



Wealth Management Americas New Business Initiatives December 2018

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BSO Observations

- Insufficient *experienced* supervisory resources in key control groups across 1st and 2nd lines of defense
 - Distinct need for a qualified, experienced 2nd LoD who will respond promptly and knowledgably with reliable insight and engaged solutions
 - Resource evaluation for DCO / BSO / ORM / Legal / Compliance
- Insufficient number of qualified licensed supervisors in a number of areas
 - More supervisors are having to delegate more responsibilities and then losing touch with the details
 - Not all have a solid understanding of the regulatory requirements of their role
- LatAm business increases risks related to complex structures and potential for money laundering

Overview of WM Statistics

Topic	Title		Commentary
1 (Slide 3)	RM: 2018 new hires	13	3 Miami, 3 NY, 3 Geneva, 2 Chicago, 1 LA, 1 San Francisco
2 (Slide 4)	New Clients / New Accounts	1547	235 LatAm; 1312 USO
3 (Slide 5)	Latin America Statistics	235 accounts	High 138, Moderate 56, Low 41
4 (Slide 6)	Miami Statistics	140 accounts	High 61, Moderate 43, Low 36
5 (Slide 7)	Temporary Waivers / Exceptions	51 exceptions	Approved 47; Overdue 1; Upcoming 1 (No Permanent Exceptions)
6 (Slide 8)	Client Acceptance Forum Escalations	2 new clients reviewed	Navarro – Accepted Patronato Benefico Oriental of the US - Rejected
7 (Slide 8)	Complex Structures	2	Aromatiss and Long Term Insured Credit Fund
8 (Slide 10)	Cross Border Training	4 trainings	Connect2Learn: 3 online trainings; 1 training delivered remotely

Relationship Manager - Hiring Statistics

Employee Name / Expected Candidate	GPM ID	Entity	Location	Est Month (Joining / Leaving)
Incremental EXTERNAL Hires				
Teofilo,Roberto	80628011	DBTCNA	Miami	4
Hirsh,Johnathan	80635336	DBTCA	Chicago	6
Sergio Stiglich	80628001	DBTCNA	Miami	8
Reilly,William J	80621808	DBTCNA	Miami	9
Aguiar,Richard Manuel	80621810	DBNTC	L.A.	9
Wendy McMillian	80586534	DBNTC	San Fran	10
Lori Jackson	80155458	DBTCA	NY	11
Santo Vicenzino	80621806	DBTCA	NY	11
DB Internal RM Transfers				
Pablos Rodrigues,Ricardo	80626369	DBSA	Geneva	3
Kiesel,Gregory J	80627017	DBTCA	Chicago	5
Smith,Tazia D	80691725	DBTCA	NY/L.A.	9
WMA Internal RM Transfers				
Ralf Fischer	80628005	DBSA	Geneva	8
von Sandersleben,Wolfgang-Friedrich	80628003	DBSA	Geneva	10

New Clients / New Accounts

Row Labels	High	Low	Moderate	Grand Total
Chicago	1	28	10	39
Geneva	17		6	23
L.A.	12	43	69	124
Miami	61	36	43	140
NY	261	638	292	1191
San Francisco	2	10	18	30
Grand Total	354	755	438	1547

Row Labels	High	Low	Moderate	Grand Total
Latam	138	41	56	235
Americas USO	216	714	382	1312
Grand Total	354	755	438	1547

Latin America Business

Row Labels	High	Low	Moderate	Grand Total
Latam	138	41	56	235
Americas USO	216	714	382	1312
Grand Total	354	755	438	1547

Row Labels	Count of Account Id
Latam	235
Geneva	23
Miami	51
NY	161

Observations:

- Client Risk Program (CRP) issues raised for Venezuelan clientele
 - BIU reports have been ordered to maintain these relationships
- LatAm clientele with domicile (either UBO or POA) in Netherlands
 - DBSI surrendering broker dealer license in Netherlands
- 3 Fraud issues raised in 2018
 - Mons internal fraud identified in 2018
- For the last 2-3 years, LatAm teams have not had appropriately licensed supervisors from a broker dealer perspective

Miami Business

Row Labels	Count of Account Id
Miami	140
Latam	51
Josie Alonso	7
Pascal Landrove	18
Reynaldo Figueredo	25
Sergio Stiglich	1
Americas USO	89
Carolyn Magliaro	25
Oti Roberts	34
Rachel Maglicic	15
Roberto Teofilo	15

Miami	140
High	61
Low	36
Moderate	43

Temporary Waivers and Exceptions

* Refer to Excel file for details:



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Accounts Temp Exceptions

- 1 Temporary Exception Overdue (shown in red)
- 3 Temporary Exceptions Future Due (in yellow) – Jan 2019
- 47 Temporary Exceptions already Approved and Deadline Met (in green)
- 0 Permanent Exceptions

Client Acceptance Forum

- 2 New Clients reviewed in CAF:

CAF Date	Client Name	Client Type	CAF Decision	Banker
3/18/2018	Navarro	Prospect	Accepted	Joanne Jensen
4/11/2018	Patronato Benefico Oriental of the Untied States	Prospect	Rejected	Oti Roberts



Navarro CAF
Memo



Patronato CAF
Memo

Complex Structures

- Two KYC's for entities with complex structures

Customer Number	Customer Name	* Type	Client Since Date	Customer Risk Rating	Customer Owner	Latam?	Relationship	Relationship Customer Number
570587	Aromatiss S.A.S	Organization	4/27/2018	High	Ralf Fischer		BELMONT, F RELATIONSHIP	290654
583987	Long Term Insured Credit Fund LLC	Organization	10/29/2018	Moderate	Stewart Oldfield		ZUECH, CHRIS RELATIONSHIP	583134

- Aromatiss (Global Print and Org Chart)



Global Print Aromatiss



Aromatiss Org Chart

- Long Term Insured Credit Fund (Global Print and LLC LTICF)



Global Print LTICF



LLC LTICF

Cross Border Training

Connect2Learn trainings (provided to all WM employees):

- Anti-Financial Crime - KYC Level 2 Policy Version 3.2 Training for WM Staff
 - Delivered remotely on 4/17/18
- Compliance - Cross Border Risk Management Training
 - Completion due by 12/9/18
- Anti-Financial Crime - Anti-Fraud, Bribery and Corruption
 - Completion due by 12/9/18
- Anti-Financial Crime - Anti-Money Laundering, Counter Terrorist and Proliferation Financing
 - Completion due by 1/28/19

Additional Details: Latin America Strategy Approach

Ongoing strategy review: Our approach to defining the path to growth for DB's WM LatAm business

Developments in recent years have shaped the WM LatAm franchise



Approach to defining the growth strategy for DB WM LatAm

