Date: March 31, 2021

STERLING DILIGENCE

BACKGROUND REPORT

## RE: [Full\_Entity\_Name]

*- PERSONAL AND CONFIDENTIAL -*

STERLING DILIGENCE BACKGROUND REPORT

[Full\_Entity\_Name]

[EntityCity], [EntityState]

March 31, 2021

**SUMMARY RESULTS TABLE**

|  |  |  |  |
| --- | --- | --- | --- |
| **COMPONENTS INVESTIGATED** | **RESULTS** | | **COMMENTS** |
| Corporate Identification Profile | PLRESULT | | PICOMMENT |
| Secretary of State Officer/Director & Other Corporate Records | SODRESULT | | SODCOMMENT |
| Licensures & Other Designations | PROFRESULT | | PROFCOMMENT |
| Regulatory Searches & Verification | REGRESULT | | REGCOMMENT |
| **Bankruptcy, Civil Litigation & Other Filings** | | | |
| Bankruptcy Court Filings | BANKRUPRESULT | | BANKRUPCOMMENT |
| Civil Court Litigation Records – Federal (Nationwide), State & County Courts | CIVILRESULT | | CIVILCOMMENT |
| Tax Liens & Civil Judgments | TAXLIENRESULT | | TAXLIENCOMMENT |
| Uniform Commercial Code Filings | UNIFRESULT | | UNIFCOMMENT |
| **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 |
| **END** | | |  |

**EXECUTIVE SUMMARY**

At the request of ClientName(“Client”), Sterling Diligence undertook a background due diligence investigation in the United States in connection with [FullEntityName], which was aimed at identifying any of the following: civil litigation filings; liens and judgments; bankruptcies; corporate and other business associations and filings; regulatory and licensing status; adverse media reports; and any other matters which would reflect potential items of interest. *[RESULTSPENSECTIONS1]*

HasLegalRecordsJudgmentsorLiensHits

HasRegulatoryorGlobalSecurityHits

*HasHitsAboveAndCompanionReport*

The following presents the results of Sterling Diligence’s investigation in detail.

[Full\_Entity\_Name]

[EntityCity], [EntityState]

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

March 31, 2021

*PERSONAL AND CONFIDENTIAL*

# **CORPORATE INFORMATION**

According to the company’s website, <company website link>,[[3]](#footnote-3) [FullEntityName] (“[ShortEntityName]”) <investigator to insert description>. The company’s principal address is located at [FullEntityAddress].

<Investigator to add relevant details regarding company origin, affiliated entities, and/or any known Officers, Directors, relevant press hits, etc.>

According to records maintained by the Secretary of State’s Office, [ShortEntityName] was formed in [IncorporationState] on [IncorporationDate], where it is <status> and is <insert standing (active, inactive, etc.)>. <Investigator to add details regarding any other states of registration, historical or other name changes, caveat search language etc.>

BUSINESSAFFILIATIONSIDENTIFIED

INTELLECTUALPROPERTYIDENTIFIED

##### **PROFESSIONAL LICENSURE AND/OR DESIGNATIONS**

PLLICENSEDESCRIPTION[PLLICENSEDESC]

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

OTHERREGULATORYREDFLAGSDESCRIPTION

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

Covering a period of at least ten years or so, bankruptcy and civil court records were searched on a federal, state and county level.COMMONNAMESUBDESC The following is a summary of the courts searched and any actions found:

*Bankruptcy Filings*

HASBANKRUPTYRECHITDESC

*Civil Litigation Filings*[HASCIVILRECDESC][HASNAMECIVILLITIDESC][USTAXCOURTHITDESC]

1. **TAX LIENS, JUDGMENTS AND UCCS**

HASNAMETAXLIENUCCDESC

1. **GLOBAL SECURITY**

GLOBALSECURITYHITSDESCRIPTION

ICIJHITSDESCRIPTION

1. **PRESS AND OTHER MEDIA RESEARCH**

PRESSANDMEDIASEARCHDESCRIPTION

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We hope this report satisfies your request for a background due diligence investigation relating to this subject entity. 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.

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. 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. This website domain name was registered on <registration date> and will expire on <expiration date>, unless renewed. [↑](#footnote-ref-3)