

Dit document bevat namen van bedrijven en individuen. De bedrijven die we niet hebben opgenomen in onze wederhoor aan Roman Abramovitsj, of partijen aan wie geen wederhoor is gevraagd, zijn onleesbaar gemaakt.

De reacties van hen die we wel hebben benaderd volgen hieronder:

### **Roman Abramovitsj**

Volgens een woordvoerder van Abramovitsj zijn de transacties onderdeel van een interne herstructurering van diens bedrijven en zijn ze onderworpen aan uitgebreide controles. 'De financiële zaken van Mr Abramovitsj voldoen volledig aan de internationale belastingwetten en -regels', aldus de woordvoerder, 'iets anders suggereren is onterecht.' Om wat voor herstructurering het gaat wordt uit het antwoord niet duidelijk.

### **ING Bank**

'Het is ons beleid om geen uitspraken te doen over individuele klanten, transacties of interacties met toezichthouders', zegt ING.

### **Rigensis Bank**

Rigensis Bank heeft de ontvangst van onze vragen bevestigd, maar heeft ze niet beantwoord.



BSA: [REDACTED] and DCN:

Filing Information	
<b>Type of Report</b>	Continuing Activity Report
<b>Filing Date</b>	03/14/2017
<b>Received Date</b>	03/14/2017
<b>Entry Date</b>	03/15/2017
<b>Submission Method</b>	Electronic discrete filing

Subject Information	
<b>Subject 1 of 16 : Abramovich</b>	
<b>Role</b>	Subject
<b>Subject Type</b>	Both Purchaser and Payee
<b>Individual/Organization</b>	Individual
<b>Last (or Entity) Name</b>	Abramovich ABRAMOVICH - Enhanced
<b>First Name</b>	Roman ROMAN - Enhanced
<b>Middle Name</b>	Arkadievich ARKADIEVICH - Enhanced
<b>Alternate Name(s)</b>	<b>Alternate Name</b> De Heer R.A. Abramovich De Heer R.A. Abramovich - Enhanced
<b>Gender Type</b>	Male
<b>Date of Birth</b>	[REDACTED]
<b>TIN Unknown</b>	Yes
<b>Form(s) of Identification</b>	<b>Identification Unknown</b> Yes
<b>Address(es)</b>	<b>Street Address</b> [REDACTED]
	<b>City</b> Moscow MOSCOW - Enhanced
	<b>ZIP Code</b> [REDACTED]
	<b>Country</b> RS RU - Enhanced
<b>Corroborative Statement to Filer</b>	No
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b> 134941247
	<b>Relationship of Subject</b> Other: Yes client of correspondent
<b>Affected Account(s)</b>	<b>Account 1 of 2</b>
	<b>Account Number</b> [REDACTED]
	<b>Account 2 of 2</b>
	<b>Account Number</b> [REDACTED]



BSA: [REDACTED] and DCN:

Subject Information		
<b>Subject 2 of 16 :</b> [REDACTED]		
<b>Role</b>	Subject	
<b>Subject Type</b>	Both Purchaser and Payee	
<b>Individual/Organization</b>	Organization	
<b>No Known Acct. Involved</b>	Yes	
<b>Last (or Entity) Name</b>	[REDACTED]	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Road Town, Tortola ROAD TOWN, TORTOLA - Enhanced
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	VI VG - Enhanced
<b>Corroborative Statement to Filer</b>	No	
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	No Relationship: Yes
<b>Subject 3 of 16 : Cantley Investments Limited</b>		
<b>Role</b>	Subject	
<b>Subject Type</b>	Purchaser/Sender	
<b>Individual/Organization</b>	Organization	
<b>Last (or Entity) Name</b>	Cantley Investments Limited	
	CANTLEY INVESTMENTS - Enhanced	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Tortola
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	VI VG - Enhanced
<b>Corroborative Statement to Filer</b>	No	
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	Other: Yes client of correspondent
<b>Affected Account(s)</b>	<b>Account Number</b>	[REDACTED]
<b>Subject 4 of 16 : Eucla Investments Limited</b>		
<b>Role</b>	Subject	
<b>Subject Type</b>	Both Purchaser and Payee	
<b>Individual/Organization</b>	Organization	



BSAR Transcript  
BSA: [REDACTED] and DCN:

Subject Information		
<b>Last (or Entity) Name</b>	Eucla Investments Limited	
	EUCLA INVESTMENTS - Enhanced	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Road Town, Tortola ROAD TOWN, TORTOLA - Enhanced
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	VI
		VG - Enhanced
<b>Corroborative Statement to Filer</b>	No	
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	Other: Yes client of correspondent
<b>Affected Account(s)</b>	<b>Account Number</b>	[REDACTED]
<b>Subject 5 of 16 :</b>		
<b>Role</b>	Subject	
<b>Subject Type</b>	Both Purchaser and Payee	
<b>Individual/Organization</b>	Organization	
<b>Last (or Entity) Name</b>	[REDACTED]	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Road Town, Tortola ROAD TOWN, TORTOLA - Enhanced
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	VI
		VG - Enhanced
<b>Corroborative Statement to Filer</b>	No	
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	Other: Yes client of correspondent
<b>Affected Account(s)</b>	<b>Account Number</b>	[REDACTED]
<b>Subject 6 of 16 :</b>		
<b>Role</b>	Subject	
<b>Subject Type</b>	Both Purchaser and Payee	
<b>Individual/Organization</b>	Organization	
<b>Last (or Entity) Name</b>	[REDACTED]	



BSA: [REDACTED] and DCN: [REDACTED]

Subject Information		
<b>Alternate Name(s)</b>	<b>Alternate Name</b>	[REDACTED]
	<b>Alternate Name</b>	[REDACTED]
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Road Town, Tortola ROAD TOWN, TORTOLA - Enhanced
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	VI VG - Enhanced
	<b>Corroborative Statement to Filer</b>	No
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	Other: Yes client of correspondent
<b>Affected Account(s)</b>	<b>Account 1 of 2</b>	
	<b>Account Number</b>	[REDACTED]
	<b>Closed</b>	Y
	<b>Account 2 of 2</b>	
<b>Account Number</b>	[REDACTED]	
<b>Subject 7 of 16 :</b>		
<b>Role</b>	Subject	
<b>Subject Type</b>	Both Purchaser and Payee	
<b>Individual/Organization</b>	Organization	
<b>No Known Acct. Involved</b>	Yes	
<b>Last (or Entity) Name</b>	[REDACTED]	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Road Town, Tortola ROAD TOWN, TORTOLA - Enhanced
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	VI VG - Enhanced
	<b>Corroborative Statement to Filer</b>	No



BSA: [REDACTED] and DCN:

Subject Information		
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	No Relationship: Yes
<b>Subject 8 of 16 :</b>		
<b>Role</b>	Subject	
<b>Subject Type</b>	Both Purchaser and Payee	
<b>Individual/Organization</b>	Organization	
<b>Last (or Entity) Name</b>	[REDACTED]	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Tortola
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	VI VG - Enhanced
<b>Corroborative Statement to Filer</b>	No	
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	Other: Yes client of correspondent
<b>Affected Account(s)</b>	<b>Account Number</b>	[REDACTED]
<b>Subject 9 of 16 :</b>		
<b>Role</b>	Subject	
<b>Subject Type</b>	Purchaser/Sender	
<b>Individual/Organization</b>	Organization	
<b>No Known Acct. Involved</b>	Yes	
<b>Last (or Entity) Name</b>	[REDACTED]	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Road Town, Tortola ROAD TOWN, TORTOLA - Enhanced
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	VI VG - Enhanced
<b>Corroborative Statement to Filer</b>	No	
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	No Relationship: Yes
<b>Subject 10 of 16 :</b>		
<b>Role</b>	Subject	



BSA: [REDACTED] and DCN: [REDACTED]

Subject Information		
<b>Subject Type</b>	Both Purchaser and Payee	
<b>Individual/Organization</b>	Organization	
<b>Last (or Entity) Name</b>	[REDACTED]	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Road Town, Tortola ROAD TOWN, TORTOLA - Enhanced
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	VI VG - Enhanced
	<b>Corroborative Statement to Filer</b>	No
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	Other: Yes client of correspondent
<b>Affected Account(s)</b>	<b>Account Number</b>	[REDACTED]
<b>Subject 11 of 16 :</b>		
<b>Role</b>	Subject	
<b>Subject Type</b>	Both Purchaser and Payee	
<b>Individual/Organization</b>	Organization	
<b>Last (or Entity) Name</b>	[REDACTED]	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Moscow MOSCOW - Enhanced
	<b>ZIP Code</b>	[REDACTED]
	<b>Country</b>	RS RU - Enhanced
<b>Corroborative Statement to Filer</b>	No	
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	Other: Yes client of correspondent
<b>Affected Account(s)</b>	<b>Account 1 of 2</b>	
	<b>Account Number</b>	[REDACTED]
	<b>Account 2 of 2</b>	
	<b>Account Number</b>	[REDACTED]





BSA: [REDACTED] and DCN: [REDACTED]

Subject Information		
<b>Subject 12 of 16 :</b>		
<b>Role</b>	Subject	
<b>Subject Type</b>	Both Purchaser and Payee	
<b>Individual/Organization</b>	Organization	
<b>No Known Acct. Involved</b>	Yes	
<b>Last (or Entity) Name</b>	[REDACTED]	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Tortola
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	VI VG - Enhanced
<b>Corroborative Statement to Filer</b>	No	
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	No Relationship: Yes
<b>Subject 13 of 16 :</b>		
<b>Role</b>	Subject	
<b>Subject Type</b>	Payee/Receiver	
<b>Individual/Organization</b>	Organization	
<b>Last (or Entity) Name</b>	[REDACTED]	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Mahe
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	SE SC - Enhanced
<b>Corroborative Statement to Filer</b>	No	
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	Other: Yes client of correspondent
<b>Affected Account(s)</b>	<b>Account Number</b>	[REDACTED]
<b>Subject 14 of 16 : Ovington Worldwide Limited</b>		
<b>Role</b>	Subject	
<b>Subject Type</b>	Purchaser/Sender	
<b>Individual/Organization</b>	Organization	





BSA: [REDACTED] and DCN: [REDACTED]

Subject Information		
<b>Last (or Entity) Name</b>	Ovington Worldwide Limited	
	OVINGTON WORLDWIDE - Enhanced	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Tortola
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	VI VG - Enhanced
<b>Corroborative Statement to Filer</b>	No	
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	Other: Yes client of correspondent
<b>Affected Account(s)</b>	<b>Account Number</b>	[REDACTED]
<b>Subject 15 of 16 :</b>		
<b>Role</b>	Subject	
<b>Subject Type</b>	Payee/Receiver	
<b>Individual/Organization</b>	Organization	
<b>Last (or Entity) Name</b>	[REDACTED]	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Tortola
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	VI VG - Enhanced
<b>Corroborative Statement to Filer</b>	No	
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	Other: Yes client of correspondent
<b>Affected Account(s)</b>	<b>Account Number</b>	[REDACTED]
<b>Subject 16 of 16 : Protonius Investments Ltd</b>		
<b>Role</b>	Subject	
<b>Subject Type</b>	Both Purchaser and Payee	
<b>Individual/Organization</b>	Organization	
<b>Last (or Entity) Name</b>	Protonius Investments Ltd	
	PROTONIUS INVESTMENTS - Enhanced	
<b>TIN Unknown</b>	Yes	
<b>Form(s) of Identification</b>	<b>Identification Unknown</b>	Yes



BSA: [REDACTED] and DCN: [REDACTED]

Subject Information		
<b>Address(es)</b>	<b>Street Address</b>	[REDACTED]
	<b>City</b>	Road Town, Tortola ROAD TOWN, TORTOLA - Enhanced
	<b>ZIP Code Unknown</b>	Yes
	<b>Country</b>	VI VG - Enhanced
	<b>Corroborative Statement to Filer</b>	No
<b>Relationship to Reporting Institution(s)</b>	<b>Institution TIN</b>	134941247
	<b>Relationship of Subject</b>	Other: Yes client of correspondent
<b>Affected Account(s)</b>	<b>Account Number</b>	[REDACTED]

Suspicious Activity Information	
<b>Amount Involved</b>	\$523,270,164
<b>Cumulative Amount</b>	\$2,919,529,165
<b>Date or Date Range of Activity</b>	02/23/2016 - 01/26/2017
<b>Money laundering</b>	Suspicious EFT/wire transfers Suspicious use of multiple accounts
<b>Other suspicious activities</b>	Suspicious use of multiple locations Transaction with no apparent economic, business, or lawful purpose
<b>Financial instrument or payment mechanism</b>	Funds transfer

Activity Location	
<b>Financial Institution Location 1 of 1</b>	
<b>No Branch Activity Involved</b>	Yes
<b>Type of Financial Institution</b>	Depository institution
<b>Primary Regulator</b>	Federal Reserve
<b>RSSD Number</b>	[REDACTED]
<b>Legal Name</b>	Deutsche Bank Trust Company Americas
<b>EIN</b>	[REDACTED]
<b>RSSD Number</b>	[REDACTED]



BSA: [REDACTED] and DCN:

Activity Location	
<b>Address(es)</b>	<b>Street Address</b> 60 Wall Street 60 WALL ST - Enhanced
	<b>City</b> New York NEW YORK - Enhanced
	<b>State</b> NY NY - Enhanced
	<b>ZIP Code</b> 10005 10005-2836 - Enhanced
	<b>Country</b> US US - Enhanced
	<b>Internal Control File Number</b> [REDACTED]

Filer Information		
<b>Primary Regulator</b>	Federal Reserve	
<b>Filer Name</b>	Deutsche Bank Trust Company Americas DEUTSCHE BANK TRUST CO AMERICAS - Enhanced	
<b>EIN</b>	[REDACTED]	
<b>Address(es)</b>	<b>Street Address</b> 60 Wall Street 60 WALL ST - Enhanced	
	<b>City</b> New York NEW YORK - Enhanced	
	<b>State</b> NY NY - Enhanced	
	<b>ZIP Code</b> 10005 10005-2836 - Enhanced	
	<b>Country</b> US US - Enhanced	
	<b>Type of Financial Institution</b> Depository institution	
<b>RSSD Number</b>	[REDACTED]	
<b>Internal control/file number</b>	[REDACTED]	
<b>Contact for Assistance</b>	<b>Full Name</b> AML [REDACTED]	
	<b>Phone Number</b>	<b>Type</b> Work
	<b>Number</b> [REDACTED]	

Law Enforcement Information
No Law Enforcement Information Available



BSA: [REDACTED] **BSAR Transcript** and DCN: [REDACTED]

**Narrative**

Internal Reference Number: [REDACTED] - CMS Case ID: [REDACTED] Analyst: [REDACTED]

This SAR is being filed to report a continuation of activity from a previously filed SAR, which involved several groupings of suspicious payments involving offshore shell companies, many of which are owned by Roman Abramovich ("Abramovich"), Russian billionaire, who has been accused of money laundering. This investigation involves multiple instances of "round-trip" payments involving Abramovich and several entities, crossing multiple locations and banking jurisdictions. In addition, many of the payments were for large, round dollar amounts, with no discernible commercial purpose.

This SAR supplements a previous SAR filed on 12/02/2016 concerning Roman Abramovich, which is the same party involved in the transactions described below. This current SAR contains transactions which were not reported in the previously-filed SAR.

During AML Monitoring, DBTCA was alerted to wire transfer activity involving Roman Abramovich. Due to a prior investigation in which funds were moved between multiple Abramovich's offshore entities in suspicious patterns, which depicted possible layering of funds and round-tripped payments, DBTCA expanded investigation to include a search of DBTCA's wire transfer database for all payments involving any of the entities that are involved in suspicious patterns. A total of one hundred and seven (107) payments totaling \$523,270,163.33 sent from 02/23/2016 to 01/26/2017 were identified. These transactions were processed on behalf of Abramovich and Additional Suspects through the following DBTCA correspondent accounts: #04451335 for ING Bank Netherland N V, Netherlands, [REDACTED] Russia, [REDACTED] Latvia, [REDACTED] Russia, and [REDACTED] Switzerland.

The ORIGINATORS involved in these transactions were: [REDACTED], [REDACTED], [REDACTED], PROTONIUS INVESTMENTS LTD, EUCLA INVESTMENTS LIMITED, ABRAMOVICH ROMAN ARKADIEVICH aka DE HEER R.A. ABRAMOVICH, [REDACTED], [REDACTED] S [REDACTED], [REDACTED], [REDACTED], CANTLEY INVESTMENTS LIMITED, [REDACTED], OVINGTON WORLDWIDE LIMITED, [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED]

The ORIGINATING BANKS involved in these transactions were: [REDACTED], [REDACTED], [REDACTED], [REDACTED], ING BANK NETHERLAND N V, [REDACTED], and [REDACTED]





BSAR Transcript  
BSA: [REDACTED] and DCN:

## Narrative

Chukotka.

D. From 04/28/2016 to 01/26/2017, Abramovich sent twelve (12) large, round dollar transactions, totaling \$55,175,000 between his accounts at ING Bank Netherlands, [REDACTED], and [REDACTED].

2. [REDACTED]

A. The address for [REDACTED] was listed in the transaction details as [REDACTED] Road Town, Tortola, VG."

B. No physical location, place of incorporation or line of business was found through external research.

3. [REDACTED]

A. The address for [REDACTED] was listed in the transaction details as [REDACTED] Tortola, VG."

B. No physical location, place of incorporation or line of business was found through external research.

4. Protonius Investments Ltd ("Protonius")

A. The addresses for Protonius were listed in the transaction details as [REDACTED] Cyprus" and [REDACTED] Cyprus."

B. According to an October 2013 article on www.cre.ru, Protonius Investments Ltd is owned by Abramovich. As per Lexis, Protonius has an address of [REDACTED] As per www.i-cyprus.com, Protonius was incorporated in Cyprus 9/20/2010 under [REDACTED] listing [REDACTED] as secretary.

5. Eucla Investments Limited ("Eucla")

A. The address for Eucla was listed in the transaction details as [REDACTED] Tortola, GB Maagden Eil, VG."

B. According to February 2011 articles on The Guardian and www.fm-base.co.uk, Eucla is a holding company owned by Abramovich.

6. [REDACTED]

A. The address for [REDACTED] was listed in the transaction details as [REDACTED] GB Maagden Eil, VG."

B. According to www.infocreditworld.com, [REDACTED] was incorporated in the BVI under registration number [REDACTED] According to www.pressreader.com, [REDACTED] is owned by Abramovich.





BSAR Transcript  
BSA: [REDACTED] and DCN: [REDACTED]

**Narrative**

7. [REDACTED]

A. The address for [REDACTED] was listed in the transaction details as [REDACTED] Tortola, VG."

B. No physical location, place of incorporation or line of business was found through external research.

8. [REDACTED]

A. The address for [REDACTED] was listed in the transaction details as [REDACTED]

B. No physical location, place of incorporation or line of business was found through external research.

9. [REDACTED]

A. The address for [REDACTED] was listed in the transaction details as [REDACTED]

B. According to <https://en.crimerrussia.com>, [REDACTED] is a BVI-based entity owned by to [REDACTED] (associate of Abramovich and a member of the [REDACTED] board of directors, ex-senator of Omsk Region).

10. [REDACTED]

A. The address for [REDACTED] was listed in the transaction details as [REDACTED] Tortola, VG."

B. According to several sources (<http://theblacksea.eu>, <http://futbolgrad.com>, [www.maisfutebol.iol.pt](http://www.maisfutebol.iol.pt)), [REDACTED] is an investment fund registered in the BVI that owns various contracts for soccer players, and is controlled by [REDACTED] a close associate of Abramovich.

11. [REDACTED]

A. The address for [REDACTED] was listed in the transaction details as [REDACTED] Tortola, VG."

B. According to [www.infocreditworld.com](http://www.infocreditworld.com), [REDACTED] was incorporated in the BVI under registration number [REDACTED]. No additional information was found.

12. Cantley Investments Limited ("Cantley")

A. The address for Cantley was listed in the transaction details as [REDACTED]

B. According to <https://beta.companieshouse.gov.uk>, Cantley is UK-incorporated entity, registered at [REDACTED] [REDACTED] and is involved in construction of commercial/domestic buildings. A previous field inquiry response from ING Bank Netherlands NV identified Abramovich as Cantley's UBO. Per same inquiry, Cantley provides financing for





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investments into real estate projects and equity trade.

### 13. Ovington Worldwide Limited ("Ovington")

A. The address for Ovington was listed in the transaction details as [REDACTED] Tortola, VG."

B. According to <http://listings.findthecompany.com>, Ovington is a holding company with an address of [REDACTED] Virgin Islands, British." According to Lexis, Ovington is owned by Abramovich. The entity operates under [REDACTED], Abramovich's holding company.

### 14. [REDACTED]

A. The address for [REDACTED] was listed in the transaction details as [REDACTED] Seychelles."

B. A search of public databases yielded a number of results for [REDACTED]. However, DBCTA could not determine if these listings concerned the same entity involved in the transactions described above.

### 15. [REDACTED]

A. The address for [REDACTED] was listed in the transaction details as [REDACTED], Tortola, VG."

B. According to a February 2011 posting on [www.fm-base.co.uk](http://www.fm-base.co.uk), [REDACTED] is partly owned by Abramovich, who owns 25% of company's shares.

### 16. [REDACTED]

A. The address for [REDACTED] was listed in the transaction details as [REDACTED] Russia."

B. According to [REDACTED], Abramovich is a founding partner of [REDACTED].

Previous SARs: DBTCA has filed previous SARs concerning some of the parties discussed above, including SARs filed on:

- 12/02/2016 concerning [REDACTED], [REDACTED], Cantley Investments Limited, Ovington Worldwide Limited, And Protonius Investments Ltd;
- 10/03/2016 concerning Cantley Investments Limited;
- 06/02/2016 concerning Ovington Worldwide Limited; and
- 02/27/2017 [REDACTED] was a counterparty in a SAR concerning [REDACTED]



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Details of the suspicious transactions:

In each of the following instances, the funds originated in accounts maintained at DBTCA correspondent account #04451335USD for ING Netherland NV, Netherlands and were sent to the second party's accounts at Rigensis Bank AS, Latvia. The second legs of the payments were sent from the second party's account at Rigensis back to ING's DBTCA account; but to a third beneficiary entity. In all cases, [REDACTED] Russia served as an intermediary. Details follow:

1. On 06/14/2016, [REDACTED] sent one (1) payment for \$33,259,000 to [REDACTED]. On the same day [REDACTED] sent one (1) payment for \$33,258,935.96 to [REDACTED].
2. On 08/16/2016 [REDACTED] sent one (1) payment for \$23,416,000 to [REDACTED]. On the same day [REDACTED] sent one (1) payment for \$23,000,000 to Eucla.
3. On 08/22/2016 [REDACTED] sent one (1) payment for \$20,415,554.55 to [REDACTED]. On the same day [REDACTED] sent one (1) payment for \$20,675,554.55 to Eucla.
4. On 09/12/2016 [REDACTED] sent one (1) payment for \$18,769,368.85 to [REDACTED]. On the same day [REDACTED] sent one (1) payment for \$18,769,368.85 to [REDACTED].
5. On 01/17/2017 Protonius sent one (1) payment for \$27,152,674.67 to [REDACTED]. On the same day [REDACTED] sent one (1) payment for \$27,150,000 to [REDACTED].

Additional instances of suspicious activities:

6. On 06/28/2016 [REDACTED] sent one (1) payment for \$9,358,183.68 from its account at ING to [REDACTED]'s account at Rigenis. On the same day [REDACTED] sent one (1) payment for \$9,358,183.68 from its account at Rigenis to [REDACTED] account at [REDACTED].
7. On 08/17/2016 Eucla sent one (1) payment for \$23,139,000 from its ING account to Abramovich's [REDACTED] account. On the same day Abramovich sent one (1) payment for \$23,000,000 from his account at [REDACTED] to his account at ING Bank.
8. On 08/22/2016, Eucla sent one (1) payment for \$20,692,000 to ING account to Abramovich's [REDACTED] account. On 08/23/2016, Abramovich sent one (1) payment for \$20,675,000 from his account at [REDACTED] to his account at ING Bank.



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9. Fifty three (53) transactions were conducted in large, round dollar amounts, ranging from \$5,000 to \$33,259,000.