

## NAME SEARCHED: **The Financial Trust Company**

PWM BIS-RESEARCH performed due diligence research in accordance with the standards set by AML Compliance for your business. We completed thorough searches on your subject name(s) in the required databases and have attached the search results under the correct heading below. Significant negative media results may require escalation to senior business, Legal and Compliance management. Also, all accounts involving PEPs must be escalated.

Search:	Result:	Click here for results:	Reviewer Comments (as necessary):
RDC	<input checked="" type="checkbox"/> No Hit <input type="checkbox"/> Not Required <input type="checkbox"/> Hit	I. <a href="#">RDC Results</a>	No RDC Alert (Please See Attached)
FIRCOSOFT	<input checked="" type="checkbox"/> No Hit <input type="checkbox"/> Not Required <input type="checkbox"/> Hit	II. <a href="#">FIRCOSOFT Results</a>	No FIRCOSOFT Alert (Please See Attached)
BIS	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Not Required	III. <a href="#">Negative Media</a>	No Information Found
		IV. <a href="#">Non-Negative Media</a>	Information Found (Please See Attached)
		V. <a href="#">Other Language Media</a>	Not Required
D&B	Results? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	VI. <a href="#">D&amp;B</a>	Information Found (Please See Attached)
SMARTLINX	Results? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Required	VII. <a href="#">Smartlinx</a>	No Information Found
COURT CASES	<input checked="" type="checkbox"/> Review by Legal May be Required <input type="checkbox"/> No Results <input type="checkbox"/> Search not required	VIII. <a href="#">Court Cases</a>	Information Found (Please See Attached)

Prepared by: Himanshu Khandelwal Date: 10/15/2018

Research Analyst

### Instructions:

1. Review and confirm that all results are returned for your client.
2. Please note that you are still required to perform any Martindale-Hubbell search (if applicable) on each search subject. We have attached the web link below for your convenience: [Martindale-Hubbellhttp://www.martindale.com/xp/Martindale/home.xml](http://www.martindale.com/xp/Martindale/home.xml)
3. As needed, provide comment for any negative results.
4. If applicable, please obtain clearance from Compliance for all alerts.
5. Save any changes you make to this document and attach file to your KYC.

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Please note: Submission of a signed KYC is your confirmation that you have fully reviewed the research documents.

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DB-SDNY-0026461  
EFTA\_00174144

EFTA01298709

**OFAC RESULTS**

**RDC:**

11641989	<u>Not Alerted</u>	KYC 0198325	 The Financial Trust Company	(Global Search)
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**FIRCOSOFT:**

31721057	WR_317210572182	Company	The Financial Trust Company	No Alert	No Alert	No Alert	No Alert
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**BIS RESULTS:**

**Negative Media:**

No Information Found

**Non-Negative Media:**

PR Newswire

October 9, 2018 Tuesday 6:30 AM EST

**IRA Financial Trust Company** - Fast Growing Self-Directed IRA Custodian - Announces Average Client Account Fees at Less than .001% of Account Value;  
 IRA Financial self-directed IRA flat account fee costs less than the average robo investment advisor fees

PR Newswire

NEW YORK, Oct. 9, 2018 /PRNewswire-PRWeb/ -- **IRA Financial Trust Company**, the market's fastest growing self-directed IRA custodian for checkbook IRA and full-service IRA custodian accounts announces that the average self-directed IRA client pays account fees of less than .001% of their IRA account value. With checkbook IRA annual account fees of \$180 flat per year and with the average client having around \$200,000 in IRA funds, IRA Financial Trust's self-directed IRA clients are paying less than .001% in account value fees. "We believe that our flat low-cost annual self-directed IRA fee, which averages out to less .001% of the average client's account value is a great value proposition for any robo investor looking to invest in alternative asset investments, such as real estate," stated Adam Bergman, President of the **IRA Financial Trust Company**.

According to Adam Bergman, a partner with the IRA Financial Group, the costs involved in having a self-directed IRA account has been reduced dramatically allowing retirement account investors to gain more investment options without the increased costs. "The IRA Financial Group has built our businesses on offering low-cost alternative asset self-directed IRA options to retirement account holders whose portfolios may not be big enough for traditional firms."

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IRA Financial Trust is a non-banking IRA Trust company responsible for administering Self-Directed IRA custodian accounts, including checkbook control IRA, to make traditional as well as alternative asset investments, such as real estate.

IRA **Financial Trust Company** was founded by Adam Bergman, a partner with the IRA Financial Group. The IRA Financial Group, the leading provider of self-directed IRA retirement solutions. IRA Financial Group has helped thousands of clients take back control over their retirement funds while gaining the ability to invest in almost any type of investment, including real estate without custodian consent.

IRA Financial Group is the market's leading provider of self-directed IRA LLC and Solo 401(k) plans. IRA Financial Group has helped thousands of clients take back control over their retirement funds while gaining the ability to invest in almost any type of investment, including real estate without custodian consent.

To learn more about the IRA Financial Group please visit our website at <http://www.irafinancialgroup.com> or call 800-472-0646. To learn more about establishing a self-directed IRA account with the IRA **Financial Trust Company** please visit <http://www.irafinancialtrust.com> or call 800-472-1043.

SOURCE IRA Financial Group, LLC

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**Other Language Media:**

Not Required

**D&B:**

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Worldbase

November 15, 2015

FINTRASTKOM, OOO

📍 D.25 UL.TSVILLINGA  
CHELYABINSK 454091  
RUSSIAN FEDERATION

COUNTY: CHELYABINSKAYA OBL.  
REGION: EUROPE

\*\*\*\*\* COMMUNICATIONS \*\*\*\*\*

TELEPHONE: [REDACTED]

FAX: [REDACTED]

COUNTRY CODE: 0007  
CABLE TELEX: NNYNNNP

\*\*\*\*\* COMPANY IDENTIFIERS \*\*\*\*\*

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DUNS: 68-342-9052  
NATIONAL: 99249213-Office 801 Government Gazette Number

\*\*\*\*\* COMPANY INFORMATION \*\*\*\*\*  
FOUNDED: 2007  
LEGAL STATUS: Corporation

\*\*\*\*\* EXECUTIVES \*\*\*\*\*

CEO: VYACHESLAV VALEREVICH ZHGUNOV, PRINCIPAL

Download Table

\*\*\*\*\* DESCRIPTION \*\*\*\*\*  
SECURITY AND COMMODITY EXCHANGES, NSK

\*\*\*\*\* MARKET AND INDUSTRY \*\*\*\*\*  
PRIMARY SIC:  
6231 - Security/commodity exchange  
SECONDARY SIC:  
1629 - Heavy construction  
1721 - Painting/paper hanging contractor  
1742 - Drywall/insulating contractor  
1752 - Floor laying contractor  
1761 - Roofing/siding contractor

\*\*\*\*\* FINANCIALS \*\*\*\*\*  
FISCAL YEAR DATE: December 31, 2014

\*\*\*\*\* OTHER FINANCIALS \*\*\*\*\*  
FINANCIAL FIGURE DATE 12/31/2014

	US DOLLARS	Russian Federation Rubles
NET WORTH	\$10,820 - Actual	504,000 - Actual
PROFIT	\$ -751 - Actual	35,000 - Actual

Download Table

CROSS REFERENCE:

- **'FINANCIAL TRUST COMPANY'**

**Public Record:**  
No Information Found

**LEGAL RESULTS:**

**Court Cases:**

Beverly Haccesa, Individually, and First **Financial Trust Company**, as Conservator for Shenoel Haccesa, A Minor, Petitioners v. United States.

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No. 02-1640.

SUPREME COURT OF THE UNITED STATES

540 U.S. 814; 124 S. Ct. 65; 157 L. Ed. 2d 29; 2003 U.S. LEXIS 5545; 72 U.S.L.W. 3235

October 6, 2003, Decided

**PRIOR HISTORY:** Hacesa v. United States, 309 F.3d 722, 2002 U.S. App. LEXIS 22192 (10th Cir. N.M., 2002)

**JUDGES:** [\*1] Rehnquist, Stevens, O'Connor, Scalia, Kennedy, Souter, Thomas, Ginsburg, Breyer.

**OPINION**

Petition for writ of certiorari to the United States Court of Appeals for the Tenth Circuit denied.

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