

No Risk Factors Present

Risk Indicators:
No Government ID : None

Risk Rating

Initial Risk Rating
Standard

Final Risk Rating
High

Reason for Adjusted Risk Rating
Negative media - human rights issue

Report Requested from GS&I
Full

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.

GSI Report

Current Report Type:
Full

Main Client Report Type:
Full

GSI Grid

Search Type Further Review Required

Company Information
No additional research necessary. No

Corporate Records
No additional research necessary. No

Other Database Searches
No additional research necessary. No

Internal Database Search (SPEADD/FPS)
Internal database search revealed prior GDDO research for Ghislaine Maxwell and the following derogatory information was reported: 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. Reference the account titled "116 East 65th St LLC" (attached document labeled 816859913B) AND account titled "Pot and Kettle" (attached document labeled 511696411B) for previous research. Yes

Court Searches
No additional research necessary. No

Personal Particulars
No additional research necessary. No

Publications
No additional research necessary. No

Regulatory Sanctions
No additional research necessary. No

OFAC/Control List Search
No additional research necessary. No

GSI Red Dot

Has this been identified as Red Dot KYC? Negative or Inconsistent Information
No Yes

Please respond to any issue identified in the GS&I grid that either needs further review or red dot which is not already covered in Business Case within the KYC
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

(No Comments Available)