

USCG Due Diligence Report - Corporation

DDR Name: MAX Foundation ~

DDR Status: Process Completed

Banker Information

Banker:

Paul V Morris/JPMCHASE

LE/OU:

Banker SID:

Banker BAC:

Banker FNEN:

Banker History:

03/04/2010 11:27:26 PM - CRD / Notrix changed: Banker from Mary C Casey/-JPMCHASE to Paul V Morris/JPMCHASE.

DM ID Link Information

The DM for this DDR is DM Name -JEFFREY E EPSTEIN CAS ID - 9710670708.

The following DDR's are associated with this Decision Maker .

DDR Name

116 East 65th St., LLC

Darren K. Indyke PLLC

EMMCAC, LLC

Epstein, Jeffrey

Financial Trust Company, Inc.

Financial Trust Company, Inc.

Freedom Air International, Inc.

HBRK Associates Inc.

Hyperion Air, Inc.

I-Correct.com LLC

Indyke, Darren K

Jege, Inc.

LYN & JOJO LLC

MAX Foundation

New York Strategy Group, LLC

Plan D, Inc.

The 2007 Jeffrey E Epstein Insurance Trust

#2 - November 1, 2007

The 2007 Jeffrey E Epstein Insurance Trust

#3 dtd November 1, 2007

The 2007 Jeffrey E. Epstein Insurance

Trust #1 Dtd November 1, 2007

The C.O.U.Q. Foundation, Inc.

The Haze Trust

Corporation Name/Contact Information

Banker

Morris, Paul V

Morris, Paul V
Morris, Paul V
Morris, Paul V
Morris, Paul V
Morris, Paul V
Morris, Paul V
Morris, Paul V
Morris, Paul V
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Morris, Paul V

Security Services Search Date

02/02/2009
10/17/2008
02/08/2004
08/06/2004
03/07/2011
08/11/1999
05/21/2003
03/11/2010
10/17/2008
02/03/2009
01/30/2009
01/15/2010
02/03/2009
07/31/2006
02/08/2004
12/10/2009
04/16/2003
01/30/2009
12/01/2008
12/02/2008
11/25/2008
01/28/2004

102/29338

N256838

8634--CHBG

01

Only Select "New Client" if this entity will be a PCN.

JPMC Internal Use Only

Full Legal Corporate

Name:

MAX Foundation

(No P.O. Box address. Must be a physical address.)

Primary Corporate Address

Name:

Attention:

Address Line 1:

Address Line 2:

City:

State:

Province:

Postal/Zip Code:

Country:

Tax ID # :

Business Phone:

State of Domicile:

Where is the Company

Incorporated?

What document did you obtain to
evidence state of domicile?

Articles of Incorporation,
Partnership Agreement, etc

10022

UNITED STATES

656194566

Remember to collect W-8's or other applicable tax forms for each
jurisdiction.

NY

Cert

of Inc

c/o George V. Delson Associates

110 East 59th Street

New York

NY

MAX Foundation

Introduction / Financial Information

Introduction Type:

Other

Specific Information:

Have you met with the Principal/Authorized
Individual?

Legal Entity:

Corporation - Not For Profit (charity)

Describe the Charity and its Mission/Program?

(type of charity: religious, social club, civic
league, etc. Please include the approximate
year founded and a website, if available)

What forms/documents did you obtain to
support the existence of the charity? (e.g. IRS
Form 990 - available on Guidestar -

www.guidestar.org)

Primary Source of funding/donations? (include
approximate yearly income)

Locations served?

Authorized Individuals

Please list all individuals who have authority over this entity

First Name:

Last Name:

Ghislaine

Maxwell

Did you conduct an onsite visit?

Please indicate when a visit is planned

-Title

SSN

133784883

DOB

12/25/1961

Form

of Govt

Issued ID Obtained

passportFoundation

is for charitable purposes

Corporation - Not For Profit (charity)

Entity belongs to Ghislaine Maxwell, an existing client of J.P. Morgan
(Please identify referral source, etc.)

Guidestar

contributions

-

Is this an operating company?

Entity/Client Net Worth:

\$ 0.02 (USD millions)

Documentation/ Information obtained to confirm stated net worth of the Entity/Client:

Industry Code:

The Business Type is the industry in which the client derives the majority of its income.

Transaction Profile/Expected Account Activity

What is the purpose/intended use of this account?

What is the expected source of account funding ?

Approximate \$ amount to fund the account

:

Checking account for charitable foundation

Other

If "Other" please describe

Transfer of account from Chase retail

18,000

Please select each "Product Type" that applies. Within each product type, please check ALL transaction types that apply and provide a description of expected account activity. (document expected sources of inflows and destinations of transfers,countries, and types of payors/payees.Include where is the money coming from - example : A specific bank or firm and purpose of specific transactions, if known)

Product Type - Select all that apply

Transaction Types - Select all that apply and expected activity level (L = 1-5, M = 6-12, H =>12 transactions per month)

Deposit/Current Accounts

(Checking, Savings, Money Market)

Cash (withdrawals/deposits) -

Check deposits / Check paid -

Wire Incoming & Outgoing

Internal Transfers

Other

Please describe in detail expected account activity for this product :

Investment Products

(Custody,Brokerage,Agency,Margin)

-

-

-

Occasional charitable contributions

Anticipated \$

Amount Totals per

month – Please

provide at least an

estimate

IRS Form 990 for 2008 listed assets as \$24,509.

PRIVATE HOUSEHOLDS

NAIC Code: 814100

Below \$100000

Fiduciary

(Investment Mgmt. / Trust)

Credit type facilities

(Line of Credit, Mortgage, Letter of Credit)

Required Security Services Checks

Security Search Type:

Note for Security Services:

Please list any specific search
requests/instructions to Security

Full

Services here

Security Services Information

A Security Services Check is REQUIRED for New Clients and Prospects

This section to be completed by the Security Services Group:

List Individuals and Corporate Entities Investigated:

Attachment:

Please Note: All research is subject to the availability of electronic database resources.

Search Type

Is

Security Service Details:

Further

Review

by

Banker

Required?

Company Information

Corporate Records

Other Database Searches

(RDC/CDC/MIS)

Internal Database Search

(CSSS/FPS)

No

No

No

No

Information confirmed; details included in the attachment.

Information confirmed; details included in the attachment.

No records were found.

Reference section of the DDR titled "Red Dot (derogatory information) identified:" to view the specifics on the adverse information GS&I has identified for this account.

State Court Searches

No

Federal Court Searches No

Personal Particulars

Publications

Regulatory Sanctions

No

No

No

OFAC/Control List Search No

Information confirmed; details included in the attachment.

No records were found.

No records were found.

No additional research necessary.

Information confirmed; details included in the attachment.

No records were found.

No records were found.

Has this been identified as a Red Dot DDR? :

Red Dot (derogatory information) Identified:

Red Dot information is any derogatory information identified by Global Security Services which warrants the attention of the banker. The presence of "Red Dot" information does not necessarily mean that an existing relationship will be exited or a potential client relationship not pursued. The banker should document any conversations that have taken place with the client/prospect, if any, with regard of the issue and whether or not this impacts his/her, or management's decision to continue with or accept the person/entity as a client.

Security Service Details (Include DDR names in which this was previously reported, if any)

Proceed with or maintain the client relationship

Yes / No

Banker Response (If "Yes", please provide your rationale for proceeding with or maintaining the client relationship. If "No", please specify steps that will be taken)

The following information was previously reported to Mary Reith on 03/17/2003 under the account Ghislaine Maxwell (DDR # 1185/03):

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

As stated previously, the information listed pertains to that of her father and brothers and there is no indication that she was involved in their actions.

Banker

Response:

fraud charges brought against Kevin and Ian Maxwell (sons of Robert Maxwell).

The following information was previously reported to Mary Reith on 10/20/2005 under the account Forums, LLC (DDR # 11374/04):

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 th

Expense No.:

Total Costs:

Signed by:

Dated:

99/31167

\$0.00

Marisol X Torres-Soler

12/10/2009 11:44:56 AM

Background Checks conducted in addition to Security Services

Background Check

Date

(Required If Check Carried Out)

12/11/2009

Comments

(Required If Check Carried Out)

Ghislaine Maxwell is an existing client.

Summary

Summary Of Findings:

Anticipated Product(s)

This is an existing account which is being transferred from Retail into PB.

Deposits

Client Hierarchy Assignments

GRAY SHADED AREA CONTAINS SPN/CAS ID ASSIGNMENT INFORMATION

Banker SID

N256838

Banker BAC:

FNEN:

Does the DDR have Multiple Entities?

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No

Client Hierarchy and Additional Entity Assignment:

Name

Tax ID #

Existing

CAS Id

Linking to
DM Id

MAX Foundation

██████████
Linked to DM Name
JEFFREY E EPSTEIN
Date of Birth

.
.
No
SPN No
██████████

Contact Information for each entity named within the Client Hierarchy Table:

Associated Entity

Government issued

I.D Obtained

MAX Foundation

Do any of the above entities require a joint SPN?

Select Yes, if multiple entities will share the same
account (OMNI, CASII or Olympic)

Does the DDR have Multiple Owners?

No

This area is used to document individuals who DO NOT require a new CAS or
SPN, but have authority over the entity or
entities for which this DDR was created. Individuals documented within the
above client hierarchy area do not need to be
repeated in this section

Name

Government issued

I.D Obtained

Tax ID #

Date of Birth

Tax ID #

656194566

.

.

9710670

708

CAS ID

0221136343

Citizenship

Attention

Address Line 1

State

Citizenship

Zip

Address Line 2

Province

City

Country

Approval Information

Public/High Profile Figure

No

High Risk Jurisdiction
High Risk Business
Is this a Foreign Bank?
"Foreign Bank" as defined in the USA
PATRIOT Act.
Banker:
LE/OU:
Senior Manager:
Paul V Morris/JPMCHASE
102/29338
Marcus Sheridan/JPMCHASE
No
No
No
Annual / Periodic Review Information
Annual/Periodic Review
Due in:
36 months
Periodic Review Comments :
Temporary Waiver Information
Waiver Status:
DDR Complete

Reason for Waiver:

Waiver Requested By:

Date of Waiver Request:

Approver for Waiver:

Waiver Approved On:

The DDR requires additional follow-up action/update.

Lucy Baglivo

09/22/2009

Elizabeth X Hogan

09/22/2009

Banker Approval Information

Sponsorship affirmation -

Based on my due diligence and the information provided , I approve and accept sponsorship of MAX Foundation ~ as a

Client from inception and throughout the client relationship.

Mary C Casey 12/11/2009 07:13:58 PM

Senior Manager Approval Information

Based on the information provided and the approval granted by Mary C Casey, I approve the acceptance of MAX Foundation

~ as a Client.

Marcus Sheridan 12/14/2009 10:22:43 AM

Admin Comments

Admin Comments:

By:

Date:

Admin Comments History :

Document History

Created: 09/17/2009

Last Modified: 12/14/2009

Submitted: 12/10/2009 11:44:57 AM

Audit History

11. 'Senior Manager Approval' performed by: Marcus Sheridan on: 12/14/2009 10:22:47 AM

10. 'Banker Approval' performed by: Mary C Casey on: 12/11/2009 07:13:59 PM

9. Submitted for Banker Approval SS Type = Full performed by: Marisol X Torres-Soler on: 12/10/2009 11:45:01 AM

8. Button: 'Flag: Security Check has begun' performed by: Marisol X Torres-Soler on: 12/10/2009 09:39:25 AM

7. Button: 'Print' performed by: Javia S Hairston on: 12/01/2009 03:30:11 PM

6. Resubmitted for Security Services Approval - Explanation of Modification done : Legal Corporate Address updated, as

requested performed by: Lucy Baglivo on: 11/30/2009 01:02:06 PM

5. Security Services - Not Signed Off for the following reason: Need to confirm the address of the legal entity. performed

by: Ryan T McGowan on: 09/28/2009 01:48:52 PM

4. Button: 'Print' performed by: Javia S Hairston on: 09/23/2009 11:11:40 AM

3. Button: 'Approve Waiver' performed by: Elizabeth X Hogan on: 09/22/2009 04:09:44 PM

2. Button : 'Request Waiver' performed by: Lucy Baglivo on: 09/22/2009 03:58:34 PM

1. Submitted for Security Services Approval performed by: Lucy Baglivo on:

09/22/2009 03:57:58 PM

Converted Tracking Document History:

By: Lucy Baglivo

By: Marcus Sheridan

By: Marisol X Torres-Soler

CN=Ujwala Srinath/O=JPMCHASE: 9147709B.doc