

**EXHIBIT A TO EDR SWITZERLAND
NON-PROSECUTION AGREEMENT**

STATEMENT OF FACTS

INTRODUCTION

1. Edmond de Rothschild (Suisse) SA is a corporation organized under the laws of Switzerland with its headquarters in Geneva, Switzerland.¹ It operates a subsidiary called Edmond de Rothschild (Lugano) SA. Edmond de Rothschild (Suisse) SA and Edmond de Rothschild (Lugano) SA are hereinafter collectively referred to as “EdR Switzerland” or the “Bank.”
2. EdR Switzerland operates a financial services business in Geneva, Lausanne, Fribourg, and Lugano, Switzerland. It offers private banking and wealth management services for individual clients around the world, including U.S. citizens, legal permanent residents, and resident aliens.
3. EdR Switzerland is affiliated with the Edmond de Rothschild Group, an independent, family-controlled financial group focused on high-net-worth individual clients. Edmond de Rothschild Group was founded in 1953 and currently operates in 19 countries worldwide. EdR Switzerland is an independent Swiss legal entity, led by its own board of directors, chief executive officer, and executive committee, and is supported by its own legal and compliance functions.
4. [In 2012, EdR Switzerland agreed to acquire the Lugano-based Sella Bank AG, which became part of Edmond de Rothschild \(Lugano\) SA in 2013.](#)
5. ~~4.~~ In 2014, the Edmond de Rothschild Group held assets under management totaling approximately \$165.0 billion, out of which \$44.0 billion comprised client assets managed in Switzerland. This made EdR ~~Rothschild~~[Switzerland](#) one of the largest private banks in Switzerland.

U.S. INCOME TAX & REPORTING OBLIGATIONS

¹ [Edmond de Rothschild \(Suisse\)](#) SA was formerly called Banque ~~Privee~~[Privée](#) Edmond de Rothschild SA and Edmond de Rothschild [\(Lugano\) SA](#) was formerly known as Banca Privata Edmond de Rothschild Lugano SA.

- 6.** ~~5.~~ United States (“U.S.”) citizens, resident aliens, and legal permanent residents have an obligation to report all income earned from foreign bank accounts on their tax returns and to pay the taxes due on that income. Since tax year 1976, U.S. citizens, resident aliens, and legal permanent residents have had an obligation to report to the Internal Revenue Service (“IRS”) on the Schedule B of a U.S. Individual Income Tax Return, Form 1040, whether that individual had a financial interest in, or signature authority over, a financial account in a foreign country in a particular year by checking “Yes” or “No” in the appropriate box and identifying the country where the account was maintained.
- 7.** ~~6.~~ Since 1970, U.S. citizens, resident aliens, and legal permanent residents who have had a financial interest in, or signature authority over, one or more financial accounts in a foreign country with an aggregate value of more than \$10,000 at any time during a particular year were required to file with the Department of the Treasury a Report of Foreign Bank and Financial Accounts, FinCEN Form 114, formerly known as Form TD F 90-22.1 (the “FBAR”).
- 8.** ~~7.~~ An “undeclared account” was a financial account owned by an individual subject to U.S. tax and maintained in a foreign country that had not been reported by the individual account owner to the U.S. government on an income tax return and an FBAR.
- 9.** ~~8.~~ Since approximately the 1930s, Switzerland has maintained laws that ensure the secrecy of client relationships at Swiss banks. Swiss law prohibits the disclosure of identifying information without client authorization, especially to foreign government investigators. These are Swiss criminal laws punishable by imprisonment. Because of the secrecy guarantee that they created, these Swiss laws enabled U.S. clients to conceal their Swiss bank accounts from U.S. authorities.
- 10.** ~~9.~~ In or about 2008, Swiss bank UBS AG (“UBS”) publicly announced that it was the target of a criminal investigation by the IRS and the United States Department of Justice (“DOJ”) and that it would be exiting and no longer accepting certain U.S. clients. On February 18, 2009, the DOJ and UBS filed a deferred prosecution agreement in the Southern District of Florida, in which UBS admitted that its cross-border banking business used Swiss banking secrecy and privacy laws to aid and assist U.S. clients in opening and maintaining accounts and concealing undeclared assets and income from the IRS. Since UBS’s announcement, several other Swiss banks have publicly announced that they were or are the targets of similar criminal investigations and that they would likewise be exiting and not accepting certain U.S. clients. These cases have been closely monitored by banks operating in Switzerland, including EdR Switzerland, since at least the third quarter of 2008.

OVERVIEW OF EDR SWITZERLAND’S U.S. CROSS-BORDER BUSINESS

- 11.** ~~10.~~ For decades prior to and through in or about 2013, EdR Switzerland **conducted a U.S. cross-border banking business that** aided and assisted U.S. clients in opening

Commented [VT1]: Saying EdR “conducted a U.S. cross border banking business” suggests a much higher degree of strategy and organization than actually existed at EdR – there was no U.S. desk, no RMs who focused on U.S. clients, no marketing aimed at the U.S., and no strategic plans focused on U.S. clients.
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and maintaining undeclared accounts in Switzerland and concealing the assets and income they held in these accounts. During the Applicable Period,² EdR Switzerland held and managed approximately ~~941~~950 U.S. client accounts, which included both declared and undeclared accounts, with aggregate peak of assets under management of \$2.15 billion.³

~~12.~~ ~~11.~~ EdR Switzerland was aware that U.S. taxpayers had a legal duty to report to the IRS and pay taxes on all of their income, including income earned in accounts that these U.S. taxpayers maintained at EdR Switzerland. EdR Switzerland knew that it was likely that certain U.S. taxpayers who maintained accounts at EdR Switzerland during the Applicable Period were not complying with their U.S. reporting obligations.

~~13.~~ ~~12.~~ EdR used a variety of means to assist U.S. clients in concealing their undeclared accounts, including by:

- providing traditional Swiss banking products such as hold mail, code name, and numbered account services;
- assisting clients in using sham entities such as structures ~~and insurance wrappers~~ as nominee beneficial owners of the undeclared accounts;
- providing offshore credit cards, cash cards, and debit cards to repatriate funds from the undeclared accounts;
- structuring transfers of funds from undeclared accounts to evade currency transaction reporting requirements;
- facilitating the covert repatriation of undeclared accounts via cash withdrawals, the purchase of luxury goods, and transfers to the foreign bank accounts of non-U.S. friends, family, and business associates;
- accepting and suggesting the use of IRS forms that falsely stated under penalties of perjury that the sham entities beneficially owned the assets in the undeclared accounts;
- divesting U.S. securities from its undeclared U.S. accounts for the purpose of

Commented [VT2]: See BPER000901 – the only insurance wrapper connection was that the Bank permitted the beneficial owners of G01078 and G00778 to open new named accounts at the Bank for a matter of days so that they could exit the Bank to insurance wrapper accounts at another bank. The Bank had no US related accounts held by insurance wrappers.
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² Capitalized terms not otherwise defined in this Statement of Facts have the meanings set forth in the Program for Non-Prosecution Agreements or Non-Target Letters for Swiss Banks, issued on August 29, 2013 (the “Swiss Bank Program”).

³ Of the 161 U.S. client accounts at Edmond de Rothschild (Lugano) SA, 58 accounts with peak assets under management of approximately \$56 million were accounts opened by Sella Bank AG and inherited by Edmond de Rothschild (Lugano) SA as a result of its acquisition of Sella Bank AG.

subverting its Qualified Intermediary ("QI") Agreement with the IRS.

- 14. 13-** Approximately 101 private bankers were responsible for managing at least one U.S. client account during the Applicable Period. These private bankers (referred to as "relationship managers") served as the points of contact for U.S. clients at EdR Switzerland and were responsible for opening and servicing U.S. client accounts at EdR Switzerland. Certain relationship managers assisted or otherwise facilitated some U.S. individual taxpayers in establishing and maintaining undeclared accounts in a manner that concealed the U.S. taxpayers' ownership or beneficial interest in said accounts. EdR Switzerland acquired U.S. client accounts primarily from direct referrals, walk-ins, and business arrangements with external asset managers.
- 15. 14-** Since August 2008, approximately 43 external asset managers were responsible for independently managing at least one U.S. client account held at EdR Switzerland. EdR Switzerland compensated certain of these external asset managers for the business they generated for the Bank based on a negotiated fee structure.
- 16. 15-** Relationship managers typically communicated via telephone, fax, business email, and mail (when clients did not request hold mail services) with certain of their clients in the United States. Certain relationship managers also met with U.S. clients outside of the United States to provide banking services and investment advice related to their undeclared accounts. On at least one occasion, a relationship manager traveled to the United States after August 1, 2008 and met with an existing U.S. client to discuss the client's accounts.

METHODS USED TO CONCEAL ASSETS AND INCOME

- 17. 16-** EdR Switzerland offered a variety of traditional Swiss banking services that it knew would and did assist U.S. clients in concealing assets and income from the IRS. One such service was hold mail. For an annual fee, the Bank would hold all mail correspondence for a particular client at the Bank. At least 352 U.S. accounts utilized EdR Switzerland's hold mail services. These services allowed U.S. clients to eliminate the paper trail of undeclared assets and income held at EdR Switzerland back to the United States.
- 18. 17-** The Bank also offered code name or numbered account services. For an annual fee, it allowed U.S. accountholders to keep their names **secret off of account statements and other documentation received** from the Bank. In lieu of **keeping records in referring to** the U.S. **client's client by** name, the Bank would use a secret code name or number. At least 198 U.S. accounts utilized EdR Switzerland's code name or numbered account services. These services allowed U.S. clients to conceal their names from bank records which would otherwise document the undeclared assets and income they held at EdR Switzerland.
- 19. 18-** EdR Switzerland relationship managers assisted U.S. clients in opening and maintaining bank accounts in the names of non-U.S. structures **and non-U.S.**

Commented [VT3]: The Bank's records reflect the names of accountholders and beneficial owners.
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Commented [VT4]: See para. 13 above. There were no insurance wrapper accounts for US clients at the Bank.
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insurance companies. In total, approximately 42% of the Bank's U.S. client accounts that were open on or after August 1, 2008 were nominally held in the name of offshore entities. These accounts held approximately 61% of the total U.S. client assets at EdR Switzerland during the Applicable Period.

20. 19- At least one EdR Switzerland relationship manager coordinated with an external trust company to create and administer an offshore structure incorporated in Singapore. EdR Switzerland relationship managers **coordinated with also had reason to know that U.S. clients used** external trust companies and attorneys to create and administer **offshore** structures incorporated or based in offshore locations such as the British Virgin Islands, Panama, and Liechtenstein **for its U.S. clients.** Because Swiss law requires EdR Switzerland to identify the true beneficial owner of structures on a document called a Form A, it knew that these were U.S. client accounts. Nonetheless, for certain U.S. client accounts, EdR relationship managers and other employees knowingly accepted and included in EdR Switzerland's account records IRS Forms W-8BEN (or EdR Switzerland's substitute forms) provided by the directors of the offshore companies that falsely represented under penalty of perjury that such companies were the beneficial owners, for U.S. federal income tax purposes, of the assets in the EdR Switzerland accounts. This aided and assisted the U.S. clients in concealing these assets and income from the IRS.

Commented [VT5]: We are aware of one instance where an RM coordinated with external advisors to set up a holding structure in Singapore - G00732 discussed at BPER000894 .
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21. 20- EdR Switzerland's At least one relationship managers aided and manager assisted at least threetwo U.S. clients within closing their undeclared accounts at the Bank by placing and maintaining their assets in accounts held in the names of non-U.S. insurance companies and not the actual beneficial owner of the funds (known colloquially as an "insurance wrapper"). Additionally, at least one relationship manager assisted a U.S. client in closing his undeclared account at the Bank by opening up a new account at the Bank and transferring briefly opening up new nominative accounts at the Bank, which permitted them to transfer funds from the new accountaccounts to an insurance wrapper accountaccounts in Liechtenstein. Insurance wrappers were marketed to **Swiss banks, including to EdR Switzerland, U.S. clients** by third-party providers in the wake of the UBS investigation as a means of disguising the beneficial ownership of U.S. clients. By the operation of Swiss bank secrecy laws, the U.S. client's ownership would not be disclosed to U.S. authorities, including the IRS.

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22. 21- EdR Switzerland employees assisted U.S. clients in covertly repatriating offshore funds by providing credit cards, cash cards, and debit cards linked to their undeclared accounts, including three types of cards issued by American companies. These services allowed U.S. clients to withdraw funds remotely or pay for goods and services without a paper trail back to their undeclared accounts in Switzerland. The bank issued such cards to at least 24 U.S. account holders at the Bank.

23. 22- EdR Switzerland relationship managers assisted numerous U.S. clients in structuring transfers from their undeclared accounts in amounts less than \$10,000 to

avoid detection by U.S. authorities. This conduct assisted U.S. clients in avoiding United States currency transaction reporting requirements. For example, after numerous discussions with one U.S. client regarding his intent to covertly repatriate his undeclared account funds, an EdR Switzerland relationship manager issued a series of checks in the amount of \$8,500 made out to the U.S. client drawn on EdR Switzerland's bank account at UBS in Switzerland. The same relationship manager also assisted this U.S. client in withdrawing \$11,000 in cash before re-depositing \$2,000 based on "customs limitations."

Commented [VT7]: See BPER000889-BPER000890. The client determined how he would dispose of the assets to close out the account; Mr. Ballenegger assisted him in executing transactions.
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24, 23- EdR Switzerland relationship managers assisted numerous U.S. clients in covertly repatriating their undeclared account funds with large cash withdrawals. Between August 1, 2008 and May 2014, the Bank allowed at least 53 U.S. clients to make at least 155 cash withdrawals of \$30,000 or more totaling more than \$20.68 million. In one instance in August of 2011, the Bank allowed a U.S. client to close his account by making a single cash withdrawal in the amount of \$2.53 million.

25, 24- EdR Switzerland relationship managers assisted U.S. clients in covertly repatriating their undeclared account funds by purchasing luxury goods. This allowed U.S. clients to convert their undeclared account funds into small, transportable items of value that are difficult to trace. For example, in one instance, after numerous discussions with a U.S. client about how **best the client intended** to close his account and covertly repatriate his undeclared account funds, an EdR Switzerland relationship manager assisted this U.S. client in transferring 145,000 Swiss francs to the Swiss UBS account of a luxury watch maker.

26, 25- EdR Switzerland relationship managers assisted U.S. clients in closing their accounts and covertly repatriating their undeclared account funds via transfers to the foreign bank accounts of non-U.S. friends, relatives, and business associates. For example, one relationship manager noted the following about his discussion with a U.S. client:

Telephonic contact with the account holder. Explained to him the situation with respect to U.S. citizen account holders. Asked what to do. Suggested to him to make a donation to his wife.

Another relationship manager made this note in her file:

Explained to [the niece] our need to close the account (client residing in USA) and only possible solution transfer of account to a person not resident in the USA.

27, 26- In one instance, **a U.S. client the representative of a Panamanian company account holder** told EdR Switzerland that he **had a was the** "man of confidence" in Switzerland **and wanted all for the beneficial owner of the account, whom he identified as a non-U.S. citizen resident in the U.S. All** communication regarding his account **to go went** through **this person, the "man of confidence."** Even though no one

Commented [VT8]: With respect to the second example included, the person who wrote the note was a relationship manager's assistant – not a relationship manager. See description of account L00031 at BPER000899. Please note, moreover, that the assistant claims that it was the niece who made the suggestion of a donation, although the note itself is not entirely clear.
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at the Bank had ever met the **“man-of-confidencebeneficial owner,”** an EdR Switzerland relationship manager assisted the **U.S. client“man of confidence”** in closing **his**the company account and **covertly repatriating his undeclared account funds by** transferring the balance to the **Swiss bank account of his “man of confidence.”“man of confidence’s” account at another Swiss bank.** In other instances, EdR Switzerland relationship managers assisted U.S. clients in closing their accounts and covertly repatriating their undeclared account funds by opening up new accounts at the Bank for family members and then transferring the balance of the U.S. client’s undeclared account into the newly formed bank accounts of their non-U.S. relatives.

EDR SWITZERLAND SUBVERTED ITS QUALIFIED INTERMEDIARY AGREEMENT

- 28. 27-**Effective in or about January 2001, EdR Switzerland entered into a Qualified Intermediary (“QI”) Agreement with the IRS. To comply with its responsibilities as a QI, EdR Switzerland introduced a new form titled “Declaration of U.S. Status / or / Non-U.S. Status in relation to assets and income subject to United States withholding tax” (“DNUS”). EdR Switzerland required all new and existing account holders to complete a DNUS form. It required all clients to self-certify whether they were or were not U.S. persons. If the U.S. client provided EdR Switzerland with a validly signed IRS Form W-9, then the client could hold U.S. securities and EdR Switzerland would conduct Form 1099 reporting in respect of any reportable amounts, in accordance with the terms of its QI Agreement with the IRS. If the U.S. client did not provide a Form W-9, then EdR Switzerland prohibited the client from holding any U.S. investments, in accordance with the QI Agreement, and the client’s name was not provided to the IRS.
- 29. 28-**As a consequence of EdR Switzerland entering into a QI Agreement with the IRS, certain relationship managers and supervisory relationship managers encouraged and allowed U.S. clients to create and open accounts in the name of **sham offshore entities and insurance wrappers.** In connection with these accounts, EdR Switzerland employees knowingly accepted and included in its account records IRS Forms W-8BEN (or EdR Switzerland’s substitute forms) provided by the directors of the offshore companies that falsely represented under penalty of perjury that such companies were the beneficial owners of the assets in the accounts for U.S. federal income tax purposes.
- 30. 29-**Certain relationship managers and others assisted U.S. clients in executing forms that directed EdR Switzerland not to acquire U.S. securities in their accounts. The purpose of such forms was to avoid EdR Switzerland having to disclose the identities of U.S. clients to the IRS under its QI Agreement.
- 31. 30-**Certain relationship managers, supervisory relationship managers, and others caused EdR Switzerland to certify compliance with the QI Agreement even though the true beneficial owners were not reflected in the IRS Forms W-8BEN in the account

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files.

EDR SWITZERLAND'S EXIT OF ITS U.S. CROSS-BORDER BUSINESS

- ~~32.~~ ~~31.~~ Beginning in mid to late 2008, in the wake of the UBS investigation and [deferred prosecution agreement](#), EdR Switzerland instituted policies that were intended to ~~limit its potential criminal and civil tax liability~~ [ensure compliance with U.S. laws](#).
- ~~33.~~ ~~32.~~ Beginning in approximately September 2008, EdR Switzerland instituted a formal policy prohibiting relationship managers from opening new accounts for U.S. clients unless the U.S. client first provided a Form W-9. This policy applied irrespective of whether the U.S. client wished to hold U.S. investments. Thereafter, EdR Switzerland declined to open accounts for certain prospective U.S. clients who refused to provide a Form W-9.
- ~~34.~~ ~~33.~~ Beginning in May 2008, EdR Switzerland's management formally advised relationship managers and other Bank employees against traveling to the United States for business reasons and required employees to report to the Executive Committee any planned U.S. travel. In January 2009, EdR Switzerland formally prohibited relationship managers from making business trips to the United States.
- ~~35.~~ ~~34.~~ Recognizing that certain accounts had been opened under prior policies without a Form W-9, EdR Switzerland instituted a legacy account remediation project beginning in October 2008. Thereafter, EdR Switzerland affirmatively required every existing U.S. client account to provide a signed, valid Form W-9, regardless of whether the U.S. client's account held U.S. securities. If the existing U.S. client did not provide a Form W-9, EdR Switzerland eventually terminated the account relationship. Although these policies did remediate most of its undeclared U.S. accounts, not all such accounts were immediately closed. With few exceptions, EdR Switzerland had successfully exited most of its undeclared U.S. client accounts by the end of 2011. EdR Switzerland closed approximately ~~41446~~ U.S. accounts between August 1, 2008 and June 30, 2014, totaling approximately \$~~704.5691.5~~ million. Many of these U.S. accounts were closed in connection with EdR Switzerland's remediation efforts.
- ~~36.~~ ~~35.~~ Beginning in October 2008, EdR Switzerland adopted a policy of encouraging U.S. clients who had undeclared accounts to declare those accounts to the IRS. Under this policy, relationship managers and Bank management proactively encouraged U.S. clients to make a voluntary disclosure to U.S. authorities, through the IRS's Offshore Voluntary Disclosure Program ("OVDP") or otherwise, if and when EdR Switzerland has learned of a client's non-compliance with U.S. tax obligations. However, EdR Switzerland identified one relationship manager who violated this policy by discouraging U.S. clients from declaring their accounts.

~~37, 36~~-In July 2012, EdR Switzerland began requiring all new and existing U.S. clients to provide a signed FBAR or other proof of U.S. tax compliance since the opening of the U.S. client account, such as evidence of participation in an OVDP.

EDR SWITZERLAND'S COOPERATION THROUGHOUT THE SWISS BANK PROGRAM

~~38, 37~~-In December 2013, EdR Switzerland entered into the Department of Justice's Swiss Bank Program as a Category 2 bank.

~~39, 38~~-Since 2013, EdR Switzerland has cooperated with the Department of Justice to comply with the Swiss Bank Program. At the outset, EdR Switzerland formed a Steering Committee consisting of EdR Switzerland representatives and U.S. and Swiss law firm partners who, along with independent accountants, oversaw and executed each phase of Program compliance. Along with its outside advisors, EdR Switzerland established a multi-tiered review protocol to identify and analyze all U.S. accounts in accordance with the Program. Specifically, the Bank, with the assistance of U.S. and/or Swiss counsel and/or its independent accountants, performed an electronic search of U.S. indicia across all of its accounts, manually conducted a full paper record search of hundreds of physical account files, analyzed relevant management policies, interviewed dozens of current and former relationship managers and members of management, reviewed relevant paper and electronic communications, and contacted hundreds of current and former U.S. clients or their representatives, among other efforts.

~~40, 39~~-EdR Switzerland has devoted significant time and effort to convince certain U.S. clients to participate in the OVDP, including through in-person meetings and numerous follow-up discussions to ensure that those individuals follow through on the commitment to enter the OVDP. To date, at least ~~140~~~~167~~ of EdR Switzerland's U.S. clients, totaling approximately ~~\$344~~~~377~~ million in assets under management, have participated in the OVDP as a result of the Bank's efforts.

~~41, 40~~-Throughout its participation in the Swiss Bank Program, EdR Switzerland has made comprehensive disclosures regarding its U.S. ~~cross-border-businessrelated accounts~~. Specifically, EdR Switzerland, with the assistance of U.S. and Swiss counsel, forensic investigators, and in compliance with Swiss banking secrecy and privacy laws has:

- a. Obtained waivers of Swiss banking secrecy and data privacy protections from ~~316~~~~395~~ current and former U.S. clients, which permit EdR Switzerland to disclose account information to the Department of Justice;
- b. Provided actionable information concerning numerous U.S. client accounts held at EdR Switzerland since August of 2008 permitting the Department of Justice to make treaty requests to the Swiss competent authority for U.S. client account records;

- c. Described in detail ~~the structure of~~ information about EdR Switzerland's U.S. cross-border business, which included but is not limited to: (1) the policies or lack of policies that contributed to misconduct committed by relationship managers, supervisory relationship managers, and Bank management; (2) the supervisory chain overseeing relationship managers; and (3) the names of senior management and legal and compliance officials;
- d. Provided detailed information concerning the operation of its U.S. cross-border business, which included but is not limited to: (1) misconduct committed by EdR Switzerland; and (2) names of relationship managers who committed misconduct;
- e. Provided the names and information of key external asset managers who made significant contributions to the operation of EdR Switzerland's U.S. cross-border business as well as the relationship managers who assisted those external asset managers; and
- f. Provided responsive, specific, and actionable information to the Department of Justice concerning associated persons, entities, and areas of concern for use in other ongoing and potential DOJ investigations.

Summary report:	
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<i>Table moves from</i>	0
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Embedded Excel	0
Format changes	0
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