STERLING DILIGENCE

BACKGROUND REPORT

## RE: First\_Name Middle\_Initial Last\_Name

THE GOVERNMENT OF THE REPUBLIC OF CYPRUS

MINISTRY OF INTERIOR

Date: March 2, 2021

*- PERSONAL AND CONFIDENTIAL -*

STERLING DILIGENCE BACKGROUND REPORT

First\_Name Middle\_Initial Last\_Name

Position1

Employer1

[Employer1City], [Employer1State]

March 2, 2021

**SUMMARY RESULTS TABLE**

|  |  |  |  |
| --- | --- | --- | --- |
| **COMPONENTS INVESTIGATED** | **RESULTS** | | **COMMENTS** |
| Personal Identification Profile | PLRESULT | | PICOMMENT |
| Name & Address Verification & History | NAMERESULT | | NAMECOMMENT |
| Social Security Trace & Verification | SOCSECRESULT | | SOCSECCOMMENT |
| Real Estate Property Ownership Records | REALRESULT | | REALCOMMENT |
| Secretary of State Officer/Director & Other Corporate Records | SODRESULT | | SODCOMMENT |
| Education Verification | DEGREEHEADER | | SUMMDEGDESCRIPTION |
| Professional Licenses & Designations | PROFRESULT | | PROFCOMMENT |
| Regulatory Searches & Verification | REGRESULT | | REGCOMMENT |
| Driving History | DRIVINGRESULT | | DRIVINGCOMMENT |
| Personal Credit History & Information | PERCREDITRESULT | | PERCREDITCOMMENT |
| **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 |
| **Criminal Records** | | | |
| Criminal Records – Federal, State & County Courts | 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 |
| **END** | | |  |

**EXECUTIVE SUMMARY**

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

HasLegalRecordsJudgmentsorLiensHits

HasRegulatoryorGlobalSecurityHits

*HasHitsAboveAndCompanionReport*

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

First\_Name Middle\_Initial Last\_Name

Position1

Employer1

[Employer1City], [Employer1State]

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

March 2, 2021

*PERSONAL AND CONFIDENTIAL*

##### **PERSONAL IDENTIFICATION**[[3]](#footnote-3)

Name: [FirstName] [MiddleName] [LastName] (also known as [FullAliasName])

Date of Birth: [DateofBirth]

Social Security Number: [Initial\_digits\_of\_SSN]-XXXX

Most Recent Address: [CurrentFullAddress]

[FirstName] [MiddleInitial] [LastName] (hereafter referred to as “[LastName]” or “the subject”) has been associated with several addresses and/or jurisdictions within the past 15 years or so in [ADDITIONALSTATES] and investigative efforts were conducted in these jurisdictions.

ADDITIONALJURIDICTIONS

1. **PROPERTY RECORDS**

CURRENTRESIDENTIALPROPERTYDESC OTHERPROPOWNERSHIPDESC PREVIOUSPROPERTYOWNERSHIPDESC

1. **BUSINESS AFFILIATIONS AND EMPLOYMENT HISTORY**[[4]](#footnote-4)

EMPLOYEEDESCRIPTION

BUSINESSAFFILIATIONSIDENTIFIED

INTELLECTUALPROPERTYIDENTIFIED

##### **EDUCATIONAL CREDENTIALS**

DEGREEDESCRIPTION

##### **PROFESSIONAL LICENSURE**

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, criminal and civil court records were searched on a federal, state and county level in the jurisdictions in which [LastName] has resided and/or has conducted business.COMMONNAMESUBDESC The following is a summary of the courts searched and any actions found with regard to [LastName], personally:

*Bankruptcy Filings*

HASBANKRUPTYRECHITDESC

*Criminal Records* CRIMINALRECDES

HASBUREAUPRISONHITDESC

HASSEXOFFENDERREGHITDESC

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

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

HASNAMETAXLIENUCCDESC

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

DRIVINGHISTORYDESCRIPTION

HASNAMEDRIVINGINCIDENTDESC

1. **GLOBAL SECURITY**

GLOBALSECURITYHITSDESCRIPTION

ICIJHITSDESCRIPTION

### PERSONAL CREDIT HISTORY

CREDITHISTORYDESCRIPTION

1. **PRESS AND OTHER MEDIA RESEARCH**

PRESSANDMEDIASEARCHDESCRIPTION

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We hope this report satisfies your request for background and due diligence investigation relating to this subject. 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. For privacy and confidentiality reasons, the subject’s full date of birth and Social Security number have been omitted from this report. It is noted, however, that [LastName]'s Social Security number was issued in <Investigator to add State of issuance and YYYY(s)>, and for the purposes of this investigation, this and other identification information regarding the subject has been confirmed as well. [↑](#footnote-ref-3)
4. It should be noted that investigative efforts include searches for affiliations with any corporations, partnerships, and/or fictitious or assumed business names. In this regard, a variety of sources were used in this portion of the investigation, including state and county corporation and other business records, nationwide business information sources, business reference directories, media publications and other appropriate sources. It should also be noted that various states do not provide public records information for limited liability companies, corporations and other business entities, and therefore it is possible that [LastName] is associated with other businesses, but the association may not be disclosed in Secretary of State records or filings. [↑](#footnote-ref-4)