



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

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Asset & Wealth Management
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Email michael.vila@db.com

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_00065230

From: Amanda Kirby/db/dbcom
To: PWMUS AMLKYC/db/dbcom@DBAMERICAS, Andrea Klingenberg/db/dbcom@DBAMERICAS,
Cc: Urvashi Lavania/db/dbcom@DBAPAC, PWM BIS-Research/db/dbcom@DBAPAC, Paul Morris/db/dbcom@DBAMERICAS
Date: 09/04/2013 11:09 AM
Subject: Re: Richard D Kahn rdc alert
[1]

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: PWM BIS-Research/db/dbcom@DBAPAC
To: Amanda Kirby/db/dbcom@DBAMERICAS,
Cc: PWMUS AMLKYC/db/dbcom@DBAmericas
Date: 09/03/2013 04:32 PM
Subject: Richard D Kahn rdc alert
[1]

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_00065231

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CONFIDENTIAL

DB-SDNY-0028056

EFTA_00175731

EFTA01299322

Kahn rdc alert_1.pdf" deleted by Amanda Kirby/db/dbcom]

Regards
Urvashi

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SDNY_GM_00065232

DB-SDNY-0028057
EFTA_00175732

EFTA01299323