

Ticket#	103265268	Account#	Initiated Date	04/26/2012 03:39 PM
Client Name	TERRA MAR PROJECT, INC.	Account Title	Initiator	DEBRA WHITE
ECI		Account Type	Initiating Team	PB FRONT OFFICE
LOB	PB			

Verify & Confirm for TERRA MAR PROJECT, INC.

Final Risk Rating	Standard
Initial Risk Rating	High
GCS Report Requested	Full
Presence of Potential High Risk Indicators	No
Reason for Adjustment	Not associated with a HRJ. Derogatory information previously addressed.
Comments	
Summary of Risk Attributes	

Risk Updated History

Creation Date	Entered by	Updated Risk	Previous Risk	Comment
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GCS Grid

Search Type	Security Service Details	Further Review Required
Company Information	Information not confirmed on Terra Mar Project Inc for tax id and address.	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)	Several newspaper articles detailing the investigation conducted by Britain's 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 Maxwell's 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 records were found.	No
Publications	Publications revealed nothing derogatory.	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