

Ticket#  
105258609  
Client Name  
ECI  
LOB  
Account#  
DARREN INDYKE Account Title  
0221165201  
PB  
Verify & Confirm for DARREN INDYKE  
Final Risk Rating  
High  
Initial Risk Rating  
GCS Report Requested  
Presence of Potential High Risk  
Indicators  
Reason for Adjustment  
Comments  
Summary of Risk Attributes  
Please summarize any material changes  
which have occurred with the client  
within the past 12 months:  
Standard  
Full  
No  
Attorney of a convicted felon  
Accounts are to be monitored while relationship in in process of exit.  
Darren is the attorney of convicted felon, Jeffrey Epstein.  
Jeffrey Epstein is a longstanding client. He has dissolved his family office  
(New York  
Strategy Group) and has split it in two: HBRK Associates Inc. and Darren K  
Indyke  
PLLC. HBRK provides consulting services to Mr. Epstein.  
Account Type  
Initiated Date  
Initiator  
Initiating Team  
07/13/2013 07:22  
AM  
JUSTIN D NELSON  
PB FRONT OFFICE  
Creation  
Date  
Risk Updated History  
Entered by  
Updated  
Risk  
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?

Yes

No

No

Previous

Risk

Comment

Security Service Details

No records found.

Further Review Required

No

No records found.

No records found.

No records found.

No records found.

No records found.

Information confirmed; details included in the attachment.

Nothing derogatory found.

No records found.

A search of OFAC did not reveal any matches.

No

No

No  
No  
No  
No  
No  
No  
No  
No

Senior management (John Duffy) has communicated to the client a request to move the relationship and accounts from JP Morgan to another institurion. This is now in execution mode and client is moving his business. For the time being - the accounts sit with the Region Head for Tri State,

Individual

Client

Generation

Normal

No

Country of Primary Domicile UNITED STATES

Prefix/Title

Active Indicator

Marital Status

Primary Domicile State

Insider Code (Reg. 0)

Yes

Married

New Jersey

First Name  
DARREN  
Middle Name  
Last Name  
Suffix  
PreviousName/MMN/Alias  
Citizenship  
Employer Name  
Occupation  
Years at Occupation  
INDYKE  
UNITED STATES  
Darren K. Indyke PLLC  
Lawyer  
6  
High Risk Jurisdiction  
Industry Code (NAIC)  
Secondary Industry Code  
(NAIC)  
Address(es)  
Type  
Legal  
Notes  
Address  
2 KEAN  
COURT  
City, State,  
Postal  
Code  
LIVINGSTON  
, New Jersey,  
07039  
Phone(s)/Fax(s)  
Type  
Other  
Notes  
Phone  
Number  
8624856315  
Tools  
Verify "Do Not  
Call" List  
Email(s)  
Type  
Notes  
Email address not available  
Cost Center & Hierarchy  
Client Status  
Client Sponsor  
Cost Center  
Client Service Team

GIO  
Trust Advisor  
Decision Maker  
DM ECI  
Identification  
Withholding Federal Status  
Form of government issued  
identification obtained for the  
files  
Date Issued  
Domestic Certified  
Passport  
Primary Identification Number 112637684  
03/10/2002  
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 ?  
Passport  
Issued By  
Expiration Date  
UNITED STATES  
03/10/2012  
Withholding SSN/TIN  
Certification Date  
SSN/TIN/EIN  
10/04/2013  
000-00-0000  
Email  
Entered by  
Date of Update Preferred  
Entered by  
SYSTEM  
Date of  
Update  
02/12/2013  
Preferred  
Yes  
Country  
UNITED  
STATES  
Tools  
Map it  
Entered by Date of  
Update  
BATCH  
Preferred

10/07/2009 Yes  
No  
Individuals [999940]  
NAIC NOT PROVIDED [ ]  
Full Name  
Gender  
Date of Birth  
Primary Country of Assets  
DARREN INDYKE  
Male  
02/19/1965  
UNITED STATES  
Client  
Client Type  
WILLIAM M SHERIDAN  
143360 - USPB UHNW NYC  
TRI STATE EXEC  
CHBG (DE) 4  
Paul S Barrett  
JEFFREY E EPSTEIN  
9710670708  
Entity Type  
Portfolio Manager  
Investor  
Entity  
New or Existing Client  
Individual  
Existing  
Existing JPMorgan Client - Inside LOB  
1,000,000.00

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

Yes

JPMC Network

02 Feb 2010

Darren Indyke is the longstanding internal counsel to Jeffrey Epstein (JPM client).

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?

What is the client's current position? (Include any former positions, if significant to source of wealth)

Employment

UNITED STATES

Darren Indyke (SSN: 02/19/1965 DOB: 098-54-8596 US Citizen) is Jeffrey Epstein's attorney. Jeffrey Epstein is a longstanding client. He has dissolved his family office (New York Strategy Group) and has split it in two: HBRK Associates Inc. and Darren K. Indyke PLLC. HBRK provides consulting and accounting services to Mr. Epstein.

Jeffrey Epstein is an existing client of PB. He is an active brokerage client across asset classes currently covered by the Firm's GIO desk. Jeffrey Epstein has been an investment advisor for numerous high net worth clients and also a personal investor. Jeffrey is very accessible and well known to the team. We have advised him on investments as well as estate planning opportunities. Jeffrey has continues to be well connected across business channels.

Epstein is well known to several JPM PB employees and senior management including Jes Staley. Also, Mr. Epstein was convicted of a felony charge in 2008. Jes Staley conferred with Stephen Cutler and the decision was made to keep Mr. Epstein as a PB client. Mr. Epstein completed his sentence and probation in 2010. The relationship has been reviewed with senior management and compliance/legal on a few occasions over the post year as news stories of Jeffrey's past are picked up. No new claims or stories have surfaced recently.

List the number of years in current position. (Include any

former positions, if significant to source of wealth)  
Approximate yearly income/salary/bonus/distribution and  
other compensation history (accumulated earned income)  
Client Net Worth \$  
Documentation/Information obtained to confirm stated net  
worth of Client:  
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?  
When was the last time you met the client? What was the  
reason for the meeting?  
Describe any significant changes in the client's information  
or material events that may have occurred over the last year  
(Examples: address changes, change in authorized persons  
on accounts, change in account type, change in business,  
change in net worth, etc.).  
Cash Activity: Summarize client cash activity during the  
period reviewed and explain the purpose / use of the funds:  
Wire Activity: Summarize client wire activity during the  
period reviewed and explain the purpose / use of the funds,  
including any international/cross border wires:  
Before answering the following question please review the  
Annual Account History Activity Summary Report that has  
been attached in the Summary tab. Did the actual transaction  
activity appear reasonable, normal, and expected for the type  
of business or industry in which the client engages?  
The client is in the process of moving the entire relationship at the  
request of senior management (John Duffy).  
Relationship history dates back to referral form former JPM senior  
executive (Jes Staley).  
Senior JPM exec Jes Staley.  
Active GIO client.  
No  
Previous bankers, GIO investors and Jes Staley. Last  
conversation with with John Duffy when request was made to  
exist the relationship.  
See above  
16  
1.7MM  
1000000.00  
Financial Statements

No  
Client is in process of moving entire relationship.  
Client is in the proces of moving the entire relationship from the  
firm.  
Yes

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

Was any unusual or potentially suspicious transaction activity detected?

Additional Comments

Yes

No

As mentioned above - this relationship is now in the process of exiting JP Morgan.

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)

\$50,001 TO \$100,000

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

The initial funding amount was a \$60,000 other = Wire. Ongoing will come from his PLLC account with the PB.

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 this account is to be used for an IRA account and to pay the administrative flows and fees.

Review the activity for the period overall and explain how the client's transaction profile agrees with or doesn't agree with expectations for the client based on the client relationship (purpose of accounts, occupation, business activity, etc.):

The account has been reviewed.

Was expected activity for the client modified in the transaction activity section of the KYC ticket?

Yes

If modified, explain.

Yes, we added checks deposits and paid. Low activity for the account.

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  
ACH Payments  
Internal Transfer (Debits/Credits)  
Asset Purchases/Sales

What is the initial/ongoing source of funding for the client's Client Directed Asset / Brokerage Account(s) ?

The initial funding has already taken place. Ongoing will come from his PLLC account with the PB.

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.

IRA Account

Buy and hold investments for his IRA account.

Review the activity for the period overall and explain how the client's transaction profile agrees with or doesn't agree with expectations for the client based on the client relationship (purpose of accounts, occupation, business activity, etc.):

Expected activity/account has been reviewed and any adjustments have been made.

Was expected activity for the client modified in the transaction activity section of the KYC ticket?

No

Additional Client Information

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

Low (1-10)

Low (1-10)

\$500,001 TO \$1,000,000

\$500,001 TO \$1,000,000

Expected Activity Levels

Anticipated Dollar Amount Totals

per Month

Low (1-10)

Low (1-10)

Low (1-10)

Low (1-10)

<\$10,000

<\$10,000

\$50,001 TO \$100,000

\$50,001 TO \$100,000

Expected Activity Levels

Anticipated Dollar Amount Totals

per Month

Darren Indyke is the attorney for our client, Jeffrey Epstein. Mr. Indyke is opening an IRA with JPMorgan.

Darren has been licensed to practice law in NY since 1992.

Practice Areas International Law; Corporate Law; Tax Law; Securities Law; Litigation

University Colgate University, B.A.

Law School Cornell University, J.D.

Comment History

Stage Name

Market Manager Approval

MM/Banker Comments

Market Manager Approval

Creation Date

Entered By

11/11/2013 12:57 PM

11/19/2013 09:01 AM

11/19/2013 10:37 AM

JOHN R DUFFY

WILLIAM M SHERIDAN

JOHN R DUFFY

Comment Preview

Is Jeffrey Darren's only client?

Per response from Justin

Nelson (11/12) to the best of our knowledge Darren only works for JE.

Approved to facilitate exit contemporaneously with JE

Approval History

Stage Name

Banker Attestation

Market Manager

Approval

Market Manager

Approval

CEO Approval

Signoff Date

10/10/2013 09:34

AM

11/11/2013 12:57

PM

11/19/2013 10:37

AM

11/24/2013 07:27

PM

DF#@T15#7@1

Owner SID

U095563

U093971

U093971

U093971

Owner Name

WILLIAM M SHERIDAN

JOHN R DUFFY

JOHN R DUFFY

JOHN R DUFFY