

KYC Summary

Ticket#:

Initiated Date:

1414786507980

02/15/2014 13:24

Client Name: Ghislaine Maxwell

Client Type: Individual

ECI: 0106585908

Banker: JAMES N BUCKLEY (W307403)

LOB: PB

Nationality: UNITED STATES

KYC Status: Complete

KYC Type: KYC One Year Periodic Review

Primary Information

Ghislaine Maxwell - ECI: 0106585908, 1000 VENETIAN WAY APT 801, MIAMI BEACH, FL 331391043

Primary Information

Is the Client a JPMC employee?

No

Front Office Restricted?

Normal

Prefix / Title

Full Name

Ghislaine Maxwell

Date of Birth

Primary country of domicile

UNITED STATES

Is the Client a US Citizen?

Yes

Client Addresses

Postal

Legal Address

Title

Address

Confidential Address

No

Phone

Home

1 [REDACTED]

Notes

Home

1 [REDACTED]

Notes

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Extension

This is a Call Back Number

No

Company Name
Mailing Label
Salutation
First Name
Ghislaine
Generation
Middle Name
Previous Name / Alias
Mother's Maiden Name
MEYNARD
Primary state of domicile
Florida
Last Name
Maxwell
Gender
Female
Country of Citizenship
UNITED STATES
Primary country of assets
UNITED STATES
Suffix
Marital Status
Extension
This is a Call Back Number
No
1

Email

Home

Identification & Tax Info

Tax

Type of Tax ID

Social Security Number

Identification

Form of Government ID

NONE

Why are you asking for an exception to the policy, and what actions are being taken to mitigate risk?

Attached florida drivers license is poor quality. According to last KYC attached, license number is M240-294-61-965-0. Accounts for this client have all closed as they were asked to leave by rick committee, so asking for an ID from client now is not appropriate

Withholding Federal Status

Domestic Certified

Client Coverage

Client Coverage

Decision Maker ECI

0106585908

Banker SID

W307403

Investor SID

E188557

Decision Maker Full Name

GHISLAINE MAXWELL

Banker Full Name

JAMES N BUCKLEY

Client Service Team ID

854

Client Service Team Name Cost Center Code

CHBG (DE) 4

008634

Investor Full Name

JASON A BELL

Introduction

Client Introduction Details

How were you introduced to the client?

Maxwell was referred by Jeffrey Epstein, a former client of the Private Bank and advisor to Leslie Wexner, also a longstanding client. They referred her to Jes Staley, who then referred Ghislaine Maxwell to our team. What additional research have you done on the client, aside from meeting them in person?

JPMC Network: Maxwell was referred by Jeffrey Epstein, a former client of the Private Bank and advisor to Leslie Wexner, also a longstanding client. Jes Staley met with Ghislaine Maxwell; online research; referrals from intermediaries. James Buckley is the latest banker to have met Ghislaine Maxwell in person

Has the banker or other appropriate officer of JPMorgan met the client in

person?

Yes

PEP

Is the client a current or former Senior United States or Non-USA Official / also known as a Politically Exposed Person (PEP), related to a PEP, or closely associated with a PEP?

No

Source of Wealth / Financial Information

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

UNITED STATES

Is 10% or more of the wealth derived from assets, investments or company ownership in any OFAC Sanctioned Countries?

No

Employment Status

Unemployed

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

Inheritance

Inheritance

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Social Security Number

133-78-4883

Provide a description as to how and when the original wealth was created, including the primary individual from whom the wealth came. (specifically include the name of the individual, date of birth, Tax ID if available, and relationship to the client)

CLIENT EXITED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014

We understand her wealth came from trusts her father Robert Maxwell left behind after he passed away on 5 November 1991.

Wealth is inherited from her late father, Robert Maxwell, who died in 1991. Because of circumstances surrounding the closing of the account per risk committee's request, we cannot request any additional information from client.

Ghislaine was originally referred to the PB by Jes Staley. She does not work, but volunteers for a charitable organization she founded, The TerraMar Project (www.terramarproject.org). TerraMar's mission is to create and empower a global community of ocean citizens. We promote awareness, responsibility and transparency of the high seas. The web-based nonprofit empowers the global community through citizenship, education and social engagement through The TerraMar Project. Ghislaine is the daughter of the late Robert Maxwell (DOB: 10 June 1923, DOD: 5 November 1991) - Maxwell established the Maxwell Foundation in Liechtenstein in 1970. After briefly losing control of Pergamon Press Ltd (PPL) in the early 1970s (see Controversy below), in 1974 he reacquired the company. Maxwell acquired the British Printing Corporation (BPC) in 1981, and changed its name to the British Printing and Communication Corporation (BPCC) and then to the Maxwell Communications Corporation. The company was later sold in a management buy-out, and is now known as Polestar. In July 1984 Maxwell acquired Mirror Group Newspapers from Reed International plc. MGN published the Daily Mirror, a pro-Labour Party tabloid newspaper. He also bought the American interests of the Macmillan publishing house.

By the 1980s Maxwell's various companies owned the Daily Mirror, the Sunday Mirror, the Scottish Daily Record and Sunday Mail and several other newspapers, Pergamon Press, Nimbus Records, Collier books, Maxwell Directories, Prentice Hall Information Services, Macmillan (US) publishing, and the Berlitz language schools. He also owned a half-share of MTV in Europe and other European television interests, Maxwell Cable TV and Maxwell Entertainment. In 1987 Maxwell purchased part of IPC Media to create Fleetway Publications.

In June 1985, Maxwell announced a takeover of Sir Clive Sinclair's ailing home computer company, Sinclair Research, through Hollis Brothers, a Pergamon Press subsidiary.[11] However the deal was aborted in August 1985.- [12]

Maxwell's links with Eastern European totalitarian regimes resulted in a number of biographies (generally considered to be hagiographies[13]) of those countries' then leaders, with interviews conducted by Maxwell, for which he received much derision.[14]

Maxwell was also well known as the chairman of Oxford United Football Club, saving them from bankruptcy and leading them into the top flight of English football, winning the League Cup in 1986. Maxwell bought into Derby County F.C. in 1987. He also attempted to buy Manchester United in

1984, but refused owner Martin Edwards' asking price.

Describe the approximate value when received, and how it compares to the net worth today.

CLIENT EXITED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014. Because of

circumstances surrounding the closing of the account per risk committee's request, we cannot request any additional information from client.

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Total Net Worth

\$10,000,000.00

What was the total net worth based on

Other

If Other, please describe

Clients investable assets were FORMERLY held at PB, the rest of her wealth is held in her real estate and artwork (NYC Townhouse and London townhouse). CLIENT EXISTED THE BANK AND ASSETS CLOSED JUNE 8, 2014 AS RISK COMMITTEE REQUESTED. Because of

circumstances surrounding the closing of the account per risk committee's request, we cannot request any additional information from client.

Provide a detailed narrative of how the stated net worth/source of wealth of the client was verified. Please attach any supporting documentation to the KYC.

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Foundation in Liechtenstein in 1970. After briefly losing control of Pergamon Press Ltd (PPL) in the early 1970s (see Controversy below), in 1974

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Expected Account Activity

Product Family

Banking

Investments

Banking

Please provide a detailed description of the purpose/intended use of the Banking account(s).

CLIENT EXISTED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014

Please describe any significant transactions over the last 12 months, including any that are outside of the expected account activity previously documented for the client.

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Investments

Please provide a detailed description of the purpose/intended use of the Investment account(s).

Investments : This was a long-standing brokerage relationship. Continued source of funding was from investment proceeds.; We opened and funded (from cash) TAP ARFI, TAP DYS and OAP, IHD strategies - fully managed by JPM. Continued source of funding (if any) would come from investment proceeds.

Please describe any significant transactions over the last 12 months,

including any that are outside of the expected account activity previously documented for the client.

CLIENT EXITED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014

The following questions apply to all accounts for this client

What is the initial source of funding for the client's account(s)?

CLIENT EXITED THE BANK AND ASSETS CLOSED JUNE 8, 2014 AS RISK COMMITTEE REQUESTED. Because of circumstances

surrounding the closing of the account per risk committee's request, we cannot request any additional information from client.

What is the ongoing source of funding for the client's account(s)?

CLIENT EXITED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014. Because of

circumstances surrounding the closing of the account per risk committee's request, we cannot request any additional information from client.

Wire Transaction Activity

What type of wire transfer activity is expected?

Wire activity is not expected

Automatic Clearing House Transaction Activity

What type of ACH activity is expected?

ACH activity is not expected

Cash Transaction Activity

How many cash deposits and withdrawals does the client expect to make each month?

Cash activity is not expected

Before answering the following question, please review the Account History Activity Summary Report that has been attached to this ticket. Did the actual transaction activity appear reasonable, normal, and expected for the client based on what you know about the client of the business or industry in which the client engages?

Yes

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

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

international/cross border wires:

CLIENT EXITED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014

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

Yes

Was any unusual or potentially suspicious transaction activity detected?

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No

Additional Comments

CLIENT EXITED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014

Business Case

Summary of Risk Attributes

Reputational - 2011 media alleging Maxwell solicited young girls for then boyfriend Jeffrey Epstein. Epstein was convicted for solicitation of a prostitute and procuring a person under age 18 for prostitution. He was the subject of a previous Management Review and has been exited from the Bank. In a 12/6/13 RRC mtg, the decision was made to exit Maxwell. Even though all of Maxwell's banking accounts have been closed (only credit cards remain), the ticket needs to be completed to close the loop on the exit.

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

We are no longer comfortable with this client. CLIENT EXITED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014

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.

Maxwell was referred by Jeffrey Epstein, a former client of the Private Bank and advisor to Leslie Wexner, also a longstanding client. Jes Staley has met with Ghislaine Maxwell.

Client known to whom (JPM employees), how well and how long
Maxwell was referred by Jeffrey Epstein, a longstanding client of the Private Bank and advisor to Leslie Wexner, also a longstanding client. Jes Staley got the original referral from Jeff Epstein, and he referred Ghislaine Maxwell on to our team.

Overall PB/PWM relationship size and type of accounts

ALL ACCOUNTS ARE CLOSED

CLIENT EXITED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014

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?

NOT SHARED

ALL ACCOUNTS ARE CLOSED

CLIENT EXITED THE BANK ON REQUEST OF RISK COMMITTEE AND THE LAST ACCOUNTS CLOSED JUNE 8, 2014

Describe any significant changes in the client's information or material events that may have occurred over the last year

CLIENT EXITED THE BANK AND ASSETS CLOSED JUNE 8, 2014 AS RISK COMMITTEE REQUESTED.

Additional Parties

Risk Assessment

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

THIS CLIENT EXITED THE BANK AND ASSETS CLOSED JUNE 8, 2014 AS RISK COMMITTEE REQUESTED. KYC completed as a result on a best efforts basis, given client could not be contacted to gather additional informaton.

Banker Attestation

Banker Attestation

As the client sponsor, I understand that I am primarily responsible for protecting the firm's reputation from inappropriate business relationships, as well as prevent 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

Please state your rationale for conducting business with this client
Ghislaine Maxwell was asked to leave the bank by our Risk Committee. Her assets have all left the bank and her accounts have all since closed. She is no longer a client of the Private Bank.

Comments

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

Summary

Risk Factors and Indicators

Risk Factors:

No Risk Factors Present

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Risk Indicators:

No Government ID : None

Risk Rating

Initial Risk Rating

Standard

Reason for Adjusted Risk Rating

Negative media - human rights issue

Report Requested from GS&I

Full

Summary of Risk Attributes

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GSI Report

Current Report Type:

Full

Main Client Report Type:

Full

GSI Grid

Search Type

Company Information

No additional research necessary.

Corporate Records

No additional research necessary.

Other Database Searches

No additional research necessary.

Internal Database Search (SPEADD/FPS)

Internal database search revealed prior GDDO research for Ghislaine Maxwell and the following derogatory information was reported:

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. Reference the account titled "116 East 65th St LLC" (attached document labeled 816859913B) AND account titled "Pot and Kettle" (attached document labeled 511696411B) for previous research.

Court Searches

No additional research necessary.

Personal Particulars

No additional research necessary.

Publications

No additional research necessary.

Regulatory Sanctions

No additional research necessary.

OFAC/Control List Search

No additional research necessary.

GSI Red Dot

Has this been identified as Red Dot KYC?

No

Negative or Inconsistent Information

Yes

Please respond to any issue identified in the GS&I grid that either needs further review or red dot which is not already covered in Business Case within the KYC

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Comments

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No

No

No

No

No

Yes

No

No

No

Further Review Required

Final Risk Rating

High

(No Comments Available)

Audit Trail

Date / Time

Stage

06/24/2014 10:00 Compose

08/19/2014 20:27 Market Manager

Approval

Owner Name

JAMES BUCKLEY (W307403)

08/12/2014 17:05 Banker Attestation JAMES BUCKLEY (W307403)

MARY CASEY (U043917)

08/20/2014 11:21 Regional Director

Approval

WILLIAM SHERIDAN (U095563)

09/24/2014 14:03 LOB CEO Approval JOHN DUFFY (U093971)

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Team

Onboarding Owner

KYC PB ATTESTORS

KYC PB MARKET DIRECTOR

KYC PB CEO DIRECT REPORT

KYC PB CEO

Detail

Initiated Ticket

Approved Client

Approved Client

Approved Client

Approved Client

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