

Subject: MDs Approvals required for ACUs completed for High Risk clients. [I]  
From: Vaishali-P Mehta <[REDACTED]>  
Date: Tue, 31 May 2016 16:52:01 -0400  
To: Paul Morris <[REDACTED]>

Classification: For internal use only

Dear Paul,

Based on the email I sent last week, below are the ACUs which were completed for your High Risk customers this month.

All the below ACUs were completed showing no material changes to the client's circumstances.

Please review the ACU comments, and reply back with your approval.

Annual Client Update: ID

Customer Owner

SILO

GCIS Customer Number

Customer Name

Annual Client Update: Created Date

A14.

A15. Client Status Update Description

A16.

A17.

0075022

Paul Morris

US-Onshore

00000409100

Black, Leon D.

5/10/2016

client is CEO of Apollo Global management. Family office established in 2014 to manage family wealth.

Distributions from APO and other diversified investments.

Yes

No

0075020

Paul Morris

US-Onshore

[REDACTED]

J. Epstein Virgin Islands Foundation, Inc

5/10/2016

Private foundation

investment income

Yes

No

0075019

Paul Morris

US-Onshore

[REDACTED]

Jeepers, Inc

5/10/2016

Jeepers is sub S managing various investments

investment activities, advisory services

Yes

No

0075018

Paul Morris

US-Onshore

  
Mort, Inc

5/10/2016

Mort is entity holding shares of private company Jawbone

Holds private investment

No

No

0075021

Paul Morris

US-Onshore

  
The Haze Trust

5/10/2016

Investment vehicle

No change

Yes

No

If this any information is not correct or you are aware of a material change that has not been reflected, please let us know immediately as a KYC update will be required.

Regards,

Vaishali Mehta

Head of Anti-Money Laundering Business Risk  
Deutsche Bank Wealth Management  
60 Wall Street, 27th Floor, 10005-2836 New York, NY, USA  
Tel. [REDACTED]  
Mobile [REDACTED]  
Email [REDACTED]

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{cid:image002.png@01D030D6.03601EF0}

From: Vaishali-P Mehta  
Sent: Wednesday, May 25, 2016 4:30 PM  
To: Armen Brash; Lina M Arias; Sylvia Junghardt; Daphne Cales; Scott Guest; Dawn Forbes; Amy Horak  
Cc: zia Memon  
Subject: MDs Approvals required for ACUs completed for High Risk clients. [I]

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Hello All,

As you know, the Bank is taking a very close look at the KYC process in each of the business divisions. At the beginning of the year, several control

enhancements were rolled out, including ExCo approval for all new high risk account holders. Along these lines, effective immediately, the approval of a Managing Director will be required for all ACUs completed for high risk clients.

While we work to implement a workflow within db force, a manual process will begin this month. Each month, I will be sending a list of all ACUs completed for high risk customers to the accountable managing director—in some cases this will be the RM, in some cases this will be the office director. Each accountable managing director will need to review the ACUs completed and reply back with their approval (or rejection, if applicable) ABR will maintain a file of all complete and overdue MD approvals. .

The accountable Managing Director will receive an email similar to the one below, including the list of ACUs completed for the client along with the comments contained within the ACU.

If you have any questions on this process, please let me know.

Sample Email:

Dear \_\_\_\_\_

Below are the ACUs which were completed for your High Risk customers this month.

All the below ACUs were completed showing no material changes to the client's circumstances.

Please review the ACU comments, and reply back with your approval.

If this any information is not correct or you are aware of a material change that has not been reflected, please let us know immediately as a KYC update will be required.

Armen, Sylvia, Lina, Daphne, Scott and Amy, please share this information with your teams.

Regards,

Vaishali Mehta

Head of Anti-Money Laundering Business Risk  
Deutsche Bank Wealth Management  
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Tel. + [REDACTED]  
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Email [REDACTED]

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