information

Please include any additional information that would further explain your

knowledge of the client (family tree/history, public information, websites, etc.)

\$50,001 TO \$100,000

Expected Activity Levels

Low (1-10)

Low (1-10)

Low (1-10)

Low (1-10)

Anticipated Dollar Amount Totals

per Month

<\$10,000

<\$10,000

<\$10,000

<\$10,000

regularly reviewed by management/reputational risk committee.

Long serving client relationship w/ the Private Bank.

Integrated tea/senior management.

Primarily investments, >\$100 million.

No.

N/A

No

aa. None of the above

No

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

03/08/2012 04:08

PM

03/16/2012 09:46

AM

03/19/2012 02:33

PM

03/28/2012 05:54

PM

Owner SID

N256838

U043917

U095563

U234588

Owner Name

PAUL V MORRIS

MARY C CASEY

WILLIAM M SHERIDAN

BONNIE K PERRY

DF#@&T15#7@1