

Case # 131749

ANDREWS R WALKER account# [REDACTED] exceeded the Outgoing amount for the month of January 2016. The Outgoing amount exceeded \$334,989.74. The Incoming activity was reviewed below:

Comment [TM1]: Specify alerted transaction count

Incoming wire was received on 1/8/2016 from the client's account# [REDACTED] at PERSHING in the amount of \$43,200.00.

Comment [TM2]: How many INCOMING transactions?

Incoming deposit check was received on 1/13/2016 from JP ACQUISITION III LP (BANK OF AMERICA) in the amount of \$940.48. They specialize in buyout investments. (<http://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapId=3483689>) The check details stated "Final distrib from liquidation of partnership".

Incoming pre-authorized credit was received on 1/28/2016 in the amount of \$930.40. The transaction details stated "XXSOC SEC SSA TREAS 310" indicating this was a social security payment.

A sample of the Outgoing activity of highest dollar amount was reviewed below:

Comment [TM3]: How many OUTGOING transactions?

Outgoing check was sent 1/6/2016 to JTW LLC WIRTH and CO CUSTOM BUILDERS (DEUTSCHE BANK TRUST CO. AMERICAS) in the amount of \$269,471.06. They are construction/custom builders. (<http://www.wirthandco.com/contact/>) The check details stated "Final/80 MW renovations".

Outgoing pre-authorized debit was sent 1/8/2016 to AMERICAN EXPRESS in the amount of \$25,960.93. They are a credit card company. (www.amex.com) The transaction details stated "ACH PMT AMEX EPayment".

Outgoing wires were sent on 1/5/2016 and 1/26/2016 to the client's external account at WELLS FARGO in the amount of \$13,547.50. The wire details stated "TO WELLS FARGO A/C [REDACTED] ANDREW S R WALKER"

Comment [TM4]: Reference Standing Instruction on file See STANDING INSTRUCTION #1143

Outgoing check was sent 1/27/2016 to the client's external account at CHASE in the amount of \$3,750.00. The check details stated the payment was for "CHASE"

Outgoing check was sent 1/9/2016 to VCFA GROUP in the amount of \$3,096.77. They are a venture capital investment company. (<http://www.vcfa.com/about.html>) The check details stated the payment was for "Office rent/ 01/16"

Outgoing pre-authorized debit was sent 1/5/2016 to CHUBB & SON in the amount of \$2,563.84. This appears to be an insurance company. (<http://www.chubb.com/corporate/chubb11887.html>) The transaction details stated "PAYMENT CHUBB & SON".

Per KYC (paper form), Mr. Walker inherited from his mother, Lucie Andrews Walker, a daughter of Julia DuPont. Julia DuPont was one of 5 daughters of Eugene DuPont, the last senior managing partner of DuPont before it incorporated in 1902. When that happened, he became the first president of the company. ARW Design and Moongate Corp. are funded by Mr. Walker.

The account activity does not appear suspicious as is transferring funds between related accounts owned by them, receiving funds from social security/investments and paying insurance fees, investing funds, and other personal expenses.

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