

Ticket#
103265268
Client Name
ECI
LOB
TERRA MAR
PROJECT, INC.
[REDACTED]
PB
Account#
Account Title
Account Type
Initiated Date
Initiator
Initiating Team
04/26/2012 03:39
PM
DEBRA WHITE
PB FRONT OFFICE
Verify & Confirm for TERRA MAR PROJECT, INC.
Final Risk Rating
Initial Risk Rating
GCS Report Requested
Presence of Potential High Risk
Indicators
Reason for Adjustment
Comments
Summary of Risk Attributes
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)
Standard
High
Full
No
Not associated with a HRJ. Derogatory information previously addressed.
Updated
Risk
Previous
Risk
Comment
Security Service Details
Information not confirmed on Terra Mar

Project Inc for tax id and address.
Information confirmed; details included in the attachment.
No records were found.
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 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

GCS Red Dot

Has this been identified as Red Dot KYC?

Negative Information Found

No

No

No records were found.

No records were found.

No records were found.

A search of OFAC revealed no matches.

No

No

No

Publications revealed nothing derogatory. No

No records were found.

No

No

Yes

Further Review Required

Yes

No

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

Primary Information

Client Type

Client Status

Confidential Names?

Legal Business Name

Yes

Client well known to the PB and team. Opening accounts to operate not-for profit ocean preservation initiative. No issue with the relationship. Client has recently copnsolidated portfolios at JP Morgan from several 3rd party providers.

N/A

Non Individual

Client

No

Front Office Restricted?

Active Indicator

Country of Primary Domicile UNITED STATES

Primary Country of Assets

Country of Organization

Industry Code (NAIC)

UNITED STATES

UNITED STATES

Environ, Conservation, Wildlife

Organi [813312]

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

116 E 65TH

ST

City, State,
Postal
Code
NEW YORK,
New York,
100657007
Phone(s)/Fax(s)
Type
Work
Other
Notes
Phone
Number



Tools
Verify "Do Not
Call" List
Verify "Do Not
Call" List
Email(s)
Type
Work
Notes
Email
Entered by

DEBRA WHITE

Cost Center & Hierarchy
Client Status
Client Sponsor
Cost Center
Client Service Team
GIO
Trust Advisor
Decision Maker
Identification
Date of Update Preferred
04/26/2012
Yes
Entered by
SYSTEM
SYSTEM
Date of
Update
04/26/2012
04/27/2012
Preferred
Yes
No
Country
UNITED

STATES

Tools

Map it

Entered by Date of
Update

BATCH

Preferred

04/26/2012 Yes

Corporation

04/13/2012

Corporation - Certified Articles
of Incorporation

Environmental and wildlife
awareness of marine life.

No

TERRA MAR PROJECT, INC. Insider Code (Reg. 0)

Primary Domicile State

WebSite

Organization State

Secondary Industry Code
(NAIC)

Client Category

Delaware

NAIC NOT PROVIDED []

Not for profit

Normal

Delaware

Client

Client Type

PAUL V MORRIS

008634 - CHBG

CHBG (DE) 4

GHISLAINE MAXWELL

New or Existing Client

Entity Type

Portfolio Manger

Investor

DM ECI

Non Individual

Existing

Entity

[REDACTED]

Withholding Federal Status
Domestic Certified
Withholding SSN/TIN
Certification Date
Is the TIN being applied for? No
Introduction & Wealth
Introduction Type
Net Worth of client(\$)
Additional Entities
No additional entities available at this time
Additional Party Information
ECI
Party Type Party Name Last
Completed
Search Date
██████████ Individual
Ghislaine
Maxwell
03/31/2005
KYC Status Report Type Relation
Type
Completed
Full
Signer
Powers
Full
Percent
Owned
0.0
SSN/TIN/EIN
04/26/2012
██████████
Existing JPMorgan Client - Inside LOB
20,000,000.00
Primary Information for Ghislaine Maxwell
Client Type
Client Status
Front Office Restricted?
Confidential Names?
First Name
Middle Name
Last Name
Suffix
PreviousName/MMN/Alias
Citizenship
Employer Name
Occupation
Years at Occupation
Individual
Client
Normal

No
Country of Primary Domicile UNITED STATES
Prefix/Title
Ghislaine
Maxwell
UNITED STATES
High Risk Jurisdiction
Industry Code (NAIC)
Secondary Industry Code
(NAIC)
Address(es)
Type
Legal
Notes
Address
[REDACTED],
'
City, State,
Postal Code
MIAMI
BEACH,
Florida,
[REDACTED]
Phone(s)/Fax(s)
Type
Home
Notes
Phone Number Tools
[REDACTED]
Verify "Do Not
Call" List
Email(s)
Type
Home
Notes
send eotm from
investor
Cost Center & Hierarchy
Client Status
Client Sponsor
Cost Center
Client Service Team
Email
Entered by
[REDACTED] BATCH
Date of Update
11/12/2011
Preferred
Yes
Entered by

BATCH
Date of Update Preferred
09/03/2011
Yes
Country
UNITED
STATES
Tools
Map it
Entered by Date of
Update
BATCH
Preferred
04/02/2012 Yes
Individuals [999940]
Generation
Active Indicator
Marital Status
Primary Domicile State
Insider Code (Reg. 0)
Full Name
Gender
Date of Birth
Primary Country of Assets
Ghislaine Maxwell
Female
[REDACTED]
UNITED STATES
Yes
Single
Client
Client Type
PAUL V MORRIS
008634 - CHBG
CHBG (DE) 4
Entity Type
Decision Maker
Individual

Identification

Withholding Federal Status

Form of government issued

identification obtained for the files

Primary Identification Number

Date Issued

Introduction & Wealth

Introduction Type

Net Worth of client(\$)

Source Of Wealth / Financial Information Details

Source Of Wealth -Identify the Clients Source of Wealth from following list of options

Executive Management

Issued By

Expiration Date

Withholding SSN/TIN

Certification Date

SSN/TIN/EIN

██████████

Introduction

Non Individual Entity Type

How is the charitable entity being funded?

Describe the charitable entity and its Mission/program.

Include who benefits from the charitable entity.

Corporation - Not for Profit

Public Donations

Our mission is to increase respect and protection for animals (with an emphasis on wildlife, particularly marine mammals) and their environment through research and education. Scientific endeavors include non-invasive research, academic writing and publication, lectures and facilitation of workshops and participation and collaboration in various academic projects. Educational activities include public presentations for schools and events, providing guidance and assistance to students and teachers, writing and publication in popular magazines and newspapers, and working with the media.

Where is the charity headquartered?

What geographic locations does the charity serve?

How are the charitable funds distributed?

New York City

Domestic

The principal activities of the corporation will be to support organizations and projects that will make the world's oceans cleaner and safer, sponsor educational programs to schools and the public regarding the study and protection of wildlife and the environment with an emphasis on marine mammals and marine ecosystems.

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

This is a new start-up not-for-profit organization. There is no annual income at this time. The initial contribution will be \$5,000. The donor base will be from public donations.

Ghislaine Maxwell, Chairman, of the not-for-profit organization and public volunteers of Ghislaine Maxwell's choosing.

No

This is a new not-for-profit start-up corporation. The organization's internal controls will be conducted by the organization's accounting firm, Marks, Paneth & Shron, LLP. The record keeping controls will be conducted by the not-for-profit organization accounting firm, Marks, Paneth & Shron, LLP - the accounting firm used by the e Chairman, Ghislaine Maxwell.

Yes

JPMC Network

04/26/2012

This is another part of existing client relationship with Ghislaine Maxwell. The client has requested the opening of a business checking account for new start-up not-for-profit corporation.

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

No

Client Category(for SOW)

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

Provide detailed and specific information.

Not for Profit

Other

Ghislaine Maxwell is the daughter of the late Robert Maxwell who was 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.

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 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?

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

Low (1-10)

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

The initial source of funding will be from internal transfer of funds from the personal account of Ghislaine Maxwell held at JPMorgan.

Any ongoing source of funding will be from donations provided by the public.

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.

The purpose of the checking account will be to distribute charitable funds in the form of gifts, grants and loans to schools and organizations who support the study and protections of wildlife and the

environment with an emphasis on marine mammals and marine ecosystems of Ghislaine Maxwell (Chairman) choosing.

Additional Client Information

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

<\$10,000

Expected Activity Levels

Low (1-10)

Low (1-10)

Low (1-10)

Low (1-10)

Anticipated Dollar Amount Totals

per Month

<\$10,000

<\$10,000

<\$10,000

<\$10,000

Robert Maxwell - DOD: November 5, 1991

UNITED STATES

No

20000000.00

Financial Statements

No

f. Charities

aa. None of the above

Comment History

Stage Name

Creation Date

Entered By

There are no comments entered at this time.

Approval History

Stage Name

Banker Attestation

Market Manager

Approval

Comment Preview

Signoff Date

07/23/2012 10:09

AM

07/24/2012 01:25

PM

DF#@T15#7@1

Owner SID



Owner Name

PAUL V MORRIS

MARY C CASEY