

Ticket#  
105258608  
Client Name  
ECI  
LOB  
Account#  
MAX FOUNDATION Account Title  
0309713017  
PB  
Verify & Confirm for MAX FOUNDATION  
Final Risk Rating  
Initial Risk Rating  
GCS Report Requested  
Presence of Potential High Risk  
Indicators  
Comments  
Summary of Risk Attributes  
Please summarize any material changes  
which have occurred with the client  
within the past 12 months:  
Creation  
Date  
Risk Updated History  
Entered by  
GCS Grid  
Search Type  
Company Information  
Corporate Records  
Other Database Searches  
(RDC/MIS/Factiva)  
Internal Database Search (CSSS/FPS)  
State Court Searches  
Federal Court Searches  
Personal Particulars  
Publications  
Regulatory Sanctions  
OFAC/Control List Search  
Negative or Inconsistent Information  
GCS Red Dot  
Has this been identified as Red Dot KYC?  
Negative Information Found  
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)?  
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

Primary Information

Client Type

Client Status

Confidential Names?

Yes

Yes

No

No

High risk - Client is associated with the Epstein relationship and is in the process of being exited.

Client is associated with the Epstein relationship and is in the process of being exited.

High

High

Full

No

Account Type

Initiated Date

Initiator

Initiating Team

07/13/2013 07:22

AM

JUSTIN D NELSON

PB FRONT OFFICE

Updated

Risk

Previous

Risk

Comment

Security Service Details

Information not confirmed for "Max Foundation" (Tax ID and Address); Details included in the attachment.

Information not confirmed for "Max Foundation" (State of Domicile); Details included in the attachment.

No records were found.

No records were found.

No records were found.

No records were found.

No additional research necessary.

Nothing derogatory to report.

No records were found.

A search of OFAC revealed no matches.

No

No

No

No

No

No

No

No

Yes

Yes

Further Review Required

Yes

As stated above the client is exiting the firm.

Client is exiting the firm.

Client is exiting the firm.

Non Individual

Client

No

Front Office Restricted?

Active Indicator

Normal

Yes

Legal Business Name  
MAX FOUNDATION  
Country of Primary Domicile UNITED STATES  
Primary Country of Assets  
Country of Organization  
Industry Code (NAIC)  
UNITED STATES  
UNITED STATES  
Grantmaking Foundations  
[REDACTED]  
Client Legal Entity Type  
Date of Incorporation/Situs  
(Date of Trust)  
Documentary Evidence  
What is the nature/purpose of  
this entity?  
High Risk Jurisdiction  
Address(es)  
Type  
Legal  
Notes  
Address  
ATTN  
GHISLAINE  
MAXWELL,  
16 ISLAND  
AVE APT 7D  
Phone(s)/Fax(s)  
Type  
Work  
Notes  
Phone  
Number  
[REDACTED]  
Tools  
Verify "Do Not  
Call" List  
Email(s)  
Type  
Notes  
Email address not available  
Cost Center & Hierarchy  
Client Status  
Client Sponsor  
Cost Center  
Client Service Team  
GIO  
Trust Advisor  
Decision Maker  
Identification  
Withholding Federal Status

Domestic Certified  
Withholding SSN/TIN  
Certification Date  
SSN/TIN/EIN  
Introduction & Wealth  
Introduction Type  
Net Worth of client(\$)  
Additional Party Information  
No additional parties available at this time  
Introduction  
Non Individual Entity Type  
How is the charitable entity being funded?  
Corporation - Not for Profit  
Public Donations  
11/08/2013  
656194566  
Email  
Entered by  
Date of Update Preferred  
Entered by  
BATCH  
Date of  
Update  
09/23/2009  
Preferred  
Yes  
City, State,  
Postal  
Code  
MIAMI  
BEACH,  
Florida,  
331391331  
Country  
UNITED  
STATES  
Tools  
Map it  
Entered by Date of  
Update  
BATCH  
Preferred  
09/23/2009 Yes  
Corporation  
10/25/2013  
Other  
Foundation  
No  
Insider Code (Reg. 0)  
Primary Domicile State  
WebSite

Organization State  
Secondary Industry Code  
(NAIC)  
Client Category  
Please Describe  
Florida  
NAIC NOT PROVIDED [ ]  
Not for profit  
Foundation  
Florida  
Client  
Client Type  
WILLIAM M SHERIDAN  
143360 - USPB UHNW NYC  
TRI STATE EXEC  
CHBG (DE) 4  
Paul S Barrett  
JEFFREY E EPSTEIN  
Entity Type  
Portfolio Manger  
Investor  
DM ECI  
[REDACTED]  
Entity  
New or Existing Client  
Non Individual  
Existing  
Existing JPMorgan Client - Inside LOB  
20,000.00

Describe the charitable entity and its Mission/program.  
Include who benefits from the charitable entity.  
Where is the charity headquartered?  
What geographic locations does the charity serve?  
Please list all geographic locations served  
How are the charitable funds distributed?  
What is the approximate annual income/contribution received by the Charity?  
Who is the donor base?  
Who makes up the entity's volunteer base?  
Does this charitable entity have affiliations with any NGOs, Governments, or other organizations?  
Describe the entity's internal controls:  
Describe the entity's record keeping controls:  
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  
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?  
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?  
a. Please describe:  
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?  
Business Case  
Please specify why you are comfortable with this client given the identified risk factor(s). Your answer is your "business case" and should detail all mitigating factors.

Provide client history/detail, including when the relationship was established, how it came to be in PB/PWM, client's association with other JPM LOBS, etc.

Client known to whom (JPMorgan employees), how well, and how long:

Overall PB/PWM relationship size and type of accounts:

Is this a shared client, what other LOB has a relationship with the client? Provide relationship manager name (if known), client of other LOB since (date), and relationship size?

When was the last time you met the client? What was the reason for the meeting?

Describe any significant changes in the client's information or material events that may have occurred over the last year (Examples: address changes, change in authorized persons on accounts, change in account type, change in business, change in net worth, etc.).

Client is exiting the firm.

No

Foundation is for charitable purposes

Client is associated with the Epstein relationship and is in the process of being exited.

International

Client is associated with the Epstein relationship and is in the process of being exited.

Client is associated with the Epstein relationship and is in the process of being exited.

contributions

Client is associated with the Epstein relationship and is in the process of being exited.

Client is associated with the Epstein relationship and is in the process of being exited.

No

Client is associated with the Epstein relationship and is in the process of being exited.

Client is associated with the Epstein relationship and is in the process of being exited.

No

JPMC Network

11 Dec 2009

Ghislaine Maxwell is an existing client.

Not for Profit

Other

Client is associated with the Epstein relationship and is in the process of being exited.

UNITED STATES

No

20000.00

Other

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

No

f. Charities

Cash Activity: Summarize client cash activity during the period reviewed and explain the purpose / use of the funds:

Wire Activity: Summarize client wire activity during the period reviewed and explain the purpose / use of the funds, including any international/cross border wires:

Before answering the following question please review the Annual Account History Activity Summary Report that has been attached in the Summary tab. Did the actual transaction activity appear reasonable, normal, and expected for the type of business or industry in which the client engages?

Was the nature, value, and volume of actual transaction activity consistent with expected transaction activity?

Was any unusual or potentially suspicious transaction activity detected?

Additional Comments

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) ?

Funding amount: 18,000Other = Other

Other Detail:

Transfer of account from Chase retail

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

Checking account for charitable foundation

Occasional charitable contributions

Review the activity for the period overall and explain how the client's transaction profile agrees with or doesn't agree with expectations for the client based on the client relationship (purpose of accounts, occupation, business activity, etc.):

Client is associated with the Epstein relationship and is in the process of being exited.

Was expected activity for the client modified in the transaction activity section of the KYC ticket?

No

Additional Client Information

Please include any additional information that would further explain your

knowledge of the client (family tree/history, public information, websites, etc.)

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

Comment History

Stage Name

Market Manager Approval

Expected Activity Levels

Anticipated Dollar Amount Totals

per Month

Low (1-10)

Low (1-10)

\$10,000 TO \$50,000

\$10,000 TO \$50,000

Client is exiting the firm.

Client is exiting the firm.

Yes

Yes

No

At the request of sr management client is exiting the firm.

Creation Date

Entered By

11/20/2013 01:49 PM

ALMA DEMETROPOLIS

Comment Preview

Please redirect to Tad

Smith/Marc Sheridan and

confirm whether the comments

above of moving account from

Retail to PB is valid if we are

exiting.

MM/Banker Comments

CEO Approval

Approval History

Stage Name

Banker Attestation

Market Manager

Approval

Market Manager

Approval

12/06/2013 03:47 PM

12/15/2013 07:22 AM

WILLIAM M SHERIDAN

JOHN R DUFFY

We will be exiting this relationship.

approved to facilitate exit

Signoff Date

11/08/2013 08:50

AM

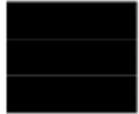
11/20/2013 01:49

PM

12/09/2013 03:06

PM

Owner SID



Owner Name

WILLIAM M SHERIDAN

ALMA DEMETROPOLIS

ALMA DEMETROPOLIS

Regional Director

Approval

CEO Approval

12/09/2013 05:30

PM

12/15/2013 07:22

AM

DF#@T15#7@1

U963678

VINCENT A LA PADULA

U093971

JOHN R DUFFY