

Subject: RE: KYC Breach SOUTHFINANMD Southern Financial, LLC\_FFT Location [I]  
From: Xavier Avila [REDACTED]  
Date: Tue, 17 Apr 2018 10:17:15 -0400  
To: Mathew Negus [REDACTED],  
Nina Tona [REDACTED]  
Cc: Ian Salters [REDACTED],  
Martin Zeman [REDACTED]

2028

We will need most of our clients trading XCCY business...so lets see how difficult this is.

03 we suddently stuck with basic DB AG London adoptions.

Can we have anoher call rhis thursday to go through some NAC thoughts and also the booking systems pls?

Thanks

From: Mathew Negus [REDACTED]  
Date: Tuesday, Apr 17, 2018, 08:10  
To: Nina Tona [REDACTED], Xavier Avila [REDACTED]  
Cc: Ian Salters [REDACTED], Martin Zeman [REDACTED]  
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Extension to FFT goes to US Case Management.

What's the mat date on the xccy swap?

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Mathew Negus  
Director | ICG Business Management | [REDACTED] | [REDACTED] |

From: Nina Tona  
Sent: Tuesday, April 17, 2018 8:32 AM  
To: Mathew Negus [REDACTED]; Jimmy-H Xu [REDACTED];  
Xavier Avila [REDACTED]; Akash Malhotra [REDACTED];  
[REDACTED]  
Cc: Joe Aglione [REDACTED]; Ian Salters [REDACTED];  
Pankaj-A Chopra [REDACTED]; NCAOTC Derivatives  
[REDACTED]; Martin Zeman [REDACTED]; Alka Gopala  
[REDACTED]  
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Mat – let me know if I can help you with this.

Thank you

Nina Tona

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From: Mathew Negus  
Sent: Tuesday, April 17, 2018 7:11 AM  
To: Jimmy-H Xu [REDACTED]; Xavier Avila [REDACTED];  
Akash Malhotra [REDACTED]; [REDACTED]  
Cc: Joe Aglione [REDACTED]; Ian Salters [REDACTED]; Nina  
Tona [REDACTED]; Pankaj-A Chopra [REDACTED]; NCAOTC  
Derivatives [REDACTED]; Martin Zeman [REDACTED];  
Alka Gopala [REDACTED]  
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I'll check who should handle the product extension to FFT. I expect it will be the US team.

Jimmy, FYI, I still see mostly London as the primary adoption location for OTC Derivs.

Best,  
Mathew

From: Jimmy-H Xu [REDACTED]

Date: Tuesday, Apr 17, 2018, 2:53 AM

To: Xavier Avila [REDACTED], Mathew Negus [REDACTED]  
Akash Malhotra [REDACTED], [REDACTED]  
[REDACTED]

Cc: Joe Aglione [REDACTED], Ian Salters [REDACTED], Nina Tona [REDACTED], Pankaj-A Chopra [REDACTED], NCAOTC Derivatives [REDACTED], Martin Zeman [REDACTED], Alka Gopala [REDACTED]

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In general, everything should face FFT and other booking centres are only used in exceptional circumstances I believe

Thanks

Kind regards

Jimmy

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Jimmy-H Xu  
Cross Currency Swap Trading

Deutsche Bank AG, Filiale London  
CB&S - Markets  
Winchester House, 1 Great Winchester Street, EC2N 2DB London, United Kingdom  
Tel. [REDACTED]  
Mobile [REDACTED]  
Email [REDACTED]

From: Xavier Avila  
Sent: 17 April 2018 02:30  
To: Jimmy-H Xu [REDACTED]; Mathew Negus [REDACTED]; Akash Malhotra [REDACTED]; [REDACTED]  
Cc: Joe Aglione [REDACTED]; Ian Salters [REDACTED]; Nina Tona [REDACTED]; Pankaj-A Chopra [REDACTED]; NCAOTC

Derivatives [REDACTED]; Martin Zeman [REDACTED];  
Alka Gopala [REDACTED]  
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Done, thanks.

Are all the XCCYs generally booked and clients KYCed in DB AG FFT? What about EUR and GBP vanilla and inflation swaps? We might have some of those coming.

Mat/Nina, who can help us with FFT extensions, same NY CMs?

Thanks

From: Jimmy-H Xu [REDACTED]

Date: Monday, Apr 16, 2018, 11:56

To: Xavier Avila [REDACTED], Mathew Negus [REDACTED],  
Akash Malhotra [REDACTED], [REDACTED]  
[REDACTED]

Cc: Joe Aglione [REDACTED], Ian Salters [REDACTED], Nina  
Tona [REDACTED], Pankaj-A Chopra [REDACTED], NCAOTC  
Derivatives [REDACTED], Martin Zeman [REDACTED],  
Alka Gopala [REDACTED]

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Approved as one-off, but let's get the KYC done for FFT please

Thanks

Kind regards

Jimmy

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Jimmy-H Xu  
Cross Currency Swap Trading

Deutsche Bank AG, Filiale London  
CB&S - Markets  
Winchester House, 1 Great Winchester Street, EC2N 2DB London, United Kingdom  
Tel. [REDACTED]  
Mobile [REDACTED]  
Email [REDACTED]

From: Xavier Avila [mailto:[REDACTED]]  
Sent: 16 April 2018 17:55  
To: Mathew Negus [REDACTED]; Akash Malhotra [REDACTED]; [REDACTED]  
Cc: Joe Aglione [REDACTED]; Ian Salters [REDACTED]; Nina Tona [REDACTED]; Pankaj-A Chopra [REDACTED]; NCAOTC Derivatives [REDACTED]; Martin Zeman [REDACTED]; Alka Gopala [REDACTED]  
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Shawn, MO, is it ok to move this trade to London pls?

From: Mathew Negus

Sent: Monday, April 16, 2018 9:03 AM

To: Xavier Avila [REDACTED]; Akash Malhotra

Cc: Shawn Staker [REDACTED]; NCAOTC Derivatives

[REDACTED]; Pankaj-A Chopra [REDACTED]; Alka

Gopala [REDACTED]; Nina Tona [REDACTED]; Ian Salters

[REDACTED]; Martin Zeman [REDACTED]

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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]; Pankaj-A Chopra [REDACTED]; Alka

Gopala [REDACTED]; Nina Tona [REDACTED]; Ian Salters

[REDACTED]; Mathew Negus [REDACTED]; Martin Zeman

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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

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: [REDACTED]

Summit Code: [REDACTED]

Date of Trade: 13/04/2018

Client Name: Southern Financial, LLC

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

EFTA01406878

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]  
Email [REDACTED]

Escalations Contact:- [REDACTED]

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