



## AC / AML SCREENING REPORT

Date of Order: Jan 07, 2020  
Order Number: LBA-002-EDDSSR-00000002  
Researched Name: █████ LTD

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# Risk Assessment

## Report Risk Scores

Corruption & Influence Peddling	68%
White-Collar Crime	82%

## Risk Scores by

Risk Type	Section	Presence	Score
Corruption & Influence Peddling	PEP & SOE	YES	72%
	Sanctions / Enforcement actions	NO	0%
	Legal Cases / Litigations	YES	65%
	Sensitive News	YES	74%
White-Collar Crime	PEP & SOE	YES	72%
	Sanctions / Enforcement actions	NO	0%
	Legal Cases / Litigations	YES	83%
	Sensitive News	YES	88%

# Company Information

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## Company data

Full company name	[REDACTED] Ltd
Name in local alphabet	N/A
Former company name	N/A
Alias	N/A
Address	[REDACTED] [REDACTED] Delaware
Country	US
Identification Number(s)	File Number: [REDACTED]
Incorporation date	Apr 15, 19[REDACTED]
Listed on Stock Exchange	N/A
Industry classification	Motorcoaches & Buses
Website	N/A

## Related Key Entities / Individuals

### Executives / Directors

Name	Birth Date	Role	Board / Committee / Department
Mr Paul J M [REDACTED]	April 01, 19 [REDACTED]	CEO	N/A



## Ownership

No information available.

## Shareholding Structure

No information available.

## Section Risk Score

PEP / SOE Risk score 72 %

A value of 0% can imply lack of matches or a result below a threshold of confidence.

The following entities / individuals are listed as PEP / SOE in specialized databases:

## High-confidence Matches

Name	Type	Information
Mr Paul J M. [REDACTED] Match: M [REDACTED], Paul John (confidence: 92%)	PEP	Former Aide to [REDACTED], President of the United States. Pleads guilty to money laundering - September, 2018. Under investigation for corruption - August 15, 2016  Relation to the target: CEO
Mr Paul J M. [REDACTED] Match: Paul John Jr. M [REDACTED] (confidence: 92%)	PEP	Relatives of High Officials, Person Related to [REDACTED]  Relation to the target: CEO

## Low-confidence Matches

No result found.

## Names Checked

Researches have been conducted on the following entities and individuals:

### Entities / Individuals checked

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██████████

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Mr Paul J M ██████████

# Sanction Lists / Enforcement Actions

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No matches were found in specialized databases.

## Section Risk Scores

Corruption & Influence Peddling	0%
White-Collar Crime	0%

A value of 0% can imply lack of matches or a result below a threshold of confidence.

## Names Checked

Researches have been conducted on the following entities and individuals:

### Entities / Individuals checked

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[REDACTED]

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Paul J M [REDACTED]

# Legal Cases / Litigations

Number of legal cases mentioning the target: 1

Names searched (exact spelling):

- [REDACTED]

## Section Risk Scores

Corruption & Influence Peddling	65%
White-Collar Crime	83%

A value of 0% can imply lack of matches or a result below a threshold of confidence.

## Selected Cases

Court Name	Dockets Delaware Court of Chancery
Date(s)	Filed: 2019-09-19
Case information data	N/A
Parties	[REDACTED] Attorney General of the State of Delaware, Plaintiff, v. [REDACTED] LTDs, a Delaware Corporation, [REDACTED] INTERNATIONAL, LLC, a Delaware limited liability company, [REDACTED] INTERNATIONAL, LLC; a Delaware limited liability company, [REDACTED] INTERNATIONAL, LLC, a Delaware limited liability company, and [REDACTED], INC., a Delaware corporation, Defendants.
Match probability (%)	TargetMatching – 100%
Risk typology	Corruption: 65% White-Collar Crime: 83%

# Sensitive News

Number of possibly Sensitive News mentioning the target: 3

Names searched (exact spelling):

- [REDACTED]

## Section Risk Scores

Corruption & Influence Peddling	74%
White-Collar Crime	88%

A value of 0% can imply lack of matches or a result below a threshold of confidence.

## Selected News Articles

Title	LLCs revealed in indictment
Date	2017-11-01
Source	The News Journal (Wilmington, Delaware)
Excerpt	

LLCs revealed in indictment  
17 domestic business entities implicated in the Manafort, Gates scheme. 4 domestic in Delaware  
Baltimore Post-Examiner  
Delaware News Journal  
"We can enlarge the legitimacy of the U.S. staff if we allow them to go uninvestigated."  
John Rowley  
State lawmaker warning calls for more rigorous state review of LLCs before they are allowed to set up shop in Delaware  
New Delaware corporations and limited liability companies helped former Trump campaign chairman Paul Manafort and former Trump campaign official Rick Gates shed from U.S. authorities millions of dollars in payments from the Ukraine, according to a federal grand jury indictment released Monday.  
Of the 17 domestic business entities implicated in the scheme, the largest number were domiciled in Delaware. Justice Department Special Counsel Robert Mueller found.  
The legal revelations of Delaware LLCs linked to financial fraud have emboldened open government advocates, such as State Rep. John Rowley, to press calls for more rigorous state review of LLCs before they are allowed to set up shop here.  
These are not "made in Delaware" companies, Rowley, a Newark Democrat said Tuesday. "We can enlarge the legitimacy of the U.S. staff if we allow them to go uninvestigated."  
Secretary of State Jeffrey Bullock has no plans to change course on the LLC approval process or shut down Manafort's and Gates' Delaware business interests, department spokesman Doug Demann said this week.  
The 21-page indictment made no mention of the Trump campaign or of Trump himself. Rather, it focused on Manafort's and Gates' duties as political consultants and lobbyists working with the Ukrainian government from 2006 to 2015. Those jobs generated tens of millions of dollars hidden from U.S. tax collectors in a number of foreign companies and bank accounts, Mueller alleged, supporting the man's extravagant lifestyle.



M [REDACTED] and [REDACTED] were charged with 12 counts related to money laundering, tax evasion and foreign lobbying. Both pleaded not guilty to all charges.

Match probability	80%
Risk typology	Corruption: 80% White Collar Crimes: 90%

Title	Former Trump campaign manager Paul Manafort received millions to promote Putin
Date	2017-03-22
Source	The Christian Science Monitor
Excerpt	<p>Former Trump campaign manager Paul Manafort received millions to promote Putin, Associated Press investigation finds ties between Manafort and Russian oligarch Oleg Deripaska, an ally of Putin's, stretching back to at least 2008. (The Post Staff)</p> <p>Former Trump campaign chairman Paul Manafort resigned in August, amid scrutiny of his connections to foreign governments, including Russia. But the extent of those ties may only now be surfacing.</p> <p>A new Associated Press investigation uncovered ties between Mr. Manafort and Russian oligarch Oleg Deripaska dating back to 2008, in a confidential strategy plan, Manafort told Mr. Deripaska that he could influence politics, business, and media across the United States, Europe, and former Soviet states for the benefit of Russia.</p> <p>"We are now of the belief that this model can greatly benefit the Putin Government if employed at the correct levels with the appropriate commitment to success," Manafort wrote in the memo.</p> <p>1.1</p> <p>Manafort received money from Deripaska through at least 2008, the AP investigation found, indicating that money did not flow to his consulting company based in Alexandria, Va., Davis Manafort, but to a business he had registered in Delaware in 2008, UDMR, Ltd. He also apparently worked to expand the promotion of pro-Putin policies into Colombia, Ukraine, and Georgia, the documents show.</p>
Match probability	100%
Risk typology	Corruption: 50% White Collar Crimes: 70%

Title	Russian Billionaire <b>Deripaska</b> Responds To AP Story On <b>Merator</b> Ties
Date	2017-03-22
Source	Phil's Stock World

Excerpt

On 22, 2017, Phil's Stock World http://www.philstockworld.com/Deripaska-by-Merator-Courtesy-of-Deripaska/1/ view original post (access) in the latest attempt to silence the just over allegations that Trump and members of his inner circle had ties to Russia, on Wednesday, the AP unearthed (the 2008 memo from former Trump campaign manager Paul Manafort - who was set up by the Trump campaign in the summer to Russian billionaire Oleg Deripaska, who became Russia's chief man under Putin and whose key asset is a 40% stake in Russian aluminum giant Rusal, according to which Manafort would head Putin's agents and reportedly undermine anti-Russian operations across Europe, the U.S. and former Soviet republics. We are now of the belief that this model can greatly benefit the Putin Government if employed at the correct levels with the appropriate commitment to success. Manafort wrote, adding I will be offering a great service that can reflect, both internally and externally, the policies of the Putin government. As a reminder, Manafort worked as Trump's unpaid campaign chairman last year from March until August.

Trump asked Manafort to resign after AP revealed that Manafort had orchestrated a covert Washington lobbying operation until 2016 on behalf of Ukraine's ruling pro-Russian political party. Furthermore, the AP wrote that Manafort and Deripaska eventually agreed a \$10 million annual contract beginning in 2008, and maintained a business relationship until at least 2016. Manafort confirmed to the AP that he worked for Deripaska in various countries, but said the work was being entirely used as inappropriate or referred as part of a smear campaign. According to AP, for the \$10 million contract, Manafort did not use his public-facing consulting firm, Davis Manafort but rather used a company, LLC/LLP, that he had registered in Delaware in 1992. He listed LLC/LLP as having the same address of his lobbying and consulting firms in Alexandria, Virginia. In other records, LLC/LLP's address was listed as Manafort's home, also in Alexandria. Ironically, even the AP reports that despite the connection, relations between then-president George W. Bush and Putin only grew worse. Manafort proposed a confidential strategy plan as early as June 2005 that he would influence politics, business dealings and news coverage inside the United States, Europe and the former Soviet republics to benefit the Putin government, even as U.S.-Russia relations under Republican President George W. Bush grew worse.

Match probability	100%
Risk typology	Corruption: 30% White Collar Crimes: 70%

# Disclaimer

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## IMPORTANT NOTICE

Please note that our research is conducted on the basis of the information provided by the client (exact spelling). The more information is provided, the more accurate the research will be. The additional information provided facilitates the identification of the target, might help distinguishing it from perfect or partial homonyms and might avoid misrepresented information. For individuals, details such as date of birth, place of residence and occupation might prove useful.

For companies, the exact registered name in the local language, legal type, registration date and number and the company's business activity are important details.

The sources of information used for this report are several international databases. In no way they are deemed exhaustive or complete.

The categorization by risk type and the scoring of the items retrieved (news articles, legal cases, enforcement actions, etc.) is done automatically by a software using multiple layers of data processing and several algorithms of machine learning. The way the software works is subject to change without prior notice.

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