

From: Xavier Avila
Sent: Monday, April 16, 2018 7:44 AM
To: Akash Malhotra <[REDACTED]>
Cc: Shawn Staker <[REDACTED]>; NCAOTC Derivatives <[REDACTED]>; Pankaj-A Chopra <[REDACTED]>; Aika Gopala <[REDACTED]>; Nina Tona <[REDACTED]>; Ian Salters <[REDACTED]>; Mathew Negus <[REDACTED]>; Martin Zeman <[REDACTED]>
Subject: RE: KYC Breach_SOUTHFINANMD_Southern Financial, LLC_FFT Location [I]

Negus, what do we do with the below?
If easy extension to OTC Rates FFT we can provide docs, if not we move this to London where client is onboarded? Thanks

Xavier Avila
Managing Director
Deutsche Bank Securities Inc
[REDACTED]

From: Akash Malhotra <[REDACTED]>
Date: Monday, Apr 16, 2018, 07:54
To: Xavier Avila <[REDACTED]>
Cc: Shawn Staker <[REDACTED]>; NCAOTC Derivatives <[REDACTED]>; Pankaj-A Chopra <[REDACTED]>; Aika Gopala <[REDACTED]>
Subject: KYC Breach_SOUTHFINANMD_Southern Financial, LLC_FFT Location [I]

Classification: **For internal use only**

Hi Alex,

For adoption location Frankfurt, the following trade has been booked in Summit application for OTC Derivative Product, details as follows:

Trade ID: G175714L
Summit Code: SOUTHFINANMD
Date of Trade: 13/04/2018
Client Name: Southern Financial, LLC

We have got your name as a sales person from Summit application.

We have observed that the client is not adopted for Frankfurt location, which results in a KYC violation. In order to comply with DB's internal policies and procedures, all KYC requirements now have to be fulfilled, if the trade should stand against Deutsche Bank

Kindly review your trade and where possible, please consider to rebook the trade to an adoption location, where the client is already adopted for OTC Derivative product or confirm if it is a valid trade for the particular location.
Upon your confirmation, we will review the client and would request the missing documents to be obtained from the client/business as per Frankfurt location guidelines.

Summit screenshot: Trade Details

Trade Type	Trade ID	Version	SubType	Amended	Status	Book	Broker	Currency	Currency pair	Collateral	Company	Customer
SWAP	G175714L	5	CCYSWAP	13/04/2018	Verified	LAG_SWAPS		USD,EUR		N	DB_AG	SOUTHFINANMD