#							
			subject / client is the UBO.				
7	10/18/2017	Active	Unable to locate a case. DbForce states "Legacy Risk Calculator Review".	Unable to locate a case. DbForce states "Legacy Risk Calculator Review".	Moderate	WM - PB	GA was unable to identify an EDR case raised after the SAR was filed. Additionally, this client remains at a moderate risk rating.
8	11/22/2017	Active	1830090	In Progress (created on 9/21/2017)	High	WM - PB	GA identified a case "in progress" created on 9/21/2017. (Two months before the SAR filing).

- 49 clients with RR due dates greater than 1 year
- 27 moderate risk clients with RR due dates greater than 2 years
- 31 low risk clients with no RR due dates

The all KYCS Risk Rating report was run from DbForce (PB). (Please refer to attachment: **WM_all KYCS – 1st report-_.xlsx**)

Finding #3
- direct owner (99.9%) not included in the ownership chain of the KYC profile
- clients with PEP relationship not escalated to BLAFC – if different from comment listing under Findings #1
- clients with PCR/negative news not escalated to BLAFC for review

Finding #4
- **Specific MI which GA was unable to reconcile/re-perform** (Regarding discrepancy[s] noted across four month of MI reviewed.) GA had provided supporting documentation for this previously, but I have re-attached, with an updated screen shot regarding the discrepancy noted in PEP totals. (Please refer to attachment: **Reporting & Statistics for WM AFC_sent on 04.25.18.docx**)

1.   For the month of April (reported in May) for Private Bank:
a.   GA reviewed the statistics provided in the MRC deck (page 45) and noted: 25 low-risk clients; 20 moderate-risk clients; and 8 high-risk clients. The statistics WM AFC provided the MI team totaled 8 high-risk clients. However, during the walkthrough, GA noted there were 9 high-risk clients on the NCA report from DbForce; not 8 as reflected in the MRC deck.
b.   GA reviewed the statistics in the MRC deck (page 45) and noted: 3 NCAs associated with high-risk jurisdiction; 7 NCAs associated with high-risk industry; 4 NCAs with doubtful / negative information; and 1 NCA treated as a PEP relationship. This results in a total of 15. The statistics WM AFC provided to the MI Team were the same, totaling 15. However, during the walkthrough, GA noted that there were 9 high-risk clients on the NCA report from DbForce; not 15 as reflected in the MRC deck.
c.   GA reviewed the statistics provided in the MRC deck (page 45) and noted, for April 2017: 429 total PEP clients. The statistics WM AFC provided to the MI Team were the same, totaling 429. However, during the walkthrough, GA noted 431 PEP clients as the total.