
From: Stewart Oldfield [REDACTED]
Sent: 4/12/2016 2:09:10 PM
To: Paul Morris [REDACTED]
Subject: FW: CRP: Client Outreach (Due 4/30) [C]
Attachments: USO - CRP Client Outreach - PAUL MORRIS.xlsx
Importance: High

Classification: **Confidential**

You all set with this?

From: Armen Brash
Sent: Thursday, April 07, 2016 8:18 PM
To: Paul Morris; Stewart Oldfield
Subject: CRP: Client Outreach (Due 4/30) [C]
Importance: High

Classification: **Confidential**

All,

Thank you for your patience. Attached you will find the list of your clients who are in scope for CRP client outreach, which, as a reminder, must be completed by the end of this month.

This means by the end of April, you must have contacted your client via phone (where possible), send them the Introduction Letter and Self Certification, and documented all of this in the CRP tracker, which is the 2nd tab of the spreadsheet attached.

You must send your progress every Friday to Andrea Wheeler and Priscilla Lewis—please email them even if to say no changes from the prior week. Our progress will be communicated to Fabrizio.

The Client outreach documents have been finalized and have been posted to the [Private Bank Operational Excellence mydb page](#). In the coming days, they will also be posted to the forms section of the WM Intranet under each product page. Please note, the Entity Self Certification is with graphics and should be ready by Monday. There will also be additional guidance documentation provided with the entity docs. I will post everything as soon as it is finalized.

A few notes:

1. **Account Duplicates**

- In the detail tab, there are often multiple rows per account. This is because our original data had non-unique data associated to it, e.g. a different address or a different UBO / KYC Party. We did not want to delete rows in the detail, but the Tracking tab will provide the distinct account list.

2. **'Delayed Contact'**

- Accounts with UBOs in **Argentina, Brazil, & Venezuela** are 'Delayed Contact' for CRP per the SteerCo. These are included at the bottom of each RM's tracking template, highlighted in orange to alert them that the accounts should **not** be included in the initial CRP outreach.
- In certain cases, an account has UBOs in one of the 'delayed contact' countries and also other countries (e.g. BVI). In those cases, the entire CRP outreach to the client should be delayed, therefore all are grouped under 'Delayed Contact.'
- Though not part of CRP outreach, these 'Delayed Contact' accounts in Argentina and Brazil (only) will need to receive an Awareness letter ASAP. The approved letter is available on the mydb page.

CRP Background

CRP is a global, internally driven project requiring Wealth Management to obtain self-certification from non-US Account Holders / Beneficial Owners regarding compliance with local Tax jurisdictions.