

Subject: FW: Single client list [I]
From: Ian Salters <[REDACTED]>
Date: Tue, 16 Jul 2019 09:00:53 -0400
To: Nina Tona <[REDACTED]>,
 Davide-A Sferrazza <[REDACTED]>,
 Liam Osullivan <[REDACTED]>
Cc: Ian Salters <[REDACTED]>

Classification: For internal use only

By the end of next week, I have to provide ORM/DCO with a list of our clients. I have taken the attached from the various files they. Can you please sanity check to confirm it is correct and advise of any missing items.

Nina – can you help fill in the blanks – KYC / ADL

Liam/Davide – can vet the client list and IWP packages.

I will arrange a meeting tomorrow to discuss.

Ian

From: Ian Salters
Sent: Thursday, June 20, 2019 10:56 AM
To: Davide-A Sferrazza <[REDACTED]>; Liam Osullivan <[REDACTED]>; Nina Tona <[REDACTED]>
Cc: Ian Salters <[REDACTED]>; Alan Brody <[REDACTED]>
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Dear All

I know this has been a topic of discussion for some time and a lot of work and effort has already gone into securing client documentation. Kim & Funda have been harassing us for some time on having a single client list and the attached is an attempt to consolidate the information into a single place. It is essential that:

1. We know who our clients are and we keep this up to date (it is also referenced in our KOP). Open to suggestions on best way to proceed;
2. The client has a KYC that is up to date and we know when it needs to be renewed (covered as part of the KYC remediation project);
3. For CIB clients we have an Agency Direction Letter on file so we avoid MIFID reporting requirements (covered as part of the above);
4. For all clients we either have an IWP Adoption Package or a FINRA 2111 letter on file for brokerage clients;
5. We also need to ensure we have IWP Adoption packages for all the clients we have identified (all of which needs to be uploaded into dbForce).

I know the above seems a lot but it is essential we get this done over the next 3 months to prove to the DCO/ORM team that we are on top of things, as I go expect a full Audit before year end.

Please review the attached and I will arrange a meeting early next week to discuss the way. Please feel free to correct where there are gaps.

Kind regards,
Ian Salters

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