

Ticket#	105258583	Account#	Initiated Date	07/13/2013 07:22 AM
Client Name	[REDACTED]	Account Title	Initiator	JUSTIN D NELSON
ECI	[REDACTED]	Account Type	Initiating Team	PB FRONT OFFICE
LOB	PB			

Verify & Confirm for [REDACTED]	
Final Risk Rating	High
Initial Risk Rating	High
GCS Report Requested	Full
Presence of Potential High Risk Indicators	Yes
Comments	
Summary of Risk Attributes	Owner, Jeffrey Epstein, is a convicted felon.
Please summarize any material changes which have occurred with the client within the past 12 months:	The activity was updated to reflect the client's current transaction activity.

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

GCS Grid		
Search Type	Security Service Details	Further Review Required
Company Information	No additional research necessary.	No
Corporate Records	No additional research necessary.	No
Other Database Searches (RDC/MIS/Factiva)	No additional research necessary.	No
Internal Database Search (CSSS/FPS)	Internal database search revealed prior GS&I research for [REDACTED] LLC, Ghislaine Maxwell, and Harry Beller and nothing derogatory to report. Internal database search revealed prior GS&I research for Jeffrey Edward Epstein and the following derogatory information was reported. Several newspaper articles were found that detail the indictment of Jeffrey Epstein in Florida on felony charges of soliciting underage prostitutes. Jeffrey Epstein served 13 months in jail. Numerous articles detail various law enforcement agencies investigating Jeffrey Epstein for allegedly participating in child trafficking and molesting underage girls. Jeffrey Epstein is required to register as a sex offender. Jeffrey Epstein has settled a dozen civil lawsuits out of court from his victims regarding solicitation for an undisclosed amount.	Yes
State Court Searches	No additional research necessary.	No
Federal 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
Negative or Inconsistent Information		Yes

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

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