

Do we have BRG approval for this?

This appears to be a cross-jurisdictional adoption from DBSI to DB AG, furthermore, the LRD for the US is 2016 and does not appear to be in the Remediation pipeline?

For Extensions to be approved, AFC UK require:

- i. BRG approval to consider cross-jurisdictional approvals which result in newly booked High Risk clients
- ii. The file to be within NRD date and if not, must be within the Remediation pipeline – of which it appears it is neither

@CDS colleagues,

Please consider the above points, I am happy to further explain on the phone to assist our business colleagues & clients expectations.

@Martin

I will keep you updated on the progress made.

Many thanks all,

<image001.gif>

James Gladwin
AFC Business Advisory
Anti-Financial Crime

DBOI Global Services (UK) Limited
5 Brindley Place, Birmingham, B1 2JB, United Kingdom
Email: [REDACTED]

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From: Martin Zeman

Sent: 08 May 2018 20:27

To: Zack Bunimovich [REDACTED]; AMLUK Reviews [REDACTED]; Jesse-J Cruz [REDACTED]; James Gladwin [REDACTED]

Cc: Kareen Johnson [REDACTED]; Daniel-A Klyashtorny [REDACTED]

Nina Tona [REDACTED]; Xavier Avila [REDACTED]; Davide-A Sferrazza [REDACTED]

Subject: RE: Escalation: ONB-1135648 / LKYCGB-160049 / Southern Financial LLC [I]

Classification: **For internal use only**

James – responding to your questions below. The extension is permanent. Southern Financial LLC trade global macro and are looking to buy CDX IG payer spreads as a hedge for their overall equities and fixed income portfolio they trade with DB. The initial size is around \$100M.

Please call me if you need any more details. This is a priority for our desk. Thank you.

From: Zack Bunimovich

Sent: Tuesday, May 08, 2018 12:24 PM

To: AMLUK Reviews [REDACTED]; Jesse-J Cruz [REDACTED]; James Gladwin [REDACTED]

Cc: Kareen Johnson [REDACTED]; Daniel-A Klyashtorny [REDACTED]