

Sample 1:

May MRC states the following NCAs for April:

8 high-risk NCAs;
20 moderate-risk NCAs; and
25 low-risk NCAs

However, the NCA report during the walkthrough showed 9 high-risk NCAs:

PEPs MRC slide 49 states 429 PEPs; however, during the walkthrough GA noted 431 PEPs:

Sample 2:

August MRC states the following NCAs for July:

The data reported to MRC is:

8 high-risk NCAs;
4 moderate-risk NCAs; and
14 low-risk NCAs

However, the NCA report run on March 9th by GA reflected:

7 High Risk NCAs
6 Moderate Risk NCAs; and
18 low-risk NCAs

March 9, 2018 report:

Please note:

GA ran the report March 22, 2018 (10:59 AM) – sent via e-mail to WM AFC and noted the following:

7 high-risk NCAs;
7 moderate-risk NCAs; and
9 low-risk NCAs

March 22, 2018 Report

Sample 3:

October MRC states the following NCAs for September:

2 high-risk NCAs;
15 moderate-risk NCAs; and
14 low-risk NCAs

However, the NCA report run on March 9th by GA reflected:

5 high-risk NCAs;
14 moderate-risk NCAs; and
14 low-risk NCAs (NO DISCREPANCY between info sent to MRC and source data)

March 9, 2018 report:

Sample 4:

November MRC states the following NCAs for October:

3 high-risk NCAs;
14 moderate-risk NCAs; and
29 low-risk NCAs

However, the NCA report run on March 9th by GA reflected:

2 high-risk NCAs;
13 moderate-risk NCAs; and
29 low-risk NCAs

March 9, 2018 report:

For Brokerage (slide 146)

GA was unclear as to whether the "Key Risk Drivers for High Risk NCAs" and "August Key Risk Drivers for High risk NCAs" were intended to be duplicates. In previous month(s), the total were different in both charts. There is a discrepancy in the breakdown between the two charts. Neither population breakdown reconciles against the source report,

PershingAccountsWithAmlRiskDesignation, which reflects

- four (4), not three (3), key risk drivers, as follows:
 - A04 (locally / divisionally defined high risk countries),
 - B11 (healthcare and pharmaceutical),
 - B13 (locally / divisionally defined risk industries),
 - and C02 (doubtful reputation/negative information).

Further, one chart reflects a total of 5 NCAs across 3 key risk drivers, and the other chart reflects 9 NCAs across 3 risk drivers. However, per PershingAccountsWithAmlRiskDesignation report, there are only 3 NCAs.

Please see below the Pershing report WM AFC provided to GA:

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