



FEDERAL BUREAU OF INVESTIGATION

Date of entry 10/22/2019

On October 10, 2019 CHERIE QUIGLEY (QUIGLEY), date of birth (DOB) April 29, 1967, was interviewed at her residence located at 736 1st Street, Middletown, NJ 07748. Also present for portions of the interview was QUIGLEY'S husband. After being advised of the identities of the interviewing Agents and the nature of the interview, QUIGLEY provided the following information:

As of the date of the interview, QUIGLEY worked in the anti-financial crime unit of DWS, which had its initial public offering in 2017 and was a subsidiary of DEUTSCHE BANK (DEUTSCHE). Since 2014 until her transition to DWS, QUIGLEY was employed directly by DEUTSCHE in their asset and wealth management business working on transaction management. Prior to her DEUTSCHE experience, QUIGLEY worked at BANK OF NEW YORK MELLON doing the same type of work.

During QUIGLEY'S time at DEUTSCHE, QUIGLEY reported to WAYNE SALIT (SALIT) and eventually MAURA LICONTE (LICONTE). LICONTE reported to TIM MCNEIL. SALIT, who now works at DWS, reported to KEITH FALCONER in Germany.

QUIGLEY managed a team of seven individuals, three of which were in New York, NY and four in Jacksonville, FL. The individuals in New York were YING WANG (WANG), KRIPA ARYAL (ARYAL) and ROBERT WANG (R. WANG). Currently, WANG worked for DWS and ARYAL was a yoga instructor. The Jacksonville, FL team consisted of MICHELLE GABRIEL (GABRIEL), TAMMY MCFADDEN (MCFADDEN), DANYA FRIEDMAN (FRIEDMAN) and KEVIN WILSON (WILSON). Eventually two additional people were added, HORACE SWAFFORD (SWAFFORD) and PATRICIA MELO (MELO). The Florida and New York teams worked together. QUIGLEY felt she was provided appropriate resources within her department to perform her work.

The wealth management department used a system called PRIME for

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transaction monitoring. The broker-dealer department used ACTIMIZE. The system parameters were already set when QUIGLEY began her employment with DEUTSCHE. Perhaps QUIGLEY'S predecessor, CLARISSA DELAFUENTE, set them. As of the date of the interview, QUIGLEY explained that an analytics team set the parameters. Prior to the analytics team, DEUTSCHE Global ultimately decided the parameters and the risk levels. There was an annual review of risk and parameters. One year, QUIGLEY performed the review and sent QUIGLEY'S findings to SALIT which ultimately did not result in any parameter changes. There were a lot of changes since the analytics team took over.

PRIME created alerts and cases. Alerts were usually based on a transaction, such as a currency transaction report (CTR). Some alerts were generated monthly, weekly or even daily. Once the PRIME system created the alert, QUIGLEY would assign it to a team member for review. The team member would look at the customer account, the know your client (KYC) documentation and perform negative news searches. All steps of the review were documented in PRIME. If it was determined that the alert was not an issue, it would be explained and waved within the system. If the alert review generated suspicious activity, it was escalated to the next level in a suspicious activity information form (SAIF) through a SAIF mailbox. Once the alert was escalated to the SAIF mailbox, the alert was closed in PRIME and a notation stating it was escalated would be attached.

As the manager, QUIGLEY was very active in the PRIME system and was aware of all alerts that were escalated to the SAIF mailbox. SAIFs were unusual and only five or six a year were filed to the SAIF mailbox. The filings were usually related to cash activity. No one in QUIGLEY'S department had access to the SAIF mailbox, including QUIGLEY.

QUIGLEY recalled being unsure about issues such as BITCOIN and marijuana transactions. She expressed her concerns to SALIT. The thresholds and parameters in the wealth management department were not necessarily set low, however, the overall risk in that line of business was lower risk. The KYC department established the risk and that criteria was then used by QUIGLEY and her transaction monitoring team.

PRIME also generated cases on a monthly basis. Each wealth management customer had an account profile average and a risk rating assigned to it.

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The higher the risk, the lower the threshold. If that average or threshold was exceeded, the system generated a case.

An example of a high risk wealth management client would be a politically exposed person (PEP). QUIGLEY performed a manual PEP review each month. This review began with QUIGLEY downloading all PEP account activity for the relevant time period. Thresholds were set for domestic and international customers. The PRIME system did not automatically generate PEP cases. This was not a feature. QUIGLEY created 30 or 40 PEP cases each month when the thresholds were exceeded. The PEP case review involved the same types of activities as an alert review. In the beginning of her time at DEUTSCHE, QUIGLEY assigned all PEP cases to WANG. However, as the department got busier, all team members were assigned PEP cases. Most of the review work was documented in PRIME. However, email was used throughout and a case summary was put into PRIME. Those emails were then attached in PRIME. QUIGLEY was able to comment in PRIME but not edit. QUIGLEY did not review the case analysis before it went into PRIME. If someone asked QUIGLEY questions during the process QUIGLEY would respond. At the end of each month, QUIGLEY sampled 50% of PEP cases, 10% of alerts and 20% of high risk country transactions. If issues were discovered QUIGLEY would look into them.

QUIGLEY had not experienced a culture of sweeping issues under the rug at DEUTSCHE. QUIGLEY was never told not to report something or not file a SAIF. QUIGLEY felt no pressure and received no instruction to avoid filing SAIFs. QUIGLEY was free to do her job. In fact, QUIGLEY usually took a more conservative approach and filed SAIFs when in doubt. However, as previously mentioned, wealth management clients were not high risk clients and therefore, not many SAIFs were filed.

MCFADDEN and QUIGLEY did not get along. MCFADDEN was narcissistic, didn't like criticism and difficult to manage. MCFADDEN was OK at MCFADDEN'S job but was not good at it. MCFADDEN liked to manipulate things and wait until deadline dates to submit work in order to avoid being assigned additional tasks. MCFADDEN did nothing more than what MCFADDEN was told. MCFADDEN was able to do monotonous things but did not like to ask questions and interact with people. MCFADDEN just used what MCFADDEN found on the internet. Out of all the members of QUIGLEY'S team, QUIGLEY trusted MCFADDEN the least. For example, QUIGLEY recalled an instance when MCFADDEN

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determined no structuring was taking place when it actually was.

QUIGLEY also recalled a PEP review performed by MCFADDEN related to JARED KUSHNER (KUSHNER). The transaction involved four thousand dollars (\$4,000) sent to Russia out of a KUSHNER corporate account. MCFADDEN looked at a GODADDY website and found someone in New Hampshire and found part of the KUSHNER business name. The information was sent to the relationship manager and it was determined the recipient was a software developer. QUIGLEY even discussed the situation with SALIT. When the NEW YORK TIMES article came out about MCFADDEN, QUIGLEY was surprised by the allegations because this was the only instance in which MCFADDEN raised an issue about KUSHNER to her. MCFADDEN did the right thing by raising the issue to QUIGLEY.

QUIGLEY also recalled an issue, raised by MCFADDEN, in which 102 PEPs were put into a deferred status by WANG. During this time, the PRIME system required a bank statement to be attached to the file in order to complete the review. WANG would perform the review, document accordingly and then wait to attach the statement. In the meantime, WANG placed the PEPs in a deferred status. MCFADDEN made a big stink about this when MCFADDEN saw it. MCFADDEN tried to make a big deal out of nothing. MCFADDEN did not like WANG. At this time, WANG was overwhelmed with work. QUIGLEY acknowledged QUIGLEY cut WANG slack and perhaps should have made WANG finish the reviews quicker. Statements being required to complete the review was eventually eliminated from the process. In order to corroborate this information, QUIGLEY suggested the time stamps within PRIME be looked at.

MCFADDEN's performance reviews remained steady, however, QUIGLEY would not promote MCFADDEN.

QUIGLEY thought JEFFREY EPSTEIN (EPSTEIN) was a pig and could not stand him. Had there been something to file on EPSTEIN, QUIGLEY would have. However, there wasn't. QUIGLEY recalled a conversation she had with SALIT in which QUIGLEY wondered why DEUTSCHE was doing business with EPSTEIN. SALIT agreed with QUIGLEY. However, it was not their call to make. The risk was on the reputational side. QUIGLEY's filing to the SAIF mailbox was related to transactions, not reputation. QUIGLEY did see the EPSTEIN accounts paying women, who appeared to be models of legal age. She also recalled EPSTEIN'S attorney, DARREN INDYKE (INDYKE), withdrawing seven thousand five hundred dollars (\$7,500) in cash each week. A SAIF was filed

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on INDYKE. QUIGLEY was unable to recall the types of accounts EPSTEIN had at DEUTSCHE. DEUTSCHE recently tried to terminate the EPSTEIN relationship before details hit the papers. Looking back, maybe a SAIF should have been filed on EPSTEIN. However, QUIGLEY was transaction activity based, not reputation based risk.

QUIGLEY also noted DONALD TRUMP (TRUMP) became a covered client, which meant special access was required to view the profile. QUIGLEY had to review all relationships to TRUMP.

QUIGLEY also noted that DEUTSCHE advised all employees not to speak with the press.