Appendix B – TALF Assessment

1.1 Monthly Term Asset-Backed Securities Loan Facility AML/NCA File Assessment - Overview

The DBUS AML Compliance Unit ("AML Unit") will conduct *Monthly AML/NCA TALF Borrower File Review Assessments* ("File Review") on five (5) randomly selected new client adoptions files affected by Global Markets (GM) to evaluate the adequacy of the AML aspects of the new client adoption process for TALF borrowers. This File Assessment is designed to assess the AML controls of TALF related new client adoption processes instituted by Global Markets as well as escalation processes for high risk accounts and Specified Borrowers as defined by DBUS AML Policy and the *Term Asset-Backed Securities Loan Facility ("TALF") Requests Desktop Procedure (CAG)*.

The File Review will focus on the functional aspects of the required new client adoption processes surrounding AML compliance including, Customer Identification Program elements (Notification, Identification, Verification, Retention) as well as verification documentation, as appropriate. The File Review will also include a qualitative review of PCR and RDC alerts (if any) and the decisioning around escalation processes as defined within DBUS policy. Elements specific to TALF (controlling person details, collection of ownership information, etc) will also be reviewed.

As part of the File Review, the AML Unit will take into consideration DBUS AML policy, TALF Borrower procedure, applicable USA PATRIOT Act provisions (Section 326) as well as regulations and guidance administered by applicable Self Regulatory Organizations (i.e. NYSE, NASD) and the Federal Reserve.

2.1 File Review Procedures –

Step 1 – Communication to Management
The AML Unit will notify TMG-QA and CAG (via e-mail or other communication) that a File Review will be executed on AML aspects of new client adoption for the previous month.

Step 2 - Obtain a list of TALF borrower new client adoptions for previous Quarter
The AML Unit will send a request to CAG for a list of all new TALF Borrowers adopted in the previous month for Global Markets. (e.g., July 2009 File Review includes new client adoptions executed in June 2009.)

Step 3 - Random selection of files
Upon receipt of the new client adoption list, the AML Unit will select five (5) new client adoptions from the list of adopted TALF borrowers. One (1) out of every three (3) adoptions from the list provided by CAG will be selected to a maximum of five (5) to be reviewed for a given calendar month.

Step 4 - Review of TALF Borrower Files
The AML Unit will review CRMdocs for the selected files; if the files are missing in CRMdocs, a request will be sent via e-mail to TMG-QA/CAG for hard copies of the files. A member of the AML Unit will review each file taking into account the below related File Review elements.

Step 5 - File Review elements
The AML Unit will review each file and assess appropriate steps were taken as part of the AML aspects of new client adoption for TALF borrowers. Items that will be reviewed are:

1) Functional aspects of Customer Identification Program requirements
- CIP Notification
- Identification information
- Verification (non-documentary/documentary)
- Retention of documentation/information