

Ticket#
104483515
Client Name
ECI
LOB
GHISLAINE
MAXWELL
0106585908
PB
Account#
Account Title
Account Type
Initiated Date
Initiator
Initiating Team
01/30/2013 12:44
PM
MARIA A COUTO
PB FRONT OFFICE
Verify & Confirm for Ghislaine Maxwell
Final Risk Rating
Initial Risk Rating
GCS Report Requested
Presence of Potential High Risk
Indicators
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)
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
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

Comments

Primary Information

Client Type

Client Status

Front Office Restricted?

Confidential Names?

First Name

Middle Name

Last Name

Suffix

Yes

No

No

Standard

Standard

Full

Yes

Updated

Risk

Previous

Risk

Comment

Security Service Details

No additional research necessary..

No additional research necessary.

No records found.

Internal database search revealed prior GS&I research for Ghislaine Maxwell and Robert Maxwell and nothing derogatory information was reported.

No additional research necessary.

No additional research necessary.

No additional research necessary.

Information confirmed; details included in the attachment.

No records found.

A search of OFAC did not reveal any matches.

No

No

No

No

No

No

No

Further Review Required

No

No

No

No

Completed 3-year KYC update for existing client of Private Bank.

Individual

Client

Generation

Normal

No

Country of Primary Domicile UNITED STATES

Prefix/Title

Ghislaine

Maxwell

Active Indicator

Marital Status

Primary Domicile State

Insider Code (Reg. 0)

Full Name

Gender

Date of Birth

Primary Country of Assets

Single

Florida

Ghislaine Maxwell

Female

12/25/1961

UNITED STATES

3055881998

2125356833

2128798204

Tools

Verify "Do Not

Call" List

Email(s)

Type

Home

Other

Notes

send eotm from

investor

Email

rkahn@hbrkassociat

es.com

Cost Center & Hierarchy

Client Status

Client Sponsor

Cost Center

Client Service Team

GIO

Trust Advisor

Identification

Withholding Federal Status

Form of government issued

identification obtained for the
files

Primary Identification Number

Date Issued

Domestic Certified

None

Withholding SSN/TIN

Certification Date

SSN/TIN/EIN

03/05/2003

[REDACTED]

Entered by

[REDACTED]

BATCH

ELIZABETH

HOGAN

Date of Update Preferred

11/12/2011

Yes

11/15/2010

No

Entered by

BATCH

BATCH

TECS DATA

SYSTEM

SYSTEM

SYSTEM

Date of

Update

02/15/2013

02/07/2012

06/04/2011

07/22/2011

09/02/2011

02/07/2012

Preferred

Yes

No

No

No

No

No

City, State,

Postal

Code

MIAMI,

Florida,

331391043

MIAMI,

Florida,

331391043

MIAMI,

Florida,

331391043

MIAMI,

Florida,

331391043

UNITED

STATES

Map it

BATCH

06/25/2012 No

UNITED

STATES

Map it

BATCH

06/25/2012 No
UNITED
STATES
Map it
BATCH
06/25/2012 No
Country
UNITED
STATES
Tools
Map it
Entered by Date of
Update
BATCH
Preferred
06/25/2012 Yes
No
Individuals [999940]
NAIC NOT PROVIDED []
Client
Client Type
KIRSTEN A SICHLER
008634 - CHBG
CHBG (DE) 4
New or Existing Client
Entity Type
Portfolio Manager
Investor
Individual
Existing
Decision Maker
839487
Issued By
Expiration Date

Introduction and Wealth

Introduction Type

Net Worth of client(\$)

Additional Party Information

No additional parties available at this time

Introduction

Form of government issued identification obtained for the files ?

Why asking for exception to Policy?

What actions are being taken to mitigate risk?

Has an employee of JP Morgan Wealth Management met the client in person?

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

None

Photo ID has been requested

Long-standing client of the PB - photo ID will be added as soon as received

Yes

JPMC Network

Existing JPMorgan Client - Inside LOB

30,000,000.00

02/05/2013

Ghislaine was originally referred to the PB by Jes Staley. She is the daughter of the late Robert Maxwell (10 June 1923 – 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.

Politically Exposed Person

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

Source of Wealth/Financial Information

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

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

Other

UNITED STATES

No

Provide detailed and specific information.

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.

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Client Net Worth \$

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

If Other, please describe

30000000.00

Other

Clients investable assets are held at PB, the rest of her wealth is held in her real estate and artwork (NYC Townhouse and London townhouse).

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) ?

This is a long-standing existing deposit relationship. Continued source of funding is from investment proceeds.

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.

For living expenses (utility bills, home maintenance, etc.)

Client Directed Asset / Brokerage 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

Expected Activity Levels

Low (1-10)

Low (1-10)

Low (1-10)

Anticipated Dollar Amount Totals

per Month

<\$10,000

<\$10,000

<\$10,000

Expected Activity Levels

Anticipated Dollar Amount Totals

per Month

ACH Payments

Internal Transfer (Debits/Credits)

Asset Purchases/Sales

Low (1-10)

\$10,000 TO \$50,000

What is the initial/ongoing source of funding for the client's Client

Directed Asset / Brokerage Account(s) ?

This is a long-standing existing brokerage relationship. Continued source of funding is from investment proceeds.

What is the purpose/intended use of account(s)? Please provide a detailed description of how the Client Directed Asset /

Brokerage Account(s) will be used by the client.

To preserve and grow wealth

Managed Fiduciary/Trust 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)

<\$10,000

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

We recently 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.

What is the purpose/intended use of account(s)? Please provide a detailed description of how the Managed Fiduciary/Trust

Account(s) will be used by the client.

To preserve and grow wealth

Additional Client Information

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

As requested, completing 3-year update on this long-standing PB client.

Comment History

Stage Name

Expected Activity Levels

Anticipated Dollar Amount Totals

per Month

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
03/15/2013 11:14
AM
03/15/2013 11:16
AM
DF#@T15#7@1
Owner SID
I095550
U037276
Owner Name
KIRSTEN A SICHLER
THOMAS K SOUTHMAYD