
From: Melisa Venegas [REDACTED]
Sent: 4/7/2014 5:25:59 PM
To: Kimberly Hart [REDACTED]
CC: Armen Brash [REDACTED]; Andrew Gallivan [REDACTED]; Michael S Jacoby [REDACTED]; Michael-J Davis [REDACTED]
Subject: March 2014 AML/KYC Escalation Reports [I]
Attachments: Domestic Coverage_HRIP Meeting Report_Mar 2014.xlsx; Domestic Coverage_Mar 2014_DomesticTempExceptions.xlsx; Domestic Coverage_Mar 2014_ACUWMatChange.xlsx; pic16256.gif; pic29055.gif

Classification: For internal use only

All,

Included below are the the monthly AML/KYC escalation reports for overdue items. Please review and address accordingly.

PLEASE NOTE:

a) For the ACUs prompting material change KYC updates please focus on the rows shaded in yellow. For the records with data NOT shaded, we anticipate AML Compliance to close those manually pending their review. Also, if Column P reads:

- "Need Update" it means that an update/KYC must be completed
- "KYC in Progress" it means that the KYC must be completed
- "AML to close" or "AML to clarify" and Column O reads "Yes", AML

Compliance cannot close out these items because a question (whether the client is a member of the board of a public company) was added to the ACU between the time the FO completed them and now. AML Compliance needs an answer to that question before they can review to determine if the ACU can be closed out without a KYC update.

b) For the HRIP Meeting report:

The High Risk in Person Meeting field in DBForce pulls from the ACU. In order to record that a meeting took place, it needs to be included in an ACU even if the ACU isn't "due" yet. This is the only way to get it off the report. If a client meeting is not possible, you need to work with AML compliance for an exception or extension.

c) For the TempExceptions report:

If the Temporary Exception should be closed, please email us the case #, explanation and resolution so that we can close it.

(See attached file: Domestic Coverage_HRIP Meeting Report_Mar 2014.xlsx)(See attached file: Domestic Coverage_Mar 2014_DomesticTempExceptions.xlsx)(See attached file: Domestic Coverage_Mar 2014_ACUWMatChange.xlsx)

Thank you.

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Melisa Venegas

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