



OSI Report on

AMERICAN PRIMATE SUPPLY COMPANY

August 2023

Overall Risk Rating: YELLOW



Prepared by:

Pacific Strategies & Assessments

TABLE OF CONTENTS

EXECUTIVE SUMMARY	5
PRIMARY SUBJECT: AMERICAN PRIMATE SUPPLY COMPANY	7
SECONDARY SUBJECT: SUBJECT INDIVIDUAL 1	10
ANNEX A: GLOBAL PROPRIETARY DATABASE CHECKS DETAILS	11

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Due to limitations in research scope, OSI reports cannot be relied on to fully determine the gravity of a risk identified. Risk flagging in an OSI is therefore conducted as a preliminary assessment based on the top line summary of an issue or event and is presented on a best-efforts basis only. We note that while the research is thorough, it is typically not possible within an OSI to address the legal or regulatory significance of an issue; its outcome; its relation to other issues; and the precise degree to which an issue attributes wrongdoing to the subject. As such the user is strongly encouraged to request from PSA, or to conduct independently, further detailed research and active remediation of any issues of significance before continuing to conduct business with the Subject. Research in languages other than English is based solely on machine translated media and database results. Under most circumstances, issues older than 10 years are not evaluated or mentioned in OSI reports.

No liability is accepted by PSA for any loss or damage arising from reliance on information contained in this report.

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This is an anonymized sample report used for demonstration purposes. The names of the Subject Company, client, key principals, and other potentially identifying information have all been altered. Any resemblance of the pseudonyms used in this report to real people is unintended.

EXECUTIVE SUMMARY

Overall Risk Rating: YELLOW

- American Primate Supply Company ("Subject Company") was registered in 19XX and is based in Alabama, USA. According to its website, the Subject Company is a supplier of primates for various sectors. American Primate Supply Company was founded by Founder A. Founder A's son Subject Individual 1 is currently registered as the Subject Company's agent. Open media research also identified Founder A as the owner of the Subject Company.
- Animal rights groups named the Subject Company as an unindicted co-conspirator in an ongoing Animal Welfare Act-related case filed by the US Government in 20XX before a US Federal Executive Department relating to the transport of long-tailed macaques without proper veterinary tests between 20XX and 20XX. Animal Rights Group A also claimed that the Subject Company imported hundreds of monkeys to be sold for experiments in 20XX. Animal Rights Group A also published a 20XX report on how the Subject Company abused a small marmoset monkey. These allegations of animal rights violations warrant a YELLOW FLAG for regulatory concerns.
- In 20XX, open media research reported that the Subject Company founder and reported owner Founder A was found guilty of falsifying information and was sentenced to X years of probation and the payment of USD XX,XXX in restitution. The police investigation found that he mailed an envelope containing a threatening letter and white powder to American Primate Supply Company representatives and blamed it on an unspecified animal rights group. In 19XX, Founder A was allegedly contacted by Russians with KGB connections to conduct an illegal shipment of several baby orangutans, which were found in crates in Myanmar that were en route to Russia in 19XX. For this, Founder A was convicted, sentenced to XX months in prison, and fined USD XX,XXX. PSA notes the passage of time. The past criminal convictions of American Primate Supply Company's reported owner warrant a YELLOW FLAG.
- A third-party legal database identified American Primate Supply Company and Subject Individual 1 as co-defendants in an unspecified labor case filed in 20XX before a US District Court. The parties failed to reach an agreement in 20XX, and no further information was found on this case. In 20XX, the Subject Company filed a restraining order against protesters from Animal Rights Group B, but this was denied by a US County Court.
- The Dow Jones RiskCenter database did not return any relevant results pertaining to the Subjects of this report.

Risk Factors		•	•	•
	Bribery and Corruption			•
	Public Bidding Irregularities			•
	Politically Exposed Persons/Government Employees			•
Overt Regulatory Risks	Government Entities/State-Owned Enterprises			•
overt Regulatory Risks	Sanctions or Export Control Issues			•
	Money Laundering			•
	Terrorism Financing or Support			•
	Arms Trafficking			•
	Fraud, Collusion, or Embezzlement			•
	Anticompetitive Practices			•
Cuiminal ou Bagulatam, Violations	Intellectual Property Violations			•
Criminal or Regulatory Violations	Financial Violations			•
	Other Criminal Investigation or Prosecution		•	
	Other Regulatory Issues		•	
	Liquidated, Delisted, or Dissolved Entity			•
	Bankruptcy or Significant Financial Issues			•
Omenational Biolog	Debarred, Disqualified, or Prohibited Person/Entity			•
Operational Risks	Significant Labor Issues			•
	Significant Civil Litigation			•
	Political Risks			•
	Human Rights Violations			•
	Social Responsibility Issues			•
Sustainability, Ethics, and Governance Issues	Environmental Issues			•
JOVCI Hallee 1334E3	Significant Internal Controls or Governance Issues			•
	Reputational Risks			•
Other Risk Factors				•

PRIMARY SUBJECT: AMERICAN PRIMATE SUPPLY COMPANY

American Primate Supply Company ("Subject Company") is a corporation registered in 19XX and is based in Alabama, USA. Subject Individual 1 is registered as the Subject Company's agent. According to its website, the Subject Company is a supplier of primates for various sectors. It also provides primate quarantine, breeding, housing, and other related services.

No shareholding information for American Primate Supply Company was found in official records. However, articles published by US animal rights groups between 20XX and 20XX identified Founder A as the owner of the Subject Company.³ Open media research also identified Founder A as the founder of the Subject Company.⁵

Corporate Registration Information

BASIC COMPANY INFORMATION ⁶	//PANY INFORMATION ⁶	
Company Name	American Primate Supply Company	
Status	Active	
Date of Registration	October 22, 19XX	
Registered Address	Alabama, USA	
Mailing Address	Alabama, USA	
Legal Form	Corporation	
Registration No.	F****	
FEI/EIN No. (Federal Employer Identification No.)	5*-*****	

MANAGEMENT ⁷	
Name	Position
Subject Individual 1	Agent

¹ US Secretary of State

² Link

³ Link

⁴ Link

⁵ Link

⁶ US Secretary of State

⁷ US Secretary of State

English Language Media Searches

English language open-source research was conducted to identify any negative or potentially damaging information related to the Subject.

Animal rights violations

According to reports published between 20XX and 20XX by Animal Rights Group A and Animal Rights Group C, the Subject Company is an unindicted co-conspirator in an ongoing Animal Welfare Act-related case filed in January 20XX by the US Government before a US Federal Executive Department. The Subject Company reportedly transported hundreds of wild-caught, endangered long-tailed macaques and transported them to another country without proper veterinary tests between 20XX and 20XX.^{8 9 10} No further information on this issue was found in the open media.

An undated report by Animal Rights Group A named American Primate Supply Company as one of the worst monkey peddlers, with thousands of monkeys imported from South Korea, Madagascar, and Jamaica in 20XX to be sold for experiments. 11 In a separate 20XX report, Animal Rights Group A detailed how the Subject Company abused a small Emperor tamarin, by removing its uterus, threading electrode leads on its neck and skull, and rough handling which resulted in the stiffening and immobility of its tail. 12

These allegations of animal rights violations warrant a YELLOW FLAG for regulatory concerns.

Criminal convictions of the Subject Company's reported owner and founder

Open media sources dated 20XX stated that American Primate Supply Company's founder and owner Founder A was sentenced to X years of probation and the payment of USD XX,XXX in restitution after he was found guilty of falsifying information when he mailed an envelope containing white powder and a threatening letter addressed to American Primate Supply Company representatives and pinned the blame on an unspecified animal rights group. 13 14 Open media sources also reported that he was convicted, sentenced to XX months in prison, and fined USD XX,XXX in 19XX for smuggling several baby orangutans in small crates found in Myanmar en route to Russia, in an incident known as the Ah Meng Case. Founder A was allegedly

⁸ Link

⁹ Link

¹⁰ Link

¹¹ Link

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¹³ Link

¹⁴ Link

approached by Russians with KGB connections in 19XX to conduct the illegal shipment.¹⁵ PSA notes the passage of time. **The past criminal** convictions of the Subject Company's reported owner warrant a YELLOW FLAG.

Overt Litigation (from Media)

Online searches were conducted to identify any instances of overt litigation pertaining to the Subject Company.

A third-party legal database identified American Primate Supply Company as co-defendant with Subject Individual 1 in an unspecified labor case filed in 20XX by Plaintiff before a US District Court. The parties failed to reach an agreement in their March 20XX settlement, and no further information was found regarding this case.¹⁷

Open media sources dated 20XX indicated that the Subject Company filed a restraining order against protesters from Animal Rights Group B, claiming that the protesters caused American Primate Supply Company's employees emotional distress. The request was denied by a US County Court.¹⁸ ¹⁹

Global Database Checks

A search on the Subject was conducted in the Dow Jones RiskCenter database to identify any sanctions listings, political exposure, SOE status or affiliation, or involvement in human rights violations, fraud, money laundering, financial issues, price fixing, terrorism, or other criminal activities. **No issues of concern were identified.**

¹⁵ Link

¹⁶ Link

¹⁷ Link

¹⁸ Link

¹⁹ Link

SECONDARY SUBJECT: SUBJECT INDIVIDUAL 1

Subject Individual 1 is registered as the American Primate Supply Company's agent.²⁰ Open media sources further identified Subject Individual 1 as the Subject Company's president.²¹ A 20XX report by a US-based animal rights group indicated that Subject Individual 1 is the son of Founder A. The Subject is reportedly a resident of Alabama, USA.²³

English Language Media Searches

English language media and internet searches were conducted to identify any negative or potentially damaging information related to the Subject.

No adverse media was identified.

Overt Litigation (from Media)

Online searches were undertaken to identify any instances of overt litigation pertaining to the Subject.

A third-party legal database identified the Subject as co-defendant in an unspecified labor case filed in 20XX before a US District Court. The parties failed to reach an agreement in their March 20XX settlement, and no further information was found.²⁴

Global Database Checks

A search on the Subject was conducted in the Dow Jones RiskCenter database to identify any sanctions listings, political exposure, SOE status or affiliation, or involvement in human rights violations, fraud, money laundering, financial issues, price fixing, terrorism, or other criminal activities. **No issues of concern were identified.**

²⁰ US Secretary of State

²¹ Link

²² Link

²³ Link

²⁴ Link

ANNEX A: GLOBAL PROPRIETARY DATABASE CHECKS DETAILS

GLOBAL DATABASE INTEGRITY CHECK DETAILS	
1. International PEP Databases	2. Government Prohibited Persons and Entities
Legislation such as the FCPA and Section 312 of the USA PATRIOT Act require the identification of foreign Politically Exposed Persons (PEPs). The PEP databases used contain records of current or former senior ranking public officials, including government officials and politicians. Where possible, searches cover local public officials, as well as relatives, close associates, and corporate affiliations of PEPs.	The entities in this database are under international sanctions or are otherwise prohibited as business partners due to their connection to terrorism, money laundering, arms trafficking, rogue regimes, or similar activities. Datasets include sanctions lists from the United Nations, EU, and 37 countries, as well as additional exclusion lists from the World Bank, Interpol, the International Criminal Court, and 62 countries.
3. Corruption and Bribery Databases	4. Terrorism Risk Database
Databases focus on individuals in public positions who have allegedly abused their position and are reported to have been arrested on suspicion of, charged with, or convicted of corrupt activities, including bribery, kickbacks, and breaches of trust. This includes information from corruption commissions, crime stoppers programs, attorney-general's offices, interior ministries, intelligence agencies, and lists such as the World Bank Debarred Party List.	Databases used contains individuals arrested on suspicion of, charged with, or convicted of acts relating to terrorism. This category includes individuals associated with or influenced by terrorist organizations not necessarily acting on those organizations' behalf. Activities also include financing of terrorist acts or organizations. Individuals are further identified through extensive and up-to-date adverse media databases and additional searches.
5. Financial Regulatory Risk	6. Serious and Organized Crime Databases
Databases include individuals and entities involved in corruption, fraud, sanctions, and regulatory issues, as well as any related adverse media. This also includes enforcement orders, warnings, reports, investigations, and allegations issued by regulatory authorities and supervisory bodies.	Databases include lists of individuals and entities associated with potentially serious crimes and high-level cases, including organized crime, trafficking, and narcotics offenses. The dataset includes more than 50,000 "wanted" notices worldwide.
7. Global Social and Environmental Misconduct	8. Corporate Fraud and Financial Risk
Databases include individuals and entities connected to misconduct including, but not limited to, discrimination and workforce rights, human rights abuses, workplace health and safety issues, environmental issues, product and service quality issues, and production and supply chain issues.	Databases include corporate entities and private individuals involved in financial crime activities such as fraud, theft, money laundering, tax evasion, and other tax-related offences. These results are then enhanced by adverse media databases and to further identify potential misconduct and risks.
9. State Owned Entities and Connections	10. Competition and Infringement Risks
Databases used track business organizations with a corporate structure for which the supra-national, national, region, provincial, or local governments hold >1% of issued shares, majority voting control, and/or have the power to appoint positions. This includes subsidiaries, assets, branches, and board members associated with SOEs.	Searches include official reports and media sources related to allegations or evidence of monopolies, antitrust, restrictive, and other unfair competition issues. These searches also include reported disagreements over patents, copyrights, and intellectual property, allegations of trade secret theft, and abuses of privacy laws.



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