

Ticket#	105258608	Account#	Initiated Date	07/13/2013 07:22 AM
Client Name	MAX FOUNDATION	Account Title	Initiator	JUSTIN D NELSON
ECI	0309713017	Account Type	Initiating Team	PB FRONT OFFICE
LCB	PB			

Verify & Confirm for MAX FOUNDATION	
Final Risk Rating	High
Initial Risk Rating	High
GCS Report Requested	Full
Presence of Potential High Risk Indicators	No
Comments	
Summary of Risk Attributes	High risk - Client is associated with the Epstein relationship and is in the process of being exited.
Please summarize any material changes which have occurred with the client within the past 12 months:	Client is associated with the Epstein relationship and is in the process of being exited.

Risk Updated History				
Creation Date	Entered by	Updated Risk	Previous Risk	Comment

GCS Grid		
Search Type	Security Service Details	Further Review Required
Company Information	Information not confirmed for "Max Foundation" (Tax ID and Address); Details included in the attachment.	Yes
Corporate Records	Information not confirmed for "Max Foundation" (State of Domicile); Details included in the attachment.	Yes
Other Database Searches (RDC/MIS/Factiva)	No records were found.	No
Internal Database Search (CSSS/FPS)	No records were found.	No
State Court Searches	No records were found.	No
Federal Court Searches	No records were found.	No
Personal Particulars	No additional research necessary.	No
Publications	Nothing derogatory to report.	No
Regulatory Sanctions	No records were found.	No
OFAC/Control List Search	A search of OFAC revealed no matches.	No
Negative or Inconsistent Information		Yes

GCS Red Dot	
Has this been identified as Red Dot KYC?	No
Negative Information Found	No

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)?	Yes
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
Please state your rationale for conducting business with this client	As stated above the client is exiting the firm.
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	Client is exiting the firm.
Comments	Client is exiting the firm.

Primary Information			
Client Type	Non Individual	Front Office Restricted?	Normal
Client Status	Client	Active Indicator	Yes
Confidential Names?	No		