



BSAR Transcript
BSA: 31000150840679 and DCN:

| Filing Information | |
|--------------------|-------------------------|
| Type of Report | Initial Report |
| Filing Date | 07/19/2019 |
| Received Date | 07/19/2019 |
| Entry Date | 07/22/2019 |
| Submission Method | Electronic batch filing |

| Subject Information | | |
|---------------------------------|------------------------------|------------------------------------|
| Subject 1 of 4 : EPSTEIN | | |
| Role | Subject | |
| Subject Type | Purchaser/Sender | |
| Individual/Organization | Individual | |
| Last(or Entity) Name | EPSTEIN | |
| First Name | JEFFREY | |
| Middle Name | E | |
| Gender Type | Male | |
| Date of Birth | ██/██/██ | |
| SSN/ITIN | ██████ | |
| Form(s) of Identification | Identification 1 of 2 | |
| | Identification Type | Driver's license/State ID |
| | Identification Number | ██████████ |
| | Issuing State Code | VI |
| | Issuing State | Virgin Islands, U.S. |
| | Issuing Country Code | VI |
| | Identification 2 of 2 | |
| | Identification Type | Passport |
| | Identification Number | 469911707 |
| | Issuing Country Code | US |
| Address(es) | Address 1 of 2 | |
| | Address Type | Subject permanent/mailling address |
| | Street Address | RED HOOK PLAZA QTR B-3 |
| | | RED HOOK PLAZA QTR B-3 - Enhanced |
| | City | ST THOMAS |
| | | ST THOMAS - Enhanced |
| | State | VI |
| | | VI - Enhanced |
| ZIP Code | 00802 | |



BSAR Transcript
BSA: 31000150840679 and DCN:

| Subject Information | | |
|--|-------------------------------|--------------------------------------|
| | | 00802 - Enhanced |
| | Country | VI |
| | | US - Enhanced |
| | Address 2 of 2 | |
| | Address Type | Subject permanent/mailling address |
| | Street Address | 6100 RED HOOK QUARTER B-3 |
| | | 6100 RED HOOK QUARTER B-3 - Enhanced |
| | City | ST THOMAS |
| | | ST THOMAS - Enhanced |
| | State | VI |
| | | VI - Enhanced |
| | ZIP Code | 00802 |
| | | 00802 - Enhanced |
| Country | VI | |
| | US - Enhanced | |
| Phone Number(s) | Phone Number 1 of 2 | |
| | Type | Work |
| | Number | (340) 775-2525 |
| | Phone Number 2 of 2 | |
| | Type | Residence |
| | Number | (340) 775-8100 |
| Occupation/Type of Business | INVESTMENT BUSINESS CONSULTAN | |
| Corroborative Statement to Filer | No | |
| Relationship to Reporting Institution(s) | Institution TIN | 660183103 |
| | Relationship of Subject | Customer: Yes |
| Affected Account(s) | Account 1 of 6 | |
| | Account Number | 7171030966 |
| | Financial Institution TIN | 660183103 |
| | Account 2 of 6 | |
| | Account Number | 7191415759 |
| | Financial Institution TIN | 660183103 |
| | Account 3 of 6 | |
| | Account Number | 72110096827 |
| | Financial Institution TIN | 660183103 |
| | Account 4 of 6 | |
| Account Number | 7171030966 | |



BSAR Transcript
BSA: 31000150840679 and DCN:

| Subject Information | | |
|---|----------------------------------|---|
| | Financial Institution TIN | 660183103 |
| | Account 5 of 6 | |
| | Account Number | 7191415759 |
| | Financial Institution TIN | 660183103 |
| | Account 6 of 6 | |
| | Account Number | 72110096827 |
| | Financial Institution TIN | 660183103 |
| Subject 2 of 4 : F T REAL ESTATE INC | | |
| Role | Subject | |
| Subject Type | Payee/Receiver | |
| Individual/Organization | Organization | |
| Last(or Entity) Name | F T REAL ESTATE INC | |
| EIN | 660695228 | |
| Address(es) | Address 1 of 3 | |
| | Address Type | Subject permanent/mailling address |
| | Street Address | 6100 RED HOOK QUARTER B-3 |
| | | 6100 RED HOOK QUARTER B-3 - Enhanced |
| | City | ST THOMAS |
| | | ST THOMAS - Enhanced |
| | State | VI |
| | | VI - Enhanced |
| | ZIP Code | 00802 |
| | | 00802 - Enhanced |
| | Country | VI |
| | | US - Enhanced |
| | Address 2 of 3 | |
| | Address Type | Subject permanent/mailling address |
| | Street Address | 6100 RED HOOK QUATERS SUITES |
| | | 6100 RED HOOK QUATERS SUITES - Enhanced |
| | City | ST THOMAS |
| | | ST THOMAS - Enhanced |
| | State | VI |
| | | VI - Enhanced |
| | ZIP Code | 00802 |
| | | 00802 - Enhanced |
| | Country | VI |
| | | US - Enhanced |



BSAR Transcript
BSA: 31000150840679 and DCN:

| Subject Information | | |
|---|----------------------------------|------------------------------------|
| | Address 3 of 3 | |
| | Address Type | Subject permanent/mailling address |
| | Street Address | RED HOOK PLAZA QTR B-3 |
| | | RED HOOK PLAZA QTR B-3 - Enhanced |
| | City | ST THOMAS |
| | | ST THOMAS - Enhanced |
| | State | VI |
| | | VI - Enhanced |
| | ZIP Code | 00802 |
| | | 00802 - Enhanced |
| Country | VI | |
| | US - Enhanced | |
| NAICS Code | 530000 | |
| Phone Number(s) | Phone Number 1 of 2 | |
| | Type | Facsimile |
| | Number | (340) 775-2528 |
| | Phone Number 2 of 2 | |
| | Type | Work |
| | Number | (340) 775-2525 |
| Occupation/Type of Business | REAL ESTATE RENTAL LEASING | |
| Relationship to Reporting Institution(s) | Institution TIN | 660183103 |
| | Relationship of Subject | Customer: Yes |
| Affected Account(s) | Account 1 of 2 | |
| | Account Number | 7171030966 |
| | Financial Institution TIN | 660183103 |
| | Account 2 of 2 | |
| | Account Number | 7171030966 |
| | Financial Institution TIN | 660183103 |
| Subject 3 of 4 : LAUREL INC | | |
| Role | Subject | |
| Subject Type | Purchaser/Sender | |
| Individual/Organization | Organization | |
| Last(or Entity) Name | LAUREL INC | |
| EIN | 660776877 | |
| Form(s) of Identification | Identification Type | Driver's license/State ID |
| | | |
| Address(es) | Address 1 of 2 | |
| | Address Type | Subject permanent/mailling address |



BSAR Transcript
BSA: 31000150840679 and DCN:

| Subject Information | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|------------------------------------|------------------------|--|-----------------------------------|-------------|-----------|--|----------------------|--------------|----|--|---------------|-----------------|-------|--|------------------|----------------|----|--|---------------|-----------------------|--|---------------------|------------------------------------|-----------------------|----------------------|--|-------------------------------|-------------|-----------|--|----------------------|--------------|----|--|---------------|-----------------|-------|--|-----------------------|----------------|----|--|---------------|
| | <table border="1"> <tr> <td>Street Address</td> <td>RED HOOK PLAZA QTR B-3</td> </tr> <tr> <td></td> <td>RED HOOK PLAZA QTR B-3 - Enhanced</td> </tr> <tr> <td>City</td> <td>ST THOMAS</td> </tr> <tr> <td></td> <td>ST THOMAS - Enhanced</td> </tr> <tr> <td>State</td> <td>VI</td> </tr> <tr> <td></td> <td>VI - Enhanced</td> </tr> <tr> <td>ZIP Code</td> <td>00802</td> </tr> <tr> <td></td> <td>00802 - Enhanced</td> </tr> <tr> <td>Country</td> <td>VI</td> </tr> <tr> <td></td> <td>US - Enhanced</td> </tr> <tr> <td colspan="2">Address 2 of 2</td> </tr> <tr> <td>Address Type</td> <td>Subject permanent/mailling address</td> </tr> <tr> <td>Street Address</td> <td>6100 RED HOOK QTR B3</td> </tr> <tr> <td></td> <td>6100 RED HOOK QTRS - Enhanced</td> </tr> <tr> <td>City</td> <td>ST Thomas</td> </tr> <tr> <td></td> <td>ST THOMAS - Enhanced</td> </tr> <tr> <td>State</td> <td>VI</td> </tr> <tr> <td></td> <td>VI - Enhanced</td> </tr> <tr> <td>ZIP Code</td> <td>00802</td> </tr> <tr> <td></td> <td>00802-1348 - Enhanced</td> </tr> <tr> <td>Country</td> <td>VI</td> </tr> <tr> <td></td> <td>US - Enhanced</td> </tr> </table> | Street Address | RED HOOK PLAZA QTR B-3 | | RED HOOK PLAZA QTR B-3 - Enhanced | City | ST THOMAS | | ST THOMAS - Enhanced | State | VI | | VI - Enhanced | ZIP Code | 00802 | | 00802 - Enhanced | Country | VI | | US - Enhanced | Address 2 of 2 | | Address Type | Subject permanent/mailling address | Street Address | 6100 RED HOOK QTR B3 | | 6100 RED HOOK QTRS - Enhanced | City | ST Thomas | | ST THOMAS - Enhanced | State | VI | | VI - Enhanced | ZIP Code | 00802 | | 00802-1348 - Enhanced | Country | VI | | US - Enhanced |
| | Street Address | RED HOOK PLAZA QTR B-3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | RED HOOK PLAZA QTR B-3 - Enhanced | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | City | ST THOMAS | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | ST THOMAS - Enhanced | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | State | VI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | VI - Enhanced | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | ZIP Code | 00802 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | 00802 - Enhanced | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Country | VI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | US - Enhanced | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Address 2 of 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Address Type | Subject permanent/mailling address | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Street Address | 6100 RED HOOK QTR B3 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | 6100 RED HOOK QTRS - Enhanced | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| City | ST Thomas | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | ST THOMAS - Enhanced | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| State | VI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | VI - Enhanced | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ZIP Code | 00802 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | 00802-1348 - Enhanced | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Country | VI | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | US - Enhanced | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| NAICS Code | 561110 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Phone Number(s) | Phone Number 1 of 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Type Residence | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Number (340) 775-2525 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Phone Number 2 of 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Type Work | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Number (340) 775-2525 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Occupation/Type of Business | Office Administrative Services | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Relationship to Reporting Institution(s) | Institution TIN 660183103 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Relationship of Subject Customer: Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Affected Account(s) | Account 1 of 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Account Number 7211096827 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Financial Institution TIN 660183103 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Account 2 of 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Account Number 7211096827 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |



BSAR Transcript
BSA: 31000150840679 and DCN:

| Subject Information | | | | | | | | | | | | | | | | | |
|--|---|----------------|------------------------------------|----------------|---------------------------|--------------------------------------|------|-----------|----------------------|-------|----|---------------|----------|-------|------------------|---------|----|
| Financial Institution TIN | 660183103 | | | | | | | | | | | | | | | | |
| Subject 4 of 4 : MICHELLES TRANSPORTATION COMPANY LLC | | | | | | | | | | | | | | | | | |
| Role | Subject | | | | | | | | | | | | | | | | |
| Subject Type | Payee/Receiver | | | | | | | | | | | | | | | | |
| Individual/Organization | Organization | | | | | | | | | | | | | | | | |
| Last(or Entity) Name | MICHELLES TRANSPORTATION COMPANY LLC | | | | | | | | | | | | | | | | |
| EIN | 660698781 | | | | | | | | | | | | | | | | |
| Address(es) | Address 1 of 2 | | | | | | | | | | | | | | | | |
| | <table border="1"> <tr> <td>Address Type</td> <td>Subject permanent/mailling address</td> </tr> <tr> <td rowspan="2">Street Address</td> <td>LITTLE SAINT JAMES ISLAND</td> </tr> <tr> <td>LITTLE SAINT JAMES ISLAND - Enhanced</td> </tr> <tr> <td rowspan="2">City</td> <td>ST THOMAS</td> </tr> <tr> <td>ST THOMAS - Enhanced</td> </tr> <tr> <td rowspan="2">State</td> <td>VI</td> </tr> <tr> <td>VI - Enhanced</td> </tr> <tr> <td rowspan="2">ZIP Code</td> <td>00802</td> </tr> <tr> <td>00802 - Enhanced</td> </tr> <tr> <td rowspan="2">Country</td> <td>VI</td> </tr> <tr> <td>US - Enhanced</td> </tr> </table> | Address Type | Subject permanent/mailling address | Street Address | LITTLE SAINT JAMES ISLAND | LITTLE SAINT JAMES ISLAND - Enhanced | City | ST THOMAS | ST THOMAS - Enhanced | State | VI | VI - Enhanced | ZIP Code | 00802 | 00802 - Enhanced | Country | VI |
| Address Type | Subject permanent/mailling address | | | | | | | | | | | | | | | | |
| Street Address | LITTLE SAINT JAMES ISLAND | | | | | | | | | | | | | | | | |
| | LITTLE SAINT JAMES ISLAND - Enhanced | | | | | | | | | | | | | | | | |
| City | ST THOMAS | | | | | | | | | | | | | | | | |
| | ST THOMAS - Enhanced | | | | | | | | | | | | | | | | |
| State | VI | | | | | | | | | | | | | | | | |
| | VI - Enhanced | | | | | | | | | | | | | | | | |
| ZIP Code | 00802 | | | | | | | | | | | | | | | | |
| | 00802 - Enhanced | | | | | | | | | | | | | | | | |
| Country | VI | | | | | | | | | | | | | | | | |
| | US - Enhanced | | | | | | | | | | | | | | | | |
| Address(es) | Address 2 of 2 | | | | | | | | | | | | | | | | |
| | <table border="1"> <tr> <td>Address Type</td> <td>Subject permanent/mailling address</td> </tr> <tr> <td rowspan="2">Street Address</td> <td>6100 RED HOOK QUARTER B-3</td> </tr> <tr> <td>6100 RED HOOK QUARTER B-3 - Enhanced</td> </tr> <tr> <td rowspan="2">City</td> <td>ST THOMAS</td> </tr> <tr> <td>ST THOMAS - Enhanced</td> </tr> <tr> <td rowspan="2">State</td> <td>VI</td> </tr> <tr> <td>VI - Enhanced</td> </tr> <tr> <td rowspan="2">ZIP Code</td> <td>00802</td> </tr> <tr> <td>00802 - Enhanced</td> </tr> <tr> <td rowspan="2">Country</td> <td>VI</td> </tr> <tr> <td>US - Enhanced</td> </tr> </table> | Address Type | Subject permanent/mailling address | Street Address | 6100 RED HOOK QUARTER B-3 | 6100 RED HOOK QUARTER B-3 - Enhanced | City | ST THOMAS | ST THOMAS - Enhanced | State | VI | VI - Enhanced | ZIP Code | 00802 | 00802 - Enhanced | Country | VI |
| Address Type | Subject permanent/mailling address | | | | | | | | | | | | | | | | |
| Street Address | 6100 RED HOOK QUARTER B-3 | | | | | | | | | | | | | | | | |
| | 6100 RED HOOK QUARTER B-3 - Enhanced | | | | | | | | | | | | | | | | |
| City | ST THOMAS | | | | | | | | | | | | | | | | |
| | ST THOMAS - Enhanced | | | | | | | | | | | | | | | | |
| State | VI | | | | | | | | | | | | | | | | |
| | VI - Enhanced | | | | | | | | | | | | | | | | |
| ZIP Code | 00802 | | | | | | | | | | | | | | | | |
| | 00802 - Enhanced | | | | | | | | | | | | | | | | |
| Country | VI | | | | | | | | | | | | | | | | |
| | US - Enhanced | | | | | | | | | | | | | | | | |
| NAICS Code | 483114 | | | | | | | | | | | | | | | | |
| Phone Number(s) | Phone Number 1 of 2 | | | | | | | | | | | | | | | | |
| | Type | Facsimile | | | | | | | | | | | | | | | |
| | Number | (340) 775-2528 | | | | | | | | | | | | | | | |
| | Phone Number 2 of 2 | | | | | | | | | | | | | | | | |
| Type | Work | | | | | | | | | | | | | | | | |



BSAR Transcript
BSA: 31000150840679 and DCN:

| Subject Information | | |
|--|---------------------------|----------------|
| | Number | (340) 775-2525 |
| Occupation/Type of Business | WATER TRANSPORTATION | |
| Relationship to Reporting Institution(s) | Institution TIN | 660183103 |
| | Relationship of Subject | Customer: Yes |
| Affected Account(s) | Account 1 of 2 | |
| | Account Number | 7191415759 |
| | Financial Institution TIN | 660183103 |
| | Account 2 of 2 | |
| | Account Number | 7191415759 |
| | Financial Institution TIN | 660183103 |

| Suspicious Activity Information | |
|---|---|
| Amount Involved | \$1,740,000 |
| Date or Date Range of Activity | 06/25/2018 - 03/29/2019 |
| Money laundering | Suspicious EFT/wire transfers Suspicious concerning the source of funds Suspicious use of multiple accounts Transaction out of pattern for customer(s) |
| Other suspicious activities | Transaction with no apparent economic, business, or lawful purpose |
| Financial instrument or payment mechanism | Funds transfer |

| Activity Location | | |
|---------------------------------------|------------------------|------------------------------------|
| Financial Institution Location 1 of 1 | | |
| No Branch Activity Involved | Yes | |
| Type of Financial Institution | Depository institution | |
| Primary Regulator | FDIC | |
| RSSD Number | 510871 | |
| Legal Name | FIRSTBANK PUERTO RICO | |
| EIN | 660183103 | |
| Address | Address Type | Address where transaction occurred |
| | Street Address | 1519 PONCE DE LEON AVENUE |
| | | 1519 AVE PONCE DE LEON - Enhanced |
| | City | SAN JUAN |
| | | SAN JUAN - Enhanced |
| | State | PR |
| | | PR - Enhanced |
| ZIP Code | 009080146 | |



BSAR Transcript
BSA: 31000150840679 and DCN:

| Activity Location | |
|-------------------------------------|-----------------------|
| | 00909-1732 - Enhanced |
| Country | PR |
| | US - Enhanced |
| Internal Control File Number | 2019-05-000722-000 |

| Filer Information | |
|--------------------------------------|---|
| Primary Regulator | FDIC |
| Filer Name | FIRSTBANK PUERTO RICO |
| EIN | 660183103 |
| Address | Address Type Reporting party address |
| | Street Address 1519 PONCE DE LEON AVENUE |
| | 1519 AVE PONCE DE LEON - Enhanced |
| | City SAN JUAN |
| | SAN JUAN - Enhanced |
| | State PR |
| | PR - Enhanced |
| | ZIP Code 009080146 |
| | 00909-1732 - Enhanced |
| | Country PR |
| | US - Enhanced |
| Type of Financial Institution | Depository institution |
| RSSD Number | 510871 |
| Internal control/file number | 2019-05-000722-000 |
| Contact for Assistance | Full Name COMPLIANCE |
| | Phone Number (787) 993-5150 |
| | Phone Type Work |

| Law Enforcement Information |
|--|
| No Law Enforcement Information Available |

| Narrative |
|---|
| Our Compliance Department received a referral to verify the existence of any suspicious activity being perpetrated against customer Laurel Inc. The customer was referred by our ASSIST Monitoring Unit after performing the Daily Newspaper Review and noticing negative news regards the customer authorized signers (sex offenders). This revision covers the transactions processed from May 1, 2018 to June 9, 2019. The customer maintains twenty-five (25) accounts relationship with FirstBank which are listed |



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BSA: 31000150840679 and DCN:

Narrative

on Exhibit-A. Due to the extension of the customer relationship and the type of referral (signers related to sex offenders found on negative news) this case will be divided on three (3) separate cases, 2019-05-000717; 2019-05-00720 and the present case under 2019-05-000722. Which analyzed eight (8) accounts for the customer relationship. The accounts evaluated under this case were opened at our FirstBank Plaza (721), East End Plaza (717) and Waterfront (719) all branches located at USVI. Laurel Inc J Epstein Virgin Island foundation Inc (T/A Enhance Education). The Jeffrey Epstein VI Foundation is a private science foundation at Harvard University with a \$30 million gift to the university. The Program for Evolutionary Dynamics is considered the first department of its kind to study the evolution of molecular biology with the sole use of mathematics. The Jeffrey Epstein VI Foundation is also known for giving one of the largest amounts of funding to individual scientists around the world. IGO Company LLC (American Yacht Harbor). Jeeps Inc. F T Real Estate inc. Thomas World Air LLC. Michelles Transportation Co LLC; As per information in our system applications and data bases, the individuals or entity hold no banking relationships in our FirstBank Florida and/or Puerto Rico regions. We conducted a search on the internet and to validate any negative news, information, or articles for the customer and various articles with negative information were found; (i) Daily Beast, April 16, 2019. Billionaire Pedophile Jeffrey Epstein Secret Charity (ii) New York Post, May 9, 2019, Billionaire pedophile Jeffrey Epstein illegally building Virgin Islands compound; (iii) New York Post, October 9, 2016, The sex slave scandal that exposed pedophile billionaire Jeffrey Epstein (iv) Opensecrets news; December 4, 2018, Billionaire sex offender Epstein gave heavily to democrats, until he did not; among others. According to the referral documents two (2) suspicious incoming wire transfers were processed in customer account 7211096827 for which we were not able to establish purpose; service rendered. As per the referral the first suspicious transaction was processed on October 24, 2017 for \$225,000.00 and the second transaction was processed on September 28, 2018 for \$180,000.00. The total suspicious amount for this referral was \$405,000.00. In addition was included negative news/information regards our customer for sex offender and bad news found. We reviewed our customer accounts relationship to validate any suspicious activity and following are the observations. Commercial checking account 7211096827 No cash or check deposit was processed; three (3) incoming funds wire transfers were processed for \$580,000.00. These transactions were processed from September 28, 2018 to March 29, 2019 and all the transactions were originated by HBRK ASSOCIATES, INC. We performed an internet search for this company and was found that the NAIC code assigned (541990) was defined as all other professional, scientific and technical services; however we were not able to find the exact line of business for the company. One (1) check was negotiated for \$300.00 payable to Government of the USVI and one (1) Automated Clearing House (ACH) debit for



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\$196,673.56 payable to Palm Beach Tax. Commercial checking account 7171018893 No cash or check deposit was processed; two (2) ACH credits were processed for \$0.23 and three (3) incoming funds wire transfers totaling \$298,626.14 issued by J Epstein Virgin Island Foundation (account at The Bank of New York Mellon the reference include in the transaction was Pershing LLC) and from Education Advance (\$50,000.00) (account at JP Morgan Chase; the reference included was returned donation. No other detail was available. Nineteen (19) checks were negotiated totaling \$212,494.54. The highest check amount processed was for \$50,000.00 to National Crime Victor Bar Association. Other checks processed were payable to Edge Foundation Inc, Joshua Bach, [REDACTED] LSJE LLC, American Express, Travelers among others. Two (2) outgoing funds wire transfer was processed for \$13,535.99 both transactions payable to Peninsula Property Management located at 521 Harbor City Boulevard Melbourne Florida USA; as per the instructions included were rent payments. Commercial checking account 7171030625; 7171030636 As per our evaluation no alert or suspicious activity was observed in the review period. The transactions processed in the period are available on file. Commercial checking account 7171030966 No cash or check deposit was processed; one (1) ACH credit was observed for \$18,500.00 issued by Alpha Group Capital and two (2) incoming funds wire transfers were processed for \$840,000.00. According to our system applications both transactions were originated by David J. Mitchell with address at [REDACTED] [REDACTED] USA. No instructions or details were included. We performed a search on internet and was found a possible match with David J. Mitchell; Chief Executive Officer and President of CenterPoint Corp. since January 24, 2002 and performs policy making functions. Mr. Mitchell has been a partner of Petherton Capital Corporation since March 1992. He founded Mitchell and Company, Ltd., in January 1991 and has been its President since its inception. He has been Managing Partner of Las Vegas Land Partners LLC since June 2004. In 2004, he became Managing Members of MandM Advisors LLC. The listed corporation address is at 18 Est 50 Street 10 Floor New York NY USA. Two (2) ACH debits were processed for \$524.00 payable to New York State Department of Finance. Also one (1) outgoing funds wire transfer was processed for \$75,000.00 payable to VIBT Inc. The transaction was identified as a donation. The company address is at 1246 Queen Cross Christiansted and was organized as a promotion of international understanding; promotion of grow and development of commerce and industry in the USVI. One (1) debit memo was processed for \$25,015.00 as per our applications was these funds were a charitable donation to VIBT Inc (through the purchase of manager check 5304 on October 1, 2018). According to information found in internet VIBT Inc is an organization that promotes international understanding through activities, such as events, forums, trainings, and exchanges. and one (1) check was negotiated for \$300.00 payable to Government of USVI. Commercial checking account



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(1) funds transfer credit was processed for \$175.01 (interest accrued on customer certificate of deposits 7178105695) and one (1) incoming funds wire transfer was processed for \$200,000.00 originated by Jeffrey Epstein care of HBRK Associates Inc; the instruction included was fund account. One (1) debit memo was processed for \$500.00 as per our applications was to issue a letter of credit and fifty-six (56) checks were processed totaling \$70,078.98. The highest check amount processed was for \$3,846.00, this check and the majority of the checks processed were payable to Virgin Island Port Authority. Other checks processed were payable to Virgin Island Water and Power Authority, Government of the USVI, Reefco Services Inc, TRI Island Energy LLC among others. Certificate of deposit 7178105695 No credit or debits were processed in this certificate in the review period. Commercial checking account 7191415759 No cash deposit was processed. One (1) check deposit was observed for \$1,167.22 issued by AIG Property Casualty Company. Three (3) incoming funds wire transfers were processed totaling \$320,000.00; all the three (3) transactions were issued by HBRK ASSOCIATES, INC; no information regards purpose or service rendered was included. Five (5) checks were negotiated totaling \$19,996.26. The highest check processed was for \$10,537.00 payable to Insurance Office of Central Ohio. The remaining checks processed were payable to Lee Thomas and Government of the USVI. No Currency Transaction Report (CTR) was filed; none of the cash transactions processed reached or surpassed the required threshold. After reviewing this case and analyzing all the available facts we can classify this case positive. Unusual incoming funds wire transfers were processed in our customer accounts 7211096827; 7171030966 and 7191415759 for which we were not able to validate the purpose or service rendered for the issuance of these transactions. In addition no relevant information was found on our search on internet that help us validate the purpose; line of business of the issuer. For the above reasons, we will file a Suspicious Activity Report (SAR) totaling \$1,740,000.00 for customer accounts 7211096827; 7171030966 and 7191415759. The period on which the suspicious activity was processed was from June 25, 2018 to March 29, 2019. Supporting Documents: Image Centre; Assist; Mainframe; Internet; OneSumX, etc.