

Ticket#: 102238348
Client Name:
ECI#:
LOB: POT AND KETTLE
0033839248
PB
Account#:
Account Title:
Account Type:
Initiated Date#:
Initiator:
Initiating Team:
08/22/2011 10:43 AM
DEBRA WHITE
PB FRONT OFFICE
Verify and Confirm for POT AND KETTLE
Final Risk Rating
Initial Risk Rating
GCS Report Requested
Presence of Potential High Risk Indicators
Reason for Adjustment
Moderate
Standard
Full
No
Derogatory information.
GCS Grid
Search Type
Security Service Details
Company Information
Corporate Records
Other Database Searches (RDC/MIS/Factiva)
Internal Database Search (CSSS/FPS)
Information not confirmed on Pot and Kettle for tax id and address.
Internal database search revealed prior GSI research and the following derogatory information was reported:
Several newspaper articles detailing the investigation conducted by Britains 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 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.

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

No records were found.

Information confirmed; details included in the attachment.

Information confirmed; details included in the attachment.

Information confirmed; details included in the attachment.

No records were found.

A search of OFAC revealed no matches.

No

No

No

No

No

No

Yes

Further Review Required

Yes

Information not confirmed on Pot and Kettle for state of domicile. Yes

No records were found.

No

Yes

GCS Red Dot

Has this been identified as Red Dot KYC?

Negative Information Found

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

Yes

Long-term clients opening up additional accounts.

reviewed

Primary Information

Client Type

Client Status

Confidential Name?

Legal Business Name

Country of Primary Domicile

Primary Country of Assets

Country of Organization

Industry Code (NAIC)

Client Legal Entity Type

Date of Incorporation/Situs (Date of Trust)

Documentary Evidence

What is the nature/purpose of this entity?

High Risk Jurisdiction

Non Individual

Client

No

POT AND KETTLE

UNITED STATES

UNITED STATES

UNITED STATES

ALL OTHER MISC CHEM PRODUCT AND

PREP MFG [325998]

Limited Liability Company

12/21/2009

LLC - State Certificate

The client owns a patent for a hand cleaning product/device. The client is looking to buy a company that holds patents for anti microbial technology.

No
Is the entity a Personal Holding Company
(PHC) or Personal Investment Company
(PIC) located in an offshore jurisdiction?

No
Front Office Restricted?
Active Indicator
Insider Code (Reg. 0)
Primary Domicile State
WebSite
Organization State
Secondary Industry Code (NAIC)
Client Category
Profit
Delaware
Normal
Delaware
Address(es)
Type
Legal
Notes
Address

[REDACTED]
[REDACTED]
City, State,
Postal Code
MIAMI BEACH,
Florida, 33139
Country

Tools
UNITED STATES Map it
Entered by
BATCH
Date of Update Preferred
08/19/2011
Yes

Phone(s)/Fax(s)

Type

Work

Notes

Phone Number

[REDACTED]

Tools

Verify "Do Not Call" List

Entered by

SYSTEM

Date of Update

08/19/2011

Preferred

Yes

Email(s)

Type

Email address not available

Notes

Email

Entered by

Date of Update

Preferred

Cost Center & Hierarchy

Client Status

Client

Client Sponsor

Cost Center

Client Service Team

GIO

Trust Advisor

Decision Maker

DM ECI

PAUL V MORRIS

008634 - CHBG

CHBG (DE) 4

Ian E Hirschfield

GHISLAINE MAXWELL

0106585908

Client Type

New or Existing Client

Entity Type

Portfolio Manger

Investor

Non Individual

Existing

Entity

Identification

Withholding Federal Status

Domestic Certified

Withholding SSN/TIN Certification Date

SSN/TIN/EIN

08/22/2011

[REDACTED]

Introduction & Wealth

Introduction Type

Net Worth of client(\$)

Existing JPMorgan Client - Inside LOB

30,000,000.00

ECI

Additional Party Information

Party Type

0106585908

Individual

Party Name

Ghislaine Maxwell

Last Completed

Search Date

03/31/2005

KYC Status

Completed

Report Type

Full

Relation Type

Owner

Powers

Percent Owned

100.00

Primary Information for Ghislaine Maxwell

Client Type

Client Status

Front Office Restricted?

Confidential Name?

Country of Primary Domicile

Prefix/Title

First Name

Middle Name

Last Name

Suffix

Previous Name/MMN/Alias

Citizenship

Employer Name

Occupation

Years at Occupation

Individual

Client

Normal

No

UNITED STATES

Ghislaine

Maxwell

UNITED STATES

High Risk Jurisdiction

Industry Code (NAIC)

Secondary Industry Code (NAIC)

Insider Code (Reg. 0)

Full Name

Gender

Date of Birth

Primary Country of Assets

01/01/1901

UNITED STATES

Ghislaine Maxwell

Generation

Active Indicator

Marital Status

Yes

Address(es)

Type

Legal

Notes

Address

[REDACTED]

[REDACTED], ,

City, State,

Postal Code

MIAMI BEACH,

Florida, 331391331

Country

Tools

UNITED STATES Map it

Entered by
SYSTEM

Date of Update Preferred

03/22/2011

Yes

Phone(s)/Fax(s)

Type

Home

Notes

Phone Number

[REDACTED]

Tools

Verify "Do Not Call" List

Entered by

SYSTEM

Date of Update

03/22/2011

Preferred

Yes

Email(s)

Type

Home

Notes

Email

[REDACTED]

Entered by

SYSTEM

Date of Update

03/22/2011

Preferred

Yes

Cost Center & Hierarchy

Client Status

Client

Client Sponsor

Cost Center

Client Service Team

PAUL V MORRIS

008634 - CHBG

CHBG (DE) 4

Entity Type

Decision Maker

Client Type

Individual

Identification

Withholding Federal Status

Introduction & Wealth

Introduction Type

Net Worth of client(\$)

Introduction

Non Individual Entity Type

For Profit?

Locations Served?

Are beneficial owners/principal shareholders associated with this business?

Who owns this entity?

Please Provide ownership details

Limited Liability Company - For Profit

Yes

Domestic

Yes

Individual

Ghislaine Maxwell is the sole owner of the entity - details below:

Ghislaine Maxwell

DOB: [REDACTED]

SSN: [REDACTED]

Govt. ID: Florida D/L # [REDACTED]

Ownership is not equal to 100%?

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

No

No

JPMC Network

08/22/2011

This is another part of an existing client relationship with Ghislaine Maxwell. 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

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?

No

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?

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

Marborough College and

Balliol College, Oxford. Ghislaine Maxwell is an entrepreneur/business owner

UNITED STATES

Is this an Operating Company?

Total Net Worth \$

No

30000000.00

What was the total net worth based on?

Is this client a Professional Service Provider acting as a financial intermediary

(Gatekeeper/Financial Liaison), with assets held on behalf of one or more unidentified

underlying clients unknown to the bank?

Is this entity a Private Equity Fund (Venture Capital Fund or Leveraged Buyout)?

Is this a Hedge Fund? (Pooled investment vehicles (often partnerships) that primarily

invest financial capital of third party investors in enterprises that are too risky for the

standard capital markets or bank loans.)

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?

Is the Entity a Personal Holding Company (PHC) or Personal Investment Company (PIC)

located in an offshore jurisdiction?

Financial Statements

No

No

No

No

aa. None of the above

No

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?

Additional Comments

Long-term client of the Private bank. Copnsolidating assets with JP Morgan.

Long-term relationship with PB. (.10 years)

Senior management of PB

.\$10 million

no

N/A

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) ?

The initial funding will be \$110,000 and will be from an internal transfer from the client's savings account. The ongoing source of funding will be from the sale of the anti microbial hand cleaning product/device to various clients.

Expected Activity Levels

Low (1-10)

Low (1-10)

Low (1-10)

Low (1-10)

Anticipated Dollar Amount Totals per Month

\$10,000 TO \$50,000

\$10,000 TO \$50,000

\$10,000 TO \$50,000

\$10,000 TO \$50,000

What is the purposed/intended use of account(s)? Please provide a detailed description of how the Deposit Account(s) will be used by the client. Sales/purchases of the anti microbial hand cleaning product/device from clients will be deposited into checking account. The purpose of the checking account will be to pay everyday living expenses and monthly bills for the client.

Additional Client Information

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

Approval History

Stage Name

Banker Attestation

Market Manager Approval

Regional Director Approval

DF#@T15#7@1

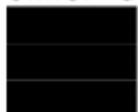
Signoff Date

12/05/2011 10:32 AM

12/19/2011 2:30 PM

12/20/2011 4:25 PM

Owner SID



Owner Name

PAUL V MORRIS

WILLIAM M SHERIDAN

WILLIAM M SHERIDAN