
From: Sylvia Escobar [REDACTED]
Sent: 4/11/2019 5:05:01 PM
To: Kimberly Hart [REDACTED]
CC: Julie Cataudella [REDACTED]; Karen Cohen [REDACTED]
Subject: SII Closure: MIFID II - Remaining EEA Countries (Excl Germany & UK) / GFMS 90-017/2019 #43 (dbTrack2407699)
Attachments: Finding Owner Closure Pack Template 04.12.2019.docx; EEA Remaining CLients_SII_Evidence_Document.docx

Hi Kim,

As requested, please see attached/below the following documents to support closure of the SII mentioned above:

1. **Closure template**
 - a. Outstanding: add new SII ID for EEA Designated Bankers Team
 - b. File name: Finding Owner Closure Pack Template 04.12.2019
2. **New SII for EEA Designated Bankers Team**
 - a. Drafted and reviewed with Karen. Please see proposed language below in blue.
 - b. I don't have access to raise a new SII in GFMS. Julie and I will raise the new SII tomorrow.

Title: EEA Designated Bankers Team - Implementation

As a result of the changes in the regulatory framework in the European Economic Area (EEA) and the significant number of important relationships across many customer owners a decision was made to reduce the number of customer owners per Sub-GMTs to service existing and new EEA clients.

EEA relationships/accounts must always be the result of Reverse Solicitation (client exclusively initiates the business rather than the other way around) as client facing staff is prohibited from actively solicit or offer any products or services to EEA clients.

This SII is to track the implementation of the EEA Designated Bankers Team to service existing and new EEA clients. Implementation will include:

1. Mgmt to identify EEA designated bankers
2. Sub-GMTs to complete relationship/account transfers
3. Implementation of control framework

Due date: Dec 31, 2019

Rating: Important

3. **Evidence document:** outlines evidence to support closure of the SII
 - a. Julie and I are still working on the evidence but will be ready for tomorrow's meeting with Patrick C at 4:30pm.
 - b. File name: EEA Remaining CLients_SII_Evidence_Document

Let me know if you have any questions.

Regards,
Sylvia



Sylvia Escobar
Vice President

Deutsche Bank Securities Inc.
Wealth Management-Americas
1 South Street, Baltimore, MD21202-3298
[REDACTED]