

Subject: RE: Cases with negative media risk [C]
From: Emily Craig <[REDACTED]>
Date: Mon, 15 Jul 2019 09:54:00 -0400
To: Kimberly Hart <[REDACTED]>

Classification: Confidential

Correct, no longer used. We have the Client Risk Rating Engine, negative media is a Special Risk Factor which is reviewed by AFC, and if the CRRE gives a M/L, AFC can override the client to High due to that special risk factor.

Kind Regards,
Emily

Emily Craig
Director
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WM Mercury on myDB

From: Kimberly Hart
Sent: Monday, July 15, 2019 9:53 AM
To: Emily Craig <[REDACTED]>
Subject: RE: Cases with negative media risk [C]

Classification: Confidential

I pulled it from one of the risk calculator worksheets – looks like inputs to the risk calculation. Is it no longer used?

<< OLE Object: Picture (Device Independent Bitmap) >>

Kimberly Hart

Managing Director | Divisional Control Officer
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From: Emily Craig
Sent: Monday, July 15, 2019 9:51 AM
To: Kimberly Hart <[REDACTED]>
Subject: RE: Cases with negative media risk [C]

Classification: Confidential

Kim,
Where is this rep risk chart used? I am not familiar with it?

Kind Regards,
Emily

<< OLE Object: Picture (Device Independent Bitmap) >>

Emily Craig
Director
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From: Kimberly Hart
Sent: Monday, July 15, 2019 9:47 AM
To: Emily Craig <[REDACTED]>; Thomas Klemm <[REDACTED]>
Subject: RE: Cases with negative media risk [C]

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I had a chance to brainstorm with Wolfram and Michael Off this morning – and their suggestions were very similar to those offered by Emily.

Review CAF and Rep Risk decisions for WM Americas client onboardings
Review HR clients where “Negative Media” contributed to the high risk rating. How do we review the risk calculations to determine which customers have a risk rating greater than “1” in any of the below Client Reputational Risk categories?

<< OLE Object: Picture (Device Independent Bitmap) >>

Review RDC alerts associated with clients/related parties and the rationales for clearance. Is there a database that contains the records of RDC clearances?

<< OLE Object: Picture (Device Independent Bitmap) >>

Kimberly Hart
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From: Emily Craig
Sent: Saturday, July 13, 2019 1:23 PM
To: Thomas Klemm <[REDACTED]>
Cc: Kimberly Hart <[REDACTED]>
Subject: RE: Cases with negative media risk [C]

Classification: Confidential

RDC does a daily reverse check against all parties and alerts on negative media.

FircoSoft just went live with a daily reverse check for negative media, and Berlin working through the backlog.

On top of that, we want to do a query of any negative media KYC summary comments and try to see where we may have onboarded WITH negative media known?

Attached is a view a query I asked Brian for a few weeks ago. The request I made to him was: << File: Negative Media - Emily Craig.xlsx >>

I need a report of all cases, since beginning of the year, that show a "yes" for negative media, in any of the sections on this topic and corresponding comments/case/client/risk details.

Note from Brian: (Be a little careful with Column R. Excel allows a maximum row height of 409, which isn't enough to view all text for all rows. If you click the cell, you can view the entire text in the formula bar – the first 3,800 characters anyway – that's a limitation that I tried to get around, but can't find a way to do it.)

This is the report we are using to try to determine which data sources provide the most relevant risk data with Barbara.

We could expand this timeframe and do "Key Word" search?

Other initial brainstorm ideas:

Do a review of all CAF/Rep Risk meeting notes as negative media as you describe, known at time of a KYC, could have been escalated by AFC to require a CAF/Rep Risk?

Review any CRRE result L/M where client ended up H risk rating (would be due to a Special Risk Factor, like Negative Media)

Our biggest risk/unknowns will be remediation cases where all parties are not currently known/captured and not query-able/part of current reverse checks.

Kind Regards,
Emily

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-----Original Message-----

From: Thomas Klemm

Sent: Friday, July 12, 2019 9:54 PM

To: Emily Craig <[REDACTED]>

Cc: Kimberly Hart <[REDACTED]>

Subject: Cases with negative media risk

Hi Emily,

We need to come up by Tuesday with an approach to doublecheck our client files on a risk based approach as good as possible for any potential criminal background that would most likely result in termination of the relationship. Ask is to ensure that we don't have any ,epstein' type of client on our books.

What do you think would be the best way to do this?

I'm not aware that we have specific negative media flags in the system but I thought we had free text fields? Everything related to bribery, sex trafficking, etc. would need to be manually reviewed with utmost scrutiny on top of any potential RR activity. We also might want to start with the HR population.

Any thoughts how to practically approach that?

Thanks a lot and have a good weekend!

T