

U/THABAT

An illustration of a small island with several wooden houses and boats. The houses are built on a sandy hill, and the boats are floating in the water. The sky is a deep blue, and the water is a lighter blue. The overall style is that of a classic children's book illustration.

ROLLING IN THE DEEP DIVE

HIDING MONEY IN THE CAYMAN ISLANDS

BRIBES & MEMES

RETURN SWAP MONEY TRAIL

SUSPICIOUS RULE EXEMPTIONS

Rolling in the Deep Dive: Hiding money in the Cayman Islands is back on the menu boys. Bribes and memes. Return Swap money trail and suspicious rule exemptions from keeping records of any kind. Hedgies are... well you know.

DD

Hello beautiful apes.

I got suspended for a week for doxxing the address to Steven Cohen's very publicly available mansion. I didn't even disclose the actual address, I censored it and just put his name on a map and showed it was 12 minutes from a Citadel office lmao

But they suspended me. AND deleted my post.

And I took that personally. AND NOW I AM BACK FOR REVENGE.

What can we learn from them deleting my last post and suspending me?

A. I touched on some very sensitive information.

B. Citadel really hates us tracking their planes.

B. Stevie Cohen is the most trigger happy of the group.

WELL LETS PISS THEM OFF SOME MORE.

I originally wrote a different post which was a lot longer but due both the character limit on Reddit + the **Total Return Swap stuff**, I decided to change it a bit.

So some parts will be out of sync (*Like mentioning the 1940 Investment Company Act before explaining what it is*) in a way initially but if you read through to the end it makes perfect sense.

See, I was on to basically the same thing but in a different way.

What I found was the other side of the Total Return Swap hypothesis. What has been posted by [u/Criand](#) was the front door. I found the back door without realizing it until I read his post.

I even called it in my original post a "Reverse Repo Short" because I didn't know what a Total Return Swap was lmao

I made a funny meme for it too.

Here's part of that original post:

The rules and exemptions are for other things but if one were to decide to abuse EXEMPTION from this specific rule (which they seem to explicitly state that they rely on) would mean that they don't have to report certain transactions because they are exempt from being LABELED and DESIGNATED AS OWNERS by any of these definitions. So they can just funnel and channel and move shit around however they see fit.

Hiding ownership of shorts perhaps for liquidity and margin calls?



NO YOU TAKE IT! NO NO YOU TAKE IT!!! Ah well no one will know cuz we're exempt. Just take it for now. A Reverse Repo Short lmao

When I read [u/Criand](#) 's masterpiece DD about Total Return Swaps, I was like HOLY SHIT I FUCKING KNEW IT LMAO and so combining his DD with the original post I was writing makes the whole story come together.

By the way, thanks for suspending me for a week. It allowed me time to make this post to be even better.

(KEEP IN MIND DEAR APES.... I am but a humble moron. I have no idea what I'm talking about. And none of this is financial advice or investigative advice or what ever kind of advice. It's just an idiot savant poking around on the Google and coming to conclusions about complicated documents I barely understand. If I'm wrong I'm wrong. Feel free to correct me if I need to be and I'll edit and or delete the whole post lmao but I FEEL like I'm right.)

So let's get into it, shall we?

First let's look at the Cayman Islands and what's actually going on there.

Citadel listed as a director of this Cayman Island thingy.

<https://aum13f.com/fund/cyprus-investment-fund-ltd>

<https://whalewisdom.com/filer/cyprus-investment-fund-ltd>

Cyprus Investment Fund Ltd. is based out of Grand Cayman. The firm last filed a Form D notice of exempt offering of securities on 2017-08-23. The filing was for a pooled investment fund: hedge fund The notice included securities offered of Pooled Investment Fund Interests

<https://whalewisdom.com/filer/cyprus-investment-fund-ltd>

Shows as of 2017 of their latest filing:

Form D Filings

Form D is a form to be used to file a notice of an exempt offering of securities with the Securities and Exchange Commission. Form D contains basic information about the offering and the company.

Form D Filings

Filing Date	Form Type	Industry Group	Securities Offered	Total Offering Amount	Total Amount Sold	Total Remaining
2017-08-23	D/A	POOLED INVESTMENT FUND: HEDGE FUND	Pooled Investment Fund Interests	INDEFINITE	754,417,006	INDEFINITE
2016-08-23	D/A	POOLED INVESTMENT FUND: HEDGE FUND	Pooled Investment Fund Interests	INDEFINITE	655,987,600	INDEFINITE
2015-09-04	D/A	POOLED INVESTMENT FUND: HEDGE FUND	Pooled Investment Fund Interests	INDEFINITE	556,244,659	INDEFINITE
2014-09-05	D/A	POOLED INVESTMENT FUND: HEDGE FUND	Pooled Investment Fund Interests	INDEFINITE	556,244,659	INDEFINITE
2013-09-05	D/A	POOLED INVESTMENT FUND: HEDGE FUND	Pooled Investment Fund Interests	INDEFINITE	528,444,659	INDEFINITE
2013-08-15	D/A	POOLED INVESTMENT FUND: HEDGE FUND	Pooled Investment Fund Interests	INDEFINITE	530,944,660	INDEFINITE
2012-08-15	D/A	POOLED INVESTMENT FUND: HEDGE FUND	Pooled Investment Fund Interests	INDEFINITE	193,176,250	INDEFINITE
2011-08-15	D	POOLED INVESTMENT FUND: HEDGE FUND	Pooled Investment Fund Interests	INDEFINITE	76,101,566	INDEFINITE

Hey kids, wanna buy some "Pooled Investment Fund Interests"?

Form D

Notice of Exempt Offering of Securities

Item 1. Issuer's Identity

Name of Issuer:

CYPRUS INVESTMENT FUND LTD.

Jurisdiction of Incorporation/Organization

CAYMAN ISLANDS

Year of Incorporation/Organization

Over Five Years Ago

Previous Name(s)

Entity Type

OTHER

Item 2 Issuer Principal Place of Business and Contact Information

MAPLES CORPORATE SERVICES LIMITED

UGLAND HOUSE, SOUTH CHURCH STREET

GRAND CAYMAN, E9 KY1-1104

Phone Number. subscription required

Item 3. Related Persons

Name

N/A CITADEL ADVISORS LLC

Address

subscription required

Relationship(s)

PROMOTER

Clarification of Response

PORTFOLIO MANAGER

Item 3. Related Persons

Name

GERALD A. BEESON

Directed by Grant Jackson.

Googling "Grant Jackson Cyprus" yields:

Kingdon Capital Management LLC

<https://fintel.io/i/kingdon-capital-management#>

First thing that pops up is 20,565,027 shares of "AMNL".

I found the graph VERY interesting.

Market Summary > Applied Minerals Inc
OTCMKTS: AMNL

0.022 USD +0.01 (115.00%) ↑ past year

Closed: Aug 20, 4:00 PM EDT · Disclaimer
After hours 0.020 -0.0013 (6.05%)

1 day 5 days 1 month 6 months YTD 1 year 5 years Max



Market Summary > Applied Minerals Inc
OTCMKTS: AMNL

0.022 USD +0.01 (115.00%) ↑ past year

Closed: Aug 20, 4:00 PM EDT · Disclaimer
After hours 0.020 -0.0013 (6.05%)

1 day 5 days 1 month 6 months YTD 1 year 5 years Max



HMMM LETS LOOK AT THOSE DATES ON GME!!!!

Market Summary > GameStop Corp.

NYSE: GME

159.30 USD **+154.43 (3,171.05%)** **↑** past year

Closed: Aug 23, 5:06 AM EDT · Disclaimer

Pre-market 158.51 **-0.79 (0.50%)**

1 day

5 days

1 month

6 months

YTD

1 year

5 years

Max



Market Summary > GameStop Corp.

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1 day

5 days

1 month

6 months

YTD

1 year

5 years

Max



As you can see by the screenshot, I wrote most of this prior to the jump to \$225 lmao

Idk what this means but it looks like a pump and dump to short more GME.

First spike as emergency capital and second spike to keep the price down. Along with the ETFs and ITM options and all the other bullshit of course.

Small potatoes in the grand scheme of things.

But this got me thinking. What else could I uncover if I Googled "Citadel Form D/A"??

Looky looky:

<http://pdf.secdatabase.com/925/0001802332-21-000001.pdf>

130 people or entities or participants involved in a sale of \$674,312,627 with an indefinite/unlimited \$\$\$ box checked for future transactions managed by CITADEL TACTICAL TRADING LTD in the Cayman Islands and declining to disclose the total amount pooled together citing exemption from the **1940 Investment Company Act Section 3(c)** as the reason filed on May 28th 2021.

Remember that 1940 act because it becomes important later on.

Another one for over \$1b with 172 participants.

<http://pdf.secdatabase.com/926/0001802332-21-000002.pdf>

I just kept finding these D/A forms and was so suspicious.

Just for shits and giggles, where was GME at on May 28th 2021?

Market Summary > GameStop Corp.

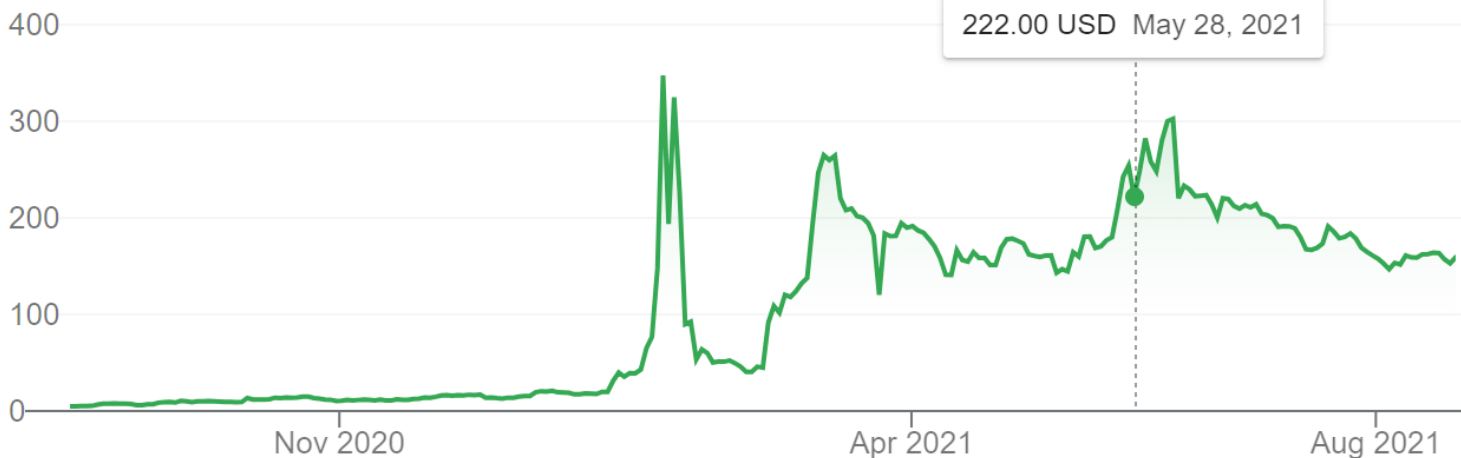
NYSE: GME

159.30 USD +154.43 (3,171.05%) ↑ past year

Closed: Aug 23, 5:06 AM EDT · Disclaimer

Pre-market 158.51 -0.79 (0.50%)

1 day 5 days 1 month 6 months YTD **1 year** 5 years Max



KEN WE NEED TO DO A 1940 FUCKERY, THESE APES ARE WINNING

OH WOW SO 130 + 172 PEOPLE OR ENTITIES (No idea if they're included or combined) SENT A LOT OF MONEY IN THE CAYMAN ISLANDS JUST AS GME WAS JUMPING PAST \$300 A SHARE!?!?! Wow who woulda guessed.

Okay I know what you're thinking. This shit was already debunked.

Well this is the part in my investigation where I found:

[u/FilingAgentMan](#) had debunked the whole "Hiding money in the Cayman Islands" thing with the form D/A.

In my original post I was just following bread crumbs on Google. Never seen his posts or any of the debunking until I started Googling backwards. Meaning I found these form D/A's and concluded independently that they were hiding money and then while Googling about these form D/A's, I found his posts.

He posted

https://www.reddit.com/r/Superstonk/comments/np6f78/citadel_has_been_filing_form_d_amendments_and_ill/

Here's the TL;DR of that:

These are annual Form D filings used by Citadel to disclose sales of unregistered "shares" of their fund, it is not a notice of liquidation of shares they hold. Citadel has to publicly file these forms to show how much capital they have raised and how many investors they have in each of these funds.

Then last week posted:

https://www.reddit.com/r/Superstonk/comments/p85rvs/fud_alert_no_griffincitadel_didnt_move_14b_to/

Essentially stating pretty much the same thing. He's saying that these filings are for basically pre-IPO and unregistered shares.

Okay seems like case closed right?

NOPE.

Why nope?

Well here's what I wrote in the original post I was making while suspended:

1. Issuer's Identity

Name of Company
issuing the
unregistered
securities

CIK (Filer ID Number)

0001199937

Name of Issuer

Citadel Kensington Global Strategies Fund Ltd.

Jurisdiction of Incorporation/Organization

CAYMAN ISLANDS

Year of Incorporation/Organization

☒ Over Five Years Ago

Previous
Names

☐ None

KENSINGTON GLOBAL STR
FUND LTD

Kensington Global Strategies F

Jurisdiction (most
likely tax purposes)

First thing's first. "Name of the company issuing the **unregistered securities**".

<https://docoh.com/company/1199937/citadel-kensington-global-strategies-fund-ltd>

Citadel Kensington Global Strategies Fund is a Hedge Fund in Illinois, that has raised \$14.3B from 680 investors, with a minimum investment of \$10M, for a fund started in Jul 1995. Data from SEC filing on 28 May 2021.

SO CITADEL IS ISSUING UNREGISTERED SECURITIES OF ITSELF TO UNKNOWN INVESTORS IN THE CAYMAN ISLANDS? Is it possible they could be using this to hide money by pretending to "raise money" from itself while "reporting" a loss?

I issue 1 billion dollars worth of **unregistered securities** of myself.... to myself. Using my hundreds of shell corporations.. I buy the securities from myself. I'm listed only as the issuer of the unregistered security but because I'm allowed to be a confidential buyer, I don't show up on the buyer list.

So I just send money to my account in the Cayman Islands and file it as a form D.

IT'S POSSIBLE. Is it likely? who knows. Probably.

I could be wrong about the entire **reason, or the mechanisms** but one thing I'm RIGHT about is that these can be used for more than just pre-IPOs and unregistered securities.

Here's why:

Form type ↑↓	Form description	Filing date ↑↓	Reporting date ↑↓
D/A	Notice of Exempt Offering of Securities - amendment Filing	2021-05-28	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2020-05-28	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2019-05-28	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2019-01-29	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2018-01-29	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2017-01-27	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2016-01-27	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2015-02-12	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2014-02-12	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2013-03-15	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2012-03-15	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2011-03-15	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2010-03-12	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2009-03-16	
REGDEX	Notice of Sale of Securities (Regulation D and Section 4(6) of the Securities	2002-10-15	

Form D

Companies may use an exemption under **Regulation D** to **offer and sell securities without having to register the offering with the SEC**. When relying on such an exemption, companies must file what's known as a "Form D" after they first sell their securities. **Form D is a brief notice that includes basic information about the company and the offering, such as the names and addresses of the company's executive officers, the size of the offering and the date of first sale.**

If you are thinking about investing in a company that is offering securities pursuant to a Regulation D exemption, you should access the **EDGAR database** to determine whether the company has filed a Form D.

See the thing is, on all their form D/A's, they list 1940 Investment Company Act exemption. I know I keep mentioning it without saying what it is because initially I wrote this with the act out in front. I decided to write it this way instead because it flows better if you're patient.

The "aha" and "OH SHIT" moment will be GLORIOUS. <3 ily guys.

Let's look at Regulation D first:

<https://www.investopedia.com/terms/r/regulationd.asp>

*"The regulation allows capital to be raised through the sale of equity **or debt securities** without the need to register those securities with the SEC. However, many other state and federal regulatory requirements still apply. "*

WHAT THE HELL IS A DEBT SECURITY? (I already know by now but I'm being dramatic lmao)

<https://www.investopedia.com/terms/d/debtsecurity.asp>

What Is a Debt Security?

"A debt security is a debt instrument that can be bought or sold between two parties and has basic terms defined, such as the notional amount (the amount borrowed), interest rate, and maturity and renewal date.

*Examples of debt securities include a government bond, corporate bond, certificate of deposit (CD), municipal bond, or **preferred stock***. Debt securities can also come in the form of* **collateralized securities***, such as collateralized debt obligations (CDOs), collateralized mortgage obligations (CMOs), mortgage-backed securities issued by the Government National Mortgage Association (GNMA), and zero-coupon securities."*

SOOOO According to the rules of Regulation D, they can technically use a Form D/A to sell bonds, CDOs, preferred stock, maybe even shorts and what ever else they want to package in *COUGH -- TOTAL RETURN SWAP -- COUGH*. AND use exemption from the 1940 Investment Company Act to hide it.

Which is what we see on their filings.

6. Federal Exemption(s) and Exclusion(s) Claimed (select all that apply)

☐ Rule 504(b)(1) (not (i), (ii) or (iii)) ☐ Rule 505

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Please Consider the Environment Before Printing This Document

☐ Rule 504 (b)(1)(i)
☐ Rule 504 (b)(1)(ii)
☐ Rule 504 (b)(1)(iii)

☐ Rule 506
☐ Securities Act Section 4(6)
☒ Investment Company Act Section 3(c)
☐ Section 3(c)(1) ☐ Section 3(c)(9)
☐ Section 3(c)(2) ☐ Section 3(c)(10)
☐ Section 3(c)(3) ☐ Section 3(c)(11)
☐ Section 3(c)(4) ☐ Section 3(c)(12)
☐ Section 3(c)(5) ☐ Section 3(c)(13)
☐ Section 3(c)(6) ☐ Section 3(c)(14)
☒ Section 3(c)(7)

Even in his post he says:

6. Federal Exemption(s) and Exclusion(s) Claimed (select all that apply)		
<input type="checkbox"/> Rule 504(b)(1) (not (i), (ii) or (iii))	<input checked="" type="checkbox"/> Investment Company Act Section 3(c)	
<input type="checkbox"/> Rule 504 (b)(1)(i)	<input type="checkbox"/> Section 3(c)(1)	<input type="checkbox"/> Section 3(c)(9)
<input type="checkbox"/> Rule 504 (b)(1)(ii)	<input type="checkbox"/> Section 3(c)(2)	<input type="checkbox"/> Section 3(c)(10)
<input type="checkbox"/> Rule 504 (b)(1)(iii)	<input type="checkbox"/> Section 3(c)(3)	<input type="checkbox"/> Section 3(c)(11)
<input checked="" type="checkbox"/> Rule 506(b)	<input type="checkbox"/> Section 3(c)(4)	<input type="checkbox"/> Section 3(c)(12)
<input type="checkbox"/> Rule 506(c)	<input type="checkbox"/> Section 3(c)(5)	<input type="checkbox"/> Section 3(c)(13)
<input type="checkbox"/> Securities Act Section 4(a)(5)	<input type="checkbox"/> Section 3(c)(6)	<input type="checkbox"/> Section 3(c)(14)
	<input checked="" type="checkbox"/> Section 3(c)(7)	

Exemptions, wrinklier brains than mine are needed to dig up what exactly they mean.

The second half of this post is ALL about the 1940s act, but quickly, what the hell is Rule 506(b)?

<https://www.sec.gov/smallbusiness/exemptofferings/rule506b>

Companies conducting an offering under Rule 506(b) can raise an unlimited amount of money and can sell securities to an unlimited number of accredited investors.

More than likely this feels to be about Citadel selling bonds/swaps/shares to itself to hide money. Because why would they need to "Raise money" using the Cayman Islands? The only reason is to keep buyer info confidential. Which means the buyer could be themselves.

Again, if I were a **Citadel fuckery lawyer**, with all the exemptions and privileges and "people looking the other way as I file these bullshit documents", I'd abuse the hell out of this rule if I wanted to funnel money into the Cayman Islands before I got margin called.

It seems like

Exemption from:

1940 Investment Company Act: "§270.3c-6 *Certain transfers of interests in section 3(c)(1) and section 3(c)(7) funds.*"

And also exemption from Rule 506(b)

And also the exemptions that come from being a market maker:

Should in theory, allow these

Form type ^{1↓}	Form description ^{1↓}	Filing date ^{1↓}	Reporting date ^{1↓}
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2021-05-28	
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2020-05-28	
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2019-05-28	
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2019-01-29	
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2018-01-29	
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2017-01-27	
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2016-01-27	
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2015-02-12	
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2014-02-12	
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2013-03-15	
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2012-03-15	
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2011-03-15	
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2010-03-12	
D/A	Notice of Exempt Offering of Securities - <i>amendment</i> Filing	2009-03-16	
REGDEX	Notice of Sale of Securities [Regulation D and Section 4(6) of the Securities	2002-10-15	

transactions to be classified and packaged however the FUCK they want.

The transaction is listed as a "Sale" to raise money. But one way to funnel from the main account back to the "purchaser" of these "exempt securities" would be to issue dividends to themselves.

I buy say... 7 billion dollars worth of myself. But because I can value my assets at what ever I want, I can say these are 7 billion dollars worth of a 1 cent share.

That's 700 billion shares of myself that my shell corporations own. On paper I now have 7 billion new dollars, right?

But what if I issue 1 dollar dividends to myself on 700 billion shares. That's 700 billion dollars now funneled away into the Cayman Islands that I, according to all these rules, do not have to report.

Based on all of the above, I'd consider the debunking to be debunked. They ARE moving billions to the Cayman Islands. And the SEC has given them the exemption to look the other way. Plausible deniability?

Who knows. I'm just a dumb ape who didn't even go past the 3rd grade in elementary school.

Now I know I'm giving you the cart before the horse but that's because I think placement matters based on the Total Return Swap stuff we figured out.

It just seems like the backdoor of the Total Return Swap mystery.

This is where the money is going.

The Total Return Swaps aren't reported on balance sheets but the money HAS to go somewhere right?

I don't think [u/FilingAgentMan](#) was wrong or a shill, I just think them abusing these rules and over complicating them is purposefully designed to make the underwriters and filing agents approve these documents easily, being none the wiser.

I believe these form D/A filings are the combination of a paper trail, receipts of the Total Return Swap payments, AND hiding money in the Cayman Islands by selling packaged **Debt Securities** to it's own shell corporations.

Not just for Citadel but for every Hedge fund. This is how they funnel their money by hiding in plain sight.

Look at Point72:

<https://sec.report/Document/0000899140-21-000108/>

13. Offering and Sales Amounts

Total Offering Amount USD or ☒ Indefinite

Total Amount Sold \$6,584,897,853 USD

Total Remaining to be Sold USD or ☒ Indefinite

Clarification of Response (if Necessary):

14. Investors

Select if securities in the offering have been or may be sold to persons who
☒ do not qualify as accredited investors, and enter the number of such non-accredited investors who already have invested in the offering.

Regardless of whether securities in the offering have been or may be sold to persons who do not qualify as accredited investors, enter the total number of investors who already have invested in the offering:

15. Sales Commissions & Finder's Fees Expenses

Provide separately the amounts of sales commissions and finders fees expenses, if any. If the amount of an expenditure is not known, provide an estimate and check the box next to the amount.

Sales Commissions \$7,616,858 USD ☐ Estimate

Finders' Fees \$0 USD ☐ Estimate

Clarification of Response (if Necessary):

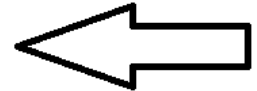
A 6.5 Billion dollar sale with a 7.6 million dollar commission paid to Shorebridge Capital Advisors, LLC

6. Federal Exemption(s) and Exclusion(s) Claimed (select all that apply)

☒ Rule 506(c)

☒

Investment
Company Act
Section 3(c)



☒ Section 3(c)(7)

They sure do love this exemption. We'll find out why soon.

12. Sales Compensation

Recipient	Recipient CRD Number	
Shorebridge Capital Advisors, LLC	269961	
(Associated) Broker or Dealer	(Associated) Broker or Dealer CRD Number	
Shorebridge Capital Advisors, LLC	269961	
Street Address 1	Street Address 2	
780 Third Avenue, 30th Floor		
City	State/Province/Country	ZIP/Postal Code
New York	NEW YORK	10017
State(s) of Solicitation (select all that apply) Check "All States" or check individual States		
<input type="checkbox"/> ILLINOIS		
<input type="checkbox"/> TEXAS		
<input type="checkbox"/> FLORIDA		
<input type="checkbox"/> WASHINGTON		
<input type="checkbox"/> NEW YORK		
<input type="checkbox"/> VIRGINIA		
<input type="checkbox"/> COLORADO		
<input type="checkbox"/> CONNECTICUT		
<input type="checkbox"/> PENNSYLVANIA		
<input type="checkbox"/> MASSACHUSETTS		
<input type="checkbox"/> LOUISIANA		
<input type="checkbox"/> RHODE ISLAND		
<input type="checkbox"/> OHIO		
<input type="checkbox"/> GEORGIA		
<input type="checkbox"/> NEW JERSEY		
<input type="checkbox"/> VERMONT		
<input type="checkbox"/> CALIFORNIA		

Shorebridge Capital Advisors, LLC has a joint fund with Point72 called ShoreBridge Point 72 Select, Ltd.

<https://sec.report/Document/0001840484-21-000009/>

1. Issuer's Identity

CIK (Filer ID Number)	Previous Names <input checked="" type="checkbox"/> None	Entity Type
0001729976		<input checked="" type="checkbox"/> Other (Specify)
Name of Issuer		Exempted Limited Company
ShoreBridge Point72 Select, Ltd.		
Jurisdiction of Incorporation/Organization		
CAYMAN ISLANDS		
Year of Incorporation/Organization		
<input checked="" type="checkbox"/> Within Last Five Years (Specify Year) 2018		

A mission for another ape would be to find every shell corporation associated with Citadel, Point72, any other hedge fund, with a D/A like this and tally up all the money it's "raised" so we can get a clearer picture of how much they're funneling per hedge fund.

If we look deeper into these D/A filings with this knowledge, I'm betting we'll find trillions of dollars funneled away into different shell corporations in chunks of 800 million here, 1.2 billion there, 7 billion here, etc etc etc.. All connected and affiliated with each other using exemption from the 1940 Investment Company Act as another layer of security hiding their actions.

Now finally, wtf is the 1940 Investment Company Act?

<https://www.govinfo.gov/content/pkg/COMPS-1879/pdf/COMPS-1879.pdf>

Investment Company Act of 1940

This Act regulates the organization of companies, including mutual funds, that engage primarily in investing, reinvesting, and trading in securities, and whose own securities are offered to the investing public. **The regulation is designed to minimize conflicts of interest** that arise in these complex operations. **The Act requires these companies to disclose their financial condition and investment policies to investors when stock is initially sold and, subsequently, on a regular basis.** The focus of this Act is on disclosure to the investing public of information about the fund and its investment objectives, as well as on investment company structure and operations. It is important to remember that the Act **does not permit the SEC to directly supervise the investment decisions or activities of these companies or judge the merits of their investments.**

So if this act is intended to minimize conflicts of interest, does that mean exemption from this act "maximizes"

conflicts of interest?

Citadel files exemption from these rules every year since 2009 and is instantly granted.

<https://www.sec.gov/cgi-bin/browse-edgar?filenum=813-00397&action=getcompany>

"Application for exemption from all provisions of The Investment Company Act of 1940 by an Employee's Investment Company"

Their exemption filings state:

https://www.sec.gov/Archives/edgar/data/1255158/000090514820001113/efc20-778_406ba.htm

Organization of the ESC Funds

Citadel is a leading global financial institution with a diverse business platform which includes two separate and distinct units: (i) a global investment firm and (ii) a global market maker.

Each of the ESC Funds will be a limited liability company, limited partnership, corporation, business trust or **other entity organized under the laws of the State of Delaware or another U.S. jurisdiction**. In each case, Eligible Employees will invest in ESC Funds with limited liability. Each ESC Fund will be identical in all material respects (other than investment objectives and strategies, vesting terms, form of organization and related structural and operative provisions contained in the constitutive documents of such ESC Funds). The Managing Member of each ESC Fund will be an Affiliate of the Company.

Purposes

"The Company intends to continue to form and operate the ESC Funds ****to provide long-term financial incentives for Eligible Employees to preserve Citadel's competitive advantage and to align the financial interests of Eligible Employees with those of Citadel and investors in the Citadel Third Party Funds.****2 In addition, the ESC Funds will be designed to enable Eligible Employees to pool their investment resources. Pooling of resources should allow the Members diversification of investments and participation in investments which usually would not be."

"Citadel has in the past and may in the future sponsor and manage other investment vehicles ----(COUGH- MELVIN CAPITAL -COUGH) ----- **for the benefit of certain current and former employees and other affiliated persons that rely on other exemptions from the 1940 Act** (e.g., Sections 3(c)(1) or 3(c)(7)). **Such vehicles will not rely on, or be subject to the terms of, the Order.**"

Which to me reads as:

"We want our employees (and to designate anyone we pretend to be an employee or "affiliate" to purposefully complicate any and all of our document's verbiage) to be able to pool their resources into our naked shorting bullshit so they feel connected to the crime. So that they are incentivized to help us and pull all the illegal shit they can think of to keep us afloat. AND we are filing this so that we are exempt from disclosing anything we're

doing".

It could be a work around/trick to say someone like Stevie Cohen is an employee or affiliated member or what ever and he's got billions of dollars so he can funnel some shit through us and no one will know about it because we're exempt from these rules.

Here's a list of all the rules they're exempt from:

<https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=e7952b58cb30418ab1364096543c6212&mc=true&n=pt17.5.270&r=PART&ty=HTML>

But I'll list some that seemed important.

https://www.ecfr.gov/cgi-bin/text-idx?SID=4712bf41ea737211b3f1efa65d0f2ef1&mc=true&node=se17.5.270_10_62&rgn=div8

"§270.0-2 General requirements of papers and applications."

Ape terms: "I can file whenever the hell I want".

https://www.ecfr.gov/cgi-bin/text-idx?SID=4712bf41ea737211b3f1efa65d0f2ef1&mc=true&node=se17.5.270_12a_61&rgn=div8

§270.2a-1 Valuation of portfolio securities in special cases.

https://www.ecfr.gov/cgi-bin/text-idx?SID=4712bf41ea737211b3f1efa65d0f2ef1&mc=true&node=se17.5.270_12a_65&rgn=div8

§270.2a-5 Fair value determination and readily available market quotations.

Ape terms: "I can value my stocks and offer them at what ever the hell I want. I can value trillions of dollars in assets as only billions because I feel that's a better valuation. Say 100 million shares of a \$400 stock I'm long on, at only \$10 a share so the value of my Cayman Island shell corporation goes up when looking at the "real" value.

Orrrrr maybe even sell synthetic fake shares of GME at a penny each in a D/A filing in the Cayman Islands, bypassing both the open market AND the Darkpool so you can short that shit and hope the APES go away."

The possibilities of being able to value your assets however you want are endless.

[https://www.ecfr.gov/cgi-bin/text-idx?
SID=b392656bb04818a7a318d97d64a7b4b8&mc=true&node=se17.5.270_145a_61&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=b392656bb04818a7a318d97d64a7b4b8&mc=true&node=se17.5.270_145a_61&rgn=div8)

270.45a-1 Confidential treatment of names and addresses of dealers of registered investment company securities.

This is a sort of complicated one but it seems they rely on it for various reasons. Here's why it's sort of important.

In the 1940 act, it says:

" (c) *Notwithstanding subsection (a), none of the following persons is an investment company within the meaning of this title**: (1) Any issuer whose outstanding securities (other than short-term paper)* **are beneficially owned by not more than one hundred persons** (or, in the case of a qualifying venture capital fund, 250 persons) and which is not making and does not presently propose to make a public offering of its securities"

Which means that, at least for the purposes of this act, a hedge fund with pooled investments from 100 people or more aren't considered an "Investment company". And therefore aren't protected by this rule.

Potentially they could be using this rule specifically to take ownership and not file and move around a bunch of short positions. If they so chose. Because Citadel's competitive advantage AND certain "investment vehicles" that they sponsor rely on exemptions from this act.

SO exemption from this rule in ape terms: "We want exemption from this rule so we don't have to show who's buying our shit. *cough* Our own different shell companies *cough*"

[https://www.ecfr.gov/cgi-bin/text-idx?
SID=4712bf41ea737211b3f1efa65d0f2ef1&mc=true&node=se17.5.270_13c_66&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=4712bf41ea737211b3f1efa65d0f2ef1&mc=true&node=se17.5.270_13c_66&rgn=div8)

§270.3c-6 Certain transfers of interests in section 3(c)(1) and section 3(c)(7) funds.

(b) Beneficial ownership by any person ("Section 3(c)(1) Transferee") who acquires securities or interests in securities of a Section 3(c)(1) Company from a person other than the Section 3(c)(1) Company shall be **deemed to be beneficial ownership by the person from whom such transfer was made** ("Section 3(c)(1) Transferor"), and securities of a Section 3(c)(7) Company that are owned by persons who received the securities from a qualified purchaser other than

the Section 3(c)(7) Company ("Qualified Purchaser Transferor") or a person deemed to be a qualified purchaser by this section shall be deemed to be acquired by a qualified purchaser ("Qualified Purchaser Transferee")

This is the one I made the funny meme for up above. I'll just re-paste that part so it all comes together:

The rules and exemptions are for other things but if one were to decide to abuse EXEMPTION from this specific rule (*which they seem to explicitly state that they rely on*) would mean that they don't have to report certain transactions because they are exempt from being LABELED and DESIGNATED AS OWNERS by any of these definitions. So they can just funnel and channel and move shit around however they see fit.

Hiding ownership of shorts perhaps for liquidity and margin calls?



NO YOU TAKE IT! NO NO YOU TAKE IT!!! Ah well no one will know cuz we're exempt. Just take it for now. A Reverse Repo Short lmao

<https://www.ecfr.gov/cgi-bin/text-idx?>

[SID=b392656bb04818a7a318d97d64a7b4b8&mc=true&node=se17.5.270_130b1_64&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=b392656bb04818a7a318d97d64a7b4b8&mc=true&node=se17.5.270_130b1_64&rgn=div8)

" §270.30b1-4 Report of proxy voting record.

Ape Terms: "We naked short a lot. And sometimes there are proxy votes. And sometimes those proxy votes come in with a lot more votes than shares exist. SO our subsidiaries *cough* Robinhood *cough* are exempt from reporting that information"

THESE ARE VERY IMPORTANT:

https://www.ecfr.gov/cgi-bin/text-idx?SID=b392656bb04818a7a318d97d64a7b4b8&mc=true&node=se17.5.270_131a_61&rgn=div8

"§270.31a-1 Records to be maintained by registered investment companies, certain majority-owned subsidiaries thereof (COUGH -- ROBINHOOD -- COUGH), and **other persons having transactions with (COUGH -- Anyone we PFOF -- COUGH)** registered investment companies.

https://www.ecfr.gov/cgi-bin/text-idx?SID=b392656bb04818a7a318d97d64a7b4b8&mc=true&node=se17.5.270_131a_62&rgn=div8

"§270.31a-2 Records to be preserved by registered investment companies, "certain majority-owned subsidiaries thereof (COUGH -- ROBINHOOD -- COUGH), and **other persons having transactions with (COUGH -- Anyone we PFOF -- COUGH)** registered investment companies.

Ape Terms: "We don't have to keep records of SHIT and neither do the people we do business with. Or any of the brokers we buy order flow from."

So these rules basically let them get away with what ever the hell they want. File whenever or however they want. Value assets and risk at what ever they want. AND NOT KEEP RECORDS OF ANYTHING.

But oh, we're not done yet.

Here's more from their exemption filing:

*A Managing Member, Member or Citadel Entity that is registered as an investment adviser under the Advisers Act may **be paid a performance fee or allocated a performance allocation** only if permitted by Rule 205-3 under the Advisers Act.*

*To the extent permitted by the Managing Member, an Eligible Employee and/or its **Qualified Participant** may be issued additional Interests (whether vested or unvested) and/or may make additional capital contributions to the ESC Fund in which it is invested after such Eligible Employee's employment with Citadel has terminated. Unvested Interests issued to an Eligible Employee after his or her employment with Citadel will typically vest following compliance with any post-employment Conditions (subject to the terms of the Program).*

SO WAIT!

This means that any Citadel employee, past, present and future, can still contribute to funds. And exemption from this act allows Citadel to keep that shit private because they don't have to keep records...

In ape terms this means

I HIRE YOU AND THEN YOU QUIT.

EVEN IF YOU NEVER WORKED FOR ME, MAYBE YOU'RE A PART OF A COMMITTY OF SOME SORT WHO HAS INVESTED WITH ME, OR WE CONSIDER YOU FOR SOME REASON A "MEMBER" OR "CITADEL ENTITY" OR "QUALIFIED PARTICIPANT".

EVEN IF I JUST SAW YOU ON THE STREET AND SAID HELLO..

YOU'RE ALLOWED TO BE PAID BY ME FOR ANY REASON WITH NO RECORDS.

EVEN IF YOU GO TO ANOTHER COMPANY SUCH AS THE DTCC OR OTHER GOVERNMENT AGENCY.

SO DO SOME FAVORS FOR ME BRUH AND I'LL "allocate a performance allocation" --- *COUGH BRIBE COUGH*--- AND NO ONE WILL KNOW ;) ;) ;)"

Essentially, this ties into the DD I did about Citadel employees rolling over to and from PWC, the DTCC and other organizations. I just didn't understand the connection at the time.

Everyone that worked at Citadel and now works for another company could theoretically and legally still be on their payroll.

Government Agents, Clearing house approvers, Auditors, and The SEC. All can still be getting money under the table according to this rule.

This includes Dave Lauer. Just something to think about.

You're shaking your head like WHAT HERESY HAVE YOU JUST COMMITTED APE! I WAS WITH YOU UP UNTIL YOU SAID THIS!

Well.. think about it. Dave Lauer is a former employee. Former employees are able to be on payroll.

"The Company intends to continue to form and operate the ESC Funds to provide long-term financial incentives for Eligible Employees to preserve Citadel's competitive advantage and to align the financial interests of Eligible Employees with those of Citadel and investors in the Citadel Third Party Funds.

"Citadel has in the past and may in the future sponsor and manage other investment vehicles for the benefit of certain current and former employees and other affiliated persons that *rely on other exemptions from the 1940 Act*"

Think logically. IF you knew you were fucked. If you saw you were in a losing battle. IF YOU SAW THAT EVERYTHING IS ABOUT TO COME TO LIGHT **ANYWAY....**

Would it be such a stretch to imagine that you could use a "former employee" who is still on payroll to advocate against

you if it would buy you time in some way by potentially using him as a selective advocate?

What do I mean by selective advocate? Well okay so I'm fucked. I'm going to lose this war in the long run. What can I do to save myself and give me more time to funnel assets? These damned apes are on to me at every turn. I can't shake them for nothing. They track even my god damned planes.

What can I do to slip one or two things past them at least?

I can send this "former employee" to talk shit about me because all that shit is gonna be revealed anyway.. And use that shit talking to get this man on the ape's side. So that anything he says afterwards will be taken as fact. And they will trust him. And give me some kinda leverage.

DL could potentially be a false flag.

https://www.reddit.com/r/Superstonk/comments/pbxzk3/this_is_what_our_boy_d_lauer_has_to_say_about/

https://www.reddit.com/r/Superstonk/comments/pbv66s/lets_stop_the_fud_regarding_barbara_roper_trust/

I mean who knows, he could be on our side. I'm not saying 100% he's a shill, nor that he's being paid to talk good about Barbara Roper. Nor that Barbara Roper is on our side or theirs. I have looked into her and she does seem to be a good person but you never know.

I'm just saying we shouldn't trust a word anyone who has worked for Citadel says. Especially BLINDLY. Just because of the fact that they can still technically be on payroll.

Citadel filed "Application for exemption from all provisions of The Investment Company Act of 1940 by an Employee's Investment Company " and have been filing this since 2009.

And were allowed. Allowed by THE SEC to be exempt from all the rules.

Because it allows them to keep their competitive advantage....

Form type	Form description	Filing date	Reporting date
D/A	Notice of Exempt Offering of Securities - amendment Filing	2021-05-28	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2020-05-28	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2019-05-28	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2019-01-29	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2018-01-29	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2017-01-27	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2016-01-27	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2015-02-12	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2014-02-12	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2013-03-15	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2012-03-15	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2011-03-15	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2010-03-12	
D/A	Notice of Exempt Offering of Securities - amendment Filing	2009-03-16	
REGDEX	Notice of Sale of Securities [Regulation D and Section 4(6) of the Securities	2002-10-15	

Now as you begin to see the truth, the words just fly out at you. "Exempt Offering of Securities" now reads as "Hedgies R Fuk"

It just seems so obvious to me at this point that any company with a bullshit newly formed LLC name, issuing hundreds of millions/BILLIONS of dollars worth of **itself** IN THE CAYMAN ISLANDS to hundreds of "unknown participants" marking **exemption from the 1940 Investment Company Act** is code for "Funneling money".

or

"Raised money" = "Hiding money we made by illegally predatorily naked shorting legitimate companies into the ground, while using multiple confidentially filed companies to make it look like we raised money"

In ape terms:

THEIR COMPETITIVE ADVANTAGE IS "BEING ALLOWED TO BREAK ALL THE GOD DAMNED RULES".



Literally

Tie that in with the Total Return Swaps, DOOMPs, ETFs, ITM Calls, and all these suspicious D/A filings and you got yourself an unmasked robber.



I woulda gotten away with it too if I weren't so greedy.

In conclusion:

TL;DR pt 1: Citadel filed for and was granted by the SEC, exemption from the 1940 Investment Company Act which has a bunch of rules. They're able to manage "investment vehicles" privately without filing, allowed to not keep records of anything or any transaction. Allowed to take money from basically anyone, or pay anyone off and call them an employee and not record anything about it. And allowed to keep people on a sort of payroll even after they leave the company and get jobs in high ranking facilities.

Basically exemption from this 1940 act allows them to do anything they want and get away with it.

TL;DR pt 2:

Citadel can technically be selling shares of itself to itself in the Cayman Islands to hide money according to the rules and exemptions which allow them to be confidential buyers of their own securities.

UPDATE: Found a document basically proving my last DD right. Citadel admitting offshore loopholes allow evading reporting and clearing requirements.

DD

Hello again beautiful apes,

I was snooping around on the google trying to find more stuff on our favorite multi-national crime syndicate.

I found a bunch of documents using some search strings I won't say exactly how but I can prove I found them using simple search terms if I need to. All publicly available. I'm still sifting through them but I found something that literally proves my last DD right. In THEIR OWN WORDS.

The last DD I made was super long so I'm going to make this shorter and straight to the point.

Remember when I said:

"I believe these form D/A filings are the combination of a paper trail, receipts of the Total Return Swap payments, AND hiding money in the Cayman Islands by selling packaged Debt Securities to it's own shell corporations.

Not just for Citadel but for every Hedge fund. This is how they funnel their money by hiding in plain sight."

and

"SOOOO According to the rules of Regulation D, they can technically use a Form D/A to sell bonds, CDOs, preferred stock, maybe even shorts and what ever else they want to package in *COUGH -- TOTAL RETURN SWAP -- COUGH*. AND use exemption from the 1940 Investment Company Act to hide it."

Well all of that was just speculation. I just assumed they "could" if they wanted to. But had no verifiable proof. It was just a logical / plausible theory.

Check this shit out from 2013:

<https://s3.amazonaws.com/citadel-wordpress-prd102/wp-content/uploads/2016/09/26121830/Citadel-CFTC-Comment-Letter-on-Further-Proposed-Cross-Border-Guidance-FINAL.pdf>

Citadel bitching about other funds doing exactly what I hypothesized. And the only reason they're bitching about it is because they want to see the info reported so THEY can make decisions based on it. Because someone was probably kicking their ass for a minute. **"Ma no fair, he's doing it too".**

CITADEL'S OWN WORDS:

*We understand that a material volume of swaps market activity is **conducted by funds that are organized or incorporated outside of the U.S***, but that have a U.S. nexus.* **If the U.S. person definition were not to apply to such offshore funds***, despite their U.S. nexus,* **then a core, active portion of the swaps market would fall outside the scope of the transaction-level requirements***, including the* **clearing and reporting requirements***.**

There you have it folks. In Citadel's own words. Offshore funds can and have been trading for YEARS in the Cayman Islands without reporting shit. And apparently it's well known by their inner circle. Hedge funds, SEC, CFTC, all dem. They all knew about this for years and let it go on.

They say "Swaps" but according to form D's rules, they can do it with anything not just Swaps.

And instead of outright banning this shit, they just made the loopholes more convoluted and harder to track. As people find out about this shit, they propose "laws" for transparency, but include easy to get around loopholes.

https://www.morganlewis.com/pubs/~/_media/fc229a42f175480591551fb6c9ff61f4.ashx

Updated U.S Person definition.

Loophole:

*"The CFTC has indicated that the definition of U.S. person **will not include a non-U.S. affiliate of a U.S. person** that is guaranteed by that U.S. person. In addition, a commodity pool, pooled account, investment fund, or other collective investment vehicle **will not be considered a U.S. person if it is publicly-traded but not offered, directly or indirectly, to U.S. persons.**"*

In Ape Terms: **Hey sir from The Caymans, can I put my shell corporations in your name instead of mine so I don't have to report anything?**

TL;DR Proof, by their own words that hedge funds can trade offshore without reporting anything. And Citadel bitched about it because someone else was doing it too lmao

Essentially proving my last DD right:

https://www.reddit.com/r/Superstonk/comments/pcklz0/rolling_in_the_deep_dive_hiding_money_in_the/

Edit: Some apes have concerns that they seem to be able to do what ever they want so how will they get liquidated?

I don't think any of this will affect the MOASS. I think perhaps this is all just ways to save their asses. Not the company but personally. Hiding assets with no record. Selling bad debt to unsuspecting whales. That sort of thing. Not that they can't get margin called, but that when they do, it'll be someone else's problem.

Apparently CFTC released this statement today:

<https://www.cftc.gov/PressRoom/PressReleases/8422-21>

Granting relief from reporting til 2023.

I think the reporting rules likely has something to do with post-MOASS litigation. Hiding evidence. Giving lawyers time to prepare for the fall out. I think MOASS is inevitable at this point and everything they're doing is simply to keep some money left over. They're hiding shit like crazy using these rules and exemptions and the CFTC seems to be complicit by

allowing them to throw the reporting into 2023, thereby making it harder for investigators to look into it and make trials take years.

But that's my personal opinion, I could be wrong.

