STERLING DILIGENCE

BACKGROUND REPORT

## RE: POOJA M. NIKUMBH

Dominica

Date: August 28, 2020

[Month Generated] [Year Generated]

PERSONAL & CONFIDENTIAL VIA ELECTRONIC MAIL DELIVERY

The Coordinator

Ministry of Finance

Citizenship by Investment Unit

1st Floor, Financial Centre

Kennedy Avenue

Roseau, Commonwealth of Dominica, West Indies

**RE: POOJA MADHUKAR NIKUMBH**

Dear Coordinator:

Enclosed is the *Due Diligence Background Report* on the subject referenced above, Pooja Madhukar Nikumbh, who submitting an individual application for economic citizenship in the Commonwealth of Dominica. <investigator to name any spouse or children who are not included in the investigation or application>.

A Due Diligence Investigation was conducted on the subject in Afghanistan, where the subject was <investigator to insert ties to country>. Our investigation included verifications and searches of the following sources and information regarding the subject: 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 subject. 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

POOJA M. NIKUMBH

lkojiuhytfgrdgvb

;olgh, Afghanistan

August 28, 2020

**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 | No Edu History | |  |
| Professional Licenses & Designations | REGRESULT | | REGCOMMENT |
| Regulatory Searches & Verification | PROFRESULT | | PROFCOMMENT |
| Military Service |  | |  |
| Driving History | Clear | | With the subject’s express written authorization, Nikumbh’s driving record was retrieved in Afghanistan, which did not reveal any traffic infractions or license suspensions. |
| Personal Credit History | Records | | With the subject’s express written authorization, Nikumbh’s personal credit history was retrieved in Afghanistan, which revealed the following negative credit information:  <investigator to insert summary here> |
| **Bankruptcy, Civil Litigation & Other Filings** | | | |
| Bankruptcy Filings in Afghanistan (as available) | BANKRUPRESULT | | BANKRUPCOMMENT |
| BANKRUP1RESULT | | BANKRUP1COMMENT |
| Civil Court Litigation Records in Afghanistan (as available) | CIVILRESULT | | CIVILCOMMENT |
| CIVIL1RESULT | | CIVIL1COMMENT |
| Civil Judgments and Liens | CIVILJUDGERESULT | | CIVILJUDGECOMMENT |
| CIVILJUDGE1RESULT | | CIVILJUDGE1COMMENT |
| **Criminal Records** | | | |
| Criminal Records as available in Afghanistan | CRIMINALRESULT | | CRIMINALCOMMENT |
| CRIMINAL1RESULT | | CRIMINAL1COMMENT |
| **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** | | |  |

POOJA M. NIKUMBH

lkojiuhytfgrdgvb

;olgh, Afghanistan

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

August 28, 2020

*PERSONAL AND CONFIDENTIAL*

**INTRODUCTION**

This investigation was initiated on behalf of the subject identified below to comply with official due diligence requirements of the [Program Name] in reference to an individual application for economic citizenship in the Commonwealth of Dominica. The purpose for conducting this investigation was to determine the background and reputation of the subject, Pooja Madhukar Nikumbh.<investigator to name any spouse or children who are not included in the investigation or application>.

A Due Diligence Investigation was conducted on the subject in Afghanistan, where the subject was <investigator to insert ties to country>.

Additionally, the subject has historical and/or possible ties to Australia, UK and JK, and additional research would be required in these jurisdictions, which can be undertaken upon request -- if an expanded scope is warranted.

The following represents our findings:

##### **PERSONAL IDENTIFICATION**

The identification documents as provided by the applicants 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 subject and has been confirmed, unless otherwise noted. Certain limited-scope research efforts were conducted in connection with any below-noted name variations, as appropriate:

|  |  |
| --- | --- |
| **POOJA MADHUKAR NIKUMBH** (lkojiuhytfgrdgvb ) (Main Applicant) | |
| **Name Variations** | PoojaNikumbh |
| **Date of Birth** | June, 1995 |
| **Place of Birth** | uytf |
| **Citizenship** | .lkjyhgf |
| **Current Residences** | abc street, paris, reportedly since <date> |
| **Previous Residences** | 123, london, UK, 213344, reportedly from <date> to <date> |
| [PREVIOUSFULLADDRESSDESC]3 |
| **Military Service** | As confirmed, Nikumbh served as a <rank/position> in the <Country> military from <year> to <year>. <investigator to specify whether military certificate was provided and/or authenticated> |

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

Our investigation included a search for any affiliations of the subject 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 subject as provided in the Disclosure 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.

**POOJA MADHUKAR NIKUMBH**

REPORTED BUSINESS AFFILIATIONS AND EMPLOYMENT HISTORY

As confirmed, Nikumbh is a khg at ;olikjh[[4]](#footnote-4) in ;ikjh, since January 1, 1800. <Investigator to insert company website, brief description, registration details, and any other applicant-provided data here>.

In addition to the above, research efforts conducted through information maintained by <insert Country Corporate Registry> identified Nikumbh as an Officer, Director and/or Shareholder of the following business entities in Afghanistan:

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

UNDISCLOSED AFFILIATIONS

While not reported by the subject, research of records maintained by the <insert Country Corporate Registry>, as well as other sources, revealed the subject in connection with the following additional business entities:

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

##### **CHARACTER REFERENCES**

Nikumbh provided the following character references in Afghanistan. We attempted to contact these individuals to ask them about their knowledge of the subject’s background, reputation, character and integrity. It is noted that a reference letter was provided by an individual for Nikumbh.

The following are summaries of the interviews and reference letter:

Reference 1: ALberta

Senior manager

ABC Group

Paris

Numerous attempts to contact ALberta utilizing the contact details provided have remained unsuccessful to date.

However, ALberta provided a reference letter, wherein <he/she> stated that <investigator to insert summary or remove if no letter provided>.

##### **EDUCATIONAL CREDENTIALS**

##### **PROFESSIONAL LICENSURE**

*United States Securities and Exchange Commission*

According to records maintained by the United States Securities and Exchange Commission (“SEC”), Nikumbh has been registered, with a Central Registration Depository (“CRD”) number of <number>, as an Investment Adviser Firm Representative of <entity> (effective as of <dates>).

Further, the subject reportedly passed the following examinations: the Series <number> (<series name>) on <date>; and the Series <number> (<series name>) on <date>.

Further, the following disclosure events were reported on the subject’s SEC registration:

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

With the exception of the above, no additional disclosure events, such as formal investigations, disciplinary actions, customer disputes and/or criminal charges or convictions, were on file with the SEC in connection with Nikumbh’s registration.

*United Kingdom’s Financial Conduct Authority*

According to records maintained by the United Kingdom’s Financial Conduct Authority (“FCA”), Nikumbh, with an individual reference number of <number>, has been registered in the controlled functions of <insert controlled functions, entities and effective dates>.

There are no records of any supervisory, disciplinary or civil regulatory actions on file with the FCA against the subject.

*Hong Kong Securities and Futures Commission*

Nikumbh has been registered with the Hong Kong Securities and Futures Commission (“HKSFC”), with the identification number of <number>, as a <role> (effective as of <dates>)), in the regulated activity of <capacity> (effective as of <dates>) with <entity>.

There are no public disciplinary actions on file against the subject within the past five years.

*Other Professional Licensures and/or Designations*

Investigative efforts did not reveal any additional professional licensure or registration information in connection with Nikumbh, personally, however, further efforts would be required on a jurisdiction and license-type basis to confirm the same. As a precaution, research efforts included, but were not limited to: a Broker Check through the United States Financial Industry Regulatory Authority (for the past two years); a search of the United States Commodity Futures Trading Commission registration; an Investment Adviser Firm Representative search through the U.S. Securities and Exchange Commission; and a search through the United Kingdom’s Financial Conduct Authority. <investigator to remove any sources that came back with hits above>

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

*Other Financial and Securities Regulators*

Additionally, research efforts were conducted in Afghanistan through records maintained by the <insert Country Regulatory Body or delete section if not applicable>, which identified the following information in connection with Nikumbh:

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

In addition to the above, as a precaution, national financial institutions sanctions and legal actions were searched in the United States covering the banking, mortgage and securities industries,[[5]](#footnote-5) and the following information was identified in connection with Nikumbh: <Investigator to insert results here>

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

*Afghanistan*

Searches of all available legal records in Afghanistan, which include the <insert relevant courts> <list of available courts, tribunals and sources noted in sub report>, did not personally identify the subject as a party to any bankruptcy filings, civil litigation matters, judgments or criminal convictions.

It should be noted that one or more individuals known only as Pooja Nikumbh were identified as <party type> in at least <number> bankruptcy filings, which were recorded in Afghanistan between <date> and <date>, and manual court records retrieval efforts -- if available -- would be required in order to determine whether any of the same pertain to the subject of interest, which can be undertaken upon request if an expanded scope is warranted

It should be noted that one or more individuals known only as Pooja Nikumbh were identified as <party type> in at least <number> civil litigation filings, which were recorded in Afghanistan between <date> and <date>, and manual court records retrieval efforts -- if available -- would be required in order to determine whether any of the same pertain to the subject of interest, which can be undertaken upon request if an expanded scope is warranted

The subject provided a copy of their <jurisdiction> Criminal Clearance Certificate, number <certificate #> issued on <date> by <issuing authority>, which was authenticated by <entity>, and reported the following criminal records in connection with the subject:

• <Investigator to insert results here>

Further, efforts undertaken through official government announcements, published news stories, regulatory agency records and other available sources, identified the following references to bankruptcy filings, civil litigation filings and/or criminal records involving the subject in Afghanistan:

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

*Other Legal Records Searches*

In addition, as a precaution, bankruptcy, criminal and civil court records were searched in the United States covering a period of at least 10 years or so through the federal-level United States District and Bankruptcy Courts at a nearly national level, which identified the subject in connection with the following records:

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

It is noted that comprehensive statewide and local-level court research efforts would be required in connection with the subject in the United States, should an expanded scope be warranted.

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

With the subject’s express written authorization, Nikumbh’s driver’s abstract was retrieved in Afghanistan through <insert source> which did not identify any traffic infractions, license suspensions or other adverse records within the past <number> years or so.

###### GLOBAL SECURITY

Research was undertaken in connection with various governmental, quasi-governmental and private sector list repositories maintained for purposes of international security, fraud prevention, anti-terrorism and anti-money laundering, including the List of Specially Designated Nationals and Blocked Persons of the United States Office of Foreign Assets Control (“OFAC”),

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

Searches of the same sources were also conducted in connection with the subject’s <family members> (utilizing their names and provided in their Application Forms) and the following records were identified:

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

Further, research efforts conducted through electronically-available lists of “politically-exposed” persons and entities identified the following information in connection with Nikumbh:

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

Further, a review was conducted of the Offshore Leaks Database maintained by The International Consortium of Investigative Journalists (“ICIJ”). It is noted that the ICIJ database contains information on the more than 785,000 offshore companies, foundations and trusts from the Panama Papers, the Offshore Leaks, the Bahamas Leaks and the Paradise Papers investigations. The data covers nearly 80 years up to 2016 and links to people and companies in more than 200 countries and territories. The database is not intended to suggest or imply that any persons, companies or other entities included have broken the law or otherwise acted improperly. The following information was identified in connection with the subject:

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

### PERSONAL CREDIT HISTORY

With the subject's express written authorization, Nikumbh’s Public Record Report was retrieved through the <insert source>, which identified the following negative payment records in connection with the subject:

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

• <Investigator to insert bulleted list of results here>

1. **PRESS AND OTHER MEDIA RESEARCH**

Due to the commonality of the subject’s name, searches were structured and designed to identify specific reports relating to Nikumbh with a variety of negative search terms and derivatives thereof within the past <timeframe>. Further, the subject’s name was also searched using a variety of other terms, focusing on the subject’s employment history, and a thorough review of the same did not identify any adverse or materially-significant information in connection with Nikumbh.

\*\*\*

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 12345\_PA. 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 (“✓”):

* Afghanistan Passport
* Afghanistan Birth Certificate
* Afghanistan National Identity Card
* Afghanistan Marriage Certificate
* Afghanistan 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
* Afghanistan 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 Afghanistan, the information contained herein has been derived through open source research, including Afghanistan-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 Nikumbh’s 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 Nikumbh has been associated with other business entities, but the association may not be revealed through corporate filings. [↑](#footnote-ref-3)
4. <Investigator to insert company registry detail here>. [↑](#footnote-ref-4)
5. Searches included sanctions and/or legal actions of the following federal agencies: the Securities and Exchange Commission; the Financial Industry Regulatory Authority (formerly the National Association of Securities Dealers) and the New York Stock Exchange’s member regulation, enforcement and arbitration functions (prior to the consolidation of the two in July 2007); the Federal Deposit Insurance Corporation; Resolution Trust Corporation; Federal Reserve Board; National Credit Union Administrative Actions; Office of the Comptroller of the Currency; Department of Justice; Department of Housing and Urban Development; and other federal agencies (through the General Services Administration). [↑](#footnote-ref-5)