

USCG Due Diligence Report - Individual

DDR Name: Ghislaine Maxwell ~

DDR Status: Process Completed

Banker Information

Banker:

Paul V Morris/JPMCHASE

LE/OU:

Banker SID:

Banker BAC:

Banker FNEN:

Banker History:

03/04/2010 11:06:54 PM - CRD / Notrix changed: Banker from Mary C Casey/- JPMCHASE to Paul V Morris/JPMCHASE.

07/28/2006 11:00:04 PM - CRD / Notrix changed: Banker from Jeffrey M Matusow/- JPMCHASE to Mary C Casey/JPMCHASE.

07/13/2006 11:00:44 PM - CRD / Notrix changed: Banker from Mary C Casey/- JPMCHASE to Jeffrey M Matusow/JPMCHASE.

07/10/2006 11:00:44 PM - CRD / Notrix changed: Banker from Robert Baynard/- JPMCHASE to Mary C Casey/JPMCHASE.

07/07/2006 11:00:21 PM - CRD / Notrix changed: Banker from Mary C Casey/- JPMCHASE to Robert Baynard/JPMCHASE.

01/19/2006 11:00:30 PM - CRD / Notrix changed: Banker from Mary Rieth/- JPMCHASE to Mary C Casey/JPMCHASE.

04/23/2005 02:17:21 AM - CRD / Notrix changed: Banker GID from 00000043917 to U043917.

DM ID Link Information

The DM for this DDR is DM Name -. CAS ID - 0106585908.

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

DDR Name

Maxwell, Ghislaine

Name/Contact Information

Banker

Morris, Paul V

Security Services Search Date

03/31/2005

102/29338

N256838

8634--CHBG

01

Last Name:

First Name:

Maxwell

Ghislaine

Middle Name/Initial:

Previous Last Name(s):

Title:

Business Name:

(To Record Individual's Ownership Or Employer)

Primary Address

Addresses

(Legal address on account)

Name:

Attention:

Address Line 1:

Address Line 2:

City:

Ghislaine Maxwell

Eric Gany

457 Madison Avenue

4th Floor

New York

JPMC Internal Use Only

(Other than Primary Address)

Business Address

Ghislaine Maxwell

State:  
NY  
Province:  
Postal/Zip Code:  
Country:  
Legal Entity:  
Industry Code:  
Citizenship:  
Date of Birth:  
Gender:  
Tax ID # :  
Passport/Drivers  
License #:  
Home Phone:  
10022  
UNITED STATES  
UNITED STATES  
Individual / Joint  
PRIVATE HOUSEHOLDS\*\*8811  
NAIC Code:  
UNITED STATES

[REDACTED]  
(Use 4-digit year)

Female  
[REDACTED]

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

Florida driver's license [REDACTED] She also has a USVI driver's license. Passport copy is forthcoming  
[REDACTED]

Introduction Information

Introduction Type:

Specific Information:

Met With Principal?

If you did not meet the Principal, give an indication of why you haven't met the individual and when you will.

We have had numerous meetings with Jeffrey Epstein but not yet with Ghislaine. Jes Staley has met Ghislaine.

What form of government issued identification document did you obtain for the files?

Driver's License

Financial Information

Occupation, Business or Employer  
of the Client:

Net Worth of Client:

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

Source Of Wealth:

Please Describe:

Real estate

\$ 3 (USD millions)

Assets held at JPM.

Earned

She has indicated that she is a real estate professional. She is also the daughter of the late Robert Maxwell.

Related Client A/C

Ms. Maxwell was referred to us by Jeffrey Epstein.

Transaction Profile/Expected Account Activity

What is the

purpose/intended use of this account?

Asset account to hold pound sterling / US\$ checking account. She also will open a sterling liquidity account with the UK office.

Please check the types of account and expected activity for this legal entity (inflows and outflows of securities and cash) - check ALL that apply:

Activity Level:

Account

Low (1-5 transactions/month)

Medium (6-12 trs/month)

High (over 12 trs/month)

DDA/MMIA:

SDI:

Investment Management:

Funds:

Other:

Transaction Profile/Expected Account Activity

The money will come from her existing checking account.

Required Security Services Checks

Security Search Type:

Note for Security Services:

Please list any specific search requests/instructions to Security

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:

Reference the Due Diligence Report titled "Jeffrey Epstein" (below attached Word document labeled 210203b) for a

FULL report on Jeffrey Epstein. No research was conducted on Jeffrey Epstein under this particular DDR.

Reference the Due Diligence Report titled "Ghislaine Maxwell" (118503B) for a FULL report on Ghislaine Maxwell and a

MEDIA report on Robert Maxwell. No research was conducted on Robert Maxwell under this particular DDR. Ghislaine

Maxwell was updated for international news and company records. Please note derogatory information was found under this

DDR. Due to the fact GCS is unable to locate original template for this DDR, GCS provided an attached copy of the template

(118503c)

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

Attachment:

Full

Search Type

Is

Security Service Details:

Further

Review

by

Banker

Require

d?

Company Information

Corporate Records

Other Database Searches

(RDC/CDC/MIS)

Internal Database Search

(CSSS/FPS)

No

No

No

Yes

No records were found.

Not researched.

Not researched.

Reference the Due Diligence Report titled "Jeffrey Epstein" (below attached Word document labeled 210203b) for a FULL report on Jeffrey Epstein. No research was conducted on Jeffrey Epstein under this particular DDR.

Reference the Due Diligence Report titled "Ghislaine Maxwell" (118503B) for a FULL report on Ghislaine Maxwell and a MEDIA report on Robert Maxwell. No research was conducted on Robert Maxwell under this particular DDR. Ghislaine Maxwell was updated for international news and company records. Please note derogatory information was found under this DDR. Due to the fact GCS is unable to locate original template for this DDR, GCS provided an attached copy of the template (118503c)

Please see DDR

from 2003 for

responses to

each of the

articles.

Ghislaine

Maxwell is a

very close

friend of Jeffrey

Epstein who is

an existing

client and who

has

recommended

us to her. Jes

Staley also has

met with her

and has

recommended

we open an

account for her.

In reading the

Banker

Response:

press articles,  
we have no  
reason to  
believe that she  
had any direct  
influence on or  
participation in  
the situations in  
which her  
brothers were  
involved. She is  
a high profile  
client given her  
family  
background and  
media coverage  
surrounding her  
father's death.

State Court Searches

No

Federal Court Searches No

Personal Particulars

Publications

No

No

Not researched.

Not researched.

Not researched.

Reference the attached Word document (pages 2-3) to view  
publications.

This information was originally reported under the 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 fraud charges  
brought against Kevin and Ian Maxwell (sons of Robert Maxwell).

Regulatory Sanctions

No

OFAC/Control List Search No

Not researched.

Reference the attached Word document (page 4) to view OFAC

search results. No matches were found.  
Has this been identified as a Red Dot DDR? :  
see above

Expense No.:

Total Costs:

99/31167

\$0.00

Signed by:

Dated:

Witold X Cyrek

03/31/2005 06:05:36 PM

Individual Checks

Date

Comments

Background Check

(Required If Check

Carried Out)

03/31/2005

(Required If Check Carried Out)

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

03/11/2005

Maxwell is an existing client.

Summary

Summary Of Findings:

Jeffrey Epstein, a longstanding PB client, introduced us to Ghislaine Maxwell. She is very

close to Jeffrey Epstein and has authority over his personal checking account with us. She

is a NY socialite and daughter of the late Robert Maxwell. We opened a checking account

for her in 2003. Recently, she requested we open a brokerage account in the US to hold

Sterling and Euro, and a Sterling liquidity account in the UK.

Anticipated Product(s)

Deposits

Investment Funds

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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01

No

Client Hierarchy and Additional Entity Assignment:

Name

Maxwell, Ghislaine

Linked to DM Name

.

Date of Birth

Maxwell, Ghislaine

[REDACTED]

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

No

Tax ID #  
Existing  
CAS Id  
133784883  
SPN No  
5036151

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

Associated Entity  
Government issued  
I.D Obtained  
Driver's License

Tax ID #  
133784883

.  
Linking to  
DM Id

.  
CAS ID  
0106585908  
Citizenship  
UNITED  
STATES  
Attention  
Address Line 1  
State  
Zip  
Address Line 2  
Province  
City  
Country

Citizenship

Approval Information

Public/High Profile Figure

No

High Risk Jurisdiction

High Risk Business

Banker:

LE/OU:

Senior Manager:

No

No

Paul V Morris/JPMCHASE

102/29338

Tad C Smith/JPMCHASE

Annual / Periodic Review Information

Annual/Periodic Review

Due in:

36 months

Periodic Review Comments :

This annual/periodic review is for DMID # 0106585908 - DMID Name: .

The actual review is being conducted within the Ranch Lake III, Inc. DDR.

Temporary Waiver Information

Waiver Status:

Reason for Waiver:

Waiver Requested By:

Date of Waiver Request:

Approver for Waiver:

Waiver Approved On:

Banker Approval Information

Based on my due diligence and the information provided , I approve the acceptance of Ghislaine Maxwell ~ as a Client.

Mary Rieth 04/11/2005 04:05:19 PM

Senior Manager Approval Information

Based on the information provided and the approval granted by Mary Rieth, I approve the acceptance of Ghislaine Maxwell ~ as a Client.

Tad C Smith 04/11/2005 06:25:52 PM

Admin Comments

Admin Comments:

By:

Date:

DDR Complete

Security Services is still performing the client background check.

Vanessa A Williams

03/14/2005

David M Tarrío

03/14/2005

Admin Comments History :

Document History

Created: 03/11/2005

Last Modified: 04/11/2005

Submitted: 03/31/2005 05:05:37 PM

Audit History

12. Periodic Review Changed to 36 because Not a true PEP --> By: Bonnie K Perry on: 03/13/2006 10:14:33 AM.
11. Input/Update High Profile figure set to 'No' performed by: Bonnie K Perry on: 03/11/2006 11:44:38 AM
10. 'Senior Manager Approval' performed by: Tad C Smith on: 04/11/2005 06:25:56 PM
9. 'Banker Approval' performed by: Mary Rieth on: 04/11/2005 04:05:29 PM
8. Submitted for Banker Approval performed by: Witold X Cyrek on: 03/31/2005 05:05:53 PM
7. Document Save performed by: Witold X Cyrek on: 03/31/2005 05:04:01 PM
6. Document Save performed by: Witold X Cyrek on: 03/31/2005 04:23:25 PM
5. Button: 'Flag: Security Check has begun' performed by: Witold X Cyrek on: 03/17/2005 02:14:32 PM
4. Button: 'Print' performed by: Ticey Robertson on: 03/15/2005 07:56:41 AM
3. Submitted for Security Services Approval performed by: Mary Rieth on: 03/14/2005 05:46:51 PM
2. Button: 'Approve Waiver' performed by: David M Tarrío on: 03/14/2005 01:19:54 PM
1. Button : 'Request Waiver' performed by: Vanessa A Williams on: 03/14/2005 12:27:06 PM

Converted Tracking Document History:

By: Vanessa A Williams

By: Tad C Smith

By: Witold X Cyrek

CN=Ujwala Srinath/O=JPMCHASE: 215605b.doc

CN=Ujwala Srinath/O=JPMCHASE: 210203b.doc

CN=Ujwala Srinath/O=JPMCHASE: 118503B.doc

CN=Ujwala Srinath/O=JPMCHASE: 118503C.doc