



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	[REDACTED]	
SSN/ITIN	[REDACTED]	
Form(s) of Identification	Identification 1 of 2	
	Identification Type	Driver's license/State ID
	Identification Number	[REDACTED]
	Issuing State Code	VI
	Issuing State	Virgin Islands, U.S.
	Issuing Country Code	VI
	Identification 2 of 2	
	Identification Type	Passport
Identification Number	[REDACTED]	
Issuing Country Code	US	
Address(es)	Address 1 of 2	
	Address Type	Subject permanent/mailling address
	Street Address	[REDACTED]
	[REDACTED]	[REDACTED]



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Subject Information	
	00802 - Enhanced
Country	VI
	US - Enhanced
Address 2 of 2	
Address Type	Subject permanent/mailing address
Street Address	[REDACTED]
	[REDACTED]
Country	VI
	US - Enhanced
Phone Number(s)	Phone Number 1 of 2
	Type Work
	Number [REDACTED]
	Phone Number 2 of 2
	Type Residence
	Number [REDACTED]
Occupation/Type of Business	INVESTMENT BUSINESS CONSULTAN
Corroborative Statement to Filer	No
Relationship to Reporting Institution(s)	Institution TIN [REDACTED]
	Relationship of Subject Customer: Yes
Affected Account(s)	Account 1 of 6
	Account Number [REDACTED]
	Financial Institution TIN [REDACTED]
	Account 2 of 6
	Account Number [REDACTED]
	Financial Institution TIN [REDACTED]
	Account 3 of 6
	Account Number [REDACTED]
	Financial Institution TIN [REDACTED]
	Account 4 of 6
	Account Number [REDACTED]

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.



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Subject Information	
Financial Institution TIN	[REDACTED]
Account 5 of 6	
Account Number	[REDACTED]
Financial Institution TIN	[REDACTED]
Account 6 of 6	
Account Number	[REDACTED]
Financial Institution TIN	[REDACTED]
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/mailing address
Street Address	[REDACTED]
[REDACTED]	[REDACTED]
Country	VI
	US - Enhanced
	Address 2 of 3
Address Type	Subject permanent/mailing address
Street Address	[REDACTED]
[REDACTED]	[REDACTED]
Country	VI
	US - Enhanced



BSAR Transcript
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Subject Information		
	Address 3 of 3	
	Address Type	Subject permanent/mailling address
	Street Address	[REDACTED]
		[REDACTED]
	Country	VI
		US - Enhanced
NAICS Code	530000	
Phone Number(s)	Phone Number 1 of 2	
	Type	Facsimile
	Number	[REDACTED]
	Phone Number 2 of 2	
	Type	Work
	Number	[REDACTED]
Occupation/Type of Business	REAL ESTATE RENTAL LEASING	
Relationship to Reporting Institution(s)	Institution TIN	[REDACTED]
	Relationship of Subject	Customer: Yes
Affected Account(s)	Account 1 of 2	
	Account Number	[REDACTED]
	Financial Institution TIN	[REDACTED]
	Account 2 of 2	
	Account Number	[REDACTED]
	Financial Institution TIN	[REDACTED]
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



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Subject Information		
	Street Address	[REDACTED]
		[REDACTED]
	Country	VI US - Enhanced
	Address 2 of 2	
	Address Type	Subject permanent/mailling address
	Street Address	[REDACTED]
		[REDACTED]
Country	VI US - Enhanced	
NAICS Code	561110	
Phone Number(s)	Phone Number 1 of 2	
	Type	Residence
	Number	[REDACTED]
	Phone Number 2 of 2	
	Type	Work
	Number	[REDACTED]
Occupation/Type of Business	Office Administrative Services	
Relationship to Reporting Institution(s)	Institution TIN	[REDACTED]
	Relationship of Subject	Customer: Yes
Affected Account(s)	Account 1 of 2	
	Account Number	[REDACTED]
	Financial Institution TIN	[REDACTED]
	Account 2 of 2	
	Account Number	[REDACTED]



BSAR Transcript
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Subject Information																					
Financial Institution TIN	[REDACTED]																				
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	[REDACTED]																				
Address(es)	Address 1 of 2																				
	<table border="1"> <thead> <tr> <th>Address Type</th> <th>Subject permanent/mailling address</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Street Address</td> <td>[REDACTED]</td> </tr> <tr> <td>[REDACTED]</td> </tr> <tr> <td>[REDACTED]</td> <td>[REDACTED]</td> </tr> <tr> <td>Country</td> <td>VI</td> </tr> <tr> <td></td> <td>US - Enhanced</td> </tr> </tbody> </table>	Address Type	Subject permanent/mailling address	Street Address	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Country	VI		US - Enhanced	
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	Street Address	[REDACTED]																			
		[REDACTED]																			
	[REDACTED]	[REDACTED]																			
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	[REDACTED]	[REDACTED]																			
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	[REDACTED]	[REDACTED]																			
[REDACTED]	[REDACTED]																				
Country	VI																				
	US - Enhanced																				
NAICS Code	483114																				
Phone Number(s)	Phone Number 1 of 2																				
	Type	Facsimile																			
	Number	[REDACTED]																			
	Phone Number 2 of 2																				
Type	Work																				

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Subject Information		
	Number	[REDACTED]
Occupation/Type of Business	WATER TRANSPORTATION	
Relationship to Reporting Institution(s)	Institution TIN	[REDACTED]
	Relationship of Subject	Customer: Yes
Affected Account(s)	Account 1 of 2	
	Account Number	[REDACTED]
	Financial Institution TIN	[REDACTED]
	Account 2 of 2	
	Account Number	[REDACTED]
	Financial Institution TIN	[REDACTED]

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	[REDACTED]	
Legal Name	FIRSTBANK PUERTO RICO	
EIN	[REDACTED]	
Address	Address Type	Address where transaction occurred
	Street Address	[REDACTED]
	[REDACTED]	[REDACTED]



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Activity Location	
	[REDACTED]
	Country PR US - Enhanced
Internal Control File Number	2019-05-000722-000

Filer Information		
Primary Regulator	FDIC	
Filer Name	FIRSTBANK PUERTO RICO	
EIN	[REDACTED]	
Address	Address Type	Reporting party address
	Street Address	[REDACTED] [REDACTED]
	[REDACTED]	[REDACTED]
	Country	PR US - Enhanced
Type of Financial Institution	Depository institution	
RSSD Number	[REDACTED]	
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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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). Jeepers 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 [REDACTED] 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 [REDACTED] 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 [REDACTED] 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; 7171030636As 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 [REDACTED] (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 [REDACTED] 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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7171040305One (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 7178105695No credit or debits were processed in this certificate in the review period.Commercial checking account 7191415759No 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 [REDACTED]; [REDACTED] and [REDACTED] for which 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 [REDACTED]; [REDACTED] and [REDACTED]. 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.