March 9, 2018 report:

NCA Qtrly Report
Oct 2017.xlsx

For Brokerage (slide 146)

GA was unclear as to whether the "Key Risk Drivers for High Risk NCAs" and "August Key Risk Drivers for High risk NCAs" were intended to be duplicates. In previous month(s), the total were different in both charts. There is a discrepancy in the breakdown between the two charts. Neither population breakdown reconciles against the source report, PershingAccountsWithAmlRiskDesignation, which reflects
- four (4), not three (3), key risk drivers, as follows:

- A04 (locally / divisionally defined high risk countries),
- B11 (healthcare and pharmaceutical),
- B13 (locally / divisionally defined risk industries),
- and C02 (doubtful reputation/negative information).

Further, one chart reflects a total of 5 NCAs across 3 key risk drivers, and the other chart reflects 9 NCAs across 3 risk drivers. However, per PershingAccountsWithAmlRiskDesignation report, there are only 3 NCAs.

Please see below the Pershing report WM AFC provided to GA:

PershingAccounts
WithAmlRiskDesign.