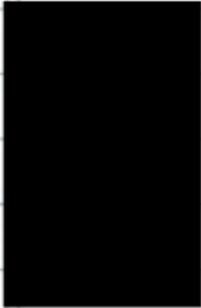


Tanny Hill - McFadden

7/12/19

Attorneys - Kristin Dodithe - labor + employment

. Brian McCafferty - web loans



Over 18 yr AML / KYC exp. started at BofA
 ↳ Jack
 ↳ Georgia
 ↳ Jack

- 7.5 years
 loan officer
 Asst BM
 op manager
 KYC compliance officer

then to Chase, fidelity - contract positions.

2008 - PB - Sr operation specialist tax + audit

in loan ops
 KYC manager
 AML compliance officer

BofA - bank representative - mort. loans, investments, then
 to op manager, Asst BM, temporarily BM.

retail - she went in

2005 - Deutsche Bank → DB Securities

cert AML
cert U of Cambridge } all 1.

~~2005~~
w loan ops - ensure collateral for loans

Vault then went to NY to Jacksonville - sandy hurricane

2010 - KYC manager position - managed 8-10 people
review KYC Docs from Client at boarding fees.

Trade Accts, incan, f.x. val, real, etc. valid docs
FS, AFI, etc. → submit to retrieval system
make decision to proceed, boarding fees would then be notified
sec 326 name, address, SSN, etc.
patriot act

rejection → failure to provide info in sufficient time.

her group was final decision

EM pressure - all the time

Brokers say would this done by 2 o'clock

she would reply w email

explaining issue + protection.

DB CA NY Books -

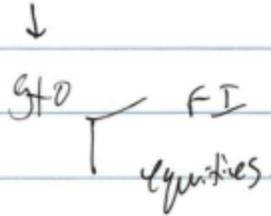
NYC manager - 3.5 to 4 years. - 2 managers. in FI + sec
about 20 people total.

Jacksonville - NYC, AML, Regal Compliance in her
former bldg.

ultimately her group reported to New York.

her group

was part of GTO / DB securities



Raul Kavanagh - NY



Steve ~~Heif~~ ^{bellinger} - VP



(y) Elena Escobar - AVP



her - NYC manager

workload → backlog.

there was pressure to get things through, did they go
around? sure. ^{they} go above her. not sure of
successful.

initial NYC + that was it. Not sure unless there was
new account request.

small trust - type of business, intangible docs,
FS do not support wealth app from RM.

she did individuals - not company's usually.

late 2010-2014 → those jobs went to India, she
was diptae

New York would put pressure on you - none she can recall.

contact → Zanaib, in NY, she was SRVP
in NYC idb

can't remember names or regions.

2014 - RML role, copious copies - interviewed in NY
+ got position.

manager to her was Chrissa de la Fuente, VP of
transaction monitoring in NY.
reported to NY, she was
not manager

Private bank clients, 2 sat in JX +
2 in NY
astronomical volume.

• RM's duty was to monitor DD of clients

monitoring process started when they received alerts

system - melavant compliance suite, called it prime
actimize - monitored fraud activity
Noicom, ^{suspicious activity system.}

SI management set parameters for the system.
Amount, country, etc.

Sheri Quigley - VP - NY (teacher in 15)
for Clarissa
↓
report to Wayne Salit - Dr

never really questioned the parameters, could see some
but not all.

Sheri disseminated with to the team.

RM would be brought in if more info needed.

cases - monthly basis

alerts - bi weekly basis. - trigger in the system
review it, case reevaluation or not

Sheri
would then approve their reevaluation

all done in the melavant system.

Sheri makes decision on case or alert, then
(sr. manager) goes to her.

alert comes in - should be looked at right away.
they were busy.

alert did not stop activity.

if case recommended.

Alert → sheri gets batch → disseminates to
staff based on ... she doesn't know how

goes through DD process, look at acct. in system. to
make sense, Tammy would then google, search, look into
it using judgment.

they had deadlines - case us 30 days.

initial team - Tammy, Almarie World's - JX
ging wang, ~~wang w~~ - wy
yang wang.

most work went to JX - not sure why.

eventually 2 more
almarie ^{transitional}, michelle gabriel comes in
+ then trevin wilson } all 4 in JX
Danya friedman
crifa apal.

6 at one point, not sure how but she of course
said Sheri she needed more help.

Sheri - not diligent, not competent.

there were times when Sheri would instruct to
do something not part of written policy,
email or phone notified.

example. Dec 2015 - 102 REP cases she
discovered - taken but bc they were
pending in deferred status. "cyber space"
someone needs to change status
from open to deferred.

statuses → open, waived, deferred

typical

if she gets a new case she
can see previous decisions

typically nothing in deferred. - no real reason but she
had ability to use deferred

if so, only a few days.

how she came across

• working a case, ^{see's} from previous months in
pry:ke.

Clarissa - prior to Sheri, went on ML, she
gave her formula to check case statuses.

she saw previous cases in defered so logical in
+ saw 102 individual peps, who know
how many cases.

emails Sheri, asks ^{feels} her about pep cases,
Tamy assumed oversight. asked her what she needed
to do

Sheri, 2 hours later, starts rejecting her
other work to make her life difficult, all her
work was rejected. productivity ~~it~~ goes down, bonus
dr.'ver, etc.

she thinks its intutional - she emails ^{about her} Wagnel. later
+ tells him the situation.

she thinks she was extremely upset

↓
Sheri

peps are high risk, should be immediate,

no

No ~~Deferred status cases don't go to Germany. Under~~

she thinks she knew about Rep cases
going in NY, but next steri, placed them
into deferred status.

didn't talk to him about it.

No Clarissa included deferred in counts to Germany

Clarissa - counts them

steri - no

Reps were 1st + foremost, the day basically, busy so
timely.

Wayne no response to her - she goes to HR
+ tells them - Francesco
Benson.

HR opens up investigation. early 2016

Joseph Acciardo - Dir of Anti Financial crime, tells him
in person, will look into it; Joe will
support Wayne or steri. She told him about bully issue
also.

Sheri: - Tammy used email when bc she does did things outside of written policy:
she would do it but say per Sheri...

Joe allowed her to still let Sheri do her reviews, all down!!

prior to 16 - great review
gen award
core of excellence
wild spot light

2016 → end of year review

she says don't ever do that again once she saw the as per... comment. - this was in an email.

Sheri would make her do a case summary narrative.
private bank - they can't file SAR, first a narrative + Sheri would decide if a SAR or not, that's Sheri's process, not in manual

SAR - internal Database

compliance officer should decide, not her boss

Managing Director makes decision to Fincen, you never know if it went or not.

Doug Sloan / Wayne as well.

in private but she couldn't see FIW or nat, even
in the past.

Peggy ^{Megarvey} - sat near Sheri

usually ended up going to RM for more + it's fine

No one ever said no directly, but she could tell
it was ~~not suggested~~ sense it wasn't going
anywhere.

They sat in room together

she didn't see 3145's from the institution.

Preps had to be reviewed by Wayne for new clients, Sheri
did existing - 102 were existing

Tammy's team felt the same way she did but
she was vocal, she likes wearing rebellion.

Nat sure who HE ~~is~~ interviewed

No wrong doing determined. ↗ 1 year

closed after 2016 performance review
retention continued until 2018 - terminated

review 2016 → very detailed, unusual.

alarming

key words, never seen, inconsistent,

never a review like that.

after she went to HR, she asked for a transfer
out. b/c she hasn't seen much. ^{2016 ish}

FYE: 2015 - Sheri to her - great

→ asks to go to FYC... → applies for all positions, nothing
her former boss contacted... she thinks that was the plan.

Drs in London decided not to hire her for jobs

late 2016 - Kushner acct open a
case.

High LLC

She sees suspicious activity, she tells
Sheri, she says do a case narrative.
She does, Sheri says unguarded, brushed off.

Transactions were majority cryptocurrency - she
couldn't validate origin + recipient.

The flow was easy to see there was an issue.

Kushner - Real Contract, LLC

she tells Sheri about a Russia individual, etc.

↳
googles him, made up page, person was listed as
of Real Contract. job description + all
looked bogus. he wasn't on Kushner's site
as employee.
no pic - just avatar

somebody in USA.

she presses - Sheri ^{says} goes to RM - Rose/Rosa

protocol is for RM to use info and decide... NOT
to client

RM goes to RM client, Kushner ~~to~~ why said
things about person etc.

all documented

Tony - she still recommended acct gets closed

30 days
or 50
time span

Case was closed.

in AMC would, he was able to file internal SAR

paying employees in cryptocurrency, never a flow like that - mind boggling.

July/August 2014 flow.

• not sure if Kushner or Trump were in 102

Wayne + Sheri were involved in Royal Carter talks in all emails.

Timeline → Kushner 11/2016 - Dec 2016 ; sure within a few days later, Francesca says Sheri wants a meeting w/ her.

meeting → productivity low, are you happy

Sheri - phone

Erica Prada - HE w/ her.

• never by a a plan.

during this meeting, Tammy realized Sheri know about her HE complaint.

4/2017 she transitions out to AFC compliance reviewer.

requested tyc at first but Joe said no, this is your opportunity.

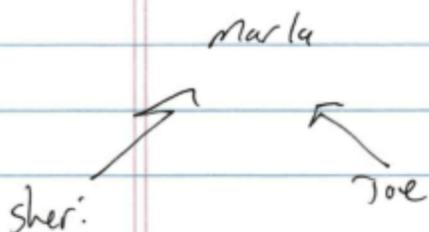
she thinks no tyc b/c it was part of plan...
culture... issues + concerns get discarded +
brushing things under the rug.

example: ?

during, Wayne no more manager of Sheri.

marla L head of ^{internal} SAR, Sheri reports to her. now

marla ~~Laconte~~ L'conte AFC + ^{int} SAR head.



basically, she is still in the mix of the same people

applied for previous 2 or 3 jobs... her former boss → her manager said he never saw her resumes.

Joe hires Josh Blazer as director, gives him responsibility.

↳ She told him numerous times 'it's bad for her, she wants out, what about other jobs. instant unsuccessful. from HE.

Josh - 1 on 1 - she tells him she isn't happy, some things, numerous applications.

she was there 8 months, 5 managers within 7 mo's.
Team of 10 + co.

she would still be there if she shut up.

Don't correspondingly work. [?] nothing.

- she gets a message to come down stairs, went to car, put purse,
low performance, productivity

erin + Josh - they were reading from something...
she pressed and asked for a copy, gave her bottom part about benefits, top part said why

Hutton Hillan - 17 review, says inconsistent

they also sent a letter alerts for 49 days which impacts her productivity.

in Private Bully
consensus was basically don't submit SAR, there would be pushback + they all get together + would talk about what you submitted.

not sure what happened to the 102

no DB lawsuit from her.

filed with OSC, WB w/ FINRA + SEC.

other clients

Jeffrey Epstein → online tax team wanted to terminate his accounts b/c of representational.

~~year~~

2015 → brought up concerns.

she emailed Stevi - she said she no longer wanted his accounts, asked to have the redistribute.

he would send wires to a person in France,
google says owned a art gallery.

xfers to young ladies based a google searches
maybe 20's.

Sheri's reply was he served his time, PB
wouldn't close L's accounts.

Rm was Rose. Yes Rosemary ✓?
her team

Darin McIntire - Epstein's lawyer, internal STAR was
filled by a colleague.
Aug/Dec - 2016
late.

Federal Reserve was in the bank at the time. w/
Sheri.

"As per - statement... that was her confirmation.

• she did review Trump cases

old post office portfolio she would review

she didn't get a sound origin of the funds.

systems didn't link

identity to pay for a loan

pull here pay that, pull here pay that.

Sher's Narrative was always emailed to
Sher... revised version if necessary goes into system.