



- For the Private Bank, new alert parameters in 9.1 have caused significant spike in alerts. For example, repetitive alerts were generating approximately 116 alerts per month. In 9.1 this has spike to approximately 238 per month. Proposal to analyze alerts to consider recalibrating or adding more accounts on the exclude list.
- Recommend changing the review and recalibration schedule to an ongoing process. A set of alerts will be reviewed every 2 months. There are 6 groups of alerts – Cash, Dormant, HubSpoke, Repetitive, High Risk Country, and Velocity.

PCS Actimize Exclude List

- Management approved renewal of accounts to be excluded for non-suspicious and previously investigated patterns of activity on 9/9/2013. All accounts on the exclude list to be reviewed when Clarissa Delafuente has returned from her maternity leave.

Risk Assessments

- DBTCA and 345 Park Risk Assessments were completed prior to Clarissa Delafuente's maternity leave. Reports were reviewed and approved by Compliance management and internal audit and submitted to the Fed.

Backlog

- Due to staffing issues (medical and maternity leaves), training of new personnel, and additional responsibilities distributed amongst team members, there is a backlog of cases and alerts in both Prime and Actimize systems.

Procedure Changes

- CTR procedures have been updated to include enhancements to the log, notification emails being sent to group mailbox, and weekly checks to ensure timely filing of CTRs.
- Removed statement regarding sampling of Actimize alerts. All alerts are reviewed unless one was generated even after an account was placed on the exclude/white list.

Training

- On November 13, 2014 Yang Chen provided additional CTR training to the Branch.
- Yang Chen visited the Jacksonville office between 11/18/2013 – 11/20/2013 to provide in person training to Michelle Gabriel and Tammy MacFadden

Other

- Clarissa Delafuente on maternity leave from September 2013 to January 2014.
- Michelle Gabriel on medical leave from 10/25/13 to 11/13/13. Upon return she worked half day for a week. She was back full time on 11/18/13. During this time, none of her work was reassigned and new work continued to be assigned to her.