

again and again despite negative media and other alerts always referring back to Packard/Caruso onboarding decision (even though both had long since left DB).

Potential solutions:

1) Assuming that negative media hits and respective clearances are stored: conduct a fuzzy logic search through all clearance statements looking for phrases such as “as per prior approval”, “based on decision by”, “...”. Any hits to be reviewed by DCO/BI/AFC.

2) Search the KYC files for unusually senior sign off parties for onboarding in AFC and the business - come up with a way to electronically search for key words, such as “exception referral”, “regional AFC Head”, maybe a list of names like prior AFC Heads, Business Heads, COOs.

3) ...?

Speak later,

Wolfram

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