

Statement of Alain Ober

I am Alain Ober. I am originally from France, but have lived in the United States since 1972, and I enjoy dual citizenship in France and the United States. I have worked for the Citibank Private Bank as a relationship manager for African clients since, 1991. Although I travel to Africa frequently, I have worked out of the New York office for the entire time. Prior accepting the position at Citibank. I worked for Manufacturers Hanover Trust as a correspondent banker for African clients, also in New York.

As a relationship manager for African Private Bank clients, I am responsible for managing existing relationships and developing new one. I follow the client accounts closely and tend to the clients' needs on a day to day basis, I report directly to the EMEA New York Unit Head, Jan Huisman and also to the Global Marketing Manager for Africa, Chris Rogers, who is based in Johannesburg, South Africa. When questions or concerns arise in connection with specific clients or accounts, I confer with both Mr. Huisman and Mr. Rogers.

In my capacity as a private banker, I have specific anti-money laundering responsibilities. I am trained to be aware of and detect attempts to launder money, and information from a variety of sources, including the client, public information, references, and the knowledge of local African Citigroup personnel. The Know Your Customer procedures are extremely important, and enable the bank to ensure that it is dealing with clients who have established their wealth through appropriate and lawful means. I update the information contained in the customer profiles throughout the course of the customer relationship.

Although procedures for obtaining information about a customer's background and source of wealth have been in place since I have been with the Private Bank, in the past few years, in light of a changing regulatory environment and lessons learned from problems in the past, the bank has significantly strengthened the procedures. For example, today my customer profiles are independently reviewed by quality assurance personnel, who make sure that I have obtained the requisite information and included it in the profile. In the past, although I knew my customers and was always comfortable with their sources of wealth, I was not required to document the information in as much detail as I am today. In the last few years, the importance of documentation has been increasingly emphasized and the quality of the information has been more closely scrutinized.

I have personally handled certain accounts of public figures. Such accounts sometimes have been hard to manage because of the difficulty in getting information about account transactions directly from the client. In June 1998, the Private Bank significantly revised its Public Figure Policy, setting forth the bank's standards for accepting and maintaining accounts of politically prominent individuals and their families. Pursuant to the Public Figure policy, we do not target public figures as clients, and a new public figure client may be accepted only with approval of the Public Figure Review Committee, which consists of the head of the Private Bank and other senior officials who do not have client-relations responsibility. Existing public figure accounts

are reviewed annually, by this Committee. As the Subcommittee staff is aware, as a result of this process, the Private Bank has refused or terminated accounts for certain public figures,

I am pleased to have had the opportunity to make this statement and welcome any questions you have regarding my role as a private banker. Thank you very much.

Alain Ober