



Ayoub-Farid Michel Saab  
Chairman, FBME Ltd  
via Fund Fiduciary Partners (Cayman) Limited  
42 North Church Street, George Town, Grand Cayman  
Cayman Islands

Strasbourg, 14 June 2018

Dear Sir,

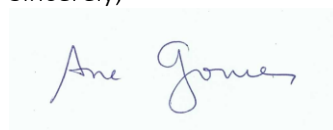
I have received a letter from you of 21 May 2018 regarding Dmitry Klyuev and Andrei Pavlov, designated by the US Treasury under the US Magnitsky Act for their role in the US\$230 Million Fraud uncovered by Russian lawyer Sergei Magnitsky, in which you offer assistance with further inquiries.

In your letter you stated that Altem Invest and Zibar Management, which held accounts at FBME Cyprus branch, were not controlled by Mr Klyuev. However, there is apparent evidence to the contrary. Therefore, I would appreciate your answers to the following questions:

1. Could you please confirm if it is true that Dmitry Klyuev wired \$500,000 to Altem Invest Limited account at FBME on 02.03.2011, 03.03.2011 and \$440,000 on 04.03.2011? Could you please explain what was the business reason of Mr Klyuev wiring funds from his personal account at UBS, Zurich to Altem Invest, purportedly unrelated to him, as you claim, and provide supporting documents for these payments?
2. Could you please confirm if it is true that Altem Invest wired \$5,005 on 18.06.2010, \$113,234 on 31.08.2010 and Zibar Management Inc wired \$50,789 on 20.01.2012 for Dmitry Klyuev's family member to Aiglon College, Switzerland?
3. Could you please confirm if it is true that Altem Invest wired \$9,416.51 on 09.10.2009 to Palace Merano, Italy, for "Accommodation of Dmitry Klyuev"?
4. Could you please confirm if it is true that Ekaterin Sokolova, the wife of Dmitry Klyuev wired \$1,125,829 to Zibar Management Inc account at FBME on 19.08.2011? Could you please explain what was the business reason of wiring personal funds of Dmitry Klyuev's wife to Zibar Management, purportedly unrelated to him as you claim and provide supporting documents for these payments?
5. Could you please confirm if it is true that International Hospital Medical Centre (Intermedcenter) owned by Dmitry Klyuev wired \$499,951 to Altem Invest Limited account at FBME on 10.08.2010, 11.08.2010, 12.08.2010, 13.08.2010, 16.08.2010, 17.08.2010 and \$474,471 on 19.08.2010? Could you please explain what was the business reason of wiring funds of Intermedcenter owned by Dmitry Klyuev to Altem Invest and provide supporting documents for these payments?
6. Could you please confirm if it is true that Altem Invest wired \$4,498.48 on 13.04.2011 to Dietrich Baumgartner in respect of Aronoil Establishment, a company owned by Dmitry Klyuev and provide supporting documents for this payment?

7. Could you please confirm if it is true that Altem Invest wired to Zibar Management at least \$2,946,070 on 08.11.2010, 10.11.2010, 12.11.2010, 28.12.2010, 29.12.2010, 11.01.2011, 18.01.2011, 21.01.2011?
8. Could you please confirm if it is true that Zibar Management wired \$18,843 on 20.04.2012 “for Olga Tamarkina”, and \$10,009 on 10.08.2012 for “medical service for Tamarkina Olga,” the previous wife of Dmitry Klyuev?
9. What was the reason to believe that an “economist” Ms Kazakova and an “engineer” Mr Ovchinnikov were real owners of BVI shell companies Altem Invest and Zibar Management which transacted hundreds of millions of dollars on their FBME accounts?
10. Who at FBME (i) approved the opening of accounts for ALTEM Invest and ZIBAR Management; (ii) oversaw the accounts; (iii) was responsible for the client file and compliance with the anti-money laundering regulations? Did you have representatives in Russia?
11. Could you please confirm if it is true that a Russian company Camelot wired from its account at Russia’s Universal Savings Bank (owned by Dmitry Klyuev) which received proceeds of the US\$230 Million Fraud, to Altem Invest \$13.3 million in 35 tranches during March-June 2008? Please could you provide supporting documents for these payments?
12. Could you please confirm if it is true that a Russian company Liga Invest wired from its account at Russia’s Universal Savings Bank (owned by Dmitry Klyuev) which received proceeds of the US\$230 Million Fraud, to Zibar Management \$8.9 million in 23 tranches during April-June 2008? Please could you provide supporting documents for these payments?
13. What was the reason to believe that transactions on accounts of ALTEM Invest and ZIBAR Management were legitimate and not money laundering, given that they were not with counterparties stated in the client file, there was lacking information on the owners and counterparties, and the companies were registered to murky nominees who were nominees for hundreds of other companies?
14. Who is Mr. Ram Jiwan Panjiyar, who was indicated as a beneficial owner of Synthoma Holding, which held account at FBME Cyprus branch, which received funds connected to the \$230 Million Fraud from a shell Moldovan company?
15. Can you confirm that BALEC Ventures Inc, a firm which held account at FBME Cyprus branch and is owned by Mr Al-Zeydi, a Syrian national who was later sanctioned by the US Treasury for the alleged support to Assad regime, received funds from Quartell Trading Inc, which in turn received proceeds connected to the \$230 Million Fraud?

Sincerely,



Ana Gomes  
Member of the European Parliament