

Date: 1st September 2015
Ref: AML/2015/57

Mr. Abdulrahim Mohamed Al Awadi
Executive Director
Head of Anti-Money Laundering & Suspicious Cases Unit
Central Bank of the U.A.E.
Abu Dhabi – U.A.E.

"After Greetings"

Please find attached our STR on the below customer:

Sr. No.	Customer Name	STR Reference No
1.	M/s. Onecoin Limited; M/s. Prosperia FZE Mr. Martin Rudolf Alexander Breidenbach; Dr. Ruja Ignatova Mr. Karl Sebastian Greenwood	AML/2015/57

In view of the salient points highlighted in our STR, we consider the account activity suspicious. We are reporting our suspicion as required by law and we are in process of exiting the relationship in line with FATF Recommendations (Feb 2012).

Please do not hesitate to contact us, in case you require any further details. Assuring you of our utmost cooperation at all times.

Yours sincerely,


Nadeem Humayun
Manager Compliance & MLRO
AML & Sanctions Unit
Audit, Fraud & Compliance Group
Mashreq
Dubai Outsource Zone,
INJAZ, Building 1,
Tel: 04-4246626
Email: NadeemH@mashreq.com

SUSPICIOUS TRANSACTION REPORT

Full name of customer:

M/s. ONECOIN Limited;
 M/s. PROSPERIA FZE
 Mr. Martin Rudolf Alexander Breidenbach;
 Dr. Ruja Ignatova
 Mr. Karl Sebastian Greenwood

Details of license:

M/s. ONECOIN Limited - Trade License Number IC20140882 issued by RAK International Companies free Trade Zone, Government of Ras Al Khaimah; M/s. PROSPERIA FZE - Trade License Number 49012014 issued by Government of Fujairah;
 Mr. Martin Rudolf Alexander Breidenbach - Passport Number CF3P1YC2V Issued by the Government of Germany;
 Dr. RUJA IGNATOVA - Passport Number C41TMRCCD Issued by Government of Germany.
 Mr. Karl Sebastian Greenwood - Passport Number 89920987 Issued by Government of Sweden.

Address / Known Address :

M/s. ONECOIN Limited

Reef Tower Bldg. Office No. 801
 Jumeirah Lake Towers Area, PO
 Box 62201, Near Dubai Marina
 Mall,
 Dubai, U.A.E.
 Tel no: 00971-44486010

M/s. PROSPERIA FZE

Reef Tower Bldg. Office No. 801

Near Dubai Marina JLT Area, PO Box 62201,
 Dubai, U.A.E.

Tel: 00971-44486010

Dr. Ruja Ignatova

Trident Grand Bldg., Flat 4001,
 Dubai Marina St., PO Box 4422,
 Dubai, U.A.E.
 Tel: 00971-527298426

Mr. Karl Sebastian Greenwood

Trident Grand Bldg., Flat 4001,
 Dubai Marina St., PO Box 4422,
 Dubai, U.A.E.

Mob: 00971 - 0555912937

Mr. Martin Rudolf Alexander
Breidenbach

Herzogstr. 63
 PO Box 80803, Munich
 Germany

*Both entities are linked through common beneficial owner and share the same Office address.
 ** Dr. Ruja Ignatova and Mr. Karl Sebastian Greenwood are sharing same address.

Amounts of suspicious transactions:

Customer	Mashreq Account	Currency	Credit Turnover since 01-Jul-2014 till 29-Jul-2015	Debit Turnover since 01-Jul-2014 till 29-Jul-2015
M/s. ONECOIN Limited	019100062895	AED	20,855,034.94	20,025,666.38
M/s. ONECOIN Limited	019100062982	USD	53,729,759.31	5,420,299.50
M/s. ONECOIN Limited	019100084477	EUR	98,563,007.79	83,705,607.28

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Customer	Mashreq Account	Currency	Credit Turnover since 01-Nov-2014 till 30-Jul-2015	Debit Turnover since 01-Nov-2014 till 30-Jul-2015
Dr. Ruja Ignatova	019100078941	AED	1,228,000.24	407,308.10
Dr. Ruja Ignatova	019100078942	EUR	930,953.94	284,700.33

Customer	Mashreq Account	Currency	Credit Turnover since 01-Jul-2014 till 30-Jul-2015	Debit Turnover since 01-Jul-2014 till 30-Jul-2015
M/s. PROSPERIA FZE	019100057798	AED	9,200.00	8,600.00
M/s. PROSPERIA FZE	019100057854	USD	160,048.70	120,874.04
M/s. PROSPERIA FZE	019100057855	EUR	5,009,936.61	25,018.84

Source of Suspicion:

M/s. ONECOIN Limited established business relationship with the Dubai Internet City branch of Mashreq in Dubai on 26-Jun-2014.

Dr. Ruja Ignatova established business relationship with the Umm Suqeim branch of Mashreq in Dubai on 16-Nov-2014.

M/s. Prosperia FZE established business relationship with the Dubai Internet City branch of Mashreq in Dubai on 15-May-2014.

Mr. Karl Sebastian Greenwood established business relationship with the Umm Suqeim branch of Mashreq in Dubai on 8-Oct-2014.

Line of Business(es) as per bank records :

M/s. ONECOIN Limited – Management Consultancy

M/s. Prosperia FZE – Business Management Consultancy

BENEFICIAL OWNER DETAILS

Following are the details of the beneficial owner of M/s. ONECOIN Limited:

Name	Ownership %	Nationality	Passport No.	Expiry Date	Date of Birth
Martin Rudolf Alexander Breidenbach	100	German	CF3P1YC2V	27-Mar-2023	22-Apr-1967
Dr. Ruja Ignatova	POA	German	C4TTMRCOC	20-Dec-2020	30-May-1980
Karl Sebastian Greenwood	POA	Sweden	89920987	8-Jun-2020	29-Dec-1976

Following are the details of the beneficial owner of M/s. Prosperia FZE:

Name	Ownership %	Nationality	Passport No.	Expiry Date	Date of Birth
Martin Rudolf Alexander Breidenbach	100	German	CF3P1YC2V	27-Mar-2023	22-Apr-1967
Dr. Ruja Ignatova	POA	German	C4TTMRCOC	20-Dec-2020	30-May-1980
Nicholas David Cully	POA	British	099267359	01-Jun-2022	06-Sep-1982

Following are the accounts maintained by M/s. ONECOIN Limited:

Mashreq Account No.	Account Type	Currency	Date Account Opened	Account Status	Credit Turnover since 01-Jul-2014 till 30-Jul-2015
019100062895	Current	AED	26-Jun-2014	Active	20,855,034.94
019100062982	Current	USD	26-Jun-2014	Active	53,779,759.31
019100084477	Current	EUR	06-Jan-2015	Active	98,563,007.79

Following are the accounts maintained by M/s. PROSPERIA FZE:

Mashreq Account No.	Account Type	Currency	Date Account Opened	Account Status	Credit Turnover since 01-Jul-2014 (Inception) till 30-Jul-2015
019100057798	Current	AED	15-May-2014	Active	9,200.00
019100057854	Current	USD	15-May-2014	Active	160,048.70
019100057855	Current	EUR	15-May-2014	Active	5,009,936.61

Following are the accounts maintained by Mr. Karl Sebastian Greenwood:

Mashreq Account No.	Account Type	Currency	Date Account Opened	Account Status	Credit Turnover since 01-Jul-2014 (Inception) till 30-Jul-2015
019100074391	Current Account	AED	8-Oct-2014	Active	896,450.03
019100074392	Current Account	GBP	8-Oct-2014	Active	NIL
019100077709	Current Account	EUR	5-Nov-2014	Active	6,771,812.66
019010024138	Current Account	USD	30-Jun-2015	Active	5,658,250.00
019000021035	Current Account	USD	13-Jul-2015	Active	206,000.00

Following are the accounts maintained by Dr. Ruia Ignatova:

Mashreq Account No.	Account Type	Currency	Date Account Opened	Account Status	Credit Turnover since 01-Nov-2014 (Inception) till 30-Jul-2015
019100078941	Current	AED	16-Nov-2014	Active	1,228,000.24
019100078942	Current	EUR	16-Nov-2014	Active	930,953.94

Summary of the AED account no. 019100062895 of M/s. ONECOIN Limited for the period 01-Jul-2014 till 30-Jul-2015:

Transaction	Count	DR Amount (AED)	Count	CR Amount (AED)
Cash Deposit			24	540,820.00
Internal Transfers	3	81,000.00	12	20,314,214.94
Telex Transfer	61	19,944,666.38		
Total	64	20,025,666.38	36	20,855,034.94

Account was funded by way of:

- 24 Cash Deposit aggregating to AED 540,820.00. Cash was mainly deposited through CCDM Machines.
- 12 Internal transfers amounting to AED 20,314,214.94. Funds are mainly received from customer's

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own accounts maintained in other currencies with Meshreq.

The funds were withdrawn from the account through:

- 3 internal transfers amounting to AED 81,000.00 out of which a single internal transfer of AED 75,000.00 is transferred to Dr. Ruja Ignatova maintaining account with Meshreq and 2 internal transfers aggregating to AED 6,000.00 transferred to M/s WIDER VIEW PROPERTIES LLC maintaining account with Meshreq (019100008480).
- 61 telex transfers aggregating to AED 19,944,666.38. Sample of high value telex transfers are as follows:

Beneficiary	Beneficiary bank	Count	Amount	Purpose of Payment
Saleh Alobeidli Advocates	United Arab Bank	1	9,637,574.00	Oceana Property
Royal Yachts And Boat	National Bank Of Abu Dhabi	1	4,950,011.00	Invoice From 16 04 2015
Artefirma LLC	Abu Dhabi Islamic Bank	1	1,350,000.00	Oceana Properties
		3	15,937,585.00	

Summary of the USD account no. 019100062982 of M/s. ONECOIN Limited for the period 01-Jul-2014 till 29-Jul-2015:

Transaction	Count	DR Amount (USD)	Count	CR Amount (USD)
Inward Remittance			161	28,163,309.17
Cash Deposit			2	36,450.14
Internal Transfer	6	5,376,395.69	5	25,530,000.00
Telex Transfers	9	43,903.81		
Total	15	5,420,299.50	168	53,729,759.31

Account was funded by way of:

- 161 inward remittances aggregating to USD 28,163,309.17. Sample of high value inward remittances are as follows:

Remitter	Remitting Bank	Country	Count	Amount	Purpose of payment
Active Tech Pty Ltd	Commonwealth Bank Of Australia	Australia	7	8,316,669.25	W1065 BNY CUST RRN - F1S1504286172800
Cong Ty TNHH Mot Thanh Vien Thuong	Vietnam Technological And Comm'l Joint Stock Bank	Vietnam	1	890,972.00	Pmt For Annex 6905/Tk-TI Dd27.5.15 /Rf/Swf Of 15/06/01
Payment Inside LTD	HSBC	Hong Kong	1	769,273.95	As Licensing Agreement

- 2 Cash Deposits of USD 36,450.14
- 5 internal transfer of USD 25,530,000.00 received from customer own account maintained in another currency with Meshreq.

The funds were withdrawn from the account through:

- 6 internal transfers aggregating to USD 5,376,395.69 transferred to customer own account maintained in another currency with Meshreq.
- 9 telex transfers amounting to USD 43,903.81.

Summary of the EUR account no. 019100084477 of M/s. ONECOIN Limited for the period 01-Jul-2014 till 30-Jul-2015:

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Transaction	Count	DR Amount (EUR)	Count	CR Amount (EUR)
Inward Remittance			1613	97,675,523.71
Cash Deposit			14	17,817.00
Internal Transfer	24	56,042,492.56	3	869,667.08
Telex Transfers	15	1,099,581.60		
Total	39	83,705,607.28	1630	98,563,007.79

Account was funded by way of:

- 1613 inward remittances aggregating to EUR 97,675,523.71. Sample of high value inward remittances are as follows:

Remitter	Remitting Bank	Country	Count	Amount	Purpose of Payment
Onlasia Limited	DBS BANK	Hong Kong	4	5,485,377.85	As Licensing Agreement 20150629/30 Cnylom
World Creation Electronics Limited	HSBC	Hong Kong	3	4,206,933.00	Current Account
Chasing Era Limited	HSBC	Hong Kong	3	3,248,136.00	Current Account
Swift Electronics Limited	HSBC	Hong Kong	3	2,114,007.00	Current Account
Mr Ngai Hin Man	HSBC	Hong Kong	2	1,644,550.00	
York Star Develop Limited	HSBC	Hong Kong	2	1,413,287.00	Current Account
Dragon World Logistics Limited	HSBC	Hong Kong	1	698,317.00	Current Account

- 14 cash deposits amounting to EUR 17,817.00.
- 3 Internal transfers aggregating to EUR 869,667.08.

The funds were withdrawn from the account through:

- 24 Internal transfers aggregating to EUR 56,042,492.56. Funds are mainly transferred to customers own accounts maintained in another currencies and to the accounts of Mr. Karl Sebastian Greenwood (POA of the subject company.)
- 15 Telex Transfers amounting to AED 1,099,581.60.

Salient points of our review:

- As per the KYC of the company declared at the time of the account opening, M/s OneCoin Limited is into Management Consultancy services; however, this activity has not been observed in the account.
- The account turnover is much higher than the one declared at the time of the account opening (App. AED 622 M as against AED 5 M).
- As per the public domain, M/s. ONECOIN Limited is a Multi Level Marketing Business, which is offering an Investment Business Plan with 7 revenue Packages:
 - **Premium Trader Price: 12500 EUR** - The Premium Trader package is the ultimate product package for people interested in mining and cryptocurrency, it includes 6 levels of the OneAcademy online education programme. This package is for those who want to bring their trading skills to the top level and seriously understand and profit from mining and trading OneCoins.

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- **Tycoon Trader Price: 5000 EUR** – The tycoon trader package is the ultimate product package, it includes all the 5 levels of the OneAcademy online education programme. This package is for those who want to bring their trading skills to the top level and seriously profit from mining and trading OneCoins.
 - **Executive Trader Price: 3000 EUR** – The Executive Trader package include levels 1, 2, 3 and 4 of the OneAcademy online education program. This package provides a detailed description of tools that will improve the profitability of your trades significantly.
 - **Pro Trader Price: 1000 EUR** – The Pro Trader package includes levels 1, 2 and 3 of the OneAcademy online education program. After completing these courses, you will achieve intermediate trading skills that can help you profit from mining and trading OneCoins.
 - **Trader Price: 500 EUR** – The trader package includes both level 1 and level 2 of the OneAcademy online education program. This package is for the people who wish to start learning about trading with asset classes such as gold and cryptocurrency among others.
 - **Starter Price: 100 EUR** – The Starter includes the first level of the OneAcademy online education program. It is an introduction to financial products and trading and provides the student with online reading materials, video presentations, quizzes and certificate to start exploring the OneExchange.
 - **Rookie Price: Free** – The Rookie is a free package that includes information on ONECOIN, the e-book: Think and Grow Rich and a newsletter regarding the development of ONECOIN
- The EDD revealed that Dr. Rujia Ignatova, is the ultimate beneficial owner of M/s. ONECOIN Limited and is a Management Consultant of M/s. Prosperia FZE. Both companies, M/s. ONECOIN Limited and M/s. Prosperia FZE are promoting similar investment business plan.
 - Account was funded by way of inward remittances from multiple individuals and entities located Bulgaria, Kuala Lumpur, Estonia, Hong Kong, Vietnam, Cambodia, Mexico, US, Gibraltar, and Australia and having purpose of payment as "username", "Marketing and educational packages", "payment for Equipment" or "Payment for Education".
 - With reference to the outward transfers, customer provided us with invoices and contract copy. It was noted that the payments were initiated for purchase of "Flash Games" which is not in line with company's line of business. The contract, with no reference of our customer, was dated 3 August 2015 i.e. post our EDD query. Furthermore, the price mentioned on the contract appeared to be inflated. For instance EUR 70,000/- for approximately 80 games; however, as per public domain, such games are quoted as less than EUR 100/- per Game.
 Source link : www.witchhut.com/flash-games-source-code-bundle (Also attached with this report)
 - Our EDD (Internet search) revealed multiple complaints from individuals who claim to have been scammed by ONECOIN Limited. As per the web information "OneCoin", a purported crypto-currency and trading venture based out of Bulgaria, is suspected to be a pyramid scheme with no verifiable evidence to back up any of its business claims". Further, the company also being investigated by various authorities such as National Bureau of Investigation in Finland and Central Bank of Hungary. Source links mentioned below:


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<http://www.topbizpromotions.com/is-onecoin-a-global-mlm-ponzi-scheme/>
<http://www.businessforhome.org/2015/06/bank-of-hungary-issued-warning-for-crypto-currency/>
<http://cointelegraph.com/news/114399/one-coin-much-scam-onecoin-exposed-as-a-global-mlm-ponzi-scheme>
<http://ethanvanderbuilt.com/2015/05/08/onecoin-scam-yes-opinion/>
<http://hotmlmcompanies.com/onecoin-review/>
<http://www.worldlawdirect.com/forum/Internet-hyip-scams/84465-warning-big-scam-onecoin.html>
<http://behindmlm.com/mlm-reviews/onecoin-review-100-5000-eur-ponzi-point-cryptocurrency/>

- One of the articles mentioned above refers to an individual "Sebastian Greenwood" associated with Ruja Ignatova which is a possible name match with the POA of Onecoin Limited, Mr. Karl Sebastian Greenwood. As per information, "Sebastian Greenwood", previously worked with Unalco whose activities were subject of a warning from Pakistan's Securities and Exchanges Commission for illegal multi-level marketing practices". World Check profile of Unalco attached for your easy reference.
- Considering the above information corroborated with the unusual account activity we suspect M/s. ONECOIN Limited may be engaged in a Pyramid /Ponzi Scheme.

In view of the above mentioned salient points of our review, we consider the account activity suspicious/ a Ponzi Scheme. We are therefore, reporting our suspicion as required by the law. Considering the risk associated with these relationships, we are in process of closing all the accounts in line with FATF Recommendations (2012).

Name & Signature of employee in charge:

for 
Nadeem Humayun
 Manager Compliance & MLRO
 AML & Sanctions Unit
 Audit, Fraud & Compliance Group
 Date: 1/09/2015
 ELZ

Ref: AML/2015/57

ACTION MEMO

		Date	14/12/2015	
		Action Memo	13-7/3242/2015-STR	
To: H.E. The Governor		STR Ref	21927	
Regarding: Onecoin Limited		STR <input checked="" type="checkbox"/>	Terrorist Financing <input type="checkbox"/>	Others <input type="checkbox"/>
		NP <input type="checkbox"/>	JP <input checked="" type="checkbox"/>	IF PEP <input type="checkbox"/>
Reported By: Mashreqbank		Branch Domicile: Dubai		
Action Recommended by AMLSCU				
<input checked="" type="checkbox"/> The STR has been added to our database		<input checked="" type="checkbox"/> The case details will be forwarded to Law Enforcement Authority		
<input type="checkbox"/> Enhanced CDD as per CB Notice 2922/2008		<input type="checkbox"/> The case details will be forwarded to Attorney General		
<input type="checkbox"/> Please conduct due diligence with remitting bank		<input type="checkbox"/> Inform Attorney General and seek guidance		
<input checked="" type="checkbox"/> You are requested to provide us with a copy of your internal investigation report on the case with special emphasis on the extent of staff collusion.		<input checked="" type="checkbox"/> You are required to freeze all available balances in the accounts of (i) Onecoin Limited (ii) Prosperia FZE (iii) RUJA IGNATOVA (iv) Karl Sebastian Greenwood (v) Martin Rudolf Alexander Breidenbach (vi) Nicholas David Cully. The freeze order extends to all unpaid Pay Orders/Payment Instruments issued by debiting the accounts of the named entities.		
Comments: Freezone company engaged in Management consultancy.				
Transactions				
Total combined credits of 4 relationships: AED 686.11M Suspected Transactions (Onecoin Limited): Inward remittances (USD 28.16M & EUR 97.67M) from multiple jurisdictions outside UAE. Internal transfers (AED 20.31M & USD 25.53M) from own / related accounts and cash deposits (AED 540k, USD 36k & EUR 17k) followed by withdrawals mainly as internal transfers (USD 25.53M & EUR 56.04M) to clients own / related accounts and outward remittances (CB attachments for details)				
Suspicion				
<ul style="list-style-type: none"> - UBO: Martin Rudolf Alexander Breidenbach (German National) - POA Holders: RUJA IGNATOVA (German National), Karl Sebastian Greenwood (Swedish National) & Nicholas David Cully (British National) - Freezone high risk entity. Involved in unlicensed activity (Investment). MLM Fraud / Ponzi Scheme. - Identified individuals are: RUJA IGNATOVA, Karl Sebastian Greenwood, Martin Rudolf Alexander Breidenbach, Nicholas David Cully. It is reported in external search that ONECOIN is the brainchild of Nigel Allen (well known fraudster) - Circular movement of funds among own / related accounts. No economic rationale. Transactions not as per profile of the customer and have exceeded significantly the anticipated level of activity in the account. Only 2 recall messages from the remitting bank reported, post facto account closure. Few Large value remitters provided by R/E seems to be into consultancy services and few are payment platforms as per external search. - As per external search client is involved in investment related activity. Multiple derogatory remarks found in relation to fraud on the client / related entities and investigated by various countries (Hungary and Finland) - Refer to CB attachments for links. - Purpose of payments missing in many swift messages. Statement of accounts indicating significant number of investors running into hundreds have been remitting funds. Only few part payouts made to investors. Possible staff collusion. - Pooling of funds from various entities in similar activity mainly from Hong Kong being consolidated in UAE. Possible money laundering. - No business / investment related activity observed depicting any income generation activity. - Concerns from FIU Bulgaria (For internal purpose only not to be disseminated) - Dubai police letter received shared with STR team recently. Reportedly Dubai police recommended freezing of funds based on intelligence received from Kuwait police however public prosecutor has requested the result of our analysis (silent on the issuance of freeze) 				

- Dubai police letter also identified related accounts with Noor Islamic Bank however no STR received by NIB as of date. As per swift messages Karl Sebastian Greenwood is banking with Noor Islamic Bank. Also identified to be banking with ENBD
- Inadequate transaction monitoring system of R/E, Fraudsters preference to open relationship with Mashreq
- Possible shell entity as client is sharing address details with entities on whom a total of 11 STRs received few referred to LEA.
- Transaction details of only Onecoin Limited provided. No transaction details of other related accounts mentioned provided.
- Related STRs 22614 (UAB – Account opening declined) and STR 22809 (CBD –EUR 6.4M under hold as per Instructions from Mr. Sheriff).
- Possible Investment fraud / Multi Level Marketing Fraud / Ponzi scheme and all related accounts possibly controlled by Karl Sebastian Greenwood and / or Ruja Ignatova
- Accounts of Onecoin Ltd at Mashreq Bank have been closed and reportedly "Tasmiya Kauser" (RM at Mashreq Bank – Terminated by Mashreq) approached UAB for account opening with Manager's Cheques amounting to USD 18.58M AED 645k issued by the client /related entity (account closure proceeds from Mashreq Bank) in order to encash the funds (account opening declined by UAB – STR 22614). Based on our findings ENBD has commenced a relationship with Karl Sebastian
- Based on external search, similar typology observed in possible linked entity "UNAICO PAKISTAN PRIVATE LIMITED" UID 2173539 reportedly "Apr 2012 - winding up proceedings initiated by the Securities and Exchange Commission of Pakistan. May 2012 - premises raided and bank accounts frozen by the NAB for alleged involvement in illegal multi-level marketing scheme. Nov 2013 - no further information reported"
- Manager's cheques outstanding with Mashreq (Refer to Report attached), accounts at Mashreq stands closed. Amount held in Commercial Bank of Dubai (Refer to report attached).
- Freeze orders recommended for all related entities/ Individuals namely (i) Onecoin Limited (ii) Prosperia FZE (iii) RUJA IGNATOVA (iv) Karl Sebastian Greenwood (v) Martin Rudolf Alexander Breidenbach (vi) Nicholas David Cully
- Freeze orders recommended for all outstanding pay orders / Payment Instruments in multiple currencies issued by debiting the accounts of (i) Onecoin Limited (ii) Prosperia FZE (iii) RUJA IGNATOVA (iv) Karl Sebastian Greenwood (v) Martin Rudolf Alexander Breidenbach (vi) Nicholas David Cully
- UAE will face a challenge on account of payouts to victims (large number of victims running into hundreds)
- Case is also recommended to be referred to LEA on account of all above indicators (Concerns in report attached in CB attachments and action memos of all related STRs 21927, 22809 & 22614 including all related CB attachments / Arabdox should be incorporated in Arabic letter)
- AMLSCU initiated fraud ECDD alerts on all related entities some other named entities with multiple banks
- No matches on World Check or Internal FIU databases. (R.MR)

Action Recommended

- Input in the system (R/E exited relationship of Onecoin Ltd however silent on other relationships)
- Freeze Notice to be issued on all the accounts of six related entities / Individuals , namely, (i) Onecoin Limited (ii) Prosperia FZE (iii) RUJA IGNATOVA (iv) Karl Sebastian Greenwood (v) Martin Rudolf Alexander Breidenbach (vi) Nicholas David Cully and extends to all unpaid Pay Order (in multiple currencies) / Payment Instruments as on date of freeze order
- LEA
- Internal Investigation report with special emphasis on staff collusion
- Special Examination on Mashreq Bank by BSD

Signature



Governor's Remarks

- | | |
|--|--|
| <input type="checkbox"/> Approval | <input type="checkbox"/> Freeze and inform Attorney General |
| <input type="checkbox"/> Send details to LEA | <input type="checkbox"/> Send relevant details to counterpart FIU in |
| <input type="checkbox"/> | <input type="checkbox"/> |

Signature