

Monthly Reverse Solicitation Review

On a monthly basis on or about the 15th of each month, review “inflow” transactions above \$1M from identified EEA accounts (non-Germany) to confirm if appropriate “Cross Border Call Note” is available in dbForce with details of reverse solicitation evidence. If not available, will escalate to BM Team for further research and resolution. (X:\BSOPWM\RIA Surveillance\Reverse Solicitation - Monthly)

1. **Update dbInsight “New EEA Clients (excluding Germany)” list:**
 - a. In dbForce, run and export the report called “BSO New EEA Customers” (Note: no filtering is necessary)
 - b. Compare this list of accounts to the previous month’s file “EEA non-German acct list compare” which is the xls version of dbInsight account list called “New EEA Clients (excluding Germany) list”
 - i. Using vlookup, first identify which accounts/clients need to be added to the dbInsight list (they are on the new list but not on the old list). Then identify which accounts/clients need to be removed (they are on the old list but not on the new list).
 - ii. Add or remove accounts/clients, as appropriate, in the DBInsight list “New EEA Clients (excluding Germany)” list.

2. **Identify appropriate EEA transactions for review:**
 - a. In dbInsight, for the previous month, run the report “EEA Reverse Solicitation”
 - b. Insert a new column A and label “BSO”
 - c. Filter for Transaction Total inflows greater or equal to \$1M
 - d. Further filter columns Transaction Type and Transaction Code for the following:
 - i. Cash Receipt
 - ii. Free Receipt
 - iii. Federal Funds Received
 - iv. Deposits/Other Credits
 - v. ???
 - vi. ???
 - vii. ???
 - e. Highlight identified transactions

3. **Verify that reverse solicitation evidence has been documented in a Cross Border Call Notes:**
 - a. In dbForce, open the customer
 - b. Go to the activity history related list
 - c. Click on the subject of the cross border call note dated approximately the date of the transaction
 - d. Review comments for explanation of reverse solicitation – ensure it is clearly stated that the transaction was not solicited. The note should also include a description of the who/what/where/when.
 - e. Review the “Who initiated contact?” field, ensure it was customer and not DB employee
 - f. If everything is in order, enter comments as such in the BSO column – if escalation is necessary, continue to part 4

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