

Subject: RE: KYC Breach\_SOUTHFINANMD\_Southern Financial, LLC\_FFT Location [I]  
From: Mathew Negus [REDACTED]  
Date: Mon, 16 Apr 2018 09:02:45 -0400  
To: Xavier Avila [REDACTED],  
Akash Malhotra [REDACTED]  
Cc: Shawn Staker [REDACTED],  
NCAOTC Derivatives [REDACTED],  
Pankaj-A Chopra [REDACTED],  
Alka Gopala [REDACTED],  
Nina Tona [REDACTED],  
Ian Salters [REDACTED],  
Martin Zeman [REDACTED]

Classification: For internal use only

I would re-book to London if the desk agrees.

From: Xavier Avila  
Sent: Monday, April 16, 2018 7:44 AM  
To: Akash Malhotra [REDACTED]  
Cc: Shawn Staker [REDACTED]; NCAOTC Derivatives [REDACTED];  
[REDACTED]; Pankaj-A Chopra [REDACTED]; Alka  
Gopala [REDACTED]; Nina Tona [REDACTED]; Ian Salters  
[REDACTED]; Mathew Negus [REDACTED]; Martin Zeman  
[REDACTED]

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Negus, what do we do with the below?

If easy extension to OTC Rates FFT we can provide docs, if not we move this to London where client is onboarded? Thanks

Xavier Avila  
Managing Director  
Deutsche Bank Securities Inc  
[REDACTED]

From: Akash Malhotra [REDACTED]

Date: Monday, Apr 16, 2018, 07:34

To: Xavier Avila [REDACTED]

Cc: Shawn Staker [REDACTED], NCAOTC Derivatives  
[REDACTED], Pankaj-A Chopra [REDACTED], Alka  
Gopala [REDACTED]

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Hi Alex,

For adoption location Frankfurt, the following trade has been booked in Summit application for OTC Derivative Product, details as follows:

Trade ID: G175714L

Summit Code: SOUTHFINANMD

Date of Trade: 13/04/2018

Client Name: Southern Financial, LLC

We have got your name as a sales person from Summit application.

We have observed that the client is not adopted for Frankfurt location, which results in a KYC violation. In order to comply with DB's internal policies and procedures, all KYC requirements

now have to be fulfilled, if the trade should stand against Deutsche Bank

Kindly review your trade and where possible, please consider to rebook the trade to an adoption location, where the client is already adopted for OTC Derivative product or confirm

if it is a valid trade for the particular location.

Upon your confirmation, we will review the client and would request the missing documents to be obtained from the client/business as per Frankfurt location guidelines.

Summit screenshot: Trade Details

{cid:image001.png@01D3D561.AD31EA70}

Regards

Akash Malhotra  
Associate | Client on Boarding

DBOI Global Services Private Limited  
Global Business Services  
A-1 & A-2, Evolve - Mahindra Technology Park, Inside Mahindra World City -  
SEZ, 302029 Jaipur, India  
Tel. [REDACTED]  
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Escalations Contact:- [REDACTED]