

Subject: RE: Remediation 2015-2016 ACO queries.xlsx [I]  
From: Vahe Stepanian <[REDACTED]>  
Date: Wed, 01 Feb 2017 09:00:24 -0500  
To: Isabel-A Gonzalez <[REDACTED]>  
Cc: Stewart Oldfield <[REDACTED]>,  
Alastair Mackinlay <[REDACTED]>,  
Iain Macara <[REDACTED]>,  
Christopher Whyton <[REDACTED]>

Classification: For internal use only

I was referring to Southern Financial LLC

From: Isabel-A Gonzalez  
Sent: Wednesday, February 01, 2017 8:48 AM  
To: Vahe Stepanian  
Cc: Stewart Oldfield; Alastair Mackinlay; Iain Macara; Christopher Whyton  
Subject: RE: Remediation 2015-2016\_ ACO queries.xlsx [I]

Thanks Vahe. Can you please confirm the below Aspen L4 is what you are referring to?

L1 Client

L1 Client ID

L1 Client RDS ID

L4 Client

L4 Client ID

L4 Client RDS ID

Southern Financial Group INC,US

222251

15250388

Southern Financial Group INC,US

267661

15250388

I look forward to hearing from you.

Kind regards,  
Isabel.

Isabel Gonzalez

ICG Sales C00 Team

Deutsche Bank AG, Filiale London

Winchester House, 1 Great Winchester Street

Tel: [REDACTED] | EC2N 2DB London

From: Christopher Whyton

Sent: 01 February 2017 13:45

To: Vahe Stepanian

Cc: Isabel-A Gonzalez; Stewart Oldfield; Alastair Mackinlay; Iain Macara

Subject: RE: Remediation 2015-2016\_ ACO queries.xlsx [I]

Thanks Vahe, ok noted.

Iain – FYI.

From: Vahe Stepanian  
Sent: 01 February 2017 13:42  
To: Christopher Whyton  
Cc: Isabel-A Gonzalez; Stewart Oldfield; Alastair Mackinlay  
Subject: RE: Remediation 2015-2016\_ ACO queries.xlsx [I]

Classification: For internal use only

Hi Chris – we are actually offboarding Southern Financial in GM. Let us know if you need anything else.

Best,

Vahe

From: Christopher Whyton  
Sent: Wednesday, February 01, 2017 8:38 AM  
To: Vahe Stepanian  
Cc: Isabel-A Gonzalez  
Subject: RE: Remediation 2015-2016\_ ACO queries.xlsx

Hi Vahe

Hope you're well. I'm working on the ACO workstream in GM and have been made aware of the below client (in yellow) that is due for KYC remediation but doesn't have an ACO assigned. Are you able to propose an ACO?

Isabel (cc'd) needs to feed the ACO name back to COB/outreach fairly urgently as the stance taken is that any clients without an ACO should be moved to the red list for offboarding.

Thanks

Chris

From: Isabel-A Gonzalez  
Sent: 01 February 2017 11:51  
To: Christopher Whyton  
Subject: RE: Remediation 2015-2016\_ ACO queries.xlsx

Hi Chris,

I have done a bit of digging on this. As per below table, two of this names were indeed included in the Phase I of the Trading Outreach. The other 2 may have happen offline via Iain. Please see below the details I have been able to extract:

#### Trading Outreach Output

CLIENTID

LEGAL\_NAME

GM Sales Sponsor for Outreach

In trading outreach Phase i

ACO suggested

Sales suggested

Person Making Suggestions

1000040765

William Beaumont Hospital



1004688558

Proven Wealth Limited

Adrienne Coyle

yes

Alex Giannou

Adrienne Coyle

Bruce Harkness, EM

1007406812

Southern Financial, LLC

Vahe Stepanian

1008346243

Tradition SEF, Inc.

Olivier Pariente - TCG

Yes

Olivier Pariente - TCG

Matt Barnett (TCG)

Matt Barnett (TCG)

My suggestions are:

- #1 - reach out to Anthony. He is very responsive
- #2 - reach out to ACO, and Bruce.
- #3 - reach out to Vahe
- #4 - reach out to Matt.

Thanks.

Kind regards,  
Isabel.

Isabel Gonzalez

ICG Sales C00 Team

Deutsche Bank AG, Filiale London

Winchester House, 1 Great Winchester Street

Tel: [REDACTED] | EC2N 2DB London

From: Christopher Whyton  
Sent: 01 February 2017 09:37  
To: Isabel-A Gonzalez  
Subject: RE: Remediation 2015-2016\_ ACO queries.xlsx

Hi Isabel

The first 3 below were not part of the debt trading outreach. Do you recall how you were made aware that trading wishes to keep?

The person in the bottom one doesn't exist in the directory so I'll need to ask around in the even they've left.

LEGAL\_NAME

GM Sales Sponsor for Outreach

1000040765

William Beaumont Hospital  


1004688558

Proven Wealth Limited

Adrienne Coyle

1007406812

Southern Financial, LLC

Vahe Stepanian

1008346243

Tradition SEF, Inc.

Olivier Pariente - TCG

Thanks

Chris

From: Isabel-A Gonzalez  
Sent: 31 January 2017 17:49  
To: Christopher Whyton  
Subject: Remediation 2015-2016\_ ACO queries.xlsx

Hi Chris,

As requested please find attached the names and below the statuses to be investigated:

- Internal entities – These accounts require remediation AND an ACO to sign off the remediation.
- o Can we off-board these?
- o If not, please provide an the ACO or get confirmation from AFC/ COB these account don't require ACO attestation
- Data Issues – idem
- CIB Claimed – These have been deemed off-boards unless you can find an ACO or say otherwise

Thanks.  
Kind regards,  
I.