

Subject: RE: Escalation: [REDACTED] / [REDACTED] / Southern Financial  
LLC [I]  
From: Zack Bunimovich [REDACTED]  
Date: Fri, 18 May 2018 13:15:09 -0400  
To: Nina Tona [REDACTED]  
ODC-Equities Account-Opening [REDACTED]  
Jesse-J Cruz [REDACTED]  
Cc: ODC FixedIncomeRepoECM [REDACTED],  
Martin Zeman [REDACTED]

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Hi Nina,

I believe James was speaking about the AFC review for the account. Now that the AFC piece was approved, the account was able to move forward to the downstream operational setups. This is essentially the last part in the process.

The ask is for some sort of confirmation details to use for margining with Southern. Attaching the original ask here.

Thanks,

Zack

From: Nina Tona  
Sent: Friday, May 18, 2018 1:02 PM  
To: Zack Bunimovich [REDACTED]; ODC-Equities Account-Opening [REDACTED]; Jesse-J Cruz [REDACTED]  
Cc: ODC FixedIncomeRepoECM [REDACTED]; Martin Zeman [REDACTED]  
Subject: RE: Escalation: [REDACTED] / [REDACTED] / Southern Financial  
LLC [I]

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Zack – can you please clarify the ask?

I thought James said this was completed?

Thank you

Nina Tona

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From: Zack Bunimovich  
Sent: Friday, May 18, 2018 12:49 PM  
To: ODC-Equities Account-Opening [REDACTED]  
Jesse-J Cruz [REDACTED]  
Cc: ODC FixedIncomeRepoECM [REDACTED]; Martin Zeman [REDACTED]; Nina Tona [REDACTED]  
Subject: RE: Escalation: [REDACTED] / [REDACTED] / Southern Financial LLC [I]

Classification: For internal use only

Adding Nina in case Martin is 000.

Thanks,

Zack

From: Zack Bunimovich  
Sent: Thursday, May 17, 2018 3:45 PM  
To: ODC-Equities Account-Opening [REDACTED];  
Jesse-J Cruz [REDACTED]  
Cc: ODC FixedIncomeRepoECM [REDACTED]; Martin Zeman  
[REDACTED]  
Subject: RE: Escalation: [REDACTED] / [REDACTED] / Southern Financial  
LLC [I]

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Hey Martin – do you have any confirmation details that can be used for downstream setups? See attached for the request.

Maybe we can use Richard's email?

Thanks,

Zack

From: Nikita Bajaj On Behalf Of ODC-Equities Account-Opening  
Sent: Thursday, May 17, 2018 1:39 PM  
To: Jesse-J Cruz [REDACTED]  
Cc: Zack Bunimovich [REDACTED]; ODC-Equities Account-Opening

[REDACTED]; ODC FixedIncomeRepoECM

Subject: RE: Escalation: [REDACTED] / [REDACTED] / Southern Financial  
LLC [I]

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Hi Jesse,

We are awaiting for the confirmation email. Please find attachment for your reference.

Thanks and Regards,  
Nikita.  
Client Account Management  
GTO  
Tel: [REDACTED]

Group Inbox :  
ODC-Equities. Account [REDACTED]  
ODC-Equities Account [REDACTED]  
Please reply to above emails for quick response.

Feedback / Escalations:

ESCALATION Points of contact

APAC Coverage

EMEA Coverage

Late EMEA / NY Coverage

Level-1

Devaraj Vaddin

Leroy Coutinho

Mukesh-tcs Shah



Level-2

Bharath Achar

Vritika Mutreja

Rajesh-E Kumar



Level-3

Gourish Shirodkhar

Kiran-Chandrakant Naik

Chaitanya Nataraj



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This email is sent to you by Tata Consultancy Services on behalf of Deutsche Bzank.  
Diese email wurde Ihnen von Tata Consultancy Services im Auftrag der Deutschen Bank gesendet

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From: Jesse-J Cruz  
Sent: 17 May 2018 22:22  
To: ODC-Equities Account-Opening [REDACTED]; ODC  
FixedIncomeRepoECM [REDACTED]  
Cc: Zack Bunimovich [REDACTED]  
Subject: RE: Escalation: [REDACTED] Southern Financial  
LLC [I]

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Hi Teams,

Please set up [REDACTED] for GED and Convertible Bonds.

Kind regards,

{cid:image002.png@01D17DF5.9DBBDFD0}

Jesse Jay Cruz

Analyst

Deutsche Bank Securities Inc.

Client Data Services | DBUSA Core Corp.

5201 Gate Parkway, 32256 Jacksonville, USA

Tel: [REDACTED]

Email: [REDACTED]

From: Zack Bunimovich

Sent: Thursday, May 17, 2018 12:17 PM

To: Jesse-J Cruz [REDACTED]

Subject: RE: Escalation: [REDACTED] Southern Financial  
LLC [I]

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Hey – can this be sent downstream now for the GED, GCD, and CB parts?

Thanks,

Zack

From: Martin Zeman

Sent: Thursday, May 17, 2018 11:44 AM

To: James Gladwin [REDACTED]

Cc: Kareen Johnson [REDACTED];

Daniel-A Klyashtorny [REDACTED]

[REDACTED]; Nina Tona [REDACTED]; Xavier Avila [REDACTED]

[REDACTED]; Davide-A Sferrazza [REDACTED]; AMLUK

Reviews [REDACTED]; Devshiji Odedra [REDACTED];

Ian Salters [REDACTED]; Simon Nall [REDACTED]; Ricky-x

Patel [REDACTED]; Jesse-J Cruz [REDACTED]; Zack

Bunimovich [REDACTED]

Subject: RE: Escalation: [REDACTED] Southern Financial  
LLC [I]

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James, thank you.

Zach – please let us know next steps and timing to complete this extension  
for Southern Financial LLC.

Martin

From: James Gladwin  
Sent: Wednesday, May 16, 2018 10:19 AM  
To: Martin Zeman [REDACTED]  
Cc: Kareen Johnson [REDACTED]; Daniel-A Klyashtorny [REDACTED]  
[REDACTED]; Nina Tona [REDACTED]; Xavier Avila  
[REDACTED]; Davide-A Sferrazza [REDACTED]; AMLUK  
Reviews [REDACTED]; Devshiji Odedra [REDACTED]  
Ian Salters [REDACTED]; Simon Nall [REDACTED]; Ricky-x  
Patel [REDACTED]; Jesse-J Cruz [REDACTED]; Zack  
Bunimovich [REDACTED]  
Subject: RE: Escalation: [REDACTED] Southern Financial  
LLC [I]

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Hello all,

After liaising with Global CDS teams and specialist colleagues, UK AFC have  
identified the key barriers and now duly approved the Extension request.

I am happy to confirm that a BRG approval will NOT be necessary for this

Extension.

For the sake of clarity and knowledge sharing it would be prudent to share a brief summary of the cause and resolution of such. I am more than happy to discuss and expand further via telephony should it be requested.

- i. Extension request was received by UK AFC and upon our initial review of the request it was apparent that there was no UK adoption within the dbCAR system, therefore AFC queried the requirement of a BRG review
- ii. Post investigation identified UK products had been booked WITHOUT a UK adoption – a never seen before scenario
- iii. Escalations to local policy colleagues and global CDS teams had also never seen such a scenario. Two cause theories were presented;
  - a. KCP clients had migrated from dbCLIENT to dbCAR, potentially the migration did not complete correctly (this will continue to be investigated SEPERATELY to this Extension request)
  - b. At the very first adoption of the client/extension to UK GM products, this was not correctly booked within our internal systems
- iv. Fixes to the dbCAR profile were discussed between Global CDS teams, of which the latter was chosen due to time constraints and the impact upon our first line colleagues ;
  - a. LKYC-US to be reviewed and approved by US colleagues which would subsequently updated the LRD/NRD dates, subsequent leverage could be used off of the LRDs to create an NCA to book the client correctly (US CDS colleagues advised that they did not believe the LKYCUS was to be further actioned)
  - b. LKYC-GB to be approved to kick start the NCA & LRD/NRD dates within dbCAR
- v. Following the LKYC-GB being approved, the file was immediately reviewed and was deemed that the UK adoption location had been fixed
- vi. Subsequent Extension request was approved

Many thanks to all that shared their knowledge, I will be looking further into KCP clients with UK adoptions to ensure that such scenarios do not

become a recurrent theme.

As always, please give me a shout if you have any questions.

Kind regards,

{logo}

James Gladwin

AFC Business Advisory

Anti-Financial Crime

DBOI Global Services (UK) Limited

5 Brindley Place, Birmingham, B1 2JB, United Kingdom

Email: [REDACTED]

P Please consider the environment before printing this email

From: James Gladwin

Sent: 11 May 2018 18:44

To: Martin Zeman [REDACTED]; Zack Bunimovich

[REDACTED]; Jesse-J Cruz [REDACTED]

Cc: Kareen Johnson [REDACTED]; Daniel-A Klyashtorny [REDACTED]

[REDACTED]; Nina Tona [REDACTED]; Xavier Avila

[REDACTED]; Davide-A Sferrazza [REDACTED]; AMLUK

Reviews [REDACTED]; Devshiji Odedra [REDACTED];

Ian Salters [REDACTED]; Simon Nall [REDACTED]; Ricky-x

Patel [REDACTED]

Subject: RE: Escalation: [REDACTED] Southern Financial  
LLC [I]

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Hello all,

I have had the pleasure with speaking directly with Martin and colleagues to assist UK AFC with this KCP Extension.

UK AFC are kindly in receipt of the KCP GM policy dated June 2017 (duly noted that this is currently under review), this document has proved useful in giving context to the UK GM product nexus with solely a US booking.

Due to the local UK time, I will be discussing KCP Extensions with my management on Monday as to best understand and process such requests in the future.

I truly appreciate the time and knowledge that has been shared and look forward to our conversations next week as to support each other.

Many thanks all,

{logo}

James Gladwin

AFC Business Advisory

Anti-Financial Crime

DBOI Global Services (UK) Limited

5 Brindley Place, Birmingham, B1 2JB, United Kingdom

Email: 

P Please consider the environment before printing this email

From: James Gladwin  
Sent: 10 May 2018 09:47  
To: Martin Zeman [REDACTED]; Zack Bunimovich  
[REDACTED]; Jesse-J Cruz [REDACTED]  
Cc: Kareen Johnson [REDACTED]; Daniel-A Klyashtorny [REDACTED]  
[REDACTED]; Nina Tona [REDACTED]; Xavier Avila  
[REDACTED]; Davide-A Sferrazza [REDACTED]; AMLUK  
Reviews [REDACTED]; Devshiji Odedra [REDACTED]  
Subject: RE: Escalation: [REDACTED] Southern Financial  
LLC [I]

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Hello all,

Do we have BRG approval for this?

This appears to be a cross-jurisdictional adoption from DBSI to DB AG, furthermore, the LRD for the US is 2016 and does not appear to be in the Remediation pipeline?

For Extensions to be approved, AFC UK require:

- i. BRG approval to consider cross-jurisdictional approvals which result in newly booked High Risk clients
- ii. The file to be within NRD date and if not, must be within the Remediation pipeline – of which it appears it is neither

@CDS colleagues,

Please consider the above points, I am happy to further explain on the phone to assist our business colleagues & clients expectations.

@Martin

I will keep you updated on the progress made.

Many thanks all,

{logo}

James Gladwin

AFC Business Advisory

Anti-Financial Crime

DBOI Global Services (UK) Limited

5 Brindley Place, Birmingham, B1 2JB, United Kingdom

Email: [REDACTED]

P Please consider the environment before printing this email

From: Martin Zeman

Sent: 08 May 2018 20:27

To: Zack Bunimovich [REDACTED]; AMLUK Reviews

[REDACTED]; Jesse-J Cruz [REDACTED]; James Gladwin

Cc: Kareen Johnson [REDACTED]; Daniel-A Klyashtorny [REDACTED]

[REDACTED]; Nina Tona [REDACTED]; Xavier Avila

[REDACTED]; Davide-A Sferrazza [REDACTED]

Subject: RE: Escalation: [REDACTED] Southern Financial  
LLC [I]

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James – responding to your questions below. The extension is permanent. Southern Financial LLC trade global macro and are looking to buy CDX IG payer spreads as a hedge for their overall equities and fixed income portfolio they trade with DB. The initial size is around \$100M.

EFTA01406933

Please call me if you need any more details. This is a priority for our desk. Thank you.

From: Zack Bunimovich  
Sent: Tuesday, May 08, 2018 12:24 PM  
To: AMLUK Reviews [REDACTED]; Jesse-J Cruz [REDACTED]  
[REDACTED]; James Gladwin [REDACTED]  
Cc: Kareen Johnson [REDACTED]; Daniel-A Klyashtorny [REDACTED]  
[REDACTED]; Martin Zeman [REDACTED]; Nina Tona  
[REDACTED]  
Subject: RE: Escalation: [REDACTED] Southern Financial  
LLC [I]

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+Nina

From: Zack Bunimovich  
Sent: Tuesday, May 08, 2018 10:21 AM  
To: AMLUK Reviews <[REDACTED]>; Jesse-J Cruz [REDACTED]  
[REDACTED]; James Gladwin [REDACTED]  
Cc: Kareen Johnson [REDACTED]; Daniel-A Klyashtorny [REDACTED]  
[REDACTED]; Martin Zeman [REDACTED]  
Subject: RE: Escalation: [REDACTED] Southern Financial  
LLC [I]

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Hi James,

For ii, this is a permanent extension.

Martin – can you advise on the questions from James in i. below?

Thanks,

Zack

From: James Gladwin On Behalf Of AMLUK Reviews

Sent: Tuesday, May 08, 2018 10:18 AM

To: Jesse-J Cruz [REDACTED]; James Gladwin [REDACTED]

Cc: Kareen Johnson [REDACTED]; Daniel-A Klyashtorny [REDACTED]  
[REDACTED]; Zack Bunimovich [REDACTED]; AMLUK

Reviews [REDACTED]

Subject: RE: Escalation: [REDACTED] Southern Financial  
LLC [I]

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Hi both,

I am happy to help.

Just a couple of immediate questions to help expedite this:

- i. What is the business purpose for the extension?
  - a. Elaborate on key details including; booked trades, expected volumes
- ii. Is the extension request permanent or temporary?
  - a. Please provide activation/closure dates if temporary

FYI, Helen has been removed from the chain as she has left the bank.

AMLUK.COMPLIANCE has been removed, AMLUK.REVIEWS primarily

work extensions/reactivations now alongside our PRs/EDRs and not the  
aforementioned team.

Many thanks!

{logo}

James Gladwin  
AFC Business Advisory  
Anti-Financial Crime

DBOI Global Services (UK) Limited  
5 Brindley Place, Birmingham, B1 2JB, United Kingdom  
Email: [REDACTED]

P Please consider the environment before printing this email

From: Jesse-J Cruz  
Sent: 08 May 2018 15:06  
To: AMLUK Reviews [REDACTED]; amluk compliance  
[REDACTED]; James Gladwin [REDACTED]; Helen Ncube  
[REDACTED]  
Cc: Kareen Johnson [REDACTED]; Daniel-A Klyashtorny [REDACTED]  
[REDACTED]; Zack Bunimovich [REDACTED]  
Subject: RE: Escalation: [REDACTED] Southern Financial  
LLC [I]

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James/Helen,

Can you assist with this request? Please make top priority.

Thanks,

Jesse

From: Zack Bunimovich  
Sent: Monday, May 07, 2018 3:51 PM  
To: Jesse-J Cruz [REDACTED]; AMLUK Reviews  
[REDACTED]; amluk compliance [REDACTED]  
Cc: Kareen Johnson [REDACTED]; Daniel-A Klyashtorny [REDACTED]  
Subject: RE: Escalation: [REDACTED] Southern Financial  
LLC [I]

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Hi AML teams,

Can you please revert on the below?

Thanks,

Zack

From: Jesse-J Cruz  
Sent: Thursday, May 03, 2018 3:05 PM  
To: AMLUK Reviews [REDACTED]; amluk compliance  
[REDACTED]  
Cc: Zack Bunimovich [REDACTED]; Kareen Johnson  
[REDACTED]  
Subject: Escalation: [REDACTED] Southern Financial LLC [I]

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Hi All,

We are performing a principal product extension for Southern Financial, LLC for GED, Convertible Bonds, and Global Credit Derivatives in DBAG. DBcar triggered a high risk rating. Attached is an EDD package comprised of the following:

- Searches
- Formation documents
- Tax document
- Correspondence with client emails
- Financial statements

Please let me know if you need any additional information.

Kind regards,

{cid:image002.png@01D17DF5.9DBBDFD0}

Jesse Jay Cruz

Analyst

Deutsche Bank Securities Inc.

Client Data Services | DBUSA Core Corp.

5201 Gate Parkway, 32256 Jacksonville, USA

Tel: [REDACTED]

Email: [REDACTED]