

EXHIBIT 112

Ticket#	104537517	Account#	Initiated Date	02/09/2013 10:43 AM
Client Name	JEFFREY E EPSTEIN	Account Title	Initiator	JUSTIN D NELSON
ECI	9710670708	Account Type	Initiating Team	PB FRONT OFFICE
LOB	PB			

Verify & Confirm for Jeffrey Epstein

Final Risk Rating	High
Initial Risk Rating	Standard
GCS Report Requested	Full
Presence of Potential High Risk Indicators	Yes
Reason for Adjustment	Convicted Felon
Comments	
Summary of Risk Attributes	Per bank policy, felons are considered high risk and require additional approval.
Please summarize any material changes which have occurred with the client within the past 12 months:	The account still has yearly monitoring as the client is sensitive.

Risk Updated History

Creation Date	Entered by	Updated Risk	Previous Risk	Comment
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GCS Grid

Search Type	Security Service Details	Further Review Required
Company Information	No additional research necessary.	No
Corporate Records	No additional research necessary.	No
Other Database Searches (RDC/MIS/Factiva)	No additional research necessary.	No
Internal Database Search (CSSS/FPS)	Internal database search revealed prior GS&I research for The Financial Trust Company & J Epstein and Co and nothing derogatory to report. Internal database search revealed prior GS&I research for Jeffrey Edward Epstein and the following derogatory information was reported: Several newspaper articles were found that detail the indictment of Jeffrey Epstein in Florida on felony charges of soliciting underage prostitutes. Jeffrey Epstein served 13 months in jail. Numerous articles detail various law enforcement agencies investigating Jeffrey Epstein for allegedly participating in child trafficking and molesting underage girls. Jeffrey Epstein is required to register as a sex offender. Jeffrey Epstein has settled a dozen civil lawsuits out of court from his victims regarding solicitation for an undisclosed amount.	Yes
State Court Searches	No additional research necessary.	No
Federal Court Searches	No additional research necessary.	No
Personal Particulars	No additional research necessary.	No
Publications	No additional research necessary.	No
Regulatory Sanctions	No additional research necessary.	No
OFAC/Control List Search	No additional research necessary.	No
Negative or Inconsistent Information		Yes

GCS Red Dot

Has this been identified as Red Dot KYC?	Yes
Red Dot (Derogatory Information) Identified	
Security Service Details (Include KYC names in which this was previously reported, if any.)	
Red Dot Information	
Negative Information Found	Yes

EXHIBIT

17

3/29/23

tabbles

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.	Yes
Please state your rationale for conducting business with this client	Jeffrey Epstein has been an active trading client and keeps most of his liquidity with us. Total assets over \$100MM. Both Mary Erdoes and John Duffy are aware of the relationship.
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	Senior management is aware of the relationship with Jeffrey.
Comments	

Primary Information

Client Type	Individual	Generation	
Client Status	Client	Active Indicator	Yes
Front Office Restricted?	Normal	Marital Status	Single
Confidential Names?	No		
Country of Primary Domicile	UNITED STATES	Primary Domicile State	New York
Prefix/Title		Insider Code (Reg. O)	
First Name	Jeffrey	Full Name	Jeffrey E Epstein
Middle Name	E	Gender	Male
Last Name	Epstein	Date of Birth	
Suffix		Primary Country of Assets	UNITED STATES
PreviousName/MMN/Alias			
Citizenship	UNITED STATES		
Employer Name	Self	High Risk Jurisdiction	No
Occupation	Entrepreneur	Industry Code (NAIC)	Individuals [999940]
Years at Occupation	0	Secondary Industry Code (NAIC)	Personal Investment Companies [525997]

Address(es)

Type	Notes	Address	City, State, Postal Code	Country	Tools	Entered by	Date of Update	Preferred
☒ Legal		6100 RED HOOK QTRS STE B3	ST THOMAS, 00802	VIRGIN ISLANDS, U.S.	Map It	BATCH	08/03/2012	Yes

Phone(s)/Fax(s)

Type	Notes	Phone Number	Tools	Entered by	Date of Update	Preferred
Home			Verify "Do Not Call" List	BATCH	02/22/2013	Yes
Work			Verify "Do Not Call" List	ROSALIA CRACCHIOLO	05/12/2011	No
Work			Verify "Do Not Call" List	TECS_DATA	05/21/2011	No
Fax			Verify "Do Not Call" List	TECS_DATA	04/30/2011	No
Fax			Verify "Do Not Call" List	TECS_DATA	04/30/2011	No
Work			Verify "Do Not Call" List	SYSTEM	05/12/2011	No
Work			Verify "Do Not Call" List	BATCH	03/08/2013	No
Other			Verify "Do Not Call" List	SYSTEM	03/18/2013	No

Email(s)

Type	Notes	Email	Entered by	Date of Update	Preferred
Other			BATCH	03/16/2013	Yes

Cost Center & Hierarchy

Client Status	Client	Client Type	Individual
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Client Sponsor	JUSTIN D NELSON	New or Existing Client	Existing
Cost Center	002753 - GREENWICH		
Client Service Team	CHBG (DE) 4	Entity Type	Decision Maker
GIO	Paul S Barrett	Portfolio Manager	
Trust Advisor		Investor	

Identification			
Withholding Federal Status	Domestic Certified	Withholding SSN/TIN Certification Date	09/18/2006
		SSN/TIN/EIN	
Form of government issued identification obtained for the files	Drivers License		
Primary Identification Number		Issued By	VIRGIN ISLANDS, U.S.
Date Issued	01/15/2010	Expiration Date	01/20/2015

Introduction and Wealth	
Introduction Type	Existing JPMorgan Client - Inside LOB
Net Worth of client(\$)	500,000,000.00

Additional Party Information	
No additional parties available at this time	

Introduction	
Form of government issued identification obtained for the files ?	Drivers License
Has an employee of JP Morgan Wealth Management met the client in person?	Yes
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
JPMC Network Date	03/12/2013
JPMC Network Comments	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. The purpose of this DDR is to refresh our due diligence on Mr. Epstein. 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 past year as news stories of Jeffrey's past are picked up. No new claims or stories have surfaced recently.

Politically Exposed Person	
Is the client a current or former Senior United States or Non-USA Official / also known as a Politically Exposed Person (PEP), related to a PEP, or closely associated with a PEP?	No

Source of Wealth/Financial Information	
Source of Wealth- Identify the clients source of wealth from the following list of options	Other
Which country(ies) is(are) the Clients primary Source of Wealth or Income derived?	UNITED STATES

Provide detailed and specific information.	Epstein managed money for numerous high net worth families and has been an active investor himself. Epstein began his financial career in 1976 as an options trader at Bear Stearns. He specialized in mathematical models such as the Black-Scholes option-pricing model and later worked in the special products division, advising high net worth clients on tax strategies. In 1980, Epstein became a partner at Bear Stearns. In 1982, Epstein founded his own financial management firm, J. Epstein & Co., managing the assets of clients with more than a billion in net worth. In 1987, Leslie Wexner, founder and chairman of the Columbus, Ohio-based Limited chain of women's clothing stores became a well-known client. In 1996, Epstein changed the name of his firm to The Financial Trust Company and based it in the US Virgin Islands.
Client Net Worth \$	500000000.00
Documentation/Information obtained to confirm stated net worth of Client:	Financial Statements

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.	Long term client of the PB, well known to senior staff and relationship monitored closely with regular reviews. No materials events or developments to note over past twelve months.
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.	Jeffrey Epstein has been a client of the Private Bank for over ten years. Jeffrey's felony offense is well documented and he complete his sentence and probation two years ago. No material developments or issues with client relationship over the past twelve months.
Client known to whom (JPMorgan employees), how well, and how long:	Integrated team, sr. management (see notes). Known for ten years. Regular dialogue with client.
Overall PB/PWM relationship size and type of accounts:	Jeffrey maintains a brokerage trading relationship across multiple entities (>\$100 million) and also maintain numerous checking accounts for personal and business working capital.
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?	No, as of now Jeffrey works with the U.S. Private Bank
When was the last time you met the client? What was the reason for the meeting?	I saw Jeffrey this week with John Duffy. Purpose was to check in and have John reconnect with Jeffrey.
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.).	The only main change is Jeffrey is now a US Virgin Islands resident for tax purposes. He is still a US Citizen.
Cash Activity: Summarize client cash activity during the period reviewed and explain the purpose / use of the funds:	Only major change is that his old entity, Financial Trust, merged into a new entity, Southern Trust, which now holds all of Jeffrey's assets. All assets are 100% owned by Jeffrey.
Wire Activity: Summarize client wire activity during the period reviewed and explain the purpose / use of the funds, including any international/cross border wires:	Nothing unusual.
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?	Yes
Was the nature, value, and volume of actual transaction activity consistent with expected transaction activity?	Yes
Was any unusual or potentially suspicious transaction activity detected?	No
Additional Comments	N/A

Expected Activity		
Deposit Account(s)		
Transaction Types	Expected Activity Levels	Anticipated Dollar Amount Totals per Month
Cash Deposits		
Cash Withdrawals	Low (1-10)	<\$10,000
Check Deposits		
Checks Paid	Low (1-10)	\$50,001 TO \$100,000
Incoming Wires (Domestic)		
Outgoing Wires (Domestic)	Low (1-10)	\$100,001 TO \$500,000
Incoming Wires (International)		
Outgoing Wires (International)		
ACH Deposits		
ACH Payments	Low (1-10)	\$10,000 TO \$50,000
Internal Transfer (Debits/Credits)	Low (1-10)	>\$1,000,000
Asset Purchases/Sales		
What is the initial/ongoing source of funding for the client's Deposit Account(s) ?		
This is a annual review. The account has already been funded. Any ongoing source of funding will be from assets obtained through personal investments and from internal transfer of funds from personal account held at JPMorgan.		
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.		

Operational/household checking accounts and custody account to hold money market funds.
Epstein has a checking account in personal name and a large trading account for his company, Financial Trust Company LLC.
Account is used for maintenance of his various homes and lifestyle expenses. Personal accts. are primarily funded from Mr. Epstein's personal investment entity (which invests mostly in JPM MM Funds).

Checking account is used for personal investments and to pay everyday and monthly expenses.

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.):

Compliance reviews activity regularly.

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

Yes

If modified, explain.

Activity modified to reflect client's current transaction activity.

Client Directed Asset / Brokerage Account(s)

Transaction Types	Expected Activity Levels	Anticipated Dollar Amount Totals per Month
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 Client Directed Asset / Brokerage Account(s) ?

This is an annual review. The account has already been funded. Any ongoing source of funding will be from investment growth and dividends.

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.

The purpose of the account is for investments, trading and wealth accumulation.

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.):

Compliance review activity regularly.

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

Yes

If modified, explain.

The activity was updated to reflect the client's current transaction activity.

Additional Client Information

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

Jeffrey Epstein is an existing client of PB. He is an active brokerage client covered on the GIO desk. Jeff is well known to the integrated team and senior management. Jeffrey Epstein has been a money manager for high net worth individuals, entrepreneur and personal investor. the team has regular discussion with Mr. Epstein and he remains very accessible.

Mr. Epstein is well known to several JPM PB employees.

6-18-10: Mr. Epstein completed serving out his house arrest. We have met regularly with compliance and legal do discuss the relationship and any potential reputational risk concerns. We continue to monitor the situation closely and monitoring the occasional news stories regarding Mr. Epstein and civil lawsuits and monitor closely money movement. Mr. Epstein is managing his own personal wealth.

January 27, 2011 update: A few news stories during 2010 connects Jeffrey Epstein to human trafficking. The coverage team along with Catherine Keating and William Langford all met to discuss the situation and agreed to enhance monitoring and document a discussion with the client. Jes Staley discussed the topic with Jeffrey Epstein who replied there was no truth to the allegations, no evidence and was not expecting any problems. We will continue to monitor the accounts and cash usage closely going forward.

We continue to monitor the relationship closely and no additional stories or allegations have surfaced recently and Jeffrey maintain a professional relationship with the PB and integrated team.

Comment History

Stage Name	Creation Date	Entered By	Comment Preview
There are no comments entered at this time.			

Approval History

Stage Name	Signoff Date	Owner SID	Owner Name
Banker Attestation	04/26/2013 11:04 AM	U008568	JUSTIN D NELSON
Market Manager Approval	05/01/2013 11:53 AM	U117517	TOWNSEND C SMITH

Regional Director Approval	05/01/2013 05:18 PM	U095563	WILLIAM M SHERIDAN
CEO Approval	05/08/2013 10:23 AM	U234588	BONNIE K PERRY