



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/21/2019

On July 12, 2019, TAMMY HILL-MCFADDEN (HILL-MCFADDEN), was interviewed at the Jacksonville, FL field office of the Federal Bureau of Investigation. HILL-MCFADDEN'S legal representation present during the interview consisted of KRISTEN DOOLITTLE and BRIAN MCCAFFERTY. Assistant United States Attorneys consisted of [REDACTED]. Also present during the interview were Special Agents [REDACTED]. HILL-MCFADDEN was advised it was imperative she provide truthful information. After being advised of the identities of the interviewing Agents and the nature of the interview, HILL-MCFADDEN provided the following information:

HILL-MCFADDEN had over 18 years of anti-money laundering (AML) and know your client (KYC) experience in the banking industry. She began her career at Bank of America (BOA) in Jacksonville, FL as a loan officer. During her approximately seven years of employment at BOA, she held several positions including Assistant Branch Manager, Operations Manager and KYC Compliance Officer. Following her BOA experience, she worked in contract positions for CHASE and FIDELITY. In 2008, HILL-MCFADDEN began her employment with DEUTSCHE BANK (DEUTSCHE) as a Senior Operations Specialist. She worked in tax, audit and loan operations. Eventually, she became a KYC Manager and the AML Compliance Officer. HILL-MCFADDEN held several certifications, including but not limited to, AML and University of Cambridge certifications.

After working in loan operations with DUETSCHKE Securities for approximately two years, HILL-MCFADDEN moved to the the role of KYC Manager in or around 2010. While in that role, she managed eight to ten people. The department was responsible for reviewing KYC documents for new customer trading and equity accounts. The documents included, but were not limited to, financial statements and articles of incorporation received from the client on-boarding team. Once the documentation was received and reviewed by HILL-MCFADDEN and her team, a decision to proceed or not was made and the

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Investigation on 07/12/2019 at Jacksonville, Florida, United States (In Person)

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on-boarding team was notified. HILL-MCFADDEN'S team would ensure the information provided made sense. Part of this process was required by section 326 of the Patriot Act.

Since HILL-MCFADDEN'S group made the final decision on opening an account for new customers, typically individuals, she regularly received pressure from relationship managers (RM) and individuals in New York, to get the account opened. For example, a RM would tell HILL-MCFADDEN they needed an account open by two o'clock. HILL-MCFADDEN typically replied to these requests with an email explaining the issues and the protections for the RM and the bank. At times, people would go above HILL-MCFADDEN to get what they wanted, but she was not sure how successful they were. HILL-MCFADDEN could not recall specific names or regions of where the pressure came from, but she did recall a contact in New York named ZANAIB, who was a Senior Vice President (SVP) on the KYC side.

HILL-MCFADDEN'S group was part of DEUTSCHE Securities, which was a part of GTO, that included financial investments and equities. Although her group worked out of Jacksonville, FL, she ultimately reported to New York. Her chain of command was ELENITA ESCOBAR, Assistant Vice President (AVP), STEVE HELLINGER, Vice President (VP), and PAUL KAVANAUGH, all in New York. HILL-MCFADDEN held that role until 2014, when the work was outsourced to India.

In 2014, HILL-MCFADDEN interviewed for and received the role of AML Compliance Officer. HILL-MCFADDEN, who was no longer a manager, originally reported to CLARRISA DELAFUENTE (DELAFUENTE), VP of transaction monitoring in New York. HILL-MCFADDEN worked with private bank clients. She and one other AML Compliance Officer, ALMARIE WORLDS, sat in Jacksonville, FL and an additional two, YING WANG (WANG) and YANG WONG (WONG), sat in New York. The work volume was astronomical. Additional Jacksonville, FL Compliance Officers, MICHELLE GABRIEL, KEVIN WILSON, DANYA FRIEDMAN and CRIPA APAL were added to the team. SHERI QUIGLEY (QUIGLEY), VP, took over for DELAFUENTE in 2015. QUIGLEY reported to WAYNE SALIT (SALIT), Director.

The transaction monitoring process began when one of the DEUTSCHE systems created an alert. DEUTSCHE used MELAVANTE, aka PRIME, for compliance, ACTIMIZE for trading activity, and other systems such as NORCOM. Senior management created the alert parameters within these systems, such as dollar



DELAFUENTE. While in the system, HILL-MCFADDEN came across 102 politically exposed persons (PEP) pending in deferred status. PEP'S were high risk individuals and they should have been addressed immediately. New PEP'S were reviewed by SALIT and existing PEP clients were reviewed by QUIGLEY. All 102 referenced above were existing clients.

The system had three typical case/alert statuses: open, waved and deferred. Deferred status was basically like "cyber space." In order for something to be in deferred status, someone would have needed to change the status accordingly. In HILL-MCFADDEN'S experience, although she had the ability to do so, there was typically no real reason to put anything in deferred status. If for some reason a deferred status was appropriate, it should have only remained in that status for a few days.

After HILL-MCFADDEN discovered the PEP'S in deferred status, she emailed QUIGLEY and asked her about the situation. At first, HILL-MCFADDEN assumed it was just an oversight and she wanted to know what she needed to do to address the issue. Approximately two hours later, QUIGLEY began rejecting all of HILL-MCFADDEN'S work product in order to make her life difficult. As a result, HILL-MCFADDEN'S productivity numbers went down and her bonus was impacted. She believed QUIGLEY was extremely upset with her and as a result, began intentionally rejecting her work. HILL-MCFADDEN thought QUIGLEY knew about the PEP'S. She noticed that all 102 of them were placed into deferred status by WANG, who sat next to QUIGLEY in New York. HILL-MCFADDEN never spoke to him about the issue. HILL-MCFADDEN also noted DELAFUENTE calculated the deferred cases into her reporting numbers and QUIGLEY did not.

Approximately one month after HILL-MCFADDEN'S discovery of the 102 PEP'S, she emailed SALIT and told him she believed QUIGLEY was intentionally rejecting her work and hurting her productivity numbers. SALIT never responded to the email. Eventually, HILL-MCFADDEN reported her issue with QUIGLEY to FRANCESCA BENSON (BENSON) in human resources (HR) and they subsequently opened an investigation in early 2016. After their investigation and approximately one year after her reporting, HR determined that no wrong doing occurred. Prior to 2016, HILL-MCFADDEN had received great performance reviews. She received several awards and honors. However, JOSEPH ACEDEBO (ACEDEBO), Director of Anti-Financial Crime (AFC), continued to allow QUIGLEY to write HILL-MCFADDEN'S performance review even

after she told him about the PEP'S issues and her issues with QUIGLEY. ACEDEBO would always support QUIGLEY and SALIT. In her 2016 performance review, HILL-MCFADDEN came across unusual and alarming language and detail. It contained words, such as "inconsistent", that she had never before seen used in her reviews. QUIGLEY'S retaliation towards HILL-MCFADDEN continued until HILL-MCFADDEN was terminated in 2018.

At some point in 2016, HILL-MCFADDEN requested a transfer to a different department. She applied for 12 to 16 jobs and did not receive any of them. She also requested to be placed in the KYC department, where she previously worked. Her former manager told her he never saw her resume come through. On numerous occasions, HILL-MCFADDEN expressed her issues and desire to transfer to JOSH BLAZER (BLAZER), Director, but nothing came of those conversations. Every time she applied for a position in the HR system she was instantly unsuccessful.

In or around late 2016, HILL-MCFADDEN came across an LLC account, REAL CONTRAD, LLC (REAL CONTRAD), owned by JARED KUSHNER (KUSHNER) as part of a case. The majority of the transactions were in crypto-currency and she was unable to validate the origination or the recipient of the funds. It was easy to determine the activity was suspicious and there was an issue. REAL CONTRAD appeared to be paying an employee in crypto-currency. HILL-MCFADDEN thought the activity was mind boggling and she had never seen a flow like that. She examined the July and/or August 2016 activity. HILL-MCFADDEN notified QUIGLEY about the activity and she was instructed to write a case narrative and send it to her. HILL-MCFADDEN wrote the case narrative, sent it to QUIGLEY, who determined HILL-MCFADDEN'S claims were unfounded. HILL-MCFADDEN came across the name of a Russian individual. She GOOGLE searched that individual and found a website that appeared to be made up. The website said he was in the United States but there was no picture, just an avatar. On the website, the individual was listed as an employee of REAL CONTRAD but everything, including the job description, looked bogus. She then went to one of KUSHNER'S website's and noted the individual was not listed as an employee.

HILL-MCFADDEN continued to push QUIGLEY on the REAL CONTRAD issue. QUIGLEY instructed her to speak with the RM, a woman named ROSE (ROSE). Typically, when potentially suspicious activity was brought to the attention of the RM, they used the information they knew or had to look into the

issues. They were not supposed to contact the client or ask them questions related to the activity. It was the RM'S duty to monitor the due diligence of their client's. However, in this situation, the RM contacted KUSHNER'S company and was provided information about the person receiving the cryptocurrency. All of this information was documented. HILL-MCFADDEN recommended the associated accounts be closed. SALIT and QUIGLEY were involved in all REAL CONTRAD email discussions. After that, the case was closed. HILL-MCFADDEN did not know if KUSHNER or DONALD TRUMP (TRUMP) were in the original 102 PEP'S she discovered.

A few days after HILL-MCFADDEN raised concerns about the KUSHNER accounts, BENSON told HILL-MCFADDEN that QUIGLEY wanted to meet with her. QUIGLEY attended the meeting by phone while HILL-MCFADDEN and ERICA PRADA in HR were present. During the meeting, HILL-MCFADDEN was told her productivity was low and was asked if she was happy. It was during this meeting that HILL-MCFADDEN realized QUIGLEY knew about her original HR complaint.

In April of 2017, HILL-MCFADDEN transitioned to the role of AFC Compliance Officer. She requested to work in KYC. but ACEDEBO told her no and that AFC was her opportunity. Since MARLA LICONTE was the head of AFC and SAR's, HILL-MCFADDEN was essentially working with the same group of individuals. Since DEUTSCHE tended to discount concerns and sweep issues under the rug, she felt this move was part of a plan to terminate her. One day she received a message to come down stairs. She knew this meant she was going to be terminated so she took her purse to her car prior to the meeting. The meeting was with BLAZER and an individual named ERIN. Reading from a piece of paper, they told her her productivity and performance was low. HILL-MCFADDEN asked for a copy of the paper but they only provided her the portion of the form that addressed benefits. They did not give her the portion of the form that explained why she was terminated.

Also while employed by DEUTSCHE, HILL-MCFADDEN also raised concerns about client JEFFREY EPSTEIN (EPSTEIN). It appeared that EPSTEIN sent wires to young women, perhaps in their twenties. He also sent wires to a woman in France that owned an art gallery. HILL-MCFADDEN gathered this information through GOOGLE searches. The entire Jacksonville, FL team wanted to terminate the relationship with EPSTEIN. In 2015, HILL-MCFADDEN e-mailed her concerns to QUIGLEY and told her she no longer wanted to work on

EPSTEIN'S accounts and requested to have that work redistributed. QUIGLEY replied that EPSTEIN served his time and the accounts were not closed at that time. The EPSTEIN RM was (ROSE). Also, in or around late 2016, an internal SAR was filed on EPSTEIN'S lawyer, DARIN MCINKE. HILL-MCFADDEN remembered learning about this SAR because the Federal Reserve was in the bank at the time with QUIGLEY.

HILL-MCFADDEN also reviewed TRUMP'S old post office portfolio cases. Since the DEUTSCHE systems did not talk to each other, she was unable to determine a sound origin of the funds. The funds were being pulled from one spot and moved to another for payments.

HILL-MCFADDEN filed complaints against DEUTSCHE with OSHA, FINRA and the SEC. However, she did not file a lawsuit against DEUTSCHE.