Does 2pm CET work for you (3pm Frankfurt/9am NY)? If yes, I will send invite.

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On Jul 15, 2019, at 2:20 AM, Wolfram Lange <██████████████████> wrote:

Kim, Michael

Looking forward to speaking later today. Early afternoon eg 2pm CET would work best.

Here a couple of thoughts - need refinement and challenge...

Problem statement:
Find client cases where we rely on some prior decision and do not question a 'borderline' client relationship - example Epstein where clearance was given 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