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**From:** Xavier Avila  
**Sent:** Monday, June 04, 2018 1:04 PM  
**To:** Funda Bozkurt <[REDACTED]>  
**Cc:** Ian Salters <[REDACTED]>; Zbynek Kozelsky <[REDACTED]>; Nina Tona <[REDACTED]>  
**Subject:** RE: NCA's Completed in May/Update [I]

MY ANSWERS IN GREEN BELOW...AVAILABLE TO TALK WHENEVER YOU CAN.

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**From:** Funda Bozkurt  
**Sent:** Monday, June 04, 2018 12:11 PM  
**To:** Xavier Avila <[REDACTED]>  
**Cc:** Ian Salters <[REDACTED]>; Zbynek Kozelsky <[REDACTED]>; Nina Tona <[REDACTED]>  
**Subject:** RE: NCA's Completed in May/Update [I]

Xavi,  
See my comments in CAPS. Let's discuss later in the week.  
Thanks,

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Funda Bozkurt

Deutsche Bank Trust Company Americas.  
WM-Divisional Control Office  
345 Park Avenue, 10154-0004 New York, NY, USA  
Email [REDACTED]

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**From:** Xavier Avila  
**Sent:** Friday, June 01, 2018 6:27 PM  
**To:** Funda Bozkurt <[REDACTED]>  
**Cc:** Ian Salter <[REDACTED]>; Zbynek Kozelsky <[REDACTED]>; Nina Tona <[REDACTED]>  
**Subject:** RE: NCA's Completed in May/Update [I]

**Simplified Definitions**

PIC Accounts Both OTC and Cash Accounts in GM where KCP is ACO and there is no WM KYC  
WM OTC Accounts WM KYCed Accounts that have been adopted for WM OTC Derivatives, typically FX Fwds/Options (RMS) and Vanilla USD Swaps (Summit) only. Used to be under WM Umbrella but now they are direct dbCAR Adoptions

I was just looking at the list below. What does business outreach mean? Is this ACO? If yes, I thought we said MD only. **Just the person in KCP that is responsible to follow up, not ACO. ACOs are only MDs Dan, Xavi, Tazia, but Dan and I discussed and we feel that when it comes to the "PIC" Sales&Trading accounts (not GM Lending relationships), the ACO should generally be only Xavi. PLS EXPLAIN THE FOLLOW UP. WHAT DOES THIS FUNCTION ENTAIL? LET ME KNOW IF I NEED TO FIGURE THIS OUT WITH GM. THIS IS JUST THE PERSON THAT NEEDS TO HELP FOLLOW UP, GETTING THE DOCS ETC, NOTHING LEGAL OR FORMAL, SO I DON'T THINK THERE IS ANYTHING TO CLARIFY WITH GM HERE. WE CAN TAKE THAT OUT OF THE EMAIL IF IT CREATES NOISE, AT END OF THE DAY, THE ONLY IMPORTANT THINGS IS THAT I AM GM ACO OF THE PIC GM ACCOUNTS.**

And why is Southern Financial a PIC client? Didn't we onboard them on to WM?

Well, things get tricky and blurred here. SF has been treated as a Pershing and WM OTC Account until we started extending GM relationships to products beyond FX Options (RMS) and OTC Rates (Summit), namely we onboarded them now to Global Credit Derivatives and GED (OTC Equities).NO BLURRED LINES PLS. IF WE NEED TO INCORPORATE OTHER PRODUCTS TYPES, LETS START THE CONVERSATIONS WITH LEGAL TEAMS TO UPDATE THE SLA TO INCLUDE