

Ticket#:
Client Name:
ECI#:
LOB:
102238622
ELLMAX
0033845033
PB
Account#:
Account Title:
Account Type:
Initiated Date#:
Initiator:
Initiating Team:
08/22/2011 11:20 AM
DEBRA WHITE
PB FRONT OFFICE
Verify and Confirm for ELLMAX
Final Risk Rating
Initial Risk Rating
GCS Report Requested
Presence of Potential High Risk Indicators
Standard
Standard
Full
No
GCS Grid
Search Type
Security Service Details
Company Information
Corporate Records
Other Database Searches (RDC/MIS/Factiva)
Internal Database Search (CSSS/FPS)
Information not confirmed for Ellmax (Tax ID). Details included
in the attachment.
Information confirmed; details included in the attachment.
No records were found.
Internal database search revealed prior GSI research and the
following derogatory information was reported: Several
newspaper articles detailing the investigation conducted by
Britains 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 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. 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."

State Court Searches

Federal Court Searches

Personal Particulars

Publications

Regulatory Sanctions

OFAC/Control List Search

Negative or Inconsistent Information

No records were found.

No records were found.

No additional research necessary.

No records were found.

No records were found.

A search of OFAC did not reveal any matches.

Further Review Required

Yes

No

No

Yes

No

No

No

No

No

No

Yes

GCS Red Dot

Has this been identified as Red Dot KYC?

Negative Information Found

No

Yes

Banker Attestation Details

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.

Please state your rationale for conducting business with this client

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

Comments

Yes

Existing relationship

Reviewed

Primary Information

Client Type

Client Status

Confidential Name?

Legal Business Name

Country of Primary Domicile

Primary Country of Assets

Country of Organization

Industry Code (NAIC)

Client Legal Entity Type

Date of Incorporation/Situs (Date of Trust)

Documentary Evidence

What is the nature/purpose of this entity?

High Risk Jurisdiction

Non Individual

Client

No

ELLMAX

UNITED STATES

UNITED STATES

UNITED STATES

ADMIN & GENERAL MGT CONSULTING

SERVICES [541611]

Limited Liability Company

12/16/2010

LLC - State Certificate

The nature/purpose of the entity is consulting -
personnel recruitment

No

Is the entity a Personal Holding Company
(PHC) or Personal Investment Company

(PIC) located in an offshore jurisdiction?

No

Front Office Restricted?

Active Indicator

Insider Code (Reg. 0)

Primary Domicile State

WebSite

Organization State

Secondary Industry Code (NAIC)

Client Category

Profit

Florida

Normal

Yes

Florida

Address(es)

Type

Legal

Notes

Address

16 ISLAND

AVENUE - #7D

City, State,

Postal Code

MIAMI, Florida,

33139

Country

Tools

UNITED STATES Map it

Entered by

BATCH

Date of Update Preferred

08/23/2011

Yes

Phone(s)/Fax(s)

Type

Work

Notes

Phone Number

2125356833

Tools

Verify "Do Not Call" List

Entered by

SYSTEM

Date of Update

08/22/2011

Preferred

Yes

Email(s)
Type
Email address not available
Notes
Email
Entered by
Date of Update
Preferred
Cost Center & Hierarchy
Client Status
Client
Client Sponsor
Cost Center
Client Service Team
GIO
Trust Advisor
Decision Maker
DM ECI
PAUL V MORRIS
008634 - CHBG
CHBG (DE) 4
Ian E Hirschfield
GHISLAINE MAXWELL
0106585908
Client Type
New or Existing Client
Entity Type
Portfolio Manger
Investor
Non Individual
Existing
Entity
Identification
Withholding Federal Status
Domestic Certified
Withholding SSN/TIN Certification Date
SSN/TIN/EIN
08/22/2011
[REDACTED]
Introduction & Wealth
Introduction Type
Net Worth of client(\$)
Existing JPMorgan Client - Inside LOB
30,000,000.00
ECI
Additional Party Information
Party Type
0106585908
Individual
Party Name
Ghislaine Maxwell

Last Completed
Search Date
03/31/2005
KYC Status
Completed
Report Type
Full
Relation Type
Owner
Powers
Percent Owned
100.00
Primary Information for Ghislaine Maxwell
Client Type
Client Status
Front Office Restricted?
Confidential Name?
Country of Primary Domicile
Individual
Client
Normal
No
UNITED STATES
Generation
Active Indicator
Marital Status
Yes

Prefix/Title
First Name
Ghislaine
Middle Name
Last Name
Suffix
Previous Name/MMN/Alias
Citizenship
Employer Name
Occupation
Years at Occupation
Maxwell
UNITED STATES
High Risk Jurisdiction
Industry Code (NAIC)
Secondary Industry Code (NAIC)
Insider Code (Reg. 0)
Full Name
Gender
Date of Birth
Primary Country of Assets
01/01/1901
UNITED STATES
Ghislaine Maxwell
Address(es)
Type
Legal
Notes
Address
16 ISLAND AVE
APT 7D, ,
City, State,
Postal Code
MIAMI BEACH,
Florida, 331391331
Country
Tools
UNITED STATES Map it
Entered by
SYSTEM
Date of Update Preferred
03/22/2011
Yes
Phone(s)/Fax(s)
Type
Home
Notes
Phone Number
[REDACTED]
Tools
Verify "Do Not Call" List

Entered by
SYSTEM
Date of Update
03/22/2011
Preferred
Yes
Email(s)
Type
Home
Notes
Email

████████████████████
Entered by
SYSTEM
Date of Update
03/22/2011
Preferred
Yes
Cost Center & Hierarchy
Client Status
Client
Client Sponsor
Cost Center
Client Service Team
PAUL V MORRIS
008634 - CHBG
CHBG (DE) 4
Entity Type
Decision Maker
Client Type
Individual
Identification
Withholding Federal Status

Introduction & Wealth

Introduction Type

Net Worth of client(\$)

Introduction

Non Individual Entity Type

For Profit?

Locations Served?

Are beneficial owners/principal shareholders associated with this business?

Who owns this entity?

Please Provide ownership details

Limited Liability Company - For Profit

Yes

Domestic

Yes

Individual

Ghislaine Maxwell is the sole owner of the entity - details below

Ghislaine Maxwell

DOB: [REDACTED]

SSN: [REDACTED]

Govt. ID: Florida D/L # [REDACTED]

Ownership is not equal to 100%?

Are there any authorized signers or any other individuals with authority over the entity?

What independent background check, in addition to the Global Corporate Security ("GCS")

background check, has been carried out? Check all that apply and provide the date in

which the background check was conducted. (at least 1 must be selected)

JPMC Network Date

JPMC Network Comments

No

No

JPMC Network

08/22/2011

This is another part of an existing client relationship with Ghislaine Maxwell. Ghislaine Maxwell is

the daughter of the late Robert Maxwell, a British media proprietor and former Member of

Parliament. Ghislaine Maxwell was educated at Marlborough College and Balliol College, Oxford.

Ghislaine Maxwell is an entrepreneur/business owner. She has requested the opening of a

checking account for personnel recruitment company.

Politically Exposed Person

Are any of the beneficial owners/authorized signers or other individuals with authority over

this entity a current or former Senior United States or Non-USA Political Official / also

known as a Politically Exposed Person (PEP) or related to one?

No

Source of Wealth/Financial Information

Client Category(for SOW)

Source of Wealth- identify the clients source of wealth from the following list of options

Provide detailed and specific information.

Which country(ies) is(are) the Client's primary Source of Wealth or Income derived?

Is this an Operating Company?

Total Net Worth \$

What was the total net worth based on?

Is this client a Professional Service Provider acting as a financial intermediary

(Gatekeeper/Financial Liaison), with assets held on behalf of one or more unidentified

underlying clients unknown to the bank?

For Profit

Other

Ghislaine Maxwell is the daughter of the late Robert Maxwell, a British media proprietor and

former Member of Parliament. Ghislaine Maxwell was educated at Marlborough College and

Balliol College, Oxford. Ghislaine Maxwell is an entrepreneur/business owner.

UNITED STATES

No

30000000.00

Financial Statements

No

Is this entity a Private Equity Fund (Venture Capital Fund or Leveraged Buyout)?

Is this a Hedge Fund? (Pooled investment vehicles (often partnerships) that primarily invest financial capital of third party investors in enterprises that are too risky for the standard capital markets or bank loans.)

Is this a Cash Intensive business? (Cash-intensive businesses/entities exist in various industry sectors and include, but are not limited to convenience stores, grocery stores, restaurants, bars, retail stores, liquor stores, cigarette distributors, privately owned ATMs, vending machine operators and parking garage operators.)

Is this entity any of the following business types?

Is the Entity a Personal Holding Company (PHC) or Personal Investment Company (PIC)

located in an offshore jurisdiction?

No

No

No

aa. None of the above

No

Expected Activity

Deposit Account(s)

Transaction Types

Cash Deposits

Cash Withdrawals

Check Deposits

Checks Paid

Incoming Wires (Domestic)

Outgoing Wires (Domestic)

Incoming Wires (International)

Outgoing Wires (International)

ACH Deposits

ACH Payments

Internal Transfer (Debits/Credits)

Asset Purchases/Sales

What is the initial/ongoing source of funding for the client's Deposit Account(s) ?

The initial source of funding will be \$100,000 and will be from an internal transfer from the client's savings account. The ongoing source of funding will be from the payment of recruiting services performed for clients.

What is the purposed/intended use of account(s)? Please provide a detailed description of how the Deposit Account(s) will be used by the client.

The client has started a personnel recruitment consulting business. Checks received from clients for recruiting services performed will be deposited into a checking account and will be used for everyday living expenses and monthly bills.

Expected Activity Levels

Low (1-10)

Low (1-10)

Low (1-10)

Low (1-10)

Anticipated Dollar Amount Totals per Month

\$10,000 TO \$50,000

\$10,000 TO \$50,000

\$10,000 TO \$50,000

\$10,000 TO \$50,000

Additional Client Information

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

Approval History

Stage Name

Banker Attestation

Market Manager Approval

Signoff Date

10/14/2011 1:38 PM

10/21/2011 4:42 PM

Owner SID

N256838

U037276

Owner Name

PAUL V MORRIS

THOMAS K SOUTHMAYD

DF#@&T15#7@1