

Ticket#:	102238622	Account#:	Initiated Date#:	08/22/2011 11:20 AM
Client Name:	ELLMAX	Account Title:	Initiator:	DEBRA WHITE
ECl#:	0033845033	Account Type:	Initiating Team:	PB FRONT OFFICE
LOB:	PB			

### Verify and Confirm for ELLMAX

Final Risk Rating	Standard
Initial Risk Rating	Standard
GCS Report Requested	Full
Presence of Potential High Risk Indicators	No

### GCS Grid

Search Type	Security Service Details	Further Review Required
Company Information	Information not confirmed for Ellmax (Tax ID). Details included in the attachment.	Yes
Corporate Records	Information confirmed; details included in the attachment.	No
Other Database Searches (RDC/MIS/Factiva)	No records were found.	No
Internal Database Search (CSSS/FPS)	Internal database search revealed prior GSI research and the following derogatory information was reported: Several newspaper articles detailing the investigation conducted by Britains Serious Fraud Office against Robert Maxwell. He allegedly used pension funds to service debts, cover operating losses, gamble in the foreign exchange markets, and support the stock of his publicly held companies. The agency is also looking into a complaint from Swiss Bank Corp., which says it did not receive collateral for a \$100 million loan to a small private Maxwell company. Newspaper article dated 12/01/2000, which stated that Ghislaine Maxwells source of wealth is being classified as something of a mystery. Newspaper article dated 08/09/1996 detailing the arrest of Ghislaine Maxwell on DWI charges. Numerous newspaper articles detailing the criminal fraud charges brought against Kevin and Ian Maxwell (sons of Robert Maxwell). Newspaper article dated 6/23/2005 detailing Robert Maxwell misappropriated funds from the companies under his control. According to the newspaper article, "He pledged assets as security for additional loans", but instead of delivering the assets to the lender, he would simply sell the assets for cash. "For example, Berlitz language school was supposedly sold to a Japanese publishing company, but the shares had previously been pledged as security for loans from Swiss Volksbank and Lehman Brothers."	Yes
State Court Searches	No records were found.	No
Federal Court Searches	No records were found.	No
Personal Particulars	No additional research necessary.	No
Publications	No records were found.	No
Regulatory Sanctions	No records were found.	No
OFAC/Control List Search	A search of OFAC did not reveal any matches.	No
Negative or Inconsistent Information		Yes

### GCS Red Dot