

Anti financial crime - DWS subsidiary
investment management
for 1.5 row

2017 IPO

when DB - Asset + Wealth Business, investment
management
now DWS own entity; owned by
Deutsche.

2014 - now - 5 years

~~Greg~~ meller - some thing

2014 - go Sat. Wayne
2017 - mara Licante
now - wayne Sat. Wayne

during wealth mgmt - Jim McNeil was Wayne's
↑ mara
of wayne, now reports
to Keith Falkner in Germany

request

3 in NY, 4 in Florida



Ying Wang Wang = AWS

\$ Kripa Aryal → yoga instructor

Robert Wang

FL - nichelle gabriel
tammy mc fadden
Danya Friedman
Kevin Wilson

shen, horace swafford, shen
patricia meta mulo.

FL + NY wanted together

• transaction monitoring
brake - dealer - Activate
wm - used prime

scenarios → different ones, etc.

also made parameters, there already,
now on analytics from since

global ultimately decides what high risk
is. There is an annual review.
she did it once, sent it to Wayne,
no actual changes.

recently a lot of changes when
analytics does it.

alerts - prime
cases - customer cases

Alerts - CIR, 9,000

Some were monthly, some were weekly, daily
assign to team to review.
Team would look at Acct. and
look at b/c, negative news searches,
etc. this

all in prime if fine - explained, waived
if not → escalate to prime manager
in a safe suit
sub. activity relevant given
to the suit mailbox

it prime would close it and note
was escalated / confirmed.

Team meeting, etc - they would
escalate, she would know about
it.
SAR / ^{saills} unusual - cash activity
usually.

maybe some suit a year ish

she was very active in prime.

wasn't really sure about htein, mari, uae, etc.
she would talk to Wayne about her questions
& concerns

activity was lower risk, but that
threshold was low.

fyrc team establishes risk, then that
criteria.

a high risk client would be a pep.

cases

monthly basis - each customer had payable
on average. if exceeded, the system generated
a case.

each customer had a risk rating.
high risk, very low threshold.

she did manual pep review for each month.

she would download all activity for Peps

threshold was subprime domestic
T incl

not a feature of the system.

created 30 or 40 cases a month.
break the threshold - some reviews
all others look at monthly activity.

Ung was only one at first, then everyone
when they get busier.

foot over. Dan Cullington or Tiffany Bellinger.

most all in prime,

email was used during investigations, summary
was in prime

email would be attached to prime w
DM

she could comment in prime, could not
edit.

she wouldn't review their analysis before
it went into prime. Unless questions.

no issue - closed, she then samples
at end of month + go back to issues.

about 50% of yep's. 10% of alerts,
20% of high risk countries, already
established.

~~it~~ no one in her side had access to
that mailbox

she has never seen squashing,
more conservative approach, like a SAIF,
not high risk clients in WM.

from what she has seen, no culture
of sweeping things under rug.

Tammy

difficult to manage, narcissist, didn't like criticism, didn't get along

was good at jobs, she was ah.
she liked to manipulate things, Tammy would wait til work to be done.

nothing more than what she was told.

she could do monotonous things, didn't like to ask questions, just used internet & would use that.

she trusts her the least.

I where Tammy said no structuring
& she said it was.

Kushner

prep review to do - low \$ to russië, less
than 4k - corporate acct.

any Trump relationship to Trump she had
to review - Cherie.

Trump became a "covered" client,
Special access.

looked at godaddy site for someone in WH.
partial business name, etc.

she sent her to RM, they determined
a software developer, etc.

Cherie was linked to Wagoner, Cipriani
was after Tammy

just 1 time.

she had issues prior to article.

He did right thing by escalating to her

Epstein → she would have fished, can't steal
him, wanting to get on. He was a pig

lawyer would take cash out 7,500/week

Darin Indyke

D: ft names +

to women - models, were of age.

can't remember the figures of Accts.

GR's. money, but looked on Darin.

Gift box was only transacted

Reputation - talk to Wayne, how do we have this guy as a client.
Wayne agreed. wasn't her call.

trying to exit relationship but it hit her.

she thinks a reputation is a gap, he was just activity.

looking back, maybe.

no pressure, no instruction, agree to do her job.

must be predecessor - Clarissa sent the
parameters.

102 steps - ying did all.

one step before completing review was attach
the statement.

ying would deferred then
not until she statement.

Tammy made a strike, pain.

she is trying to make a big deal
out of nothing. She didn't like ying.

ying was overwhelmed, they should
have be finished guidelines the statement
step was eventually eliminated.

she raised a him a lot.

she cut slack when she shouldn't
have.

you can go in and coach
at time steps.

- she escalated / case, no concerns ~~raised~~ raised.
- reviews were steady but she wouldn't promote her.

Kevin Wilson - Schville
Benson -

resources - no, eventually getting a
consultant + another person

no talking to press.

the spirit of the law is not to be
broken but the letter of the law
may be

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