

Was any unusual or potentially suspicious transaction activity detected?

No

Additional Comments

CLIENT EXITED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014

Business Case

Summary of Risk Attributes

Reputational - 2011 media alleging Maxwell solicited young girls for then boyfriend Jeffrey Epstein. Epstein was convicted for solicitation of a prostitute and procuring a person under age 18 for prostitution. He was the subject of a previous Management Review and has been exited from the Bank. In a 12/6/13 RRC mtg, the decision was made to exit Maxwell. Even though all of Maxwell's banking accounts have been closed (only credit cards remain), the ticket needs to be completed to close the loop on the exit.

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

We are no longer comfortable with this client. CLIENT EXITED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014

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.

Maxwell was referred by Jeffrey Epstein, a former client of the Private Bank and advisor to Leslie Wexner, also a longstanding client. Jes Staley has met with Ghislaine Maxwell.

Client known to whom (JPM employees), how well and how long

Maxwell was referred by Jeffrey Epstein, a longstanding client of the Private Bank and advisor to Leslie Wexner, also a longstanding client. Jes Staley got the original referral from Jeff Epstein, and he referred Ghislaine Maxwell on to our team.

Overall PB/PWM relationship size and type of accounts

ALL ACCOUNTS ARE CLOSED

CLIENT EXITED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014

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?

NOT SHARED

ALL ACCOUNTS ARE CLOSED

CLIENT EXITED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014

Describe any significant changes in the client's information or material events that may have occurred over the last year

CLIENT EXITED THE BANK AND ASSETS CLOSED JUNE 8, 2014 AS RISK COMMITTEE REQUESTED.

Additional Parties

Risk Assessment

Please include any additional information that would further explain your knowledge of the client (family tree/history, public information, websites, etc.)

THIS CLIENT EXITED THE BANK AND ASSETS CLOSED JUNE 8, 2014 AS RISK COMMITTEE REQUESTED. KYC completed as a result on a best efforts basis, given client could not be contacted to gather additional informaton.

Banker Attestation

Banker Attestation

As the client sponsor, I understand that I am primarily responsible for protecting the firm's reputation from inappropriate business relationships, as well as prevent 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

Ghislaine Maxwell was asked to leave the bank by our Risk Committee. Her assets have all left the bank and her accounts have all since closed. She is no longer a client of the Private Bank.

Comments

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

Summary

Risk Factors and Indicators

Risk Factors:

No Risk Factors Present

Risk Indicators:

None

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