

~~OFFICIAL USE ONLY~~

| | | | |
|--|-------------------------|-----------------------------|-------------------|
| DEPARTMENT OF HOMELAND SECURITY ICE | | TECS ACCESS CODE (b)(2)high | |
| REPORT OF INVESTIGATION | | PAGE 1 | |
| | | CASE NUMBER (b)(2)high | |
| TITLE: CIRCLE GROUP LIMITED | | | |
| CASE STATUS: CLOSING RPT | | | |
| REPORT DATE 052902 | DATE ASSIGNED 010702 | PROGRAM CODE (b)(2)high | REPORT NO. 007 |
| RELATED CASE NUMBERS: | | | |
| COLLATERAL REQ: | | | |
| TYPE OF REPORT: INVESTIGATIVE FINDINGS | | | |
| TOPIC: CLOSING REPORT OF INVESTIGATION DUE TO NONDISCLOSURE BY BAHAMAS | | | |

SYNOPSIS:

On March 16, 2001, at the FEDEX International Hub in Memphis, Tennessee, a FEDEX parcel containing three negotiable checks totaling \$1,515,523.13 going from Alpharetta, Georgia, to Nassau, Bahamas, was seized. A collateral request was sent to the SAIC Miami, Florida, Bahamas Liaison Officer to identify and interview the shipper of the unreported monetary instruments.

This report serves to document the closing of the investigation by the Bahamas Liaison Officer due to the nondisclosure of information by Bahamian government officials regarding financial information.

| | | |
|------------------------------------|--|---|
| DISTRIBUTION: SACMI RACME SACNO | SIGNATURE: _____ (b)(6),(b)(7)(C) SENIOR SPEC AGENT | |
| | APPROVED: _____ (b)(6),(b)(7)(C) OI GRP SUPERVISOR | |
| | ORIGIN OFFICE: MI MIAMI - SAC | TELEPHONE: 305 597 (b)(6),(b)(7)(C) TYPIST: (b)(6),(b)(7)(C) |

~~OFFICIAL USE ONLY~~

THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY. ICE ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY
ICE

PAGE 2

REPORT OF INVESTIGATION
CONTINUATION

CASE NUMBER (b)(2)high

REPORT NUMBER: 007

CASE PROGRAM CODES:

(b)(2)high MONEY LAUNDERING CON (b)(2)high FEDERAL EXPRESS OPER

~~OFFICIAL USE ONLY~~

~~THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY, ICE. ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.~~

| | |
|---|------------------------|
| DEPARTMENT OF HOMELAND SECURITY ICE | PAGE 3 |
| REPORT OF INVESTIGATION CONTINUATION | CASE NUMBER (b)(2)high |
| | REPORT NUMBER: 007 |

DETAILS OF INVESTIGATION:

On May 16, 2002, the reporting agent spoke with (b)(6),(b)(7)(C) Officer in Charge of the Commercial Crimes Division, Nassau, Bahamas, (242) 322 (b)(6),(b)(7)(C) regarding the request of information sent on Harborside Atlantis. (b)(6),(b)(7)(C) stated that office had misplaced the request made to his office regarding information on HARBORSIDE ATLANTIS. (b)(6),(b)(7)(C) stated that he was not in a position to provide the information requested. He stated that there is certain protocol regarding financial information and that the type of information requested can't be forwarded or obtained without an MLAT request from a foreign government. He stated that he conferred with his immediate supervisor, (b)(6),(b)(7)(C) regarding this request and (b)(6),(b)(7)(C) recommended contacting the Police Commissioner, to obtain a final declination from him.

(b)(6),(b)(7)(C) was informed that the Police Commissioner instructed the reporting agent to contact the Financial Crimes Division for help in obtaining the information, which is under the direction of (b)(6),(b)(7)(C) and directed by (b)(6),(b)(7)(C). (b)(6),(b)(7)(C) stated that he must receive direction from the Police Commissioner before proceeding.

On May 23, 2002, contact was established with (b)(6),(b)(7)(C) of the RAIC Memphis, Tennessee, Office of Investigations, and he was briefed concerning the lack of cooperation and lack of information being received from the Bahamian government. (b)(6),(b)(7)(C) stated that he was not concerned with whether or not the Bahamian government cooperated or not. He stated that the USCS would just keep the monies in question and proceed with the forfeiture. He stated that due to the negative response from (b)(6),(b)(7)(C), that his office would no longer require the reporting agent to proceed with trying to obtain the information.

No further investigative attempts are anticipated. This investigation is terminated.

~~OFFICIAL USE ONLY~~

~~THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY. USE ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.~~