

**From:** Amanda Kirby [REDACTED]  
**Sent:** 3/7/2016 10:50:49 AM  
**To:** Melisa Venegas [REDACTED]; Mildred Hernandez [REDACTED]; Melinda Roy [REDACTED]  
**CC:** Paul Morris [REDACTED]; Armen Brash [REDACTED]  
**Subject:** RE: ACTION REQUIRED: Issue related to ACUs [I]

Classification: **For internal use only**

Melinda - FYI

Best,  
Amanda Kirby



Amanda Kirby

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**From:** Melisa Venegas  
**Sent:** Monday, March 07, 2016 10:49 AM  
**To:** Amanda Kirby; Mildred Hernandez  
**Cc:** Paul Morris; Armen Brash  
**Subject:** ACTION REQUIRED: Issue related to ACUs [I]

Classification: **For internal use only**

All,

As you may know, per the AML Procedures manual, certain clients are excluded from ACUs. An issue has been identified in dbforce where High Risk clients are given an ACU Auto Exemption for Retail Banking, however, per Policy, this exception does NOT apply to High Risk clients.

Unfortunately, the code in dbforce is exempting high risk clients with only deposit accounts under \$250K from the ACU when it should not be—the code will be fixed, but in the meanwhile, while the ACUs listed below don't appear as overdue, they must be completed.

GCIS Customer #	Customer Name	Relationship	PO
[REDACTED]	JEJE, LLC	SOUTHERN FINANCIAL RELATIONSHIP	Paul Morris