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**From:** Emily Craig [REDACTED]  
**Sent:** 12/4/2018 8:33:28 AM  
**To:** Kimberly Hart [REDACTED]; Thomas Klemm [REDACTED]  
**CC:** Maria Pedulla [REDACTED]; Anna Issel [REDACTED]; Leonhard Mueller [REDACTED]  
**Subject:** RE: CONFIDENTIAL: Organisational alignment of Case Managers and ABR [C]  
**Attachments:** 20181030\_CM\_Scoring\_v6.xlsm

Classification: **Confidential**

Kim,  
Past due KYC's are the responsibility of the ACO.

Once structure/organization is agreed, we will work on defining and publishing our metrics. Currently, we review complexity of cases against rejections and quality of cases, see sample for Case Management attached.

Kind Regards,  
Emily



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**From:** Kimberly Hart  
**Sent:** Monday, December 03, 2018 10:11 PM  
**To:** Thomas Klemm <[REDACTED]>  
**Cc:** Maria Pedulla <[REDACTED]>; Andrea DeMar <[REDACTED]>; Anna Issel <[REDACTED]>; Leonhard Mueller <[REDACTED]>; Emily Craig <[REDACTED]>  
**Subject:** Re: CONFIDENTIAL: Organisational alignment of Case Managers and ABR

Are there KPIs that you can share? My only concern would be if managers are measured on past due KYCs which might incentive them to approve deficient KYCs. It would be prudent to identify controls to prevent this from happening.

Kimberly Hart  
Managing Director | Divisional Control Officer  
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