

EXHIBIT 162

From: mary.c.casey@jpmorgan.com
To: bonnie.k.perry@jpmorgan.com <bonnie.k.perry@jpmorgan.com>
Sent: 10/24/2006 3:18:32 PM
Subject: Re: Question on BACs
Attachments: pic11224.gif; pic15748.gif

Thanks!

Mary Casey
Managing Director
JPMorgan Private Bank
345 Park Ave.
New York, NY 10154
tel: (212) 464-0374
fax: (212) 464-1912

IRS Circular 230 Disclosure:

JPMorgan Chase & Co. and its affiliates do not provide tax advice. Accordingly, any discussion of U.S. tax matters contained herein (including any attachments) is not intended or written to be used, and cannot be used, in connection with the promotion, marketing or recommendation by anyone unaffiliated with JPMorgan Chase & Co. of any of the matters addressed herein or for the purpose of avoiding U.S. tax-related penalties.

* The Private Bank Risk Management and Control Group - Tel 713-216-5136 Fax 713-216-6984

The Private Bank Risk Management and Control Group - Tel 713-216-5136 Fax 713-216-6984

Bonnie K Perry To: Mary C Casey/JPMCHASE@JPMCHASE
cc:
Subject: Re: Question on BACs
10/24/2006
10:17 AM

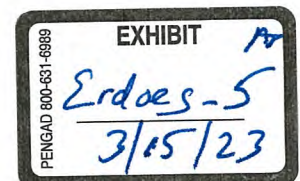
Mary -

The only time BAC has any impact is at the inception of the client. We were having problems with the DDR in that when clients were being reassigned to other bankers with multiple BACs to choose from, the system would just leave the BAC area blank. If the banker needed to update the DDR, they were unable to do so if the BAC area was blank. We decided that since the BAC area has no impact at any other time except upon the establishment of the client, we would allow the system to just default to the first BAC of the receiving banker so that area would not be blank and would not cause any problems when the banker needed to update the DDR.

Hope that adequately answers your question :o)

Regards,

Bonnie
* Mary C Casey/JPMCHASE



Mary C
Casey/JPMCHASE

ToBonnie K Perry/JPMCHASE@JPMCHASE
cc
SubjectQuestion on BACs

10/24/2006 07:53 AM

Hi Bonnie,

I had to reference the below DDR yesterday and I noted that the Banker BAC as noted below is incorrect. I was on Financial Markets, not Business Owners, when this DDR was approved. Does that impact anything? Of course, I have since moved to EMEA so my current BAC is different as well although Mr. Epstein remains my client.

I would appreciate your thoughts,

Mary

Mary Casey
Managing Director
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----- Forwarded by Mary C Casey/JPMCHASE on 10/24/2006 08:48 AM -----

USCG Due Diligence Report - Individual



DDR Name: Jeffrey Epstein ~
DDR Status: Process Completed

Fields marked with * are required

Banker Information

*	Banker:		Mary C Casey/JPMCHASE R
	LE/OU:		99/31167
	Banker SID:		U043917
	Banker BAC:		8631--BUSINESS OWNERS II

Banker FNEN:	01
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Banker History:

07/28/2006 11:00:04 PM - CRD / Notrix changed: Banker from Jeffrey M Matusow/JPMCHASE to Mary C Casey/JPMCHASE.
07/15/2006 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 Jeffrey M Matusow/JPMCHASE to Robert Baynard/JPMCHASE.
06/24/2006 11:00:45 PM - CRD / Notrix changed: Banker from Mary C Casey/JPMCHASE to Jeffrey M Matusow/JPMCHASE.
01/19/2006 11:00:30 PM - CRD / Notrix changed: Banker from Mary Rieth/JPMCHASE to Mary C Casey/JPMCHASE.
04/22/2005 10:10:28 PM - CRD / Notrix changed: Banker GID from 00000043917 to U043917.




DM ID Link Information


The DM for this DDR is DM Name -JEFFREY E. EPSTEIN CAS ID - 9710670708.
The following DDR's are associated with this Decision Maker .








DDR Name, Banker listed on DDR, and Security Services Search Date if applicable






Family Interests, LP - Casey, Mary C - 03/12/2003
Maxwell, Ghislaine - Casey, Mary C - 03/31/2005
New York Strategy Group, LLC - Casey, Mary C - 04/16/2003
The C.O.U.Q. Foundation, Inc. - Casey, Mary C - 01/28/2004
[REDACTED] - Casey, Mary C - 02/08/2004
[REDACTED] - Casey, Mary C - 02/08/2004
EMMCAC, LLC - Casey, Mary C - 08/06/2004
FORUMS, LLC - Casey, Mary C - 10/20/2005
Indyke Holdings, LLC - Casey, Mary C - 09/12/2005
LYN & JOJO LLC - Casey, Mary C - 07/31/2006
YHS, LLC - Casey, Mary C - 09/22/2006
Ranch Lake III, Inc. - Casey, Mary C - 10/04/2006
Ranch Lake II, Inc. - Casey, Mary C - 10/04/2006
Health & Science Interest II - Casey, Mary C
Health & Science Interests II Trust - Casey, Mary C
International Charitable Interest II - Casey, Mary C
Financial Trust Company, Inc. - Casey, Mary C - 05/21/2003
Financial Trust Company, Inc. - Casey, Mary C - 08/11/1999
Epstein, Jeffrey - Casey, Mary C - 05/21/2003

Name/Contact Information






	Only Select "New Client" if this entity will be a PCN.	
	Is this DDR being used for multiple entities?	
	Last Name:	Epstein

	First Name:	Jeffrey
	Middle Name/Initial:	
	Previous Last Name(s):	
	Title:	
	Business Name:	J. Epstein & Co. (To Record Individual's Ownership Or Employer)

	Addresses	Primary Address (Legal address on account)	Business Address (Other than Primary Address)
	Name:	Jeffrey Epstein	
	Attention:		
	Address Line 1:		
	Address Line 2:		
	City:		
	State:		
	Province:		
	Postal/Zip Code:		
	Country:		UNITED STATES

	Legal Entity:	Individual / Joint
	Industry Code:	
	Citizenship:	USA
	Date of Birth:	 (Use 4-digit year)
	Gender:	
	Tax ID # :	 Remember to collect W-8's or other applicable tax forms for each jurisdiction.
	Passport/Drivers License #:	
	Home Phone:	()-

Introduction Information

	Introduction Type:	Other
	Specific Information:	Jeffrey Epstein is an existing client. (Please identify Client, Type of Account etc.)
	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. N/A	
	What form of goverment issued identification document did you obtain for the files?	

Financial Information

	Occupation, Business or Employer of the Client:		Money manager
	Net Worth of Client:		\$ 300 (USD millions) (Please enter a value greater than 0 & less than 10,000 (\$10 billion USD) for Net Worth)
	Documentation/ Information obtained to confirm stated net worth of the Client:		accounts held at JPM, knowledge of ownership of certain assets, and public articles (Please indicate all that apply: financial statements, directory, magazine, tax returns)
	Source Of Wealth:		Earned
	Please Describe:		Epstein has made his wealth managing money for wealthy individuals Please be explicit, e.g. if inherited, specify the original source of wealth. If the client is an entrepreneur, indicate the name of the business (es) and describe with detail the client's business(es) (nature of business, number of employees, assets, estimated revenues, listed or not, etc.).

Transaction Profile/Expected Account Activity
--

	What is the purpose/intended use of this account? (Describe why the account is being opened?)																				
	Please check the types of account and expected activity for this legal entity (inflows and outflows of securities and cash) - check ALL that apply: <table border="1"> <thead> <tr> <th><u>Account</u></th> <th></th> <th><u>Activity Level:</u> Low (1-5 transactions/month) Medium (6-12 trs/month) High (over 12 trs/month)</th> </tr> </thead> <tbody> <tr> <td>DDA/MMIA:</td> <td></td> <td></td> </tr> <tr> <td>SDI:</td> <td></td> <td></td> </tr> <tr> <td>Investment Management:</td> <td></td> <td></td> </tr> <tr> <td>Funds:</td> <td></td> <td></td> </tr> <tr> <td>Other:</td> <td></td> <td></td> </tr> </tbody> </table>			<u>Account</u>		<u>Activity Level:</u> Low (1-5 transactions/month) Medium (6-12 trs/month) High (over 12 trs/month)	DDA/MMIA:			SDI:			Investment Management:			Funds:			Other:		
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DDA/MMIA:																					
SDI:																					
Investment Management:																					
Funds:																					
Other:																					
	Transaction Profile/Expected Account Activity What are the expected sources of inflows and destinations of transfers, countries and types of payors or payees? Where is the money coming from? For Example, a bank. Epstein has a checking account in personal name and a large trading account for his company, Financial Trust Company LLC.																				

Required Security Services Checks
--

	Security Search Type:	Full
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:

Jeffrey Epstein was fully research in New York, Florida and available international databases only.

J. Epstein & Co. was searched through derogatory news reports and regulatory sanctions only.

Please Note: Research has revealed Jeffrey Epstein to have used the name Jeff Epstein and Jerrery Epstein. Research was conducted on all variations.

Investigation indicates Jeffrey Epstein to have affiliations in California and Colorado. Records in these states were not searched. Please note, research in these states may reveal company affiliation records, civil suits, state court records and criminal history. This research can be completed upon request of the client advisor. These searches require additional time (two business weeks) and cost.

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

Attachment:

[attachment "210203b.doc" deleted by Bonnie K Perry/JPMCHASE]

<u>Search Type</u>	<u>Is Further Review by Banker Required?</u>	<u>Security Service Details:</u>	<u>Banker Response:</u>
Company Information	Yes	Reference the attached Word document (pages 2-11) to view the Company records for Jeffrey Epstein and Jeffrey E Epstein.	Company information is in accordance with discussions with client.
Corporate Records	Yes	Reference the attached Word document (pages 12-22) to view the Corporate records for Jeffrey Epstein, Jeffrey E Epstein and Jeff Epstein.	Same as above.
Other Database Searches (RDC/CDC/MIS)			
Civil Court Action	Yes	Reference the attached Word document (pages 23-25) to view the Civil Suit records for Jeffrey Epstein and Jeffrey E Epstein.	Civil Suits are not significant in size and are over 8 years old.
Federal & State Court Action	Yes	Reference the attached Word document (page 26) to view the Federal/State record for Jeffrey E Epstein. Cannot confirm this is our subject.	This suit was filed within the past 12 months and limited information is given in the report. It is unclear as to what the suit pertains, other than it is contractual, has no demand amount, and cites 'personal injury -- auto negligence'. I have no reason at this time to assume that the civil action is significant.
Personal Particulars	Yes	Social security number [REDACTED] was issued to Jeffrey E Pres Epstein in New	Satisfactory.

		<p>York. Date of birth is listed as [REDACTED]. Last reported address used by Jeffrey E Epstein was [REDACTED]</p> <p>Mr. Epstein has had previous addresses in California and Colorado.</p> <p>Jeffrey E Epstein possesses a Florida Driver License.</p> <p>See attached word document. (27-37)</p>	
Publications	No	<p>Nothing derogatory was found.</p> <p>Please note: Due to the commonality of the name "Jeffrey Epstein" research was conducted using identifiers given or found, middle initial/name and derogatory terms.</p>	
Regulatory Sanctions	Yes	<p>According to the NFA, Jeffrey E Epstein is a member. His NFA ID Number is listed as 0078035. There are no Regulatory Actions, NFA Arbitration Awards, or CFTC Reparations Cases against this individual.</p>	Satisfactory.
OFAC/ Control List Search			
Signed by:	Vanessa A Budhu		
Dated:	05/21/2003 10:25:41 AM		

Individual Checks

If A Background Check Has Been Carried Out, Then Both The Date Of The Check And Comments From The Findings Of That Check Are Required.

At least one Background Check needs to be performed OUTSIDE THE MORGAN NETWORK (Third Party Validation).

If Security Services will check this DDR, you NEED NOT obtain a Lexis Nexis or D&B report.



<u>Background Check</u>	<u>Date (Required If Check Carried Out)</u>	<u>Comments (Required If Check Carried Out)</u>
	05/12/2003	Jeffrey Epstein is an existing client and has been trading foreign exchange with the firm for 7 years. He manages money for high net worth individuals, specifically [REDACTED] [REDACTED] was a JPM client and then

retained Epstein as his advisor.



Epstein is well known to many JPM employees. The purpose of this DDR is to refresh our due diligence on Mr. Epstein as we are going to be increasing his credit exposure to do additional foreign exchange trading with his personal trading vehicle.

Summary





Please state your conclusions regarding the principal's background, reputation, and character. Include your rationale for doing business with this entity, and other information important to understanding client or ownership structure of assets


	Summary Of Findings:	Jeffrey Epstein, through the trading of his accounts and that of [REDACTED] generates one of the largest annual revenue flows of private clients in the private bank. As we seek to increase our business with him, we are refreshing our due diligence on him and his company, Financial Trust Company.
	Anticipated Product(s)	Deposits; SDI

Number Assignments

	Standalone Entity?	<i>If this legal entity is or will be a Client (PCN) or Prospect answer YES. If this legal entity is or will be part of an Existing PCN relationship answer NO.</i>
	If "No" above, then indicate the Client (PCN):	1405152
	Ultimate Customer Number (UCN):	9710670708
	Optionally, you may indicate the Affiliation Number:	
	SPN Required?	1405152
	SPN#:	
	CAS ID:	9710670708

Approval Information

	Public/High Profile Figure	No	
		<= Click for examples	
	Click to bring up the Private Bank's Public & High Profile Figures procedures -- >		
	High Risk Jurisdiction	No	
		<= Click for examples	
	Click to bring up the Private Bank's High Risk Jurisdictions and Business procedures -- >		
	Click to Open Up the FATF and FINCEN advisory countries --- >		

	High Risk Business	No		
<= Click for examples				
Banker:	Mary C Casey/JPMCHASE			
LE/OU:	99/31167			
Senior Manager:	Tad C Smith			
Annual / Periodic Review Information				
Annual/Periodic Review Due in:		36 months		
Periodic Review Comments :				

Banker Approval Information

Based on my due diligence and the information provided , I approve the acceptance of *Jeffrey Epstein* ~ as a Client.

Mary Rieth 05/28/2003 08:34:02 AM

Senior Manager Approval Information

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

Tad C Smith 05/28/2003 09:04:04 AM

Document History

Created: 05/12/2003

By: Mary Rieth

Last Modified: 05/28/2003 09:04:09 AM

By: Tad C Smith

Submitted: 05/14/2003

By: Mary Rieth

Audit History

Converted Tracking Document History:

1. Client Manager Approval by: Mary Rieth on 05/28/2003 08:34:02 AM.
2. Senior Manager Approval by: Tad C Smith on 05/28/2003 09:04:12 AM.
3. Awaiting Security Services Research by: Mary Rieth on 05/14/2003 11:15:48 AM.
4. Security Services Sign-Off by: Vanessa A Budhu on 05/21/2003 10:25:48 AM.