

AML Committee  
PWM AML Surveillance  
Status Report  
June 2014

MANAGEMENT SUMMARY

Regulatory/Audit

Fed Exam

Starting in January 2014, Fed examiner started her review of the clearance of MRAs which AML/BSA Compliance received during 2012 exam.

Review of ATM limit (\$9,999 for client population), CTR discrepancies (DB Taunus vs. DBTCA), QA of CTRs conducted by AML Compliance, Risk Assessment DB AML to have biweekly meetings and monthly visits with the branch at 345 Park Avenue regarding cash activities.

Internal audit

Audit was completed in December 2013.

No significant findings

Projects/Work Efforts

Risk Assessments

As a result of Fed exam, Risk Assessments for both the Private Bank and 345 Branch Operations need to be reassessed. Private Bank will solely focus on DBTCA and DB AG accounts.

Working group created to streamline methodology across business lines. Data retrieval for 2012 and 2013 and analysis are in progress.

Semi-Annual Fuzzy Logic Testing

Testing of Prime OFAC Fuzzy Logic in UAT was completed on February 27, 2013. Cross-field validation still not working as expected. Worked with GTO to test Production data in UAT before implementing changes in Production. However, due to issues with UAT environment, changes could not be made.

Received training material from FIS. Plan is to test in 8.0.2 and 9.1 UAT environments after all other UAT testing (for Prime upgrade) has been completed.

Testing was not done in 2013 as Clarissa Delafuente was on maternity leave when the Prime upgrade was completed. Testing rescheduled for mid 2014.

PB and PCS Annual AML Monitoring Program Review

For the Private Bank, new alert parameters in 9.1 have caused significant spike in alerts. For example, repetitive alerts were generating approximately 116 alerts per month. In 9.1 this has spike to approximately 238 per month. Proposal to analyze alerts to consider recalibrating or

adding more accounts on the exclude list.

Recommend changing the review and recalibration schedule to an ongoing process. A set of alerts will be reviewed every 2 months. There are 6 groups of alerts – Cash, Dormant, HubSpoke, Repetitive, High Risk Country, and Velocity.

#### Exclude Lists

Management approved renewal of PCS accounts to be excluded for non-suspicious and previously investigated patterns of activity on 9/9/2013. Accounts were reviewed in February. Awaiting management approval. Alerts are being reviewed to determine if there are additional PB accounts that can be excluded for non-suspicious and previously investigated patterns of activity. Target date for completion is mid-2014.

#### Backlog

As of February 14, 2014, it was determined that there was a 4 month backlog for Prime cases (dating back to September), and a 2 month backlog for Prime and Actimize alerts (dating back to December). There are no outstanding alerts or cases assigned prior to September 2013.

As of 2/14/14

Notes

As of 7/24/14

Notes

Assigned in June

Prime cases

743

oldest case - Aug

999

oldest case not worked on - Feb

See below

Prime alerts

854

oldest alert - Nov

1050

oldest alert not worked on - April

See below

Actimize alerts

437

oldest alert - Dec

514

oldest alert not worked on - May

See below

#### Procedure Changes

There is a weekly review of rejected wires in NetX. This process was recently added to determine if there are any clients with both a PB and PCS relationship who are using their PB account to facilitate a wire that was rejected by Pershing.

Training

Yang Chen conducted OFAC training to the Branch on March 10, 2014. Branch personnel are required to perform OFAC search on any third parties withdrawing cash on behalf of a PB client.

Other

Clarissa Delafuente returned from maternity leave on January 13, 2014.

Clarissa Delafuente's last day at DB will be July 18, 2014.

Total transactions monitored in Prime for June 2014 is 73,999, which is 17.3% more than June 2013 volume.

Total transactions monitored in Actimize for June 2014 is 40,541, which is 8.1% less than June 2013 volume.

#### US PWM Transactions Monitored

#### US PWM Prime Case Volumes

Total number of cases generated in June 2014 is 565.

Total number of cases to be researched for June 2014 is 217, which is 38.4% of the total number generated that month.

Case reviews for June 2014 is 46% more than June 2013 volume.

### US PWM Prime Alert Volumes

Total number of alerts generated in June 2014 is 617.

Total number of alerts to be researched for June 2014 is 463, which is 75% of the total number generated that month.

Alert reviews for June 2014 is 30.4% more than the June 2013 volume.

### US PWM Actimize Alert Volumes

Total number of alerts generated in June 2014 is 351.

Total number of alerts to be researched for June 2014 is 308, which is 88% of the total number generated that month.

Alert reviews for June 2014 is 39% more than June 2013 volume.

#### US PWM Work Completed

Total number of Prime cases and alerts reviewed in June 2014 is 519.  
Total number of Actimize alerts reviewed in June 2014 is 100.

#### US PWM Prime Maintenance

Total number of Prime account profiles set up or modified in June 2014 is 223.  
Total number of Prime customer and related parties information added in June 2014 is 332.

4 OFAC requests were received.  
4 FinCEN 314(a) requests were received.  
3 Department of Commerce Denied Persons List were received  
1 International Inquiries and/or Static Data Embargo Inquiries were received.  
47 General/Legal requests were received.

US PWM AML Search Requests - June 2014

5 CTRs were filed in June 2014  
4 SAIF were filed in June 2014 for the Private Bank.  
1 SAIF was filed in June 2014 for Private Client Services.

US PWM CTR and SAIF Filings

For internal use only

4

For internal use only

1

For internal use only

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Total transactions monitored in Prime for June 2014 is 73,999, which is  
17.3% more than June 2013 volume.{114300}{1}{-114300}{l}{533400}{90000}{0}-  
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June 2014 is 40,541, which is 8.1% less than June 2013 volume.{114300}{1}-  
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{-114300}{l}{533400}{90000}{0}{15000}{\*\*}{en-US}{1200}{1200}Prime cases to  
be researched for June 2014 is 217. {114300}{1}{-114300}{l}{533400}{90000}{0}-  
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451. {114300}{1}{-114300}{l}{533400}{90000}{0}{15000}{\*\*}{en-US}{1200}{1200}-  
Actimize alerts to be researched for June 2014 is 308. {5400000}{2895981}-  
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{l}{488950}{90000}{0}{15000}{\*\*}{en-US}{1100}{1200} {en-US}{1200}{1200}-  
Total number of Prime cases and alerts reviewed in June 2014 is 519. {114300}-  
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of Actimize alerts reviewed in June 2014 is 100. {5400000}{2895981}{811669}-  
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{1200}Toal number of Prime account profiles set up or modified in June 2014  
is 223. {114300}{1}{-114300}{l}{533400}{90000}{0}{15000}{••}{en-US}{1200}-  
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in June 2014 is 332. {5400000}{2895981}{2041043}{876689}{4780398}-  
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{114300}{1}{-114300}{l}{533400}{90000}{0}{15000}{••}{en-US}{1200}{1200}4  
OFAC requests were received. {114300}{1}{-114300}{l}{533400}{90000}{0}{15000}-  
{••}{en-US}{1200}{1200}4 FinCEN 314(a) requests were received, which  
included 817 names. {114300}{1}{-114300}{l}{533400}{90000}{0}{15000}{••}{en-  
US}{1200}{1200}3 Dept. of Commerce Denied Persons List were received. {114300}-  
{1}{-114300}{l}{533400}{90000}{0}{15000}{••}{en-US}{1200}{1200}1  
International Inquiries/Static Data Embargo Inquiries were received. {114300}-  
{1}{-114300}{l}{533400}{90000}{0}{15000}{••}{en-US}{1200}{1200}47 General/-  
Legal requests were received. {114300}{1}{-114300}{l}{533400}{90000}{0}{15000}-  
{••}{en-US}{1200}{1200}Above data is for June 2014 {5400000}{2661716}{3518884}-  
{1345218}{4780398}{7FF3D975-13B6-4AED-8F00-BC77549A7AC0}{0}{0}{5400000}-  
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{6985}{1}{1270}{ctr}{0}{0}{ctr}{488950}{90000}{0}{35000}{en-US}{1100}{1200}-  
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{ctr}{0}{114300}{1}{-114300}{l}{533400}{90000}{0}{15000}{••}{en-US}{1200}-  
{1200}5 CTRs were filed in June 2014 . {114300}{1}{-114300}{l}{533400}{90000}-  
{0}{15000}{••}{en-US}{1200}{1200}5 SAIFs were filed; 4 for PB and 1 for PCS.  
{5400000}{2787775}{4870666}{1093099}{4780398}