

Dit document bevat namen van bedrijven. De namen van organisaties die we niet om wederhoor hebben gevraagd, zijn onleesbaar gemaakt.

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

Schildershoven Finance BV

De eigenaar en bestuurder van Schildershoven schrijven in een reactie dat het bedrijf sinds twee jaar nieuwe eigenaren heeft en dat ze om die reden niet kunnen reageren op de beschuldigingen uit het verleden. Het bedrijf zegt dat het inmiddels moderne anti-witwasstandaarden hanteert, en dat het geen zaken doet met Ergoinvest LLP en Serbenta Global Alliance Limited. De oud-bestuurder van Schildershoven reageert niet op vragen.

Tristane Capital

Tristane Capital gaat niet in op vragen.

ING Bank

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

Ergoinvest LLP

Ergoinvest is opgeheven sinds 2017.

Serbenta Global Alliance Limited

Serbenta is opgeheven sinds 2019.

Danske Bank

Danske Bank zegt niet te kunnen reageren op vragen omdat deze onderdeel zijn van lopende onderzoeken door autoriteiten. De bank stelt dat het haar portfolio van buitenlandse klanten bij Danske Estland nooit had moeten hebben. 'Het is ook duidelijk dat we de omvang van de problemen te laat beseften en te laat besloten om Danske Estland te sluiten.'



BSA: [REDACTED]

BSA: [REDACTED] and DCN: [REDACTED]

Filing Information	
Type of Report	Initial Report
Filing Date	07/11/2014
Received Date	07/11/2014
Entry Date	07/13/2014
Submission Method	Electronic batch filing

Subject Information		
Subject 1 of 7 : ERGOINVEST LLP		
Role	Subject	
Subject Type	Other	
Individual/Organization	Organization	
Last (or Entity) Name	ERGOINVEST LLP	
TIN Unknown	Yes	
Form(s) of Identification	Identification Unknown	Yes
Address(es)	Street Address	175 DARKES LANEPOTTERS BAR 175 DARKES LANEPOTTERS BAR - Enhanced
	City	HERTFORDSHIRE
	State Unknown	Yes
	ZIP Code Unknown	Yes
	Country	UK GB - Enhanced
	Corroborative Statement to Filer	No
Relationship to Reporting Institution(s)	Institution TIN	134994650
	Relationship of Subject	No Relationship: Yes
Affected Account(s)	Account 1 of 2	
	Account Number	[REDACTED]
	Account 2 of 2	
	Account Number	[REDACTED]
Subject 2 of 7 : [REDACTED]		
Role	Subject	
Subject Type	Other	
Individual/Organization	Organization	
Last (or Entity) Name	[REDACTED]	
TIN Unknown	Yes	
Form(s) of Identification	Identification Unknown	Yes



BSA: [REDACTED]

BSA: [REDACTED] and DCN: [REDACTED]

Subject Information	
Address(es)	Street Address [REDACTED]
	City TORTOLA TORTOLA - Enhanced
	State Unknown Yes
	ZIP Code Unknown Yes
	Country VI VG - Enhanced
	Corroborative Statement to Filer No
Relationship to Reporting Institution(s)	Institution TIN 134994650
	Relationship of Subject No Relationship: Yes
Affected Account(s)	Account Number [REDACTED]
Subject 3 of 7 : [REDACTED]	
Role	Subject
Subject Type	Other
Individual/Organization	Organization
Last (or Entity) Name	[REDACTED]
TIN Unknown	Yes
Form(s) of Identification	Identification Unknown Yes
	Address(es)
Address(es)	Street Address [REDACTED]
	City MOSCOW MOSCOW - Enhanced
	State Unknown Yes
	ZIP Code Unknown Yes
	Country RS RU - Enhanced
	Corroborative Statement to Filer No
Relationship to Reporting Institution(s)	Institution TIN 134994650
	Relationship of Subject No Relationship: Yes
Affected Account(s)	Account 1 of 2
	Account Number [REDACTED]
	Account 2 of 2
	Account Number [REDACTED]
Subject 4 of 7 : [REDACTED]	
Role	Subject
Subject Type	Other
Individual/Organization	Organization
Last (or Entity) Name	[REDACTED]
TIN Unknown	Yes



BSA: [REDACTED] and DCN: [REDACTED]

BSA: [REDACTED]

Subject Information			
Form(s) of Identification	Identification Unknown	Yes	
Address(es)	Street Address	[REDACTED]	
	City	LIMASSOL LIMASSOL - Enhanced	
	State Unknown	Yes	
	ZIP Code	3035 3035 - Enhanced	
	Country	CY	CY - Enhanced
Corroborative Statement to Filer	No		
Relationship to Reporting Institution(s)	Institution TIN	134994650	
	Relationship of Subject	No Relationship: Yes	
Affected Account(s)	Account Number	[REDACTED]	
Subject 5 of 7 : SCHILDERSHOVEN FINANCE BV			
Role	Subject		
Subject Type	Other		
Individual/Organization	Organization		
Last (or Entity) Name	SCHILDERSHOVEN FINANCE BV		
TIN Unknown	Yes		
Form(s) of Identification	Identification Unknown	Yes	



BSA: [REDACTED]

BSA: [REDACTED] and DCN: [REDACTED]

Subject Information	
Address(es)	Address 1 of 3
	Street Address [REDACTED]
	City ZAANDAM ZAANDAM - Enhanced
	State Unkown Yes
	ZIP Code 1507CB 1507 CB - Enhanced
	Country NL NL - Enhanced
	Address 2 of 3
	Street Address [REDACTED]
	City AMSTERDAM AMSTERDAM - Enhanced
	State Unkown Yes
	ZIP Code 1014BA 1014 BA - Enhanced
	Country NL NL - Enhanced
	Address 3 of 3
	Street Address [REDACTED]
	City AMSTERDAM AMSTERDAM - Enhanced
	State Unkown Yes
	ZIP Code 1001 1001 - Enhanced
	Country NL NL - Enhanced
	Website(s) WWW.SCHILDERSHOVEN.COM
	Corroborative Statement to Filer No
	Relationship to Reporting Institution(s)
Relationship of Subject No Relationship: Yes	



BSA: [REDACTED]

BSA: [REDACTED] and DCN: [REDACTED]

Subject Information											
Affected Account(s)	<table border="1"> <tr> <td colspan="2">Account 1 of 6</td> </tr> <tr> <td>Account Number</td> <td>[REDACTED]</td> </tr> </table>	Account 1 of 6		Account Number	[REDACTED]						
	Account 1 of 6										
	Account Number	[REDACTED]									
	<table border="1"> <tr> <td colspan="2">Account 2 of 6</td> </tr> <tr> <td>Account Number</td> <td>[REDACTED]</td> </tr> </table>	Account 2 of 6		Account Number	[REDACTED]						
	Account 2 of 6										
	Account Number	[REDACTED]									
<table border="1"> <tr> <td colspan="2">Account 3 of 6</td> </tr> <tr> <td>Account Number</td> <td>[REDACTED]</td> </tr> </table>	Account 3 of 6		Account Number	[REDACTED]							
Account 3 of 6											
Account Number	[REDACTED]										
<table border="1"> <tr> <td colspan="2">Account 4 of 6</td> </tr> <tr> <td>Account Number</td> <td>[REDACTED]</td> </tr> </table>	Account 4 of 6		Account Number	[REDACTED]							
Account 4 of 6											
Account Number	[REDACTED]										
<table border="1"> <tr> <td colspan="2">Account 5 of 6</td> </tr> <tr> <td>Account Number</td> <td>[REDACTED]</td> </tr> </table>	Account 5 of 6		Account Number	[REDACTED]							
Account 5 of 6											
Account Number	[REDACTED]										
<table border="1"> <tr> <td colspan="2">Account 6 of 6</td> </tr> <tr> <td>Account Number</td> <td>[REDACTED]</td> </tr> </table>	Account 6 of 6		Account Number	[REDACTED]							
Account 6 of 6											
Account Number	[REDACTED]										
Subject 6 of 7 : SERBENTA GLOBAL ALLIANCE LIMITED											
Role	Subject										
Subject Type	Other										
Individual/Organization	Organization										
Last (or Entity) Name	SERBENTA GLOBAL ALLIANCE LIMITED										
TIN Unknown	Yes										
Form(s) of Identification	<table border="1"> <tr> <td>Identification Unknown</td> <td>Yes</td> </tr> </table>	Identification Unknown	Yes								
Identification Unknown	Yes										
Address(es)	<table border="1"> <tr> <td>Street Address</td> <td>[REDACTED]</td> </tr> <tr> <td>City</td> <td>NICOSIA NICOSIA - Enhanced</td> </tr> <tr> <td>State Unknown</td> <td>Yes</td> </tr> <tr> <td>ZIP Code</td> <td>1070 1070 - Enhanced</td> </tr> <tr> <td>Country</td> <td>CY CY - Enhanced</td> </tr> </table>	Street Address	[REDACTED]	City	NICOSIA NICOSIA - Enhanced	State Unknown	Yes	ZIP Code	1070 1070 - Enhanced	Country	CY CY - Enhanced
	Street Address	[REDACTED]									
	City	NICOSIA NICOSIA - Enhanced									
	State Unknown	Yes									
	ZIP Code	1070 1070 - Enhanced									
Country	CY CY - Enhanced										
Corroborative Statement to Filer	No										
Relationship to Reporting Institution(s)	Institution TIN 134994650										
	Relationship of Subject No Relationship: Yes										
Affected Account(s)	Account Number [REDACTED]										
Subject 7 of 7 :											
Role	Subject										
Subject Type	Other										
Individual/Organization	Organization										
Last (or Entity) Name	[REDACTED]										



BSA: [REDACTED]

BSA: [REDACTED] and DCN: [REDACTED]

Subject Information	
TIN Unknown	Yes
Form(s) of Identification	Identification Unknown Yes
Address(es)	Street Address [REDACTED]
	City TORTOLA TORTOLA - Enhanced
	State Unknown Yes
	ZIP Code Unknown Yes
	Country VI VG - Enhanced
	Corroborative Statement to Filer No
Relationship to Reporting Institution(s)	Institution TIN 134994650
	Relationship of Subject No Relationship: Yes
Affected Account(s)	Account Number [REDACTED]

Suspicious Activity Information	
Amount Involved	\$644,855,862
Date or Date Range of Activity	05/13/2013 - 06/10/2014
Money laundering	Suspicious EFT/wire transfers Suspicious concerning the source of funds
Financial instrument or payment mechanism	Funds transfer

Activity Location	
Financial Institution Location 1 of 1	
Type of Financial Institution	Depository institution
Primary Regulator	OCC
Legal Name	JPMORGAN CHASE BANK, NATIONAL ASSOCIATION
EIN	[REDACTED]



BSA: [REDACTED]

BSA: [REDACTED] and DCN: [REDACTED]

Activity Location

Address(es)	Street Address	1111 POLARIS PARKWAY
		1111 POLARIS PKWY - Enhanced
	City	COLUMBUS
		COLUMBUS - Enhanced
	State	OH
		OH - Enhanced
	ZIP Code	43240
	43240-2031 - Enhanced	
Country		US
		US - Enhanced
Internal Control File Number	[REDACTED]	

Branch Office Location 1 of 1

Financial Institution Name	JPMORGAN CHASE BANK, NATIONAL ASSOCIATION	
Address	Street Address	270 Park Avenue
		270 PARK AVE - Enhanced
	City	New York
		NEW YORK - Enhanced
	State	NY
		NY - Enhanced
	ZIP Code	10017-2014
	10017-2014 - Enhanced	
Country		US
		US - Enhanced

Filer Information

Primary Regulator	OCC
Filer Name	JPMORGAN CHASE BANK, NATIONAL ASSOCIATION
EIN	[REDACTED]



BSA: [REDACTED]

BSA: [REDACTED] and DCN: [REDACTED]

Filer Information			
Address(es)	Street Address	1111 POLARIS PARKWAY	
		1111 POLARIS PKWY - Enhanced	
	City	COLUMBUS	
		COLUMBUS - Enhanced	
	State	OH	
		OH - Enhanced	
	ZIP Code	43240	
	43240-2031 - Enhanced		
Country	US		
	US - Enhanced		
Type of Financial Institution	Depository institution		
Internal control/file number	[REDACTED]		
Contact for Assistance	Full Name	AML [REDACTED]	
	Phone Number	Type	Work
		Number	[REDACTED]

Law Enforcement Information
No Law Enforcement Information Available

Narrative

JPMorgan Chase Bank NA ("JPMC") is filing this SAR to report suspicious wire transactions involving Schildershoven Finance Bv ("Schildershoven") and one of its top transactional counterparties, Ergoinvest LLP ("Ergoinvest"), due to the companies' high risk transactional patterns, suspicion concerning the source of funds, and lack of transparency. Schildershoven appears to be a Netherlands-based institutional investor with core business line as investment advisory across international capital markets and "in-house" trading focused on relevant securities. Although Schildershoven is publically identifiable, its primary wire transactional counterparties appear to be unidentifiable, nontransparent entities registered at shell addresses and banking primarily in Latvia and Estonia. Ergoinvest, the largest beneficiary of wires sent by Schildershoven, is a publically unidentifiable entity with wire activity with no known economic rationale. Schildershoven sent and received wires with multiple high-risk transactional patterns, including: sending/receiving of high-value wires (large, round dollar amounts) in clusters on the same day or consecutive days with unclear and generic payment details (sale of securities, interest claim, and payments under agreement); imbalance in funds sent versus funds received, use of accommodation addresses (United Kingdom, Cyprus), transactions with high-risk, low-transparency entities and lack of clear business rationale. The total SAR amount reported herein is \$644,855,862, representing the total of the 399 wires sent and received by Schildershoven and including additional wire activity remitted by Ergoinvest from May 13, 2013 to June 10, 2014. JPMC identified activity involving



BSA: [REDACTED]

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

Narrative

Schildershoven during an internal alert review process. Schildershoven, Ergoinvest and their counterparties are not JPMC clients, but hold accounts at JPMC foreign correspondent banks ("FCB"). Full banking details for accounts utilized by entities named herein can be found at the end of this SAR narrative in the "Schedule of Accounts". Schildershoven appears to be a Netherlands based institutional investor with core business line as investment advisory across international capital markets and "in-house" trading focused on relevant securities, however it interacts almost solely with nontransparent entities about which no media or information could be found. There is concern about the wires sent and received by Schildershoven, in spite of its public profile, as the source of funds of the nontransparent entities sending wires to and receiving wires from the entity is unknown. Given the high-risk geographies, use of accommodation addresses and nonresident bank accounts utilized by Schildershoven's wire transactional counterparties, all wire activity involving Schildershoven is deemed suspicious and reported herein. From May 13, 2013 to June 10, 2014 Schildershoven remitted 369 wires totaling \$634,832,580 and received 28 wires totaling \$6,923,282. Schildershoven received wires from various entities, however the majority of funds came from [REDACTED] (1 wire for \$4,253,129.53). Payment details refer to sale of securities, interest claims, and payments under agreements. No public media could be found on [REDACTED] and therefore the underlying economic rationale and source of funds for this transaction could not be verified. Schildershoven's debit wires were remitted to three primary counterparties: Ergoinvest (received 76 wires totaling \$306,756,490.20), Serbenta Global Alliance Ltd ("Serbenta", received 86 wires totaling \$207,683,768.15), and [REDACTED] ([REDACTED], received 74 wires totaling \$96,660,291.38). These three entities received over 96% of wires remitted by Schildershoven. Wires sent to Ergoinvest, [REDACTED] and Serbenta all contain unclear and nonspecific payment details referring to "payments under agreements". Payments were sent in clusters with multiple payments on the same day or consecutive days for large dollar amounts. Two of the three top beneficiaries of Schildershoven wires are registered at apparent accommodation addresses (United Kingdom and Cyprus), and the other is registered in Russia. All three utilized bank accounts at the same bank in Estonia. None of these Schildershoven counterparties appears to maintain a public profile and limited information about these counterparties was identified. The extremely high value of wires and the near-total lack of transparency increases risk and raises suspicion on transaction, causing JPMC to name these primary Schildershoven counterparties as suspects herein. JPMC also reviewed wire activity for Ergoinvest. Aside from the \$306,756,490.20 (analyzed above) that Ergoinvest received from Schildershoven, the entity had extremely limited additional activity. Ergoinvest received no other wires, and remitted only 2 wires totaling \$3,100,000. These wires were sent to [REDACTED] ([REDACTED]) and [REDACTED] ([REDACTED]) in July 2013 and September 2013 respectively, both for apparent investment contracts. Wires were large, round-dollar amounts and were sent to entities that share the same P.O.Box address in British Virgin Islands, and have no web presence. No public profiles or information on Ergoinvest counterparties could be identified. The underlying economic rationale for these transactions could not be determined and lack of transparency raises suspicion on these high-value wires. As such, these two counterparties of Ergoinvest are also included in this SAR and the value of these wires is included in the SAR total. JPMC is



BSA: [REDACTED]

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

Narrative

reporting wire activity involving Schildershoven and Ergoinvest due to lack of transparency, suspicion concerning the source of funds, the inability to establish the underlying business rationale for wire transactions, along with the patterns of high-risk activity described in preceding paragraphs. The total SAR amount reported herein is \$644,855,862, representing the total of the 399 wires sent and received by Schildershoven and Ergoinvest from May 13, 2013 to June 10, 2014. SCHEDULE OF ACCOUNTS: SCHILDERSHOVEN FINANCE BV: [REDACTED]

[REDACTED]

banking relationship [REDACTED] [REDACTED]

[REDACTED], clearing through a non-JPMC banking relationship at [REDACTED], also clearing through a non-JPMC banking relationship at [REDACTED]. --Account

[REDACTED], also clearing through a non-JPMC banking relationship at [REDACTED]. --

[REDACTED], also clearing through a non-JPMC banking relationship at [REDACTED]. --Account [REDACTED] held at [REDACTED], clearing through a non JPMC banking relationship at [REDACTED]

[REDACTED] ERGOINVEST LLP: [REDACTED] at [REDACTED]

[REDACTED] held at [REDACTED]

[REDACTED] clearing through a non-JPMC banking relationship at [REDACTED] SERBENTA GLOBAL ALLIANCE LIMITED:

[REDACTED] clearing through a non JPMC banking [REDACTED] Account

[REDACTED] clearing through a non-JPMC banking [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Supporting documentation associated with this report (SAR [REDACTED] includes, but may not be limited to, documents maintained or identified in case file [REDACTED] and can be retrieved upon request. Upon the appropriate and validated request of a regulator or law enforcement agency, supporting documentation will be provided. [REDACTED]

[REDACTED]

[REDACTED]



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

Narrative

BSA: [REDACTED]