

BSA

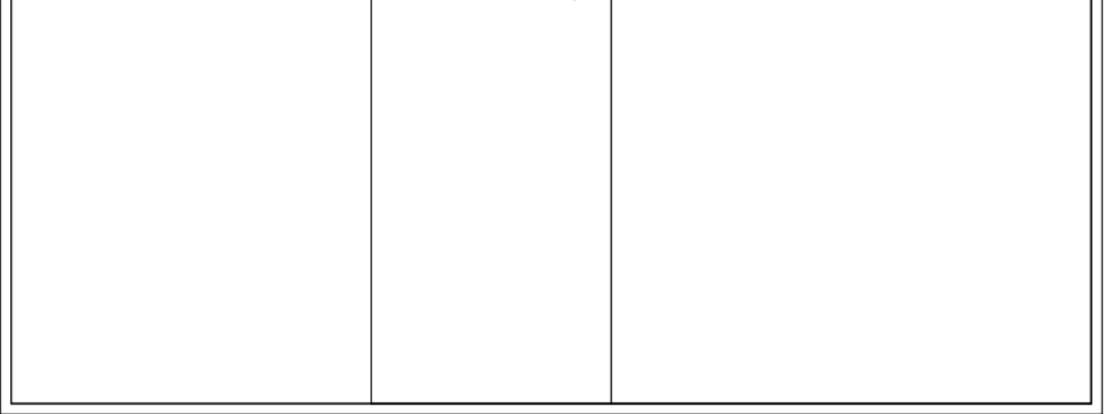
BSAR Transcript BSA: and DCN:

Filing Information

Type of Report	Continuing Activity Report
Filing Date	02/09/2017
Received Date	02/09/2017
Entry Date	02/10/2017
Submission Method	Electronic batch filing

Subject Information

Subject 1 of 3 : FENERO EQUITY INVESTMENTS LP		
Role	Subject	
Subject Type	Both Purchaser and Payee	
Individual/Organization	Organization	
Last (or Entity) Name	FENERO EQUITY INVEST	MENTS LP
	FENERO EQUITY INVEST	MENTS - Enhanced
TIN Unknown	Yes	
Form(s) of Identification	Identification Unknown	Yes
Address(es)	Street Address	
	City	
	ZIP Code Unknown	
	Country	VI
		VG - Enhanced
Occupation/Type of Business	INVESTMENT FUND	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	
Institution(s)	Relationship of Subject	No Relationship: Yes



Page 1



BSAR Transcript and DCN: BSA:

Subject Information			
Affected Account(s)			
	Account 1 of 7	17	
	Account Number		
	Financial Institution TIN		
	Account 2 of 7		
	Account Number	T	
	Financial Institution TIN		
	Account 3 of 7		
	Account Number		
	Financial Institution TIN		
	Account 4 of 7	Т	
	Account Number		
	Financial Institution TIN	1	
	Account 5 of 7		
	Account Number	T	
	Financial Institution TIN	+	
		* 	
	Account 6 of 7		
	Account Number		
	Financial Institution TIN		
	Account 7 of 7	т	
	Account Number		
	Financial Institution TIN		
Subject 2 of 3 : FENERO FINANCIAL			
	Subject		
Individual/Organization	Purchaser/Sender		
	FENERO FINANCIAL SWI		
Last (or Linity) Name	FENERO FNCL SWITZERI		
TIN Unknown			
Form(s) of Identification		Yes	
Address(es)			
	City		
	-		
	ZIP Code Unknown		
	Country	VI	
		VG - Enhanced	

BSA:

Page 2



BSAR Transcript and DCN: BSA:

Subject Information			
Occupation/Type of Business	INVESTMENT FUND		
Corroborative Statement to Filer			
Relationship to Reporting	Institution TIN		
Institution(s)	Relationship of Subject		
Affected Account(s)	Account 1 of 3		
	Account Number		
	Financial Institution TIN		
	Account 2 of 3		
	Account Number		
	Financial Institution TIN		
		-	
	Account 3 of 3		
	Account Number		
	Financial Institution TIN		
· · · · · · · · · · · · · · · · · · ·	Subject 3 of 3 : IMS INTERNATIONAL MARKETING SERVICES GMBH		
	Subject		
	Purchaser/Sender		
Individual/Organization			
Last (or Entity) Name	IMS INTERNATIONAL MARKETING SERVICES GMBH		
	IMS INTERNATIONAL MARKETING SERVICES - Enhanced		
TIN Unknown	Yes		
Form(s) of Identification			
Address(es)	Street Address		
	City		
	-		
	ZIP Code		
	Country	GM	
		US - Enhanced	
Corroborative Statement to Filer	No		
Relationship to Reporting	Institution TIN		
Institution(s)	Relationship of Subject		
Affected Account(s)	Account Number		
	Financial Institution TIN		

Suspicious Activity Information	on
Amount Involved	\$137,609,490
Cumulative Amount	\$359,609,958
Cumulative Amount	\$359,609,958

Page 3



BSAR Transcript BSA: and DCN:

Suspicious Activity Information

07/07/2016 - 12/28/2016
Suspicious EFT/wire transfers Suspicious use of multiple accounts Suspicious concerning the source of funds
Pyramid scheme
Transaction with no apparent economic, business, or lawful purpose
Funds transfer

Activity Location

Financial Institution Location 1 of 1		
No Branch Activity Involved	Yes	
Type of Financial Institution	Depository institution	
Primary Regulator	Federal Reserve	
RSSD Number		
Legal Name	THE BANK OF NEW YOR	K MELLON
EIN		
RSSD Number		
Address(es)	Street Address	225 LIBERTY STREET
		225 LIBERTY ST - Enhanced
	City	NEW YORK
		NEW YORK - Enhanced
	State	NY
		NY - Enhanced
	ZIP Code	10286
		10281-1048 - Enhanced

	Country	US
		US - Enhanced
Internal Control File Number		

Filer Information

Primary Regulator	Federal Reserve
Filer Name	THE BANK OF NEW YORK MELLON
	THE BANK OF NEW YORK MELLON - Enhanced
EIN	

Page 4



BSAR Transcript BSA: and DCN:

Filer Information		
Address(es)	Street Address	225 LIBERTY STREET
		225 LIBERTY ST - Enhanced
	City	NEW YORK
		NEW YORK - Enhanced
	State	NY
		NY - Enhanced
	ZIP Code	10286
		10281-1048 - Enhanced
	Country	US
		US - Enhanced
Type of Financial Institution	Type of Financial Institution Depository institution	
RSSD Number		
Internal control/file number		
Contact for Assistance	Full Name	LEGAL DEPT
	Phone Number	Type Work
		Number

Law Enforcement Information

No Law Enforcement Information Available

Narrative

THE BANK OF NEW YORK MELLON INTERNAL REFERENCE

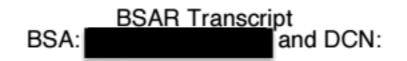
THE BANK OF NEW YORK MELLON (BNYM) IS

FILING THIS SAR TO REPORT 16 SUSPICIOUS WIRES, TOTALING \$137,609,489.20 (REFLECTING THE DEBIT

AMOUNT CONVERTED TO USD), INVOLVING IMS INTERNATIONAL MARKETING SERVICES GMBH, A SHELL ENTITY REPORTEDLY RELATED TO ONECOIN, WHICH IS MARKETED AS A VIRTUAL CRYPTOCOIN, BUT HAS ALSO BEEN ACCUSED OF OPERATING A PONZI SCHEME. THE WIRES ALSO INVOLVE FENERO EQUITY INVESTMENTS LP AND FENERO FINANCIAL SWITZERLAND LP, BVI INVESTMENT FUNDS THAT RECEIVED WIRES FROM SHELL ENTITIES ASSOCIATED WITH ONECOIN. THIS SAR SUPPLEMENTS A PRIOR SAR, FILED 12/22/2016, WHICH REPORTED SUSPICIOUS WIRE ACTIVITY INVOLVING INTERNATIONAL MARKETING SERVICES PTE LTD., ANOTHER SHELL ENTITY ASSOCIATED WITH ONECOIN. THE PREVIOUSLY REPORTED ACTIVITY TOOK PLACE FROM 05/23/2016 TO 11/07/2016 AND TOTALED \$222,000,468.00 (BNYM INTERNAL REFERENCE #622896). THE WIRES REPORTED IN THIS SAR WERE CONDUCTED THROUGH BNYM CORRESPONDENT ACCOUNTS. BNYM MAINTAINS CORRESPONDENT BANKING RELATIONSHIPS WITH FOREIGN FINANCIAL INSTITUTIONS THUS ENABLING THOSE INSTITUTIONS TO CONDUCT TRANSACTIONS IN U.S. DOLLARS ON BEHALF OF THEMSELVES AND THEIR

Page 5





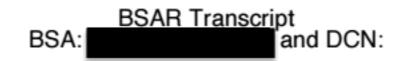
Narrative

CUSTOMERS. BNYM MAINTAINS A DIRECT RELATIONSHIP SOLELY WITH THE FOREIGN FINANCIAL INSTITUTION AND DOES NOT HAVE ANY RELATIONSHIP WITH THAT INSTITUTION'S CUSTOMERS. THE WIRES REPORTED IN THIS SAR ARE SUSPICIOUS BECAUSE: (1) INTERNET RESEARCH INDICATES THAT ONECOIN, A CRYPTOCURRENCY THAT OPERATES A PONZI SCHEME, HAS OPENED BANK ACCOUNTS USING SHELL COMPANIES, INCLUDING IMS INTERNATIONAL MARKETING SERVICES GMBH AND INTERNATIONAL MARKETING SERVICES PTE LTD; (2) THESE SHELL COMPANIES SENT WIRES TO FENERO EQUITY INVESTMENTS LP AND FENERO FINANCIAL SWITZERLAND LP, WHICH ARE REPORTEDLY INVESTMENT FUNDS REGISTERED IN THE HIGH-RISK JURISDICTION OF BVI; (3) THE INVESTMENT FUNDS THEN SENT WIRES, PRIMARILY TO OTHER RELATED ENTITIES, FURTHER LAYERING THE FUNDS; (4) ONE WIRE SENT BY FENERO EQUITY INVESTMENTS LP BENEFITTED A HONG KONG SHELL ENTITY AND REFERENCED CRYPTOREAL, WHICH IS ALSO ASSOCIATED WITH ONECOIN; AND (5) THE WIRES WERE SENT IN LARGE AMOUNTS AND SOME WERE REPETITIVE, WITH MULTIPLE WIRES SENT ON THE SAME DAY. BACKGROUND: INTERNET RESEARCH INDICATES THAT ONECOIN, FOUNDED BY RUJA IGNATOVA, OPERATES AS A PONZI/PYRAMID/CRYPTOCURRENCY SCAM, AND IT HAS BEEN SUBJECT TO INVESTIGATIONS AND INVESTOR WARNINGS IN NUMEROUS JURISDICTIONS, INCLUDING THE UK, BELGIUM, SWEDEN, AUSTRIA, LATVIA, AND SINGAPORE (HTTP://INSIDEBITCOINS.COM; HTTPS://STMK.ARBEITERKAMMER.AT; HTTP://WWW.FKTK.LV; HTTP://WWW.MAS.GOV.SG; HTTP://WWW.NEWSBTC.COM; HTTPS://WWW.FCA.ORG.UK; HTTP://WWW.FSMA.BE; HTTPS://NEWS.BITCOIN.COM/BEWARE-DEFINITIVE-ONECOIN-PONZI/; HTTPS://EN.WIKIPEDIA.ORG/WIKI/ONECOIN). INTERNET RESEARCH INDICATES THAT ONECOIN ROUTINELY OPENED BANK ACCOUNTS USING SHELL COMPANY NAMES, INCLUDING INTERNATIONAL MARKETING SERVICES PTE LTD AND IMS INTERNATIONAL

MARKETING SERVICES GMBH (HTTP://BEHINDMLM.COM; HTTPS://STEEMIT.COM; HTTP://KUSETUKSET.BLOGSPOT.COM/2016/10/ONECOINS-FROZEN-BANK-ACCOUNTS-LISTED.HTML; HTTP://ONECOIN-NEXT.BLOGSPOT.COM; HTTP://WWW.NEWCRYPTOERA.COM/EN). AS REPORTED IN THE PRIOR SAR, AFTER TWO WIRES SENT FOR THE BENEFIT OF INTERNATIONAL MARKETING SERVICES PTE LTD WERE RETURNED BY BENEFICIARY BANK UNITED OVERSEAS BANK LIMITED (SINGAPORE) CITING ITS "INTERNAL POLICY", BNYM CONDUCTED A SCAN FOR WIRE ACTIVITY INVOLVING THE ENTITY. THE SCAN IDENTIFIED WIRES SENT BY INTERNATIONAL MARKETING SERVICES PTE LTD FOR THE BENEFIT OF FENERO FINANCIAL SWITZERLAND LP AND FENERAL EQUITY INVESTMENTS LP, BOTH BANKING AT (GEORGETOWN, CAYMAN ISLANDS). AS A RESULT OF THE PRIOR ACTIVITY, BNYM CONDUCTED A SCAN FOR WIRE ACTIVITY INVOLVING FENERO EQUITY INVESTMENTS LP, FENERO FINANCIAL SWITZERLAND LP, AND INTERNATIONAL MARKETING SERVICES FOR THE PERIOD FROM 7/6/2016 TO 1/6/2017 AND IDENTIFIED 16 SUSPICIOUS WIRES, TOTALING \$137,609,489.20 (REFLECTING THE DEBIT AMOUNT CONVERTED TO USD), THAT

Page 6





Narrative

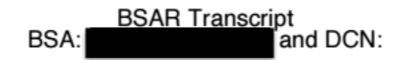
WERE SENT FROM 7/7/2016 TO 12/28/2016. ACCORDING TO KYC INFORMATION RECEIVED FROM FENERO EQUITY INVESTMENTS L.P. AND FENERO FINANCIAL SWITZERLAND L.P. ("CLIENT") IS THE FIRST OF A SERIES OF \$100,000,000 OPEN-ENDED INVESTMENT FUNDS LOCATED IN THE BRITISH VIRGIN ISLANDS, FOCUSING ON INVESTMENTS IN THE FINANCIAL SERVICES INDUSTRY IN EUROPE. THE PRIMARY OBJECTIVE OF THE CLIENT IS TO INVEST INTO CONTROLLING POSITIONS OF DISTRESSED COMPANIES IN THE FINANCIAL SERVICES INDUSTRY. THE CLIENT IS CURRENTLY ADMINISTERED AND MANAGED BY MSS INTERNATIONAL CONSULTANTS LLC, WHICH IS ULTIMATELY OWNED BY AMERICAN ATTORNEY MARK S. SCOTT. MARK SCOTT HAS CONFIRMED TO THAT THE CLIENT IS IN THE NEGOTIATION STAGES OF SECURING A NEW ADMINISTRATOR, NAMELY TRINITY FUND ADMINISTRATION LTD. THE CLIENT HAS BEEN A CUSTOMER OF SINCE 06/16/2016, AND MAINTAINS A REGISTERED OFFICE ADDRESS AT BRITISH VIRGIN ISLANDS. FENERO EQUITY INVESTMENTS L.P. AND FENERO FINANCIAL SWITZERLAND L.P. ARE ON THE BVI FINANCIAL SERVICES COMMISSION LIST OF APPROVED FUNDS (HTTP://WWW.BVIFSC.VG/EN-GB/REGULATEDENTITIES/INVESTMENTBUSINESS/APPROVEDFUNDS.ASPX). KYC INFORMATION INDICATES THAT FENERO EQUITY INVESTMENTS LP WAS FORMED IN BVI ON 03/01/2016. MSS INTERNATIONAL CONSULTANTS (BVI) LTD IS LISTED AS THE GENERAL PARTNER AND B&N CONSULT EOOD IS LISTED AS THE LIMITED PARTNER. LEXISNEXIS RESEARCH INDICATES THAT B & N CONSULT EOOD IS A PROVIDER OF MANAGEMENT CONSULTING SERVICES, AND IS LISTED AS MANAGER. ACCORDING TO ITS WEBSITE, B&N CONSULT IS INVOLVED IN REAL ESTATE INVESTMENT, CONSULTANT, AND BROKERAGE

SERVICES. ITS MAIN OFFICE IS IN SOFIA, BULGARIA (HTTP://WWW.BNCONSULT.BIZ/EN/ABOUT.PHP). AS REPORTED IN THE PRIOR SAR, THE WIRES SENT FROM INTERNATIONAL MARKETING SERVICES PTE LTD FOR THE ULTIMATE BENEFIT OF FENERO FINANCIAL SWITZERLAND L.P. REFERENCED "SUBSCRIPTION INTO CAPITAL

PAYMENT ON BEHALF OF B AND N CONSULT LTD". ALTHOUGH BNYM COULD NOT ESTABLISH A LINK BETWEEN
B&N CONSULT AND ONECOIN FOUNDER RUJA IGNATOVA, INTERNET RESEARCH INDICATES THAT RUJA
IGNATOVA HAS SPENT OVER \$20 MILLION ON BULGARIAN PROPERTY
(HTTP://BEHINDMLM.COM/COMPANIES/ONECOIN/IGNATOVA-HAS-SPENT-35-MILLION-ON-BULGARIAN-PROPERTY;
HTTP://WWW.CAPITAL.BG/BIZNES/KOMPANII/2016/05/13/2759325_DOKTOR_RUJA_I_PAZARUVANETO_NA_IMOTI_OT
_NISHTO/). KYC INFORMATION INDICATES THAT FENERO FINANCIAL SWITZERLAND LP WAS INCORPORATED ON
05/06/2016, MSS INTERNATIONAL CONSULTANTS (BVI) LTD IS THE GENERAL PARTNER AND ELIAN NOMINEES
(BVI) LIMITED IS THE INITIAL LIMITED PARTNER. KYC INFORMATION INDICATES THAT MSS INTERNATIONAL
CONSULTANTS (BVI) LTD WAS REGISTERED IN BVI ON 02/29/2016, AND ITS DIRECTORS ARE AMERICANS DAVID
RUSSELL PIKE US PASSPORT)
AND MARK STANLEY SCOTT ; US

Page 7





Narrative

PASSPORT

MSS INTERNATIONAL CONSULTANTS LLC

IS THE SOLE MEMBER AND SHAREHOLDER OF MSS INTERNATIONAL CONSULTANTS (BVI) LTD. INTERNET RESEARCH INDICATES THAT MARK S. SCOTT, P.L. IS THE REGISTERED AGENT FOR FLORIDA ENTITY MSS INTERNATIONAL CONSULTANTS LLC (HTTP://SEARCH.SUNBIZ.ORG). MSS INTERNATIONAL CONSULTANTS (BVI) LTD IS ON THE BVI FINANCIAL SERVICES COMMISSION LIST OF APPROVED MANAGERS (HTTP://WWW.BVIFSC.VG/EN-AU/REGULATEDENTITIES/INVESTMENTBUSINESS/APPROVEDMANAGERS.ASPX). ACCORDING TO HIS LINKEDIN PAGE, MARK S SCOTT IS FOUNDER AND CEO OF MSS INTERNATIONAL CONSULTANTS (BVI) LTD., WHICH "MANAGES SEVERAL HUNDRED MILLION EUROS IN A SERIES OF REGISTERED PRIVATE EQUITY FUNDS AND FOCUSES ITS INVESTMENTS ON OPPORTUNITIES IN FINTECH, FINANCIAL SERVICES, TELECOM AND HOTEL RELATED REAL ESTATE DEVELOPMENT IN EUROPE" (HTTPS://VG.LINKEDIN.COM/IN/MARK-S-SCOTT-57387518). ACCORDING TO INTERNET RESEARCH, MARK S. SCOTT WAS ADMITTED TO THE FLORIDA BAR ON 7/27/1988 AND IS IN GOOD STANDING (BAR NUMBER 142549) (HTTPS://WWW.FLORIDABAR.ORG). HOWEVER, LEXISNEXIS AND INTERNET RESEARCH INDICATE THAT SCOTT HAS BEEN ASSOCIATED WITH NUMEROUS COMPANIES, INCLUDING TWO REGISTERED IN OCTOBER 2014 THAT ARE CURRENTLY INACTIVE, WHICH APPEAR TO HAVE BEEN INVOLVED IN BINARY OPTIONS AND/OR FOREIGN EXCHANGE TRADING: BINARYHOLDINGS, LLC AND SPOTFN.COM, LLC. WIRE DETAILS: ADDITIONAL DETAILS FOR ALL WIRES REPORTED IN THIS SAR CAN BE LOCATED IN THE ATTACHED .CSV FILE. (THE .CSV FILE CONTAINS INFORMATION FOR 17 TRANSACTIONS. ONE TRANSACTION COULD NOT BE COMPLETED AS ORIGINALLY INSTRUCTED BUT WAS COMPLETED VIA AN ADJUSTMENT, AND DETAILS FOR BOTH TRANSACTIONS ARE INCLUDED IN THE ATTACHMENT). I. WIRES SENT BY IMS INTERNATIONAL MARKETING SERVICES GMBH: FROM 7/7/2016 TO 8/1/2016. IMS INTERNATIONAL MARKETING SERVICES GMBH

GREVEN), ACCOUNT WITH DEUTSCHE BANK AG (FRANKFURT, GERMANY), SENT 5 WIRES TOTALING
\$27,222,500.00 FOR THE ULTIMATE BENEFIT OF FENERO EQUITY INVESTMENTS L.P.
BRITISH VIRGIN ISLANDS) AT CAYMAN
ISLANDS; BNYM CORRESPONDENT ACCOUNT
EUR, AND THE DETAILS OF PAYMENT FOR ALL WIRES READ "PARTIAL PAYMENT FOR SUBSCRIPTION". AS
REPORTED IN THE PRIOR SAR, WIRES SENT FROM INTERNATIONAL MARKETING SERVICES PTE LTD FOR THE
ULTIMATE BENEFIT OF FENERO EQUITY INVESTMENTS LP WERE SENT IN THE SAME AMOUNT AND LISTED THE
SAME DETAILS OF PAYMENT AS THE WIRES SENT BY IMS INTERNATIONAL MARKETING SERVICES GMBH. II.
WIRE REFERENCING CRYPTOREAL: ON 07/13/0016, FENERO EQUITY INVESTMENTS LP
, ACCOUNT AT
ISLANDS; BNYM CORRESPONDENT ACCOUNT

Page 8



BSAR Transcript BSA: and DCN:

Narrative FOR THE ULTIMATE BENEFIT OF BARTA HOLDINGS LTD (HONG KONG) LIMITED (HONG KONG; BNYM CORRESPONDENT ACCOUNT). THE DETAILS OF PAYMENT READ: LOAN FOR CRYPTOREAL. INTERNET RESEARCH INDICATES THAT 100% OF THE SHARES OF BARTA HOLDINGS LTD ARE HELD BY HUI CHI MING, WHO IS ALSO A DIRECTOR OF SINO UNION ENERGY INVESTMENT GROUP LTD. (HTTP://SC.HKEXNEWS.HK). ACCORDING TO ITS WEBSITE, CRYPTOREAL INVESTMENT TRUST IS RUN BY ONECOIN. ITS WEBSITE ALSO INDICATES THAT CRYPTOREAL ENTERED INTO AN AGREEMENT WITH HOIFU ENERGY TO BUY A PETROLEUM FIELD IN MADAGASCAR. HUI CHI MING, THROUGH VARIOUS COMPANIES, IS THE CONTROLLING SHAREHOLDER OF HOIFU ENERGY (HTTP://WWW.CRYPTOREAL.COM; HTTP://WWW.HOIFUENERGY.COM/EINTRO.HTML). III. WIRES SENT BY INVESTMENT FUNDS TO RELATED PARTIES: ON 8/19/2016, FENERO EQUITY INVESTMENTS LP ACCOUNT WITH CAYMAN ISLANDS; BNYM CORRESPONDENT ACCOUNT), SENT ONE WIRE IN THE AMOUNT OF \$1,045,344.00, THROUGH BNYM FRANKFURT (ACCOUNT FOR THE ULTIMATE BENEFIT OF FENERO EQUITY INVESTMENTS (IRELAND) (AT INTERNET RESEARCH INDICATES THAT FENERO EQUITY INVESTMENTS (IRELAND) LIMITED WAS REGISTERED ON 04/05/2016, AND ITS DIRECTOR IS MARK SCOTT (HTTP://WWW.SOLOCHECK.IE/IRISH-COMPANY/FENERO-EQUITY-INVESTMENTS-IRELAND-LIMITED-580123#REPORT-2). ON 09/06/2016, FENERO EQUITY INVESTMENTS LP ACCOUNT WITH SENT ONE WIRE IN THE CAYMAN ISLANDS; BNYM CORRESPONDENT ACCOUNT AMOUNT OF \$278,850.00 FOR THE ULTIMATE BENEFIT OF MARK S SCOTT, P.L.

BRITISH VIRGIN ISLANDS, VG1110) AT

(MIAMI, FLORIDA). THE DETAILS OF

BSA:

	(,,
PAYMENT READ: FEES AND EXPENSES	S FOR LOAN FACILITYII AND FURTHER DISTRIBUTIONS. FROM 09/22/2016
TO 10/17/2016, FENERO EQUITY INVES	TMENTS LP (
ACCOUNT WITH	CAYMAN ISLANDS; BNYM CORRESPONDENT
ACCOUNTS), SENT 4 WIRES TOTALING \$64,017,260.00 FOR THE ULTIMATE BENEFIT
OF FEI IRELAND AT	IRELAND). THE DETAILS OF PAYMENT REFERENCED "FUNDING
OF FENERO SECURITIES TRADING LIN	ITED (IRELAND)", "FUNDING OF FORMATION AND INFRASTRUCTURE OF SIF
FUND LUX", AND "FUNDING OF MSSI M	ANAGED INVESTMENTS". ONE WIRE WAS SENT THROUGH
(LONDON, ENGLAND; BNYM CORRESP	ONDENT ACCOUNT
SWITZERLAND LP (TORTOLA), ACCOUNT WITH
LTD (GEORGETOWN, CAYMAN ISLAND	S; BNYM CORRESPONDENT ACCOUNT AND
SENT TWO WIRES TOTALING \$14,959,8	800.00 FOR THE ULTIMATE BENEFIT OF FENERO EQUITY INVESTMENTS

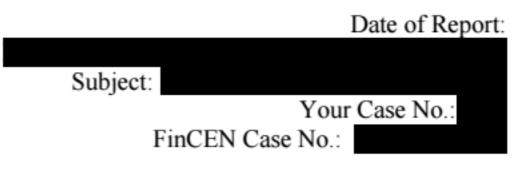
Page 9



BSAR Transcript and DCN: BSA:

Narrative
(IRELAND) (DUBLIN, IRELAND) AT
ACCOUNTS OF FENERO SECURITIES TRADING LTD. AT
FENERO GROUP IN UK (EXCLUDING LUX SIF FUND)". ONE WIRE WAS SENT THROUGH
ENGLAND; BNYM CORRESPONDENT ACCOUNT
INVESTMENTS LP TORTOLA), ACCOUNT WITH
LTD CAYMAN ISLANDS; BNYM CORRESPONDENT ACCOUNT), SENT 2 WIRES
TOTALING \$85,735.20 FOR THE ULTIMATE BENEFIT OF CAYMAN-10462701-USD (
BRITISH VIRGIN ISLANDS, AT
BANK (GEORGETOWN, CAYMAN ISLANDS). THE DETAILS OF PAYMENT READ "MSSI OPERATING FC (CIBC)". THE
FIRST WIRE COULD NOT BE APPLIED AS INITIALLY INSTRUCTED, BUT IT WAS COMPLETED SUCCESSFULLY ON
11/07/2016. ACCORDING TO HIS LINKEDIN PAGE, MARK SCOTT IS THE CEO OF MSSI
(HTTPS://VG.LINKEDIN.COM/IN/MARK-S-SCOTT-57387518).

Page 10



FinCEN FEEDBACK FORM

Thank you for using FinCEN as an information resource to support your investigation. We want to know how we can serve you better... Please take a minute to tell us.

1. In what way did the information assist your investigation? (Please circle all that apply.)

	Provided new information	Yes	No		
	Helpful in moving toward an indictment	Yes	No	Pending	N/A
	Expanded investigation	Yes	No	Pending	
	Identified new leads/subjects	Yes	No	C	
	Verified existing information	Yes	No		
2.	If financial (Bank Secrecy Act) information wa	as provided, wa	s it usef	ul for your inve	estigation?
		Yes	No	Pending	N/A
3.	Was the information received in time to be use	ful to your inve	estigatio	n?	
		Yes	No		
	If not, was there a due date i	indicated for th	e inforn	nation?	
		Yes	No		
4.	Did FinCEN network you to another agency th	at had previous	sly made	e a FinCEN req	uest?
	<i>y</i>	Yes	No	1	
	If you and that other agency shared information, was it useful?				
		Yes	No		
5.	Overall, were you satisfied with the service pro	wided by FinC	EN?		
		Yes	No		

Commei	nts'?
--------	-------

Sian	ature:		Date:
Pleas	se print name:		
Please fax	hard copy surveys	to the Customer Feed	back Liaison at
or mail to:	Financial Crimes	Enforcement Network	

The financial database information contained in this report cannot be disseminated outside Australian Transaction Reports and Analysis Centre (AUSTRAC) and the Australian Taxation Office (ATO) and is not to be used as evidentiary material, presented in court, or used in any other formal proceedings without the prior written consent of the Financial Crimes Enforcement Network.

INVESTIGATIVE MEMORANDUM

Requester:	Australian Transaction Reports and Analysis Centre (AUSTRAC)	Request Received: April 4, 2016	
	Attn.: Australia	FinCEN Case Number: Requester Case Number:	
Subject:			

SYNOPSIS

FinCEN searched its financial systems for information on approximately 1,200 additional subjects, the subjects of Panama Papers Investigation, pursuant to a request submitted AUSTRAC on April 4, 2016. Of the 1,200 approximate individuals and entities requested, research returned positive results for 57 subjects.

Research in the financial databases returned 114 Suspicious Activity Reports, 1,529 Currency Transaction Reports (CTRs) for \$26,672,579, 12 Reports of International Transportation of Currency or Monetary Instrument (CMIRs) totaling \$216,779, 61 Reports of Foreign Bank and Financial Accounts (FBARs) and two Designations of Exempt Person (DOEPs).

Please see the Narrative section of this report for further details.

Date:

A list of the databases researched by FinCEN can be found at the end of this report.

NARRATIVE

Analyst Note: Please note that the dates contained in this report are in (month) MM/ (day) DD/ (year) YYYY format. For example, August 1, 2011 may be written as 08/01/2011 or 08/1/11.

Analyst Note: Research was limited to exact name matches only due to the limited identifiers provided. Some names returned positive results but only those with a location matching or similar to the address provided were included.

Analyst Note: The word "structuring" as used in this report refers to deliberately breaking up a large transaction into amounts small enough to not trigger a Currency Transaction Report (for cash transactions over \$10,000) or additional recordkeeping and identification requirements (for wires or money services business transactions of \$3,000 or more). The intent of structuring is to evade the reporting or recordkeeping requirements.

Provided Information: Linked Company: Address: Australia				
	Provided Information:			
Address: Australia	Linked Company:			
	Address:	—	Australia	

Financial Database Results

Suspicious Activity Report (SAR) is identified as a subject of the following Suspicious Activity Report involving money laundering and corruption.

Activity Date(s)	Subject(s)	SAR	Filer and Activity
		Amount	Location

Activity Date(s)	Subject(s)	SAR Amount	Filer and Activity Location
December 03, 2015 – February 24, 2016	One Network Services Ltd One EUX Llc;(Fort Lauderdale, Florida) One Coin	<u>Amount</u> \$50,644	Australia

THE SAR FILING INSTITUTION PROVIDED THE FOLLOWING INFORMATION: This SAR is being filed to report the misuse of account that was opened for an entity by the name of ("Client") owned by The purpose of the account was for the purchase of organic skin products, however, between 12/03/2015 and 02/24/2016, the client conducted 13 payments in the aggregate amount of \$50,644.40 USD (Equivalent to 70,050.50 AUD).

The purpose of these transactions was for an investment in a virtual currency company, by the name of OneCoin, which we suspect could be a scam due to derogatory external research. The funds for these payments were sent to an individual residing in Thailand by the name of ("Beneficiary 1"), an entity under the name of ONE EUX, LLC based in the US ("Beneficiary 2"), and an entity under the name of ONE NETWORK SERVICES LTD based in Bulgaria ("Beneficiary 3").

The reported potential suspicious activity was detected on 02/24/2016

This report is being filed to report suspicious activity processed for Client, a customer of), based in Australia, an affiliate under common ownership of _____, (the end

, (the entity submitting this report).

The Client has held an account with since 11/25/2012. The Client is a manufacturer and distributor of organic skin products. The account was opened and intended to be utilized for making payments to suppliers for the purchase of skin products.

On 02/24/2016. account representative informed that the client had confirmed that the 13 payments mentioned above were related to an investment in a virtual currency company by the name of OneCoin ("Investment Company"). In addition, the Client confirmed the source of the funds utilized to fund these payments came from third parties but the names were not provided.

Due diligence performed on the investment company indicates that the company is owned and founded by Dr. Ruja Ignatova and it could be exposed as "Global Ponzi Scheme". Apparently, the company is offering a high percentage on returns. They are claiming that, in 12 month, clients can have as 80x return on their investment. (Sources: (1) http://cointelegraph.com/news/one-

coin-much-scam-onecoin-exposed-as-global-mlm-ponzi-scheme (2) http://hotmlmcompanies.com/onecoin-review/). Due to the derogatory information found, AFEX suspect about the legitimacy of the investment company. Below are the bank details which the 13 payments were sent to: Beneficiary #1: USD Account Account number:

Bank Name: BANGKOK BANK PUBLIC COMPANY LIMITED Bank Country: Thailand Intermediary: JPMORGAN CHASE BANK, N.A. Intermediary Bank Country: United States AUD and EUR Account Account number: Bank Name: KASIKORNBANK PUBLIC COMPANY LIMITED Swift Bank:KASITHBKXXX Bank Country: Thailand

Between 12/15/2015 and 02/24/2016, the Client sent 7 payments to Beneficiary 1 for the total amount of \$42,234.00. (Equivalent to 58,417.40 AUD)

Beneficiary #2 Account number:	Bank Name: TD BANK NA ABA:	Account://	Bank
Country:United States			

Between 12/07/2015 and 12/08/2015, the Client sent 3 payments to Beneficiary 2 for the total amount of \$4,997.00. (Equivalent to 6,839.21 AUD)

Beneficiary #3 Account number: Bank Name: CAPITAL BANK, JOINT STOCK COMPANY Swift Bank:CPTBGE22XXX Bank Country: Georgia

On 12/03/2015, the Client sent 3 payments to Beneficiary 3 for the total amount of \$3,413.00. (Equivalent to 4,663.35 AUD). Based on the above the Client account was closed and this SAR is being filed.

FEEDBACK FORM

Please complete the attached feedback form and return the form via mail or fax to FinCEN as soon as possible. Your input is important because it will help FinCEN to improve and better direct its analytical reports.

Requests for FinCEN research are conducted on a real-time basis. All materials provided to you are current as of the date indicated on this report. Due to the volume of cases generated through FinCEN, we are unable to provide automated updates regarding any case. To obtain updated information the requester MUST provide us with a new Request for Research form.

DISSEMINATION AUTHORITY/WARNING

The information in this document is to be used for lead or investigative purposes only. The information may not be released, disseminated, disclosed, or transmitted outside your organization, or in particular used as evidentiary material or presented in court or other formal proceedings, without the prior, written approval of the Financial Crimes Enforcement Network (FinCEN). This document contains information that is protected from unauthorized disclosure by the U.S. Bank Secrecy Act (BSA) and other laws, as well as the Egmont Group Charter. Unauthorized release of information contained in this document is unlawful and may result in penalties including the loss of access to information.

The enclosed information was collected and disseminated under provisions of the Bank Secrecy Act (the BSA) and U.S. Department of the Treasury regulations implementing the BSA. See 31 U.S.C. 5311, et seq.; 31 CFR Chapter X. The information is sensitive in nature and is to be treated accordingly. The information may be used only for a purpose consistent with a criminal, tax, or regulatory investigation or proceeding, or in the conduct of intelligence or counterintelligence activities, including analysis, to protect against international terrorism. See 31 U.S.C. 5311. The information cannot be further released, disseminated, disclosed, or transmitted without prior approval of the Director of Financial Crimes Enforcement Network or his authorized delegate. Suspicious activity reports filed under the BSA must be treated with particular care given that they contain unsubstantiated allegations of possible criminal activity, akin to confidential informant tips. Unauthorized release of information collected under the BSA may result in criminal or civil sanctions.

<u>Note – SAR Usage</u>: This report contains information derived from a Suspicious Activity Report (SAR) of suspected criminal activity, filed by a U.S. financial institution. SARs are **not** evidence, but contain information that, when further investigated, **may** produce evidence of criminal activity. SARs **must not** be disclosed to the subject of an investigation or any other individual who may be identified in the SAR. SARs should not be used in court or other formal proceedings without the prior consent of the Financial Crimes Enforcement Network. <u>Further disclosure of a SAR by the requesting agency must be coordinated with FinCEN</u>.

The Financial Crimes Enforcement Network (FinCEN) authorizes the AUSTRAC to further disseminate the information contained in this report to the Australian Taxation Office (ATO) for investigative purposes only. Please note that the information may not be used in court or any formal proceedings and may not be further disseminated without FinCEN authorization.

BACKGROUND

Research of the subjects was conducted in the databases listed below. Only positive or inconclusive database results are included in this report. *FinCEN limited its research to only those subject(s) presented in your request. Because information may exist on other entities identified pursuant to our research, you are invited to submit another request on those subjects.*

Financial (Bank Secrecy Act) Database:

NOTE: Due to privacy laws in the United States, FinCEN is unable to obtain certain banking information, such as the names of account holders, account statements or balances, or any credit card information. Should you require such information, you may consider making such a request under the provisions of a Mutual Legal Assistance Treaty (MLAT) or via letters rogatory. Transaction information from FinCEN is limited to that reported under the Bank Secrecy Act requirements:

- Financial Database: Bank Secrecy Act information from at least the past 10 years. Includes:
- Currency Transaction Reports (CTRs)
- Designation of Exempt Person forms
- Reports of International Transportation of Currency or Monetary Instruments (CMIRs)
- Currency Transaction Reports by Casinos (CTR-Cs)
- Form 8300's, Reports of Cash Payments Over \$10,000 Received in a Trade or Business
- Reports of Foreign Bank and Financial Accounts (FBARs)
- MSB Registration
- Suspicious Activity Reports (SARs)