



**Revised\_CLEARED\_Richard D Kahn rdc alert [I]**

**PWMUS AMLKYC** to: Amanda Kirby

11/01/2013 10:54 AM

Sent by: **Michael Vila**

Cc: Jacqueline Lightbody, PWMUS AMLKYC, Janice Franklin

2 attachments



Richard D Kahn rdc alert\_1.pdf



Richard D Kahn rdc alert.pdf

Classification: For internal use only

Hi Amanda -

This is a revision to the below clearance for Mr. Kahn - after further review it appears the below alert dated 9/3/2013 is a false positive. AML Compliance has reviewed an email dated 10/31/2013 that the business received from Mr. Kahn attesting that he has not been bared from NYSA Arca and that he is not the same individual as the alerted party. According to that email, our Mr. Kahn has been working at his company, HBRK Associates Inc for the past 3 years. The alert involves a Richard Kahn who was a limited partner of PennMont Securities, a former broker dealer, NASDAQ OMX PHLX and NYSE Arca member. On February 26, 2013 PennMont was banned from NYSE Arca membership due to various accounting, record keeping, and supervisory control deficiencies. AML Compliance finds these statements made by our Mr. Kahn reasonable evidence, and clears this alert as a false positive.

Please see the email chain attached to this KYC, thanks!

Best, Michael



**Michael Vila**

Team Manager | AML Compliance

Deutsche Bank Securities Inc.  
Asset & Wealth Management  
5022 Gate Parkway, Suite 400, 32256 Jacksonville, USA

Tel. [REDACTED]

Email [REDACTED]

*Passion to Perform*

Amanda Kirby---09/04/2013 11:09:44 AM---Classification: For internal use only Hi, The below RDC alerts do pertain to our client. Richard D

SDNY\_GM\_00065126

From: Amanda Kirby/db/dbcom  
To: [REDACTED]  
Cc: [REDACTED]  
Date: 09/04/2013 11:09 AM  
Subject: Re: Richard D Kahn rdc alert  
[1]

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Classification: For internal use only

Hi,

The below RDC alerts do pertain to our client. Richard D Kahn is the person in question. However, he will not be a client of the bank. We are opening an account for a trust, for which he is a trustee. It does not seem that he would pose any risk (reputational or otherwise) to the bank. Please approve

*(See attached file: Richard D Kahn rdc alert.pdf) (See attached file: Richard D Kahn rdc alert\_1.pdf)*

PWM BIS-Research---09/03/2013 04:32:05 PM---Classification: For internal use only Hello, Attached is an alert for the party mentioned above. PI

From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Date: 09/03/2013 04:32 PM  
Subject: Richard D Kahn rdc alert  
[1]

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Classification: For internal use only

Hello,

Attached is an alert for the party mentioned above. Please note that clearance from compliance is required prior to KYC approval.

Please follow the instructions below:

Forward explanation of whether the alert pertains to your client directly to compliance.

Receive confirmation from compliance that alert can be removed from the queue.

Include copies of all responses along with your KYC.

[attachment "Richard D Kahn rdc alert.pdf" deleted by Amanda Kirby/db/dbcom] [attachment "Richard D

SDNY\_GM\_00065127

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**CONFIDENTIAL**

DB-SDNY-0027952

EFTA\_00175627

EFTA01299284

Kahn rdc alert\_1.pdf" deleted by Amanda Kirby/db/dbcom]

Regards  
Urvashi

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**CONFIDENTIAL**

SDNY\_GM\_00065128

DB-SDNY-0027953  
EFTA\_00175628

EFTA01299285