

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Tuesday, June 26, 2018 4:29 PM
To: [REDACTED] <[REDACTED]@bank.com>
Cc: [REDACTED] <[REDACTED]@bank.com>; [REDACTED] <[REDACTED]@bank.com>; [REDACTED] <[REDACTED]@bank.com>; [REDACTED] <[REDACTED]@bank.com>
Subject: RE: Hudson West III - Wire Transfer Order \$1MM to OWASCO LLC
Importance: High

Hi [REDACTED]

We have been monitoring the subject customer due to the PEP designation and observations on the account activity as well as recent negative news indicate this entity to be high risk.

Since the initial funding of \$5,000,000.00 from Northern International Capital Holdings (HK) Limited on 08/08/17 as a business loan, it was noted that there was no loan agreement document submitted. The funds in the account have primarily funded 16 wires ranging from \$157,494.19 to \$400,000.00 totaling \$2,915,375.25 to [REDACTED] CLEARING SERVICES LLC (Further credit Owasco PC – Law Firm in D.C). These payments were indicated as management fees and reimbursements. We find it unusual that approximately 58% of the funds were transferred to the law firm in a few months and the frequency of payments appear erratic. It was also previously indicated that HUDSON WEST III LLC does not currently have any investment projects at this time, which raises further concerns as millions in fees are being paid but does not appear to have any services rendered by Owasco PC. Furthermore, there has been negative news regarding the beneficial owner of Owasco PC, Robert Hunter Biden (son of former U.S. Vice President - Joe Biden) regarding allegations by his ex-wife that there were financial concerns about his extravagant spending on his own interests (drugs, strip clubs, prostitutes, etc.) which may put his family in a deep financial hole. More recent negative news indicate China targeting children of politicians and purchase of political influence through "sweetheart deals". Specifically, Hunter Biden's \$1.5 billion dollar deal with the Chinese-State to establish a private-equity firm in which they manage the funds over time and make huge fees. The management company's purpose is to invest in companies that benefit Chinese government. Thus, the activity on the account appears unusual with no current business purpose and along with the recent negative news (along with the negative news regarding Dr. Patrick Ho Chi Ping's trial in the below email) may require re-evaluation of [REDACTED] relationship with the customer. For your comment.

- <https://www.wsj.com/articles/author-alleges-china-used-business-deals-to-influence-families-of-mitch-mccconnell-joe-biden-1521141489>
- <http://www.breitbart.com/radio/2018/03/20/schweizer-reveals-bidens-sons-massive-deal-chinese-company-trying-steal-americas-nuclear-secrets/>
- <https://www.westernjournal.com/flashback-biden-family-exposed-sordid-tale-cocaine-debt-prostitutes/>
- <https://www.usmagazine.com/celebrity-news/news/hunter-bidens-ex-accuses-him-of-spending-thousands-on-prostitutes-drugs-w470151/>

[REDACTED]