Date: September 14, 2020

STERLING DILIGENCE

BACKGROUND REPORT

## RE: POOJA M. NIKUMBH

*- PERSONAL AND CONFIDENTIAL -*

STERLING DILIGENCE BACKGROUND REPORT

POOJA M. NIKUMBH

lkojiuhytfgrdgvb

Principle of the firm and health

ABC Group

;olgh, Afghanistan

September 14, 2020

**SUMMARY RESULTS TABLE**

|  |  |  |  |
| --- | --- | --- | --- |
| **COMPONENTS INVESTIGATED** | **RESULTS** | | **COMMENTS** |
| Personal Identification Profile | Clear | | Confirmed |
| Name & Address Verification & History | Clear | | Nikumbh has jurisdictional ties to Afghanistan |
| Property Records | Records | | Nikumbh was identified as an owner of at least <number> of properties in Afghanistan |
| Company Directorship & Other Records | Records | | Nikumbh is a Principle of the firm and health of ABC Group, in ;olgh, Afghanistan, since 2019  In addition, Nikumbh is identified in connection with additional entities in <investigator to add countries> |
| Education Verification | Master in Arts-Results Pending | | Additionally, Nikumbh reportedly earned a Master in Arts from lkujgf in London on <not provided>, *however efforts to independently verify the same are currently ongoing (the results of which will be provided under separate cover, if and when received)* |
| Professional Licenses & Designations | Clear | |  |
| Regulatory Searches & Verification | Clear | |  |
| Driving History | No Consent | | The subject's express written authorization and a copy of their Afghanistan Driver's License would be required in order to conduct a search through the <relevant country authority>. |
| Personal Credit History | Clear | |  |
| **Bankruptcy, Civil Litigation & Other Filings** | | | |
| Bankruptcy Filings in Afghanistan (as available) | Clear | |  |
| Civil Court Litigation Records in Afghanistan (as available) | Clear | |  |
| Civil Judgments and Liens | Clear | |  |
| **Criminal Records** | | | |
| Criminal Records as available in Afghanistan | Clear | |  |
| **Press & Other Media Searches** | | | |
| News Media Searches – Print Publications and Internet Sources. Includes expanded search of investment publications, etc. | | Clear | No adverse or materially-significant information identified |
| **Global Security & Regulatory Searches** | | | |
| **Sanctions Bodies Searched:** | | | |
| Department of Foreign Affairs and Trade, Australia | | Clear |  |
| European Union Consolidated List of Persons, Groups, Equity | | Clear |  |
| HM Treasury Consolidated List of Financial Sanctions Targets (formerly Bank of England Sanctions) | | Clear |  |
| U.S. Bureau of Industry and Security List of Denied Persons, Entities List and Unverified List | | Clear |  |
| U.S. Department of State Foreign Terrorist Organizations | | Clear |  |
| U.S. Directorate of Defense Trade Controls Debarred Parties Lists | | Clear |  |
| U.S. General Services Administration Lists of Parties Excluded from Federal Procurement and Non-Procurement Programs | | Clear |  |
| U.S. Office of Foreign Assets Control | | Clear |  |
| United Nations Consolidated Sanctions | | Clear |  |
| World Bank List of Ineligible Firms and Individuals | | Clear |  |
| **Law Enforcement Bodies Searched:** | | | |
| City of London Police (U.K.) | Clear | |  |
| Constabularies of Cheshire, Lancashire, and Devon and Cornwall (U.K.) | Clear | |  |
| Hampshire Police (U.K.) | Clear | |  |
| Hong Kong Police Force | Clear | |  |
| Interpol | Clear | |  |
| Metropolitan Police Service (U.K.) | Clear | |  |
| National Crime Squad | Clear | |  |
| North Yorkshire Police (U.K.) | Clear | |  |
| Nottinghamshire Police (U.K.) | Clear | |  |
| Surrey Police (U.K.) | Clear | |  |
| Thames Valley Police (U.K.) | Clear | |  |
| U.S. Federal Bureau of Investigation | Clear | |  |
| U.S. Secret Service | Clear | |  |
| Warwickshire Police (U.K.) | Clear | |  |
| **Regulatory Enforcement Bodies Searched:** | | | |
| Alberta Securities Commission, Canada | Clear | |  |
| Assets Recovery Agency | Clear | |  |
| Australian Prudential Regulation Authority | Clear | |  |
| Australian Securities and Investments Commission | Clear | |  |
| Banque de France, CECEI, France | Clear | |  |
| Banque de France, Commission Bancaire, France | Clear | |  |
| British Virgin Islands Financial Services Commission | Clear | |  |
| Cayman Islands Monetary Authority | Clear | |  |
| Commission de Surveillance du Secteur Financier, Luxembourg | Clear | |  |
| Commodity Futures Trading Commission | Clear | |  |
| Council for Financial Activities Control, Brazil | Clear | |  |
| Departamento de Investigacoes Sobre Narcoticos, Brazil | Clear | |  |
| Department of Labour Inspection – Combating Forced Labour, Brazil | Clear | |  |
| Federal Deposit Insurance Commission | Clear | |  |
| Federal Reserve Board | Clear | |  |
| Financial Action Task Force | Clear | |  |
| Financial Crimes Enforcement Network | Clear | |  |
| Financial Industry Regulatory Authority | Clear | |  |
| Financial Regulator, Ireland | Clear | |  |
| Hong Kong Monetary Authority | Clear | |  |
| Hong Kong Securities and Futures Commission | Clear | |  |
| Investment Dealers Association of Canada | Clear | |  |
| Investment Management Regulatory Organisation | Clear | |  |
| Isle of Man Financial Supervision Commission | Clear | |  |
| Jersey Financial Services Commission | Clear | |  |
| Lloyd’s Insurance Arimbolaet | Clear | |  |
| Monetary Authority of Singapore | Clear | |  |
| National Credit Union Administration | Clear | |  |
| New York Stock Exchange | Clear | |  |
| Office of the Comptroller of the Currency | Clear | |  |
| Office of the Superintendent of Financial Institutions, Canada | Clear | |  |
| Resolution Trust Corporation | Clear | |  |
| Securities and Exchange Commission, U.S. | Clear | |  |
| Securities and Exchange Commission, Brazil  (Brazil Comissão de Valores Mobiliários) | Clear | |  |
| Securities and Futures Authority | Clear | |  |
| Swedish Financial Supervisory Authority (Finansinspektionen) | Clear | |  |
| Swiss Federal Banking Commission | Clear | |  |
| U.K. Companies House Disqualified Directors Register | Clear | |  |
| U.K. Financial Conduct Authority Regulatory Enforcements | Clear | |  |
| U.S. Court of International Trade | Clear | |  |
| U.S. Department of Justice | Clear | |  |
| U.S. Federal Trade Commission | Clear | |  |
| U.S. National Futures Association | Clear | |  |
| U.S. Office of Thrift Supervision | Clear | |  |
| **High Profile Persons Data Bodies Searched**: |  | |  |
| Central Intelligence Agency - Heads of State/Government | Clear | |  |
| International Consortium of Investigative Journalists (ICIJ) | Clear | |  |
| **END** | | |  |

**EXECUTIVE SUMMARY**

At the request of BB Fund (“Client”), Sterling Diligence undertook a background and due diligence investigation in Afghanistan in connection with Pooja M. Nikumbh, 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. Additionally, efforts included verification of the subject’s educational credentials, where available.

Searches of legal records and other sources in Afghanistan did not locate any bankruptcy filings or other claims, evidence of criminal charges or government actions, civil litigation filings, or liens or judgments in connection with the subject, personally.

Searches also were conducted of relevant legal and regulatory agencies in Afghanistan and the United States, while anti-terrorist, anti-money laundering and other compliance searches were global in scope, and no such records were identified in connection with the subject.

*In sum, no issues of potential relevance were identified in connection with Pooja M. Nikumbh in Afghanistan.*

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

POOJA M. NIKUMBH

lkojiuhytfgrdgvb

Principle of the firm and health

ABC Group

;olgh, Afghanistan

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

September 14, 2020

*PERSONAL AND CONFIDENTIAL*

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

Pooja Madhukar Nikumbh lkojiuhytfgrdgvb (hereafter referred to as “ Nikumbh ” or “the subject”) is a .lkjyhgf national born in uytf in December, 2020, and maintains a residence at 21 Plymouth Street, Montcliar, NJ, India, 321004[[4]](#footnote-4). At the request of the Client, research efforts were conducted in this jurisdiction.

Additionally, the subject has historical 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.

**II. PROPERTY RECORDS**

Research efforts conducted through records maintained by the revealed that <investigator to insert results here>.

**III. BUSINESS AFFILIATIONS AND EMPLOYMENT HISTORY**[[5]](#footnote-5)

As confirmed, Nikumbh is a Principle of the firm and health at ABC Group[[6]](#footnote-6) in ;ikjh, since February 2, 2019.

Research efforts conducted through information maintained by did not identify Nikumbh as an Officer, Director and/or Shareholder of any business entities in Afghanistan.

##### **IV. EDUCATIONAL CREDENTIALS**

According to self-reported biographical information, Nikumbh reportedly received a Master in Arts from lkujgf in London on <not provided>, having reportedly attended the same from <not provided> to <not provided>. *Efforts to independently confirm the subject’s tenure at the same are currently ongoing, the results of which will be provided under separate cover, if and when received.*

##### **PROFESSIONAL LICENSURE**

*Other Professional Licensures and/or Designations*

Investigative efforts did not reveal any 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.

###### 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 did not identify any information in connection with Nikumbh.

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,[[7]](#footnote-7) and it is noted that Nikumbh was not identified in any of these records.

###### 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.

Further, efforts undertaken through official government announcements, published news stories, regulatory agency records and other available sources, did not locate any references to any bankruptcy filings, civil litigation filings or criminal records involving the subject in Afghanistan.

*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 did not identify the subject in connection with any such records.

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**

The subject's express written authorization and a copy of their Afghanistan Driver's License would be required in order to conduct a search through the <relevant country authority>.

1. **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”),[[8]](#footnote-8) and it is noted that Nikumbh was not identified on any of these lists.

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 subject was not identified through the same.

### PERSONAL CREDIT HISTORY

With the subject's express written authorization, Nikumbh’s credit history was retrieved through the <insert source>, which did not identify any adverse payment information in connection with the subject.

1. **PRESS AND OTHER MEDIA RESEARCH**

Extensive press and other media research, including searches of international, national, regional and local newspapers, magazines, trade and finance journals, as well as Internet sources, did not identify any articles and/or media references in connection with Nikumbh.

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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 12\_PA. 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. 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. For privacy and confidentiality reasons, the subject’s full date of birth has been omitted from this report, and for the purposes of this investigation, other identification information regarding the subject has been confirmed. [↑](#footnote-ref-3)
4. Research efforts conducted through records maintained by the revealed that <investigator to insert results here>. [↑](#footnote-ref-4)
5. 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-5)
6. <Investigator to insert company registry detail here>. [↑](#footnote-ref-6)
7. 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-7)
8. It should be emphasized that updates are made to these lists on a periodic and irregular basis, and for purposes of preparing this memorandum, these lists were searched on <investigator to insert date of research>. [↑](#footnote-ref-8)