STERLING DILIGENCE

BACKGROUND REPORT

## RE: [FamilyNames]

THE GOVERNMENT OF ST. KITTS & NEVIS

OFFICE OF THE PRIME MINISTER

CITIZENSHIP BY INVESTMENT UNIT

Date: March 3, 2021

[Month Generated] [Year Generated]

PERSONAL & CONFIDENTIAL VIA ELECTRONIC MAIL DELIVERY

Ms. Shivoughan Warde

Citizenship by Investment Unit

Office of the Prime Minister

Government of St. Kitts & Nevis

1st Floor, Ministry of Finance Building

P.O. Box 597, Golden Rock, St. Kitts, West Indies

**RE:** **[Family\_Middle\_Name]**

Dear Shivoughan Warde:

Enclosed is the *Due Diligence Background Report* on the subjects referenced above, [Family\_middle\_name\_applicant] all of whom are submitting a family application for economic citizenship in St. Kitts & Nevis. <investigator to name any spouse or children who are not included in the investigation or application>.

A Due Diligence Investigation was conducted on the adult subjects in [Country], where they were <investigator to insert ties to country>. Our investigation included verifications and searches of the following sources and information regarding the adult subjects: identity and legal status; residence address; marital status and family information; employment history and business affiliations; educational background; media publications; searches of court and other legal records; international anti-terrorist and other government watch lists; discreet reputational inquiries; and other sources.

We would like to stress the confidentiality of this report. Please do not share the enclosed information with any unauthorized parties or provide a copy to the agent or the subjects. If you have any questions or comments about this report, please contact me by telephone at 212.812.1040 or by email at [alejandra.jimenez@sterlingdiligence.com](mailto:alejandra.jimenez@sterlingdiligence.com). As always, thank you for the opportunity to be of service, and we look forward to assisting you in the future.

Sincerely,

STERLING DILIGENCE

Alejandra Jiménez

Sr. Manager – Head of Global Investigations

Enc.

*- PERSONAL AND CONFIDENTIAL -*

STERLING DILIGENCE BACKGROUND REPORT

[FamilyNames]

[Country]

March 3, 2021

**SUMMARY RESULTS TABLE**

|  |  |  |  |
| --- | --- | --- | --- |
| **COMPONENTS INVESTIGATED** | **RESULTS** | | **COMMENTS** |
| Personal Identification Profile | PLRESULT | | PICOMMENT |
| Name & Address Verification & History | NAMERESULT | | NAMECOMMENT |
| Company Directorship & Other Records | COMPRESULT | | COMPCOMMENT |
| Education Verification | DEGREEHEADER | | SUMMDEGDESCRIPTION |
| Professional Licenses & Designations | REGRESULT | | REGCOMMENT |
| Regulatory Searches & Verification | PROFRESULT | | PROFCOMMENT |
| Military Service | MILITARYRES | | MILITARYCOMMENT |
| **Bankruptcy, Civil Litigation & Other Filings** | | | |
| Bankruptcy Filings in [Country] (as available) | BANKRUPRESULT | | BANKRUPCOMMENT |
| Civil Court Litigation Records in [Country] (as available) | CIVILRESULT | | CIVILCOMMENT |
| Civil Judgments and Liens | CIVILJUDGERESULT | | CIVILJUDGECOMMENT |
| **Criminal Records** | | | |
| Criminal Records in [Country] (as available) | CRIMINALRESULT | | CRIMINALCOMMENT |
| **Press & Other Media Searches** | | | |
| News Media Searches – Print Publications and Internet Sources. Includes expanded search of investment publications, etc. | | NEWSRES*[NewsRES]* | NEWSCOMMENT |
| **Global Security & Regulatory Searches** | | | |
| **Sanctions Bodies Searched:** | | | |
| Department of Foreign Affairs and Trade, Australia | | DEPTFORRESULT | DEPTFORCOMMENT |
| European Union Consolidated List of Persons, Groups, Equity | | EURUNRESULT | EURUNCOMMENT |
| HM Treasury Consolidated List of Financial Sanctions Targets (formerly Bank of England Sanctions) | | HMTRERESULT | HMTRECOMMENT |
| U.S. Bureau of Industry and Security List of Denied Persons, Entities List and Unverified List | | USBEURESULT | USBEUCOMMENT |
| U.S. Department of State Foreign Terrorist Organizations | | USBDEPRESULT | USBDEPCOMMENT |
| U.S. Directorate of Defense Trade Controls Debarred Parties Lists | | USBDIRRESULT | USBDIRCOMMENT |
| U.S. General Services Administration Lists of Parties Excluded from Federal Procurement and Non-Procurement Programs | | USGENRESULT | USGENCOMMENT |
| U.S. Office of Foreign Assets Control | | USOFFRESULT | USOFFCOMMENT |
| United Nations Consolidated Sanctions | | UNCONSORESULT | UNCONSOCOMMENT |
| World Bank List of Ineligible Firms and Individuals | | WORLDBANKRESULT | WORLDBANKCOMMENT |
| **Law Enforcement Bodies Searched:** | | | |
| City of London Police (U.K.) | CITYRESULT | | CITYCOMMENT |
| Constabularies of Cheshire, Lancashire, and Devon and Cornwall (U.K.) | COSTABRESULT | | COSTABCOMMENT |
| Hampshire Police (U.K.) | HAMPSPRESULT | | HAMPSPCOMMENT |
| Hong Kong Police Force | HONGKONGRESULT | | HONGKONGCOMMENT |
| Interpol | INTERPOLRESULT | | INTERPOLCOMMENT |
| Metropolitan Police Service (U.K.) | METROLIRESULT | | METROPOLICOMMENT |
| National Crime Squad | NATLSQADRESULT | | NATLSQADCOMMENT |
| North Yorkshire Police (U.K.) | NOYOKRESULT | | NOYOKCOMMENT |
| Nottinghamshire Police (U.K.) | NOTTINGRESULT | | NOTTINGCOMMENT |
| Surrey Police (U.K.) | SURREYRESULT | | SURREYCOMMENT |
| Thames Valley Police (U.K.) | THAMRESULT | | THAMCOMMENT |
| U.S. Federal Bureau of Investigation | USFEDERALRESULT | | USFEDERALCOMMENT |
| U.S. Secret Service | USSECRETRESULT | | USSECRETCOMMENT |
| Warwickshire Police (U.K.) | WARWRESULT | | WARWCOMMENT |
| **Regulatory Enforcement Bodies Searched:** | | | |
| Alberta Securities Commission, Canada | ALBRESULT | | ALBCOMMENT |
| Assets Recovery Agency | ASSERESULT | | ASSECOMMENT |
| Australian Prudential Regulation Authority | AUSPRRESULT | | AUSPRCOMMENT |
| Australian Securities and Investments Commission | AUSSECRESULT | | AUSSECCOMMENT |
| Banque de France, CECEI, France | BAQUERESULT | | BAQUECOMMENT |
| Banque de France, Commission Bancaire, France | BACOMRESULT | | BACOMCOMMENT |
| British Virgin Islands Financial Services Commission | BRIVIRRESULT | | BIRVIRCOMMENT |
| Cayman Islands Monetary Authority | CAYRESULT | | CAYCOMMENT |
| Commission de Surveillance du Secteur Financier, Luxembourg | COMDERESULT | | COMDECOMMENT |
| Commodity Futures Trading Commission | COMMODITYRESULT | | COMMODITYCOMMENT |
| Council for Financial Activities Control, Brazil | COUNFINRESULT | | COUNFINCOMMENT |
| Departamento de Investigacoes Sobre Narcoticos, Brazil | MENTODERESULT | | MENTODECOMMENT |
| Department of Labour Inspection – Combating Forced Labour, Brazil | DEPLABRESULT | | DEPLABCOMMENT |
| Federal Deposit Insurance Commission | FDEPORESULT | | FDEPOCOMMENT |
| Federal Reserve Board | FRESRESULT | | FRESCOMMENT |
| Financial Action Task Force | FINACRESULT | | FINACCOMMENT |
| Financial Crimes Enforcement Network | FCRIMERESULT | | FCRIMECOMMENT |
| Financial Industry Regulatory Authority | FININDRESULT | | FININDCOMMENT |
| Financial Regulator, Ireland | REGIRERESULT | | REGIRECOMMENT |
| Hong Kong Monetary Authority | KONMONRESULT | | KONMONCOMMENT |
| Hong Kong Securities and Futures Commission | KONSECRESULT | | KONSECCOMMENT |
| Investment Dealers Association of Canada | INDEASRESULT | | INDEASCOMMENT |
| Investment Management Regulatory Organisation | INMARERESULT | | INMARECOMMENT |
| Isle of Man Financial Supervision Commission | ISMASURESULT | | ISMASUCOMMENT |
| Jersey Financial Services Commission | JESECORESULT | | JESECOCOMMENT |
| Lloyd’s Insurance Arimbolaet | LIARRESULT | | LIARCOMMENT |
| Monetary Authority of Singapore | MOSIRESULT | | MOSICOMMENT |
| National Credit Union Administration | NATCRERESULT | | NATCRECOMMENT |
| New York Stock Exchange | NYRESULT | | NYCOMMENT |
| Office of the Comptroller of the Currency | OFFCPTRESULT | | OFFCPTCOMMENT |
| Office of the Superintendent of Financial Institutions, Canada | OFFSUPRESULT | | OFFSUPCOMMENT |
| Resolution Trust Corporation | RESTRESULT | | RESTCOMMENT |
| Securities and Exchange Commission, U.S. | SECRESULT | | SECCOMMENT |
| Securities and Exchange Commission, Brazil  (Brazil Comissão de Valores Mobiliários) | SECOBRRESULT | | SECOBRCOMMENT |
| Securities and Futures Authority | SEFUAURESULT | | SEFUAUCOMMENT |
| Swedish Financial Supervisory Authority (Finansinspektionen) | SWFIRESULT | | SWFICOMMENT |
| Swiss Federal Banking Commission | SWBARESULT | | SWBACOMMENT |
| U.K. Companies House Disqualified Directors Register | UKCOHORESULT | | UKCOHOCOMMENT |
| U.K. Financial Conduct Authority Regulatory Enforcements | UKFICORESULT | | UKFICOCOMMENT |
| U.S. Court of International Trade | USCOURESULT | | USCOURCOMMENT |
| U.S. Department of Justice | USDPJSRESULT | | USDPJSCOMMENT |
| U.S. Federal Trade Commission | USFEDRESULT | | USFEDCOMMENT |
| U.S. National Futures Association | USNFRESULT | | USNFCOMMENT |
| U.S. Office of Thrift Supervision | USOTRESULT | | USOTCOMMENT |
| **High Profile Persons Data Bodies Searched**: |  | |  |
| Central Intelligence Agency - Heads of State/Government | CIRESULT | | CICOMMENT |
| International Consortium of Investigative Journalists (ICIJ) | INCOJORESULT | | INCOJOCOMMENT |
| Politically - Exposed Persons | POLITICRESULT | | POLITICCOMMENT |
| **END** | | |  |

[FamilyNames]

[Country]

STERLING DILIGENCE BACKGROUND REPORT[[1]](#footnote-1),[[2]](#footnote-2)

March 3, 2021

*PERSONAL AND CONFIDENTIAL*

**INTRODUCTION**

This investigation was initiated on behalf of the subjects identified below to comply with official due diligence requirements of the Government of St. Kitts & Nevis office of the prime minister Citizenship by Investment Unit in reference to an individual application for economic citizenship in St. Kitts & Nevis. The purpose for conducting this investigation was to determine the background and reputation of the subjects, [Family\_middle\_name\_applicant].<investigator to name any spouse or children who are not included in the investigation or application>.

A Due Diligence Investigation was conducted on the subjects in [Country], where they were <investigator to insert ties to country>.

ADDITIONALJURIDICTIONS

The following represents our findings:

##### **PERSONAL IDENTIFICATION**

The identification documents as provided by the subjects were confirmed as authentic during our Due Diligence Investigation, as detailed in the Subject-Provided Documents Section at the end of this Report. The following information was identified in connection with the subjects and has been confirmed, unless otherwise noted. Certain limited-scope research efforts were conducted in connection with any below-noted name variations, as appropriate:

|  |  |
| --- | --- |
|  | |
| **Name Variations** |  |
| **Date of Birth** |  |
| **Place of Birth** |  |
| **Citizenship** |  |
| **Current Residences** |  |
|  |
|  |
| **Previous Residences** |  |
|  |
|  |
| **Marital Status** |  |
| **Military Service** |  |

1. **BUSINESS AFFILIATIONS AND EMPLOYMENT HISTORY**[[3]](#footnote-3)

Our investigation included a search for any affiliations of the adult subjects with any businesses such as corporations, partnerships, fictitious or assumed business names, etc. A variety of sources were used in this portion of the investigation, including: corporate registration and other business records; nationwide business information sources; business reference directories; media publications; and other appropriate sources. This portion of the investigation also included verification of the employment history of the adult subjects as provided in the Application Form (a copy of which was provided).

It is noted that the following employment history has been verified to be true as claimed, unless noted otherwise below.

**First\_Name Middle\_Name Last\_Name**

REPORTED BUSINESS AFFILIATIONS AND EMPLOYMENT HISTORY

EMPLOYEEDESCRIPTION

[BUSINESSAFFILIATIONSIDENTIFIED]

INTELLECTUALPROPERTYIDENTIFIED[WORLDCHECKDISCLOSEBADESC]

UNDISCLOSED AFFILIATIONS

[UNDISCLOSEDBADESC]

[WORLDCHECKUNDISCLOSEDBADESC]

##### **EDUCATIONAL CREDENTIALS**

DEGREEDESCRIPTION

##### **PROFESSIONAL LICENSURE**

PLLICENSEDESCRIPTION[PLLICENSEDESC]

###### REGULATORY, COMPLIANCE AND OTHER SEARCHES

*Other Financial and Securities Regulators* COUNTRYSPECIFICREGHITDISCRIPTION

OTHERREGULATORYREDFLAGSDESCRIPTION

##### **COURT AND OTHER PUBLIC RECORDS SEARCHES**

[CountryHeader][COURTDESC]

1. **DRIVER’S LICENSURE AND DRIVING HISTORY**

DRIVINGHISTORYDESCRIPTION

###### GLOBAL SECURITY

GLOBALSECURITYHITSDESCRIPTION

GLOBALSECFAMILYHITSDESCRIPTION

PEPHITSDESCRIPTION

ICIJHITSDESCRIPTION

### PERSONAL CREDIT HISTORY

CREDITHISTORYDESCRIPTION

1. **PRESS AND OTHER MEDIA RESEARCH**

**First\_Name Middle\_Name Last\_Name**

PRESSANDMEDIASEARCHDESCRIPTION

\*\*\*

We hope this report satisfies your request for background and due diligence investigation relating to this subjects. If you have any questions or comments about this report or our findings, please contact us and reference Case Number [CaseNumber]. As always, thank you for the opportunity to be of service.

**SUBJECT-PROVIDED DOCUMENTS**

IDENTIFICATION DOCUMENTS

As stated above, the identification documents as provided by the subject were confirmed as authentic during our Due Diligence Investigation, unless otherwise noted. Copies of the subject’s provided identification documents which have been authenticated are indicated with a check mark (“✓”):

* [Country] Passport
* [Country] Birth Certificate
* [Country] National Identity Card
* [Country] Marriage Certificate
* [Country] Driver’s License

SUPPORTING DOCUMENTATION

In addition to the above, copies of the following documents (some notarized and some with translation pages) were provided to Sterling Diligence for the subject:

* Disclosure Form
* Form 12
* [Country] Criminal Clearance Certificate
* Curriculum Vitae
* Graduation Certificate (<School Name>)
* Business Documents (<Entity Name>)
* Employment Letter (<Entity Name>)
* Bank Statement
* Bank Reference Letter
* Letter to the Minister
* Fingerprint and Photograph Verification Form
* Medical Report and Questionnaire
* Investment Agreement
* Photograph
* Certificate of Residency
* Utility Bill
* Affidavit of Source of Funds

<investigator to adjust the above lists to fit the applicant>

**APPENDIX**

As noted above, records of international and U.S. government regulatory agencies were searched for any information on the subject, including, but not limited to, the following sources:

|  |  |
| --- | --- |
| **HIGH PROFILE PERSONS DATA & OTHER BODIES** | |
| » Central Intelligence Agency (CIA) » Bureau of Industry and Security | |
| » Financial Action Task Force » World Bank | |
|  | |
|  | |
| **GLOBAL LAW ENFORCEMENT AGENCIES**  » Central Bureau of Investigation, India  » Central Commission for Discipline Inspection  » Central Commission for Discipline Inspection – Most Wanted  » Central Narcotics Bureau, Singapore  » Cheshire Constabulary, UK  » China Ministry of Public Security - Wanted  » China Provincial Commissions for Discipline Inspection  » China Supreme People's Court  » China Supreme People's Procuratorate  » City of London Police, UK  » Devon & Cornwall Constabulary, UK  » Federal Bureau of Investigation (FBI), United States  » General Police Directorate, Slovenia  » Hampshire Police, UK  » Hong Kong Police Force  » Interpol  » Lancashire Constabulary, UK  » Metropolitan Police Service, UK  » National Crime Squad, UK  » North Yorkshire Police, UK  » Nottinghamshire Police, UK  » Philippines National Police  » Royal Embassy of Saudi Arabia  » Royal Malaysian Police | » Shanghai Stock Exchange  » South African Police Service  » Surrey Police, UK  » Thames Valley Police, UK  » US Air Force Office of Special investigations  » US Bureau of Alcohol, Tobacco, Firearms and Explosives  » US Drug Enforcement Administration  » US Immigration and Customs Enforcement  » US Marshals Service  » US Naval Criminal Investigative Service  » US Postal Inspection Service  » US Rewards for Justice  » US Secret Service  » Warwickshire Police, UK |
| **SANCTIONS**  » Commission de Surveillance du Secteur Financier, Luxembourg  » Commonwealth of Australia Law  » De Nederlandsche Bank, Netherlands  » Department of Foreign Affairs and Trade, Australia  » European Union  » Reserve Bank of Australia  » United Nations Security Council Committee  » US Department of State  » Isle of Man Financial Supervision Commission  » Jersey Financial Services Commission  » Ministry of Finance, Japan | » Financial Services Agency, Japan  » Guernsey Financial Services Commission  » HM Treasury (formerly Bank of England)  » Hong Kong Gazetted Sanctions List  » Hong Kong Monetary Authority Notice  » Monetary Authority of Singapore  » Office of Foreign Assets Control (OFAC), United States  » Office of the Superintendent of Financial Institutions, Canada  » People's Bank of China - United Nations Sanctions – PBC  » People's Bank of China - Eastern Turkistan Islamic Movement |
| **REGULATORY ENFORCEMENT BODIES**  NORTH AMERICA  » Alberta Securities Commission, Canada  » Autorité des marchés financiers, Canada  » British Columbia Securities Commission, Canada  » Centro Mexicano Para La Filantropia (CEMEFI)  » China Securities Regulatory Commission  » China Securities Regulatory Commission – Alert  » Commodity Futures Trading Commission (CFTC)  » Federal Deposit Insurance Corporation, United States  » Federal Reserve Board, United States  » Federal Trade Commission, United States  » Financial Crimes Enforcement Network (FinCEN)  » FINRA, United States  » Investment Dealers Association of Canada  » Investment Industry Regulatory Organization of Canada  » Manitoba Securities Commission, Canada  » Market Regulation Services Inc., Canada  » Mutual Fund Dealers Association of Canada  » National Credit Union Administration, United States  » National Futures Association, United States  » New York Stock Exchange, United States  » Office of Foreign Assets Control (OFAC), United States  » Office of the Comptroller of the Currency, United States  » Office of the Superintendent of Financial Institutions, Canada  » Office of Thrift Supervision, United States  » Ontario Securities Commission, Canada  » Saskatchewan Financial Services Commission, Canada  » Securities and Exchange Commission (SEC), United States  » Securities Commission of Newfoundland and Labrador, Canada  » US Court of International Trade  » US Department of Justice  UNITED KINGDOM  » Assets Recovery Agency, UK  » Financial Conduct Authority (FCA), UK  » Gibraltar Financial Services Commission, UK  » Guernsey Financial Services Commission, UK  » Isle of Man Financial Supervision Commission, UK  » Jersey Financial Services Commission, UK  » Lloyd’s Insurance Market, UK  LATIN AMERICA / CARIBBEAN  » British Virgin Islands Financial Services Commission  » Cayman Islands Monetary Authority  » Central Bank of Belize  » Central Bank of The Bahamas  » Chilean Securities and Insurance Supervisor  » Comisión Nacional de Valores, Argentina  » Comision Nacional Supervisora de Empresas Y Valores, Peru  » International Financial Services Commission, Belize | AFRICA / ASIA / PACIFIC  » Australian Prudential Regulation Authority  » Australian Securities and Investments Commission  » Central Bureau of Investigation, India  » China Insurance Regulatory Commission  » China State Administration for Industry and Commerce  » China State Administration of Taxation  » Financial Services Agency, Japan  » Financial Services Board, South Africa  » Financial Services Commission, Mauritius  » Hong Kong Monetary Authority  » Hong Kong Securities and Futures Commission  » Hong Kong Stock Exchange (“HKEX”)  » Hong Kong Sec. and Futures Comm. – Investor Alert  » Hong Kong Warning (“HKMAW”)  » Pakistan  » Securities and Exchange Commission, Republic of the Philippines  » Securities and Exchange Commission, Thailand  » Securities and Exchange Surveillance Commission, Japan  » Securities Commission of New Zealand  » Securities Commission, Malaysia  EUROPE  » Autorité des marchés financiers, France  » BaFin - Federal Financial Supervisory Authority, Germany  » Banking, Finance and Insurance Commission (CBFA), Belgium  » Banque de France, CECEI, France  » Banque de France, Commission Bancaire, France  » Capital Market Commission, Greece  » Comision Nacional del Mercado de Valores, Spain  » Commission de Surveillance du Secteur Financier, Luxembourg  » Commissione Nazionale per le Societa e la Borsa, Italy  » Cyprus Securities and Exchange Commission  » Czech National Bank  » Danish Financial Supervisory Authority  » Financial and Capital Market Commission, Latvia  » Financial Market Authority, Austria  » Financial Market Authority, Slovakia  » Financial Regulator, Ireland  » Financial Supervisory Authority of Norway (Kredittilsynet)  » Finnish Financial Supervision Authority  » Hungarian Financial Supervisory Authority  » Insurance Supervisory Commission of the Republic of Lithuania  » Malta Financial Services Authority  » Netherlands Authority for the Financial Markets  » Polish Securities and Exchange Commission  » Portuguese Securities Market Commission (CMVM)  » Securities Commission of the Republic of Lithuania  » Securities Market Agency, Slovenia  » Swedish Financial Supervisory Authority (Finansinspektionen)  » Swiss Federal Banking Commission |

1. The confidentiality of this information should be stressed, and unless required to do so by law, disseminating or otherwise distributing this information to the subject of this report or to any unauthorized parties without the express written authorization of Sterling Diligence is strictly prohibited. [↑](#footnote-ref-1)
2. Given stringent data protection laws in [Country], the information contained herein has been derived through open source research, including [Country]-based corporate registry records and other public reports.

   Further, it is understood that due to the nature of the origin of public record information, the reliability of database results can be highly variable, and there may be information which has never been reported to or is not available through various database services. Further, databases typically maintain information as acquired through or from an original source, and since queries are character specific and sensitive to spelling precision, research results are dependent upon the accuracy and correctness of the source data, which is sometimes reported or entered inaccurately, processed poorly or incorrectly, and is generally not free from defect. In this regard, additional research has been undertaken to independently verify specific results during the course of this investigation. [↑](#footnote-ref-2)
3. It is noted that the timeframe associated with the subjects' affiliation with these entities is derived from multiple sources and may not necessarily reflect the complete duration of the subject’s association with the same. Further, there may be instances where corporate records omit or do not disclose individual principals or members, and in this regard, it is possible that the subjects have been associated with other business entities, but the association may not be revealed through corporate filings. [↑](#footnote-ref-3)