

Subject: RE: WM Data Analysis for AML Risk Assessment [I]
From: Cherie Quigley <[REDACTED]>
Date: Tue, 10 Mar 2015 16:02:37 -0400
To: Sharon Donaghey <[REDACTED]>

Classification: For internal use only

Hi Sharon

Here are the spreadsheets.

Cherie

From: Sharon Donaghey
Sent: Thursday, March 05, 2015 3:18 PM
To: Cherie Quigley; Ying-A Wang
Cc: Wayne Salit
Subject: WM Data Analysis for AML Risk Assessment [I]

Classification: For internal use only

Hi Cherie and Ying,

I believe that Wayne spoke to you about gathering some metrics for the products in the WM Investment Advisory Business so that we can complete the AML Risk Assessment for 2014, which included data for 2012 and 2013. These are the products that were indicated as applicable in the Spring of 2014:

- Check deposits
- Free delivery/receipt of securities
- Internal Transfers
- Investment Advisory
- Wire Transactions

Attached is a worksheet that includes the tables for the metrics that we want to capture, i.e. the number of accounts, transaction volume and the total transaction value by client risk rating and by country risk. If possible, please also provide the metrics by client's high risk industry status, but not if this will be more time consuming.

Data was collected last year and is available on the Risk Assessment Sharepoint site. (You may have other options for pulling the data. If that's the case, in order to be consistent with the other divisions, please provide metrics for 2012 and 2013.) Here's the link to the site:

<https://sharepoint.us.intranet.db.com/site2510/-Fall%202014%20AML%20Risk%20Assmt/Forms/AllItems.aspx?-RootFolder=%2Fsite2510%2FFall%202014%20AML%20Risk%20Assmt%2FAWM%2FData%20Analysis%20n%20other&FolderCTID=0x0120009280F9074D5AA142AC7BCAB4D1559F5D&View={-7F9F3F7D-1490-40AE-BF00-4341EF424A5C}>

Clarissa used this data to generate metrics for last year's assessment, but it's not possible to get the metrics we need for this iteration of the assessment: data needed to generate the metrics by client and country risk needs to be mapped against the client data. If you have a few minutes, I'll further explain the challenge that I had with getting the metrics needed – it would be easier to show you in the worksheet.

Regards,

Sharon

Director, Financial Crimes Risk Assessments

Deutsche Bank Americas

60 Wall Street, 37th floor



