

Subject: RE: Initial thoughts
From: Kimberly Hart <[REDACTED]>
Date: Mon, 15 Jul 2019 07:57:16 -0400
To: Wolfram Lange <[REDACTED]>
Cc: Michael Off <[REDACTED]>, Martina Messing <[REDACTED]>

Classification: For internal use only

So you are free to speak in 5 minutes?

Michael – Are you free?

We can use my dial-in:

Internal Phone and VC Devices: 88088 4542877; Participant PIN: 972783;
External 1 973 631 2000

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All global numbers: <http://shortcut.db.com/VMRnumbers>

{https://brandportal.intranet.db.com/img/modules/-DAWM_logo_metallic_46x46.gif}

Kimberly Hart
Managing Director | Divisional Control Officer

Wealth Management Americas

Deutsche Bank Trust Company Americas
345 Park Avenue, 14th floor, New York, NY 10154
Tel. +1 212 454-2877
Fax +1 646 863-9809
Mobile +1 [REDACTED]
Email [REDACTED]

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From: Wolfram Lange
Sent: Monday, July 15, 2019 7:48 AM
To: Kimberly Hart <[REDACTED]>
Cc: Michael Off <[REDACTED]>; Martina Messing <[REDACTED]>
Subject: Re: Initial thoughts

It is actually 2pm Frankfurt time, ie CET = Frankfurt

Wolfram Lange
Managing Director | Divisional Control Officer

Deutsche Bank Wealth Management
The Zig Zag Building, SW1E 6SQ, London, United Kingdom
Tel. +44 20 754-59487
Mobile [REDACTED]

Email [REDACTED]

On 15 Jul 2019, at 12:06, Kimberly Hart <[REDACTED]> wrote:

Michael -

Does 2pm CET work for you (3pm Frankfurt/9am NY)? If yes, I will send invite.

Kimberly Hart
Managing Director | Divisional Control Officer

Wealth Management Americas

Deutsche Bank Trust Company Americas
345 Park Avenue, New York, NY 10154
Tel. +1 212 454-2877
Fax +1 646 863-9809
Mobile +1 [REDACTED]
Email [REDACTED]

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On Jul 15, 2019, at 2:20 AM, Wolfram Lange <[REDACTED]> wrote:

Kim, Michael

Looking forward to speaking later today. Early afternoon eg 2pm CET would work best.

Here a couple of thoughts - need refinement and challenge...

Problem statement:

Find client cases where we rely on some prior decision and do not question a 'borderline' client relationship - example Epstein where clearance was given again and again despite negative media and other alerts always referring back to Packard/Caruso onboarding decision (even though both had long since left DB).

Potential solutions:

1) Assuming that negative media hits and respective clearances are stored: conduct a fuzzy logic search through all clearance statements looking for phrases such as "as per prior approval", "based on decision by", "...". Any hits to be reviewed by DCO/BI/AFC.

2) Search the KYC files for unusually senior sign off parties for onboarding in AFC and the business - come up with a way to electronically search for key words, such as "exception referral", "regional AFC Head", maybe a list of names like prior AFC Heads, Business Heads, COOs.

3) ...?

Speak later,

Wolfram

Wolfram Lange
Managing Director | Divisional Control Officer

Deutsche Bank Wealth Management
The Zig Zag Building, SW1E 6SQ, London, United Kingdom
Tel. +44 20 754-59487
Mobile [REDACTED]

Email [REDACTED]