

Subject: April 2014 AML/KYC Escalation Reports [I]  
From: Melisa Venegas <[REDACTED]>  
Date: Tue, 06 May 2014 13:34:02 -0400  
To: Andrew Gallivan <[REDACTED]>,  
Kimberly Hart <[REDACTED]>,  
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Michael S Jacoby <[REDACTED]>  
Cc: Armen Brash <[REDACTED]>

Classification: For internal use only

All,

Included below are the the monthly AML/KYC escalation reports for overdue items. Please review and address accordingly.

PLEASE NOTE:

1) For the ACUs prompting material change KYC updates please focus on the rows shaded in green. For the records with data NOT shaded, we anticipate AML Compliance to close those manually pending their review.

Also, if Column P reads:

- a) "Need Update" it means that an update/KYC must be completed
- b) "KYC in Progress" it means that the KYC must be completed

2) For the HRIP Meeting report:

The High Risk in Person Meeting field in DBForce pulls from the ACU. In order to record that a meeting took place, it needs to be included in an ACU even if the ACU isn't "due" yet. This is the only way to get it off the report. If a client meeting is not possible, you need to work with AML compliance for an exception or extension.

3) For the TempExceptions report:

If the Temporary Exception should be closed, please email us the case #, explanation and resolution so that we can close it.

(See attached file: Domestic Coverage\_HRIP Meeting Report\_Apr 2014.xlsx) (See attached file: Domestic Coverage\_Apr 2014\_DomesticTempExceptions.xlsx) (See attached file: Domestic Coverage\_Apr 2014\_ACUWMatChange.xlsx)

Thank you.

Best regards,

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