

From: [REDACTED]

To: [REDACTED]

Subject: FW: Deconfliction Needed - FW: France FIU Egmont Response - 290581 ASSOCIATION POUR LA PROMOTION DE LA POLITIQUE CULTURELLE and GRATITUDE AMERICA LTD

Date: Fri, 06 Mar 2020 13:41:25 +0000

Importance: Normal

Morning - I'm going to tell these guys that I don't object... nothing seems to touch any dates that my investigation would be concerned with...

[REDACTED]

-

On Mar 6, 2020 8:31 AM, [REDACTED] wrote:

Good morning [REDACTED] & [REDACTED],

FinCEN received an Egmont Request from their counterpart in France trying to track down a financial transaction between a USVI company (Gratitude America LTD) and a former French Ministry. It turns out that Gratitude America is owned by Eptstein. FinCEN found three SARs related to Gratitude America.

Please let me know if you have any objections to FinCEN providing their attached response and spreadsheet which was attached to one of the SARs to the French FIU.

Please let me know if you have any other questions/concerns.

Thanks,

[REDACTED]

FinCEN Detailee

From: [REDACTED]

Sent: Thursday, March 05, 2020 11:19 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: Deconfliction Needed - FW: France FIU Egmont Response - 290581 ASSOCIATION POUR LA PROMOTION DE LA POLITIQUE CULTURELLE and GRATITUDE AMERICA LTD

Please see below. ID/LD wants to confirm there is no conflict with our disseminating the attached report to the France FIU.

Thanks,

[REDACTED]

From: [REDACTED]

Sent: Thursday, March 05, 2020 2:59 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: France FIU Egmont Response - 290581 ASSOCIATION POUR LA PROMOTION DE LA POLITIQUE CULTURELLE and GRATITUDE AMERICA LTD

[REDACTED] comment: Please deconflict with FBI.

Thank you,

[REDACTED]

From: [REDACTED]

Sent: Friday, January 24, 2020 3:41 PM

To: [REDACTED]

Subject: RE: France FIU Egmont Response - 290581 ASSOCIATION POUR LA PROMOTION DE LA POLITIQUE CULTURELLE and GRATITUDE AMERICA LTD

[REDACTED]

[REDACTED]

[REDACTED] I leave that point to ID's discretion. Otherwise, I clear.

[REDACTED]

From: [REDACTED]

Sent: Friday, January 17, 2020 2:58 PM

To: [REDACTED]

[REDACTED]

Cc: [REDACTED]

Subject: France FIU Egmont Response - 290581 ASSOCIATION POUR LA PROMOTION DE LA POLITIQUE CULTURELLE and GRATITUDE AMERICA LTD

Hello,

Attached for your review/comment/approval please find FinCEN's response to an Egmont information request received from the France FIU. TRACFIN is currently looking into the relationship between ASSOCIATION POUR LA PROMOTION DE LA POLITIQUE CULTURELLE and the US Virgin Islands company GRATITUDE AMERICA LTD. The French account of POLITIQUE CULTURELLE received 50,000 Euros from the Deutsche Bank account of GRATITUDE. The transaction was

flagged because it lacked a clear purpose and suspicions are it may be funds from illicit activities. Furthermore, the request indicates that the association between the two entities may be linked to "a former French Ministry".

FinCEN research revealed that GRATITUDE AMERICA LTD's beneficial owner was the high profile Jeffrey Epstein (now deceased), who was accused of the sex trafficking of minors and misappropriating funds while employed as a money manager. SARs identified Epstein as a "PEP" due to his ties to high-level (current/former) USG officials.

Research identified three SARs and commercial records.

Thanks,

