

CRISS-CROSS 8

Anti Money Laundering Intelligence report

Amsterdam Trade Bank N.V.

- Argon Industries SA
- Bank of New York BoNY
- Bradley International Ltd
- Commercial Bank Trust and Investment
- Dean Trading Ltd
- Farmerston Enterprises Ltd
- First Curacao International Bank NV
- Foster Intertrade Ltd
- Gazprom
- Gilford International SA
- GNC
- GNC Holding Ltd
- Intertrade European Holding Ltd
- Lelop Ltd
- Marcom Management Ltd
- Marshall International Ltd
- Matim Trading Ltd
- Menatep Bank
- Menatep Ltd
- Menatep Asset Management Ltd
- Milford Holdings Ltd
- Mutual Trust Management MTM
- Odin Investments Ltd
- OCT Consult & Trading Establishment
- Pecunia Universal Ltd
- Petrochemical Holding AG
- Porko Ltd
- Reygiend Holding Ltd
- Rohil Ltd
- Rosewood Ltd
- Sibirsko Uralskya (Sibur)
- SNC
- Stanford Industries SA
- Vadamo Trading Ltd
- Valmet SA
- UBS AG filiaal USA

Content

1	Intelligence Report Subjects	5
1.1	Company subject:	5
1.1.1	Amsterdam Trade Bank NV	5
1.2	Private Subjects:	5
1.3	SMOLENSKY, Aleksandr Pavlovich;	5
1.4	FRIDMAN, Mikhail Maratovich;	6
2	Introduction	7
3	Research file CRISS-CROSS 8 a-b	8
3.1	Short description	8
3.2	Status investigation	8
3.3	Conclusion	9
4	Research file CRISS-CROSS 8 c	10
4.1	Introduction	10
4.2	General analysis of suspicious transfers	10
4.3	Specific analysis suspicious transactions	11
5	International Legal Request for Help Russia	12
6	Gazprom versus Sibur (open source)	13
7	Sources	16
	Appendix: Schematics	17
	Appendix: Ultrascan	19

Status intelligence report:

This file contains sensitive and restricted material, which is privileged and strictly confidential and is only for the use of the addressee(s) mentioned below (FAO). The unauthorised use, disclosure or copying of this intelligence report or such information is strictly prohibited and could, in certain circumstances, be a criminal offence.

For the attention of: XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

Source: A / B (A: closed source - B: open source)
Information: 1 / 2 (1: author's intelligence gathering - 2: others)
Handling code: A1 (A1: sensitive and restricted)

Date: Wednesday, September 28, 2009
Place: Amsterdam, Netherlands
Authors: M. Becker, F. Engelsman

1 Intelligence Report Subjects

This intelligence report concerns the following subjects:

1.1 Company subject:

1.1.1 Amsterdam Trade Bank NV

- HQ based Amsterdam, Netherlands.
- Herengracht 475, 1017 BS Amsterdam, Netherlands
(http://en.wikipedia.org/wiki/Amsterdam_Trade_Bank)
- aka Stolichny Bank
- aka SBS-Agrobank
- affiliate SBS-Agro Finance BV
- affiliate Amsterdam Capital Administration Corporation BV
- subsidiary ALFA Bank, Moscow, Russian Federation
(http://en.wikipedia.org/wiki/Alfa_Group)
- former subsidiary Stolichny Bank, Moscow, Russian Federation

1.2 Private Subjects:

1.3 SMOLENSKY, Aleksandr Pavlovich;

- dob. 06/07/1954
- pob Moscow, Russia (Алекса́ндр Па́влович Смоле́нский)

Picture 1: Smolensky, A.P.



1.4 FRIDMAN, Mikhail Maratovich;

- dob 21/04/1964
- pob unknown, Russia (Миха́йл Ма́ратович Фри́дман)

Picture 2: Fridman, M.M.



2 Introduction

Ultrascan AGI is an association of 51 partners that works together with over 3200 experts in 69 countries researching, among other subjects, Advanced Fee Fraud, Corporate Identity Theft and Anti Money Laundering.

In general, Ultrascan AGI researches and disrupts Open Source Criminal Networks (OSCN). OSCN are cross-border criminal networks that have access to free or very cheap resources to conduct their criminal activities. Profits are shared afterwards.

In the period 1998-2009, Ultrascan conducted many investigations researching electronic money laundering and embezzlement of hundreds of millions of dollars and euro, through electronic criss-crossing in multiple Anti Money Laundering (AML) cases. Dutch banks, Dutch subsidiaries of foreign banks and trust companies are major players in these money laundering schemes.

In one of our investigations (CRISS-CROSS 8) the in Amsterdam, The Netherlands based Russian bank, **Amsterdam Trade Bank NV (ATB)** appears. This bank pops-up in multiple investigations, also in intelligence based investigations of police forces and intelligence services of Russia, Netherlands, Israel, France, England and the US.

CRISS-CROSS 8 is part of an ongoing investigation, CRISS-CROSS 1 (1998-). The Amsterdam Trade Bank NV also surfaces in investigation CRISS-CROSS 3 (2004-2008), based on a request for additional information regarding Stanford International Bank Antigua.

The ATB is frequently mentioned in a number of Russian international requests for legal assistance. In these requests the ATB surfaces as a link in a flow of funds from Russia to other countries.

The above mentioned investigations are presented as cases that give a detailed overview about the ATB's activities. The cases will portray a bank that has participated in criminal structures and has facilitated money laundering and capital flight from Russia.

This form of money laundering needs to be distinguished from the concept "considerable presumptuousness". In this case the bank consciously supports money laundering and capital flight, by knowingly executing certain actions on behalf of clients. The bank is part in or acts as a facilitator for money laundering of non-fiscal assets, a role for which it can be prosecuted.

Complementary information is not included in this document for reasons of clearness.

3 Research file CRISS-CROSS 8 a-b

3.1 Short description

Based upon the past administration of multiple subjects in 1999, 2000 and 2001, a number of transactions were noticed that could be categorized as unusual.

It concerns electronic flows of funds from Russia, Switzerland and Cyprus that are being transferred via the ATB to legal entities in the Dutch Antilles, Isle of Man, US, Switzerland and Russia. Several of the beneficiary companies in this carousel are connected. Several countries that are used in this construction are often named with regards to the international practice of money laundering. In criss-cross 8 a-b it concerns so-called criss-crossing, splitting and merging multiple different electronic transfers of funds.

3.2 Status investigation

Additional research has been done.

- A. About a hundred transfers show the following picture. Basically it concerns international, cross-border transfers of funds, a normal procedure.

It concerns transactions with a total value of \$94.000.000, that were received by the ATB from the Russian Trust and Investment Bank, acting on behalf of a secret/unknown principal. The Trust and Investment Bank acts on behalf of another Russian Bank, Menatep Bank, that went broke during the Russian credit crisis in the nineties. The sum was deposited into the account of the Cypriot company Menatep Asset Management Ltd. This company instructs the ATB to transfer US \$10.000.000 to IoM based Pecunia Universal Ltd. that holds accounts with UBS AG USA and First Curacao International Bank NV. The remaining US \$84.000.000 is directly wired, in several transactions, from the company's ATB account to Pecunia Universal Ltd. and others. It is assumed that almost the entire US \$94.000.000 ended up with Pecunia Universal Ltd., that is linked with Chodorkovsky.

- B. Here it also concerns normal international, electronic cross-border money transfers.

It concerns in and outgoing transactions valued at respectively \$109.000.000 and \$181.000.000, handled by the ATB for the account of Menatep Asset Management Ltd. The incoming transactions originate from the aforementioned Trust and Investment Bank, Russia, Menatep Ltd, Switzerland, and Roseword Ltd, Cyprus. All acted on behalf of unknown principals. The total incoming sum was transferred into the ATB account of Menatep Asset Management Ltd. This company is probably linked to Trust and Investment Bank, which took over all activities of Menatep Bank.

Menatep Asset Management Ltd. then instructs the ATB to transfer \$181.000.000, split over several transactions, to Pecunia Universal Ltd Isle of Man, Menatep Ltd Switzerland and Joint Commercial Bank Trust and Investment.

3.3 Conclusion

The transactions are random and, at first sight, there seem to be no connections between them.

However, it occurs that the same companies that transfer money are also receiving money. It also occurs that some companies are linked to the Financial-Industrial Group of Chodorkovsky (Menatep) and Valmet SA. There are clear signs of cross links. Based on the information it can be concluded that Pecunia Universal Ltd (Isle of Man), and Menatep Ltd. (Switzerland), on behalf of the Chodorkovsky group, are the ultimate beneficiaries. These companies were established by Valmet SA with the goal of facilitating embezzlement, money laundering and capital flight.

See Appendix for a schematic overview.

4 Research file CRISS-CROSS 8 c

Investigations CRISS-CROSS 8 c is part of the ongoing investigation CRISS-CROSS 1.

4.1 Introduction

As a result of investigation CRISS-CROSS 8 a-b additional research has been started. This research showed an additional 200 unusual transfers, which have been investigated in CRISS-CROSS 8 c.

Of the suspected transactions more than half were executed by the Amsterdam Trade Bank NV. The transactions total about 660.000.000 Euro.

As was shown in the chapter 3, the ATB is linked again to suspected transfers, and two of the ultimate beneficiaries were linked to the trust company VALMET SA and group Menatep (Michael Chodorkovsky c.s.).

4.2 General analysis of suspicious transfers

About 95% of the 100 transactions that were executed by the ATB concerned electronic transfers, and 5% cash. There are also a small number of transfers to so-called code/number accounts in Liechtenstein, Israel, Italy and Germany. Code/number accounts hide the true entity of the beneficiary. Only the bank and the client know the specific code/number of the account. Also well-known money laundering countries such as Panama, BVI, Russia and Cyprus surface again. These are being used to pump around money and hide the ultimate beneficiaries. Other ways of concealment are to omit certain transaction information, to make use of P.O. Box addresses or statutory addresses.

Looking at the parties involved (source and destination) it can be concluded, that at least Gazprom, Sibur and Menatep or linked companies, were traced. Menatep and linked companies are also acting in other CRISS-CROSS investigations, notably 8a and 8b.

It also occurs that many transactions follow one another within a small time span and are nominally identical. For example, A transfers money to B, C and D within a couple of days. B, C and D do the same and the total sum will eventually reach the ultimate beneficiary. This really is electronic criss-crossing, splitting and merging flows of funds using linked companies in an international money laundering setting

This is for the really interested: many ATB transactions that were subject of this investigation were routed through a correspondence bank, The Bank of New York. Although using a correspondence bank is normal, the period when the transactions took place, the involvement of the Bank of New York, Russian companies and Russian subjects, and the fact

that the Bank of New York was involved in a \$7.000.000.000 money laundering scandal, raises at least some suspicions.

By reporting the unusual transactions, based upon the Dutch MOT/AML law, The Amsterdam Trade Bank NV has protected itself against criminal proceedings. However, the number of transactions, the total sum of the transactions, 660.000.000 Euro, and our information does make things seem suspicious. Knowing that the ATB is also a subject of the Dutch intelligence service AIVD, one can conclude that the ATB at least sometimes acts as a facilitator for money laundering activities.

4.3 Specific analysis suspicious transactions

All suspicious transactions are put into a schema., which is part of this report. It concerns transfers, transaction dates, receiving and transferring companies.

When necessary TEXT HAS BEEN CHANGED OR OMITTED BECAUSE OF ONGOING INVESTIGATIONS.

The schematic is a representation of the general analysis.

In the schematic you will see that many transactions follow one another unchanged in value or currency within the structure. The schematic also shows that many transactions are subsequent.

A number of entities in the schematic appear to fulfill a specific role in the money carrousel:

- Rohil Ltd (start point)
- Vadamo Trading Ltd (link)
- Farmerston Enterprises Ltd (link)
- Marcom Management Ltd (link)
- Argon Industries SA (link)
- Odin Investments Ltd (link)
- Petrochemical Holding AG (link and end point)
- Sibirsko Uralskya (Sibur) (end point)

All other entities and transactions that are not mentioned in this list appear in the schematic.

5 International Legal Request for Help Russia

Following informal contacts with Russian authorities and authorities of other involved countries we found that Russia through international requests for legal assistance, is trying to get more information about suspicious transactions.

One of these request mentions companies and a linked person that also surfaces in chapter 4.

Name subject: **GOLDOVSKY**, Yakov Igorevich, voormalig president van JSC SIBUR

Companies: Joint Stock Company Sibur
Gilford International SA, Panama,
Argon Industries SA, Panama,
Dean Trading Ltd, Mauritius,
Farmerston Enterprises Ltd, Cyprus,
Vadamo Trade Ltd, Cyprus,
Lelop Ltd, Cyprus,

6 Gazprom versus Sibur (open source)

Gazprom – The New Russian Weapon" by Valery Panyushkin and Mikhail Zygar
By Grigory Pasko, journalist

Recently, the Russian mass media reported that Gazprom head Miller had met with president Putin to report about the current situation in the company Gazprom and about its prospects. The report concerned three hot topics: the fate of the pipelines leading to Europe, the increase in the price for Central Asian gas, and deliveries of the raw material to the republics of the former USSR.

For example, Miller told the President that he considers “very timely” the realization of two new gas transport projects – “North Stream” and “South Stream”.

About the fact that the company Gazprom has problems, the mass media did not report. Which got me thinking: do Russian citizens even find it interesting at all to know something about Gazprom? I came to the conclusion that no, they don't find it interesting. Because Russians have long ago accustomed themselves to the fact that Gazprom – this is not a Russian company in the sense that its assets and capital belong to all Russians, but rather a private company, belonging to a narrow circle of persons. And indeed, Gazprom treats the gas it produces as if though this gas – does not belong to all of Russia, but to Gazprom itself.

In a just-published book, several authors have attempted to tell the story of what exactly this Gazprom is all about. "Gazprom – The New Russian Weapon" That's the name of the book, which was written by the journalists Valery Panyushkin and Mikhail Zygar, joined by Irina Reznik. In Russia, the book was published by "[Zakharov](#)", [ISBN 978-5-8159-0789-8] but Russia did not become the first country where it appeared on the bookshelves. The first place it came out was in Germany. In the near future, it will also be available in France, Spain, Latvia, Estonia, Slovenia, Poland, and Ukraine. The book is interesting and informative, but in my opinion it leaves quite a number of things unsaid. Every now and then, you encounter such a passage in the book: former employees of Gazprom did not speak with the authors about this or that event from the life of this gigantic corporation-monopolist on the grounds that “not everything can be said” – intimating at “higher spheres” and that one could get killed for telling the truth about Gazprom. (Already in the preface, the authors write: “The first words that former Yeltsinite acting prime minister Yegor Gaidar told us... were: “You don't understand that they'll kill you? Do you understand what you're getting yourselves into?”)

In Russia, they can kill a journalist not only for telling the truth, but even for an attempt to get too close to it. Judging by the fact that all three of the book's authors are still alive and well, we can assume that they didn't even manage to get close to the truth about Gazprom. Perhaps this was a conscious decision on their part. But even this general and superficial survey of the country called Gazprom is enough, in my opinion, to form yet another

impression about Russia – a country with a lying and corrupt leadership through and through. A reader previously unfamiliar with the subject will discover all sorts of hitherto unheard-of hidden truths about Soviet-Russian methods of running the economy and managing large companies. For example, he will learn the favourite saying of the former chairman of the Gazprom management board, Vyacheslav Sheremet: “Whatever you may be talking about, you’re talking about money”. They’ll learn in what conditions gas is produced; about under-the-rug Kremlin intrigues; about the machinations and ways and means of “grab-and-run privatization” [the clever Russian made-up term for this is “prikhvatizatsiya”, which sounds almost exactly the same as “privatizatsiya”—Trans.] of the national wealth; about today’s state of affairs in the empire known as Gazprom.

Let’s take things in order. With the collapse of the Soviet Union, as the authors tell us, Gazprom, producing more than 800 billion cubic meters of gas per year and occupied first place in the world by volumes of production, having a network of pipelines 160 thousand kilometres in length, possessing 350 compressor stations, 270 field gas processing facilities, several thousand wells and dozens of underground storage sites, lost a third of its pipelines, a third of its gas fields, and a quarter of its compressor station capacity. From the text it can be seen that the main role in saving Gazprom from falling apart was played by its chief, Viktor Chernomyrdin, who later became prime minister, and is now the Russian ambassador in Ukraine. (In describing the scene of the session of the government of the RF in the year 1992, where the fate of Gazprom was being decided, the authors for some reason indicate that taking part in the meeting was the deputy minister of fuel and energy, “then still a banker”, Mikhail Khodorkovsky, “who had apparently already decided to get into oil”. This reminded me of the well-known saying “In the orchard there’s an elderberry tree, in Kiev there’s an uncle”) [explanation: two completely unrelated facts made to appear as if though they are connected simply by virtue of being stated together—Trans.].

The gratuitous mention of Khodorkovsky is strange also because in the middle of the book there is a story about the fate of the president of SIBUR, Yakov Goldovsky. Goldovsky was arrested right in the Gazprom building on Nametkin street in Moscow, when he came to be received by today’s Gazprom head Miller. They held Goldovsky in jail until he signed a note that he would transfer to the structures of Gazprom the shares in ten or so petrochemical enterprises. This note became a “get-out-of-jail card” for him. Nowadays, Goldovsky is living in Vienna. Since the authors decided to mention Khodorkovsky, then they could have connected the story of the head of YUKOS with the story of Goldovsky: in essence, Goldovsky was the first victim of the insatiable Putin team.

The book, I will note, is an interesting read. The essence of the famously convoluted subject of the book is that the captains of the old guard – people like Chernomyrdin and Vyakhirev – did everything possible to resist the onslaught of the young reformers such as Chubais, Fedorov, and Nemtsov, and managed to preserve the gas empire, to save it from falling apart, but were unable to withstand the onslaught of Putin and his cronies: Gazprom became their property.

In the part concerning a description of the transfer of Gazprom property into the hands of Putin and his friends, there are several fascinating facts in the book. For example, there is the following paragraph in the book: "They say that supposedly already in the autumn of the year 1999, director of the FSB Vladimir Putin was insinuating to decision-makers (Alexander Voloshin, Boris Berezovksy) that he does not want to become premier and president, but wants to head Gazprom." Maybe it really was like that. However, what brings attention to itself is the blatant inaccuracy the authors let slip by: in the autumn of 1999, Putin was already chairman of the government of the Russian Federation, and not director of the FSB.

The description of how chairman of the Gazprom board of directors Dmitry Medvedev presented the new chairman of the management board of the company, Alexey Miller, is interesting – "a nervous functionary with a puny moustache. Several years will pass before the new head of the gas concern acquires a calm pretentiousness, loses the moustache, and picks up a radiant smile." I don't know what feelings this functionary evokes in the authors of the book, when I look at him, everything about Miller screams that he is a to-the-core subservient person.

"At that moment", the authors of the book draw a conclusion, "President Putin scored his first big victory in the entire presidency. At the head of the largest company of the country turned out to be a person absolutely loyal to Putin personally."

7 Sources

- Research file CRISS-CROSS 1
- Research file CRISS-CROSS 8 a b c
- International Legal Requests Russia
- "Gazprom – The New Russian Weapon" written by the journalists Valery Panyushkin and Mikhail Zygar, joined by Irina Reznik. In Russia, the book was published by "[Zakharov](#)", [ISBN 978-5-8159-0789-8]

Appendix: Schematics

Appendix: Ultrascan

'Knowledge itself is power' -

SIR FRANCIS BACON (*Meditationes Sacrae* – 1597)

Ultrascan Research Services

'The illiterate of the 21st century will not be those who cannot read and write but those who cannot learn, unlearn and relearn' –

ALVIN TOFFLER

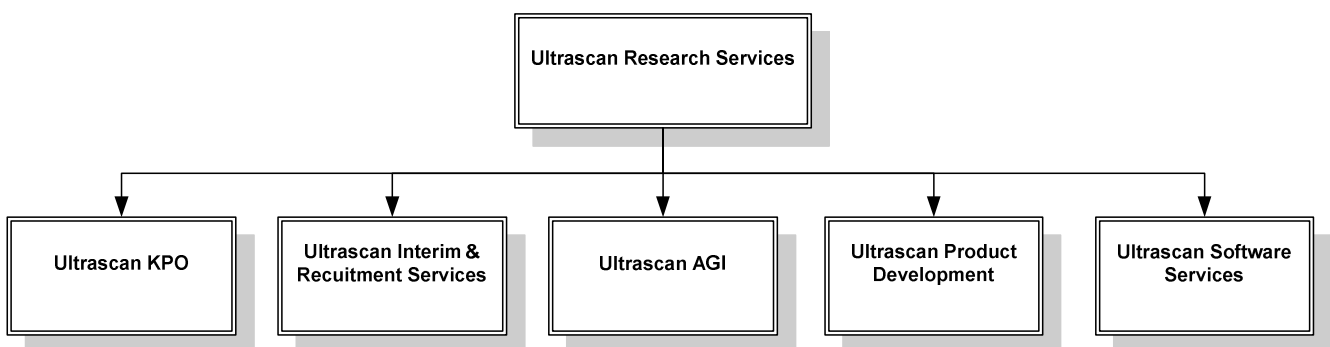
Introduction

Ultrascan is an international research organization with over 3200 experts in 69 countries. Ultrascan has been established in 1996.

What sets Ultrascan apart is its "feet in the street". Ultrascan not only employs academics, but also doctors, physicians and ex Law enforcement personnel, a powerful mix of science and streetwise skills. 90% of our experts are local: they speak the language and have a vast network in their home country.

Ultrascan services can be divided in three categories:

1. Ultrascan Knowledge Process Outsourcing (KPO) Services;
2. Ultrascan Interim & Recruitment Services;
3. Ultrascan Advanced Global Investigations (AGI);
4. Ultrascan Product Development;
5. Ultrascan Software Services.



Ultrascan Knowledge Process Outsourcing Services

'**Knowledge itself is power**' is the world famous aphorism by Sir Francis Bacon. Nowadays, in our information society, this aphorism is often translated in '**Information** is power'.

In Ultrascan's vision information is build upon knowledge, and power is build upon information.

In our view knowledge is more about the objective facts, which translates in information, which also includes the more subjective facts (e.g., your own feelings).

Gathering knowledge should be the basis of every company process and decision. But gathering knowledge can be a daunting task in our international world. Not every company has the resources to do so. There may also be other valid reasons for companies to not undertake the knowledge gathering by themselves: company A would not like company B to know it is researching company B regarding a possible takeover.

Or a bank does not have the resources and skills to research and disrupt the corporate identity fraud it fell victim too.

In such situations and of course many others, it is worth considering Ultrascan KPO Services or the services of Ultrascan Advanced Global Investigations.

There are several advantages to using KPO firms. By outsourcing non-core business activities, organizations will definitely save a great deal of money and time. There is no time and there are no resources lost to acquire necessary skills. Businesses can also gain more operational efficiencies because they can focus on the key growth areas of their industries instead of spending time and manpower on basic research and development.

KPO could be considered a high-end activity of the business process outsourcing (BPO) industry. There are several differences between the two, however. Where KPO is about intellectual and analytical processes completed by educated and trained employees, BPO is about standardized routine processes done by workers with minimal skills.

Ultrascan Interim Services

While executing its KPO and AGI services, Ultrascan has met and has been working with many skilled people.

We have an extensive international network of highly educated and trained professionals. Many of them have dealt with sensitive information during their careers.

Ultrascan Interim Services can help you finding the right trustworthy person.

Ultrascan Advanced Global Investigations

Ultrascan AGI focuses on researching and disrupting global Open Source Criminal Networks (OSCN).

An OSCN can be defined as:

- Open Source - all resources to perpetrate a crime are for free (or exceptionally low priced) available, profits are shared afterwards;
- Cross border - perpetrator and victim are in different jurisdictions;
- Criminal Networks - perpetrators operate anonymously in their network.

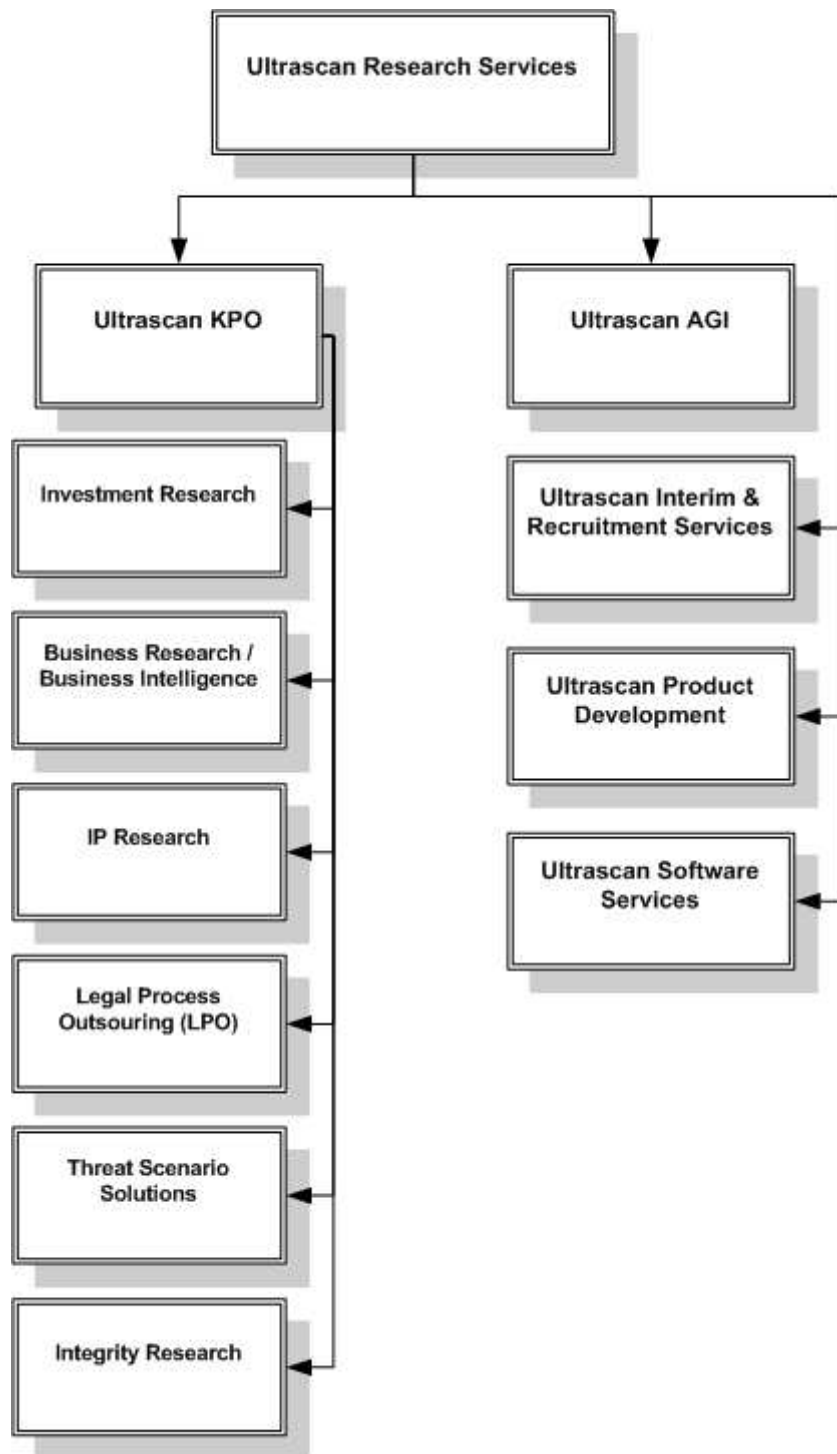
Ultrascan has been offering its services for over 13 years.

Ultrascan KPO Services

Knowledge process outsourcing (KPO) is a form of outsourcing, in which knowledge-related and information-related work is carried out by workers in a different company or by a subsidiary of the same organization, which may be in the same country or in an offshore location to save cost. Unlike the outsourcing of manufacturing, this typically involves high-value work carried out by highly skilled staff. KPO firms, in addition to providing expertise in the processes themselves, often make many low level business decisions—typically those that are easily undone if they conflict with higher-level business plans. (Source: Wikipedia)

Ultrascan Advanced Global Investigations

"Knowledge is the most democratic source of power." -
ALVIN TOFFLER



Ultrascan Advanced Global Investigations

Acting for lawyers, businesses, financial institutions, government departments and private individuals, Ultrascan provides advanced investigative solutions in such areas as card fraud, money laundering, asset tracing, and counterfeiting.

provided by . .

Based in Amsterdam and Paris, Ultrascan has highly productive units concentrating specifically on investigations, detection and disruption. We offer a most personal service from loyal and committed staff. We are equally adept in virtually all jurisdictions, including those in which a corporate veil is promoted on a governmental level.

You will find our friendly staff helpful and direct. We will quickly tell you whether we can assist and which of our services may help in your particular case.
All enquiries are dealt with in strictest confidence.

Ultrascan Advanced Global Investigations

"Knowledge is the most democratic source of power." -
ALVIN TOFFLER

