



BSAR Transcript  
BSA: [REDACTED] and DCN:

Filing Information	
Type of Report	Continuing Activity Report
Filing Date	11/09/2015
Received Date	11/09/2015
Entry Date	11/10/2015
Submission Method	Electronic discrete filing

Subject Information		
Subject 1 of 9 : Agalarov		
Role	Subject	
Subject Type	Purchaser/Sender	
Individual/Organization	Individual	
Last(or Entity) Name	Agalarov	
First Name	Aras	
Date of Birth Unknown	Yes	
TIN Unknown	Yes	
Form(s) of Identification	Identification Unknown	Yes
Address(es)	Address Type	Subject permanent/mailling address
	Street Address Unknown	Yes
	City Unknown	Yes
	State Unknown	Yes
	ZIP Code Unknown	Yes
	Country	US - Enhanced
	Country Unknown	Yes
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	[REDACTED]
	Relationship of Subject	No Relationship: Yes
Affected Account(s)	Account 1 of 3	
	Account Number	[REDACTED]
	Non-US Financial Institution	Yes
	Account 2 of 3	
	Account Number	[REDACTED]
	Non-US Financial Institution	Yes
	Account 3 of 3	

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BSAR Transcript

BSA: [REDACTED] and DCN:

Subject Information		
	Account Number	[REDACTED]
	Non-US Financial Institution	Yes
Subject 2 of 9 : Agalarov		
Role	Subject	
Subject Type	Purchaser/Sender	
Individual/Organization	Individual	
Last(or Entity) Name	Agalarov	
First Name	Emin	
Date of Birth Unknown	Yes	
TIN Unknown	Yes	
Form(s) of Identification	Identification Unknown	Yes
Address(es)	Address Type	Subject permanent/mailing address
	Street Address Unknown	Yes
	City Unknown	Yes
	ZIP Code Unknown	Yes
	Country	US - Enhanced
	Country Unknown	Yes
Relationship to Reporting Institution(s)	Institution TIN	[REDACTED]
	Relationship of Subject	No Relationship: Yes
Affected Account(s)	Account 1 of 3	
	Account Number	[REDACTED]
	Non-US Financial Institution	Yes
	Account 2 of 3	
	Account Number	[REDACTED]
	Non-US Financial Institution	Yes
Account 3 of 3	Account Number	[REDACTED]
	Non-US Financial Institution	Yes
Subject 3 of 9 : Crocus International		
Role	Subject	
Subject Type	Purchaser/Sender	
Individual/Organization	Organization	
Last(or Entity) Name	Crocus International	

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BSA: [REDACTED]

**BSAR Transcript**

BSA: [REDACTED] and DCN: [REDACTED]

Subject Information		
Alternate Name(s)	Alternate Name	JCS Crocus International
TIN Unknown	Yes	
Form(s) of Identification	Identification Unknown	Yes
Address(es)	Address Type	Subject permanent/mailing address
	Street Address Unknown	Yes
	City Unknown	Yes
	State Unknown	Yes
	ZIP Code Unknown	Yes
	Country	US - Enhanced
	Country Unknown	Yes
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	[REDACTED]
	Relationship of Subject	No Relationship: Yes
Affected Account(s)	Account 1 of 3	
	Account Number	[REDACTED]
	Non-US Financial Institution	Yes
	Account 2 of 3	
	Account Number	[REDACTED]
	Non-US Financial Institution	Yes
	Account 3 of 3	
	Account Number	[REDACTED]
	Non-US Financial Institution	Yes
Subject 4 of 9 : Denso Trading Ltd		
Role	Subject	
Subject Type	Purchaser/Sender	
Individual/Organization	Organization	
Last(or Entity) Name	Denso Trading Ltd	
TIN Unknown	Yes	
Form(s) of Identification	Identification Unknown	Yes
Address(es)	Address Type	Subject permanent/mailing address
	Street Address	12 Chelmsford Road Southgate
		12 CHELMSFORD ROAD SOUTHGATE - Enhanced
	City	London

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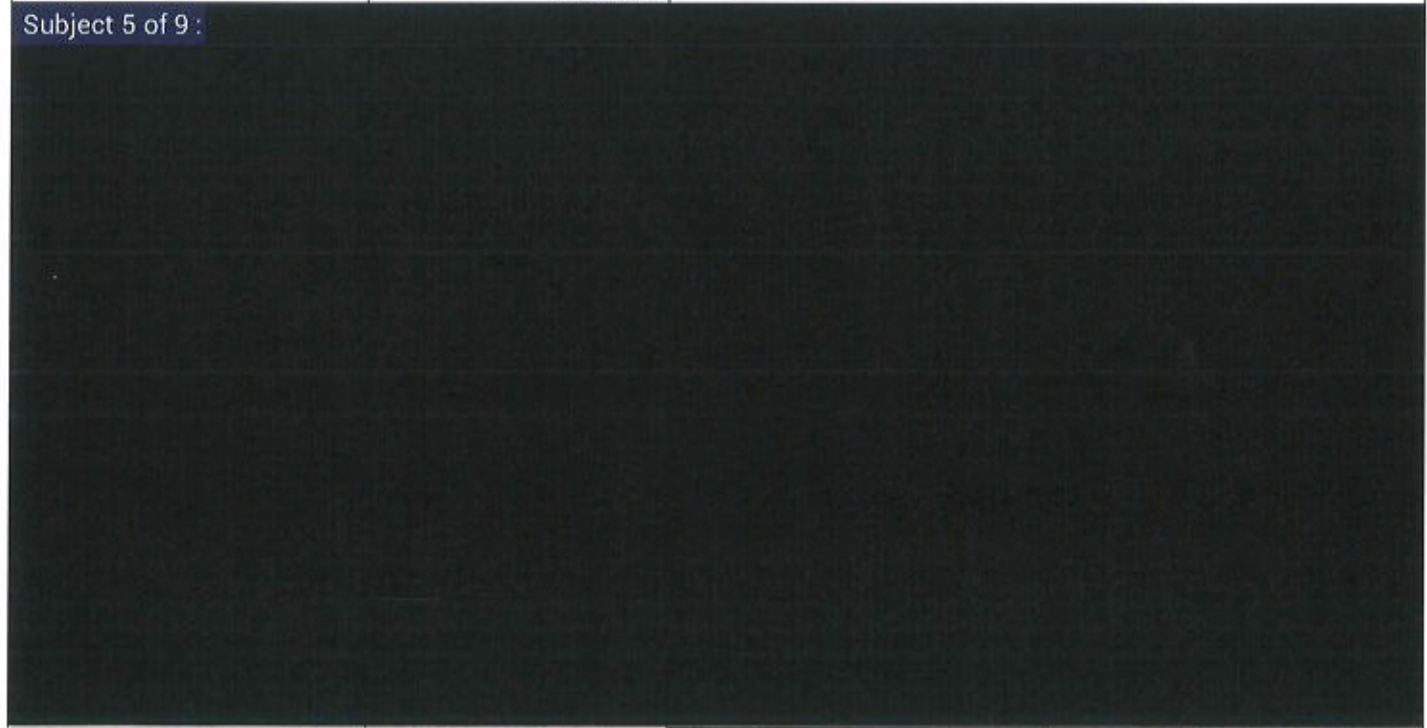
BSA:

**BSAR Transcript**

BSA: [REDACTED] and DCN:

Subject Information		
	LONDON - Enhanced	
ZIP Code Unknown	Yes	
Country	GB	
	GB - Enhanced	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN [REDACTED]	
	Relationship of Subject: No Relationship: Yes	
Affected Account(s)	Account 1 of 3	
	Account Number [REDACTED]	
	Non-US Financial Institution	Yes
	Account 2 of 3	
	Account Number [REDACTED]	
	Non-US Financial Institution	Yes
	Account 3 of 3	
	Account Number [REDACTED]	
	Non-US Financial Institution	Yes

Subject 5 of 9 :



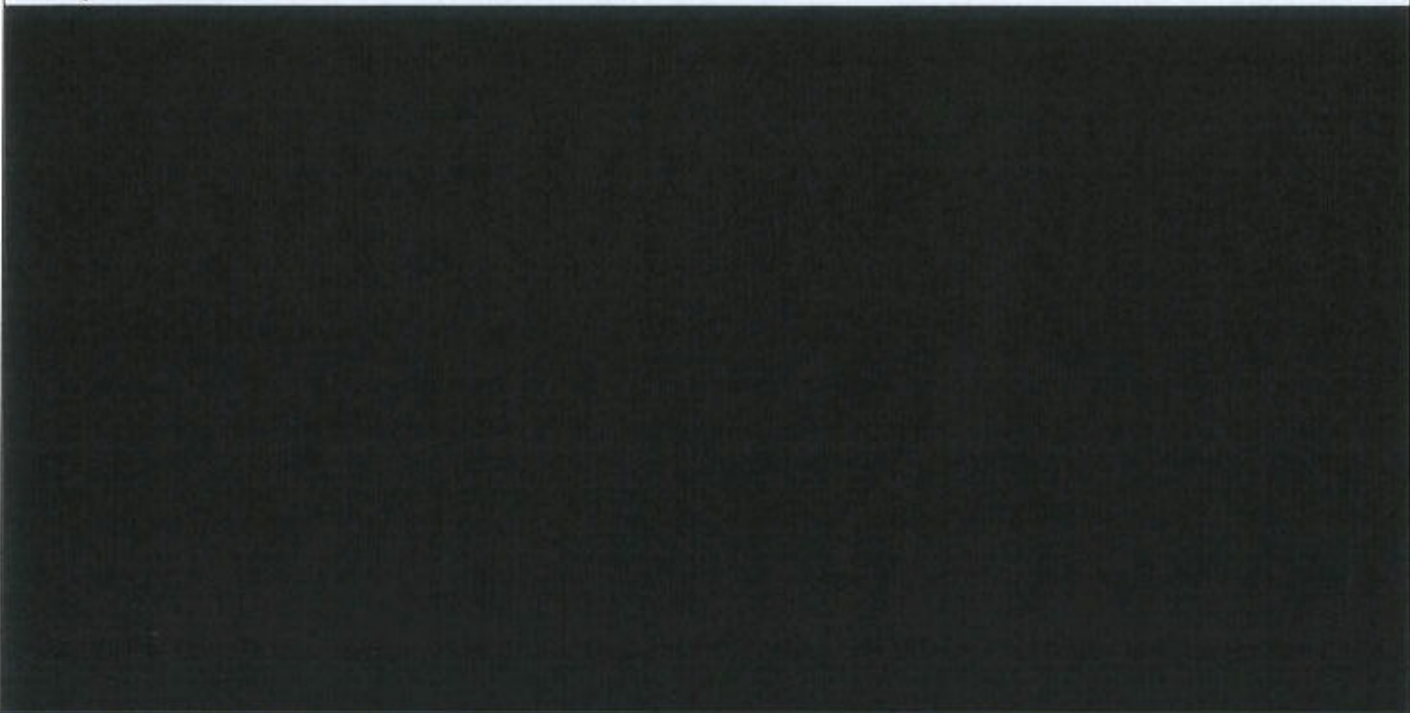
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**BSAR Transcript**

BSA: [REDACTED] and DCN:

**Subject Information**



**Subject 6 of 9 : Nobu Crocus Moscow LLC**

<b>Role</b>	Subject	
<b>Subject Type</b>	Payee/Receiver	
<b>Individual/Organization</b>	Organization	
<b>Last(or Entity) Name</b>	Nobu Crocus Moscow LLC	
<b>EIN</b>	[REDACTED]	
<b>Form(s) of Identification</b>	<b>Identification Type</b>	Other
	<b>Identification Number</b>	5470141
	<b>Other Text</b>	Certificate of LLC Formation
	<b>Issuing State Code</b>	DE
	<b>Issuing State</b>	Delaware
	<b>Issuing Country Code</b>	US
<b>Address(es)</b>	<b>Address Type</b>	Subject permanent/mailling address
	<b>Street Address</b>	[REDACTED]
	<b>City</b>	New York
		NEW YORK - Enhanced
	<b>State</b>	NY
		NY - Enhanced

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BSA: [REDACTED]

**BSAR Transcript**

BSA: [REDACTED] and DCN: [REDACTED]

Subject Information		
	ZIP Code	[REDACTED]
	Country	US US - Enhanced
NAICS Code	Food Services and Drinking Places	
Phone Number(s)	Phone Number 1 of 3	
	Type	Facsimile
	Number	[REDACTED]
	Phone Number 2 of 3	
	Type	Work
	Number	[REDACTED]
	Phone Number 3 of 3	
	Type	Mobile
	Number	[REDACTED]
Occupation/Type of Business	Restaurant	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	[REDACTED]
	Relationship of Subject	Customer: Yes
Affected Account(s)	Account Number	[REDACTED]
	Financial Institution TIN	[REDACTED]
Subject 7 of 9 : Nobu Moscow LLC		
Role	Subject	
Subject Type	Payee/Receiver	
Individual/Organization	Organization	
Last(or Entity) Name	Nobu Moscow LLC	
EIN	[REDACTED]	
Form(s) of Identification	Identification Type	Other
	Identification Number	4458797
	Other Text	Certificate of LLC Formation
	Issuing State Code	DE
	Issuing State	Delaware
	Issuing Country Code	US
Address(es)	Address 1 of 3	
	Address Type	Subject permanent/mailing address
	Street Address	[REDACTED]

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**BSAR Transcript**

BSA: [REDACTED] and DCN:

Subject Information		
	City	New York
		NEW YORK - Enhanced
	State	NY
		NY - Enhanced
	ZIP Code	[REDACTED]
	Country	US
		US - Enhanced
	<b>Address 2 of 3</b>	
	Address Type	Subject permanent/mailling address
	Street Address	[REDACTED]
	City	New York
		NEW YORK - Enhanced
	State	NY
		NY - Enhanced
	ZIP Code	[REDACTED]
	Country	US
		US - Enhanced
	<b>Address 3 of 3</b>	
	Address Type	Subject permanent/mailling address
	Street Address	[REDACTED]
City	New York	
	NEW YORK - Enhanced	
State	NY	
	NY - Enhanced	
ZIP Code	[REDACTED]	
Country	US	
	US - Enhanced	
NAICS Code	Food and Beverage Stores	
Phone Number(s)	<b>Phone Number 1 of 3</b>	
	Type	Work
	Number	[REDACTED]
	<b>Phone Number 2 of 3</b>	

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BSA: [REDACTED]

**BSAR Transcript**

BSA: [REDACTED] and DCN: [REDACTED]

Subject Information		
	Type	Facsimile
	Number	[REDACTED]
	Phone Number 3 of 3	
	Type	Facsimile
	Number	[REDACTED]
Occupation/Type of Business	Restaurant	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	[REDACTED]
	Relationship of Subject	Customer: Yes
Affected Account(s)	Account Number	[REDACTED]
	Financial Institution TIN	[REDACTED]
Subject 8 of 9 : Rhodes		
Role	Subject	
Subject Type	Payee/Receiver	
Individual/Organization	Individual	
Last(or Entity) Name	Rhodes	
First Name	Merrick	
Alternate Name(s)	Alternate Name	Merrick Andrew Rhodes
Gender Type	Male	
Date of Birth	[REDACTED]	
SSN/ITIN	[REDACTED]	
Form(s) of Identification	Identification Type	Driver's license/State ID
	Identification Number	[REDACTED]
	Issuing State Code	[REDACTED]
	Issuing State	[REDACTED]
	Issuing Country Code	US
Address(es)	Address Type	Subject permanent/mailing address
	Street Address	[REDACTED]
	City	[REDACTED]
	State	NY
		NY - Enhanced
	ZIP Code	[REDACTED]
Country	US	

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**BSAR Transcript**

BSA: [REDACTED] and DCN: [REDACTED]

Subject Information	
	US - Enhanced
NAICS Code	Food and Beverage Stores
Phone Number(s)	Phone Number 1 of 6
	Type: Residence
	Number: [REDACTED]
	Phone Number 2 of 6
	Type: Mobile
	Number: [REDACTED]
	Phone Number 3 of 6
	Type: Facsimile
	Number: [REDACTED]
	Phone Number 4 of 6
	Type: Residence
	Number: [REDACTED]
	Phone Number 5 of 6
	Type: Residence
	Number: [REDACTED]
	Phone Number 6 of 6
	Type: Facsimile
	Number: [REDACTED]
Email(s)	[REDACTED]
Occupation/Type of Business	Manager of restaurant
Corroborative Statement to Filer	No
Relationship to Reporting Institution(s)	Institution TIN: [REDACTED]
	Relationship of Subject: Customer: Yes
Affected Account(s)	Account 1 of 2
	Account Number: [REDACTED]
	Financial Institution TIN: [REDACTED]
	Account 2 of 2
	Account Number: [REDACTED]
	Financial Institution TIN: [REDACTED]
Subject 9 of 9 :	[REDACTED]

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BSA: [REDACTED]

**BSAR Transcript**

BSA: [REDACTED] and DCN:

**Subject Information**

[REDACTED]

**Suspicious Activity Information**

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BSA: [REDACTED]

**BSAR Transcript**

BSA: [REDACTED] and DCN:

Suspicious Activity Information	
Amount Involved	\$54,989
Cumulative Amount	\$224,846
Date or Date Range of Activity	07/14/2015 - 10/22/2015
Money laundering	Suspicious concerning the source of funds
Other suspicious activities	Transaction with no apparent economic, business, or lawful purpose
Financial instrument or payment mechanism	Funds transfer

Activity Location		
Financial Institution Location 1 of 1		
Type of Financial Institution	Depository institution	
Primary Regulator	FDIC	
RSSD Number	4114567	
Legal Name	First Republic Bank	
EIN		
Address	Address Type	Address where transaction occurred
	Street Address	111 Pine Street
		111 PINE ST - Enhanced
	City	San Francisco
		SAN FRANCISCO - Enhanced
	State	CA
		CA - Enhanced
	ZIP Code	94111
94111-5602 - Enhanced		
Country	US	
	US - Enhanced	
Internal Control File Number		
Branch Office Location 1 of 1		
Financial Institution Name	First Republic Bank	
RSSD Number	4174105	
Address	Address Type	Address where transaction occurred
	Street Address	1230 Avenue of the Americas 2nd Floor
		1230 AVENUE OF THE AMERICAS FL 2 - Enhanced
	City	New York
		NEW YORK - Enhanced
State	NY	
	NY - Enhanced	

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BSA: [REDACTED]

**BSAR Transcript**

BSA: [REDACTED] and DCN: [REDACTED]

Activity Location		
	ZIP Code	10020-1513
		10020-1513 - Enhanced
	Country	US
		US - Enhanced

Filer Information		
Primary Regulator	FDIC	
Filer Name	First Republic Bank	
EIN	[REDACTED]	
Address	Address Type	Reporting party address
	Street Address	111 Pine Street
		111 PINE ST - Enhanced
	City	San Francisco
		SAN FRANCISCO - Enhanced
	State	CA
		CA - Enhanced
	ZIP Code	94111
94111-5602 - Enhanced		
Country	US	
	US - Enhanced	
Type of Financial Institution	Depository institution	
RSSD Number	4114567	
Internal control/file number	[REDACTED]	
Contact for Assistance	Full Name	[REDACTED]
	Phone Number	[REDACTED]
	Phone Type	Work

Law Enforcement Information
No Law Enforcement Information Available

**Narrative**

This Suspicious Activity Report (SAR) is being filed to report continuing suspicious activity filed under Document Control Number [REDACTED] filed on 07/20/2015. That SAR reported suspicious incoming wire transfers originating from unrelated businesses and possible shell entities that were based in high risk jurisdictions that lacked an apparent lawful business purpose totaling \$38,032.00 from 03/26/2015 to 06/05/2015 involving FRB accounts [REDACTED] and [REDACTED].

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BSA: [REDACTED]

**BSAR Transcript**

BSA: [REDACTED] and DCN:

**Narrative**

The continuing pattern of suspicious activity identified in this report occurred between 07/14/2015 and 10/22/2015 and totaled \$54,988.31. This investigation determined that target accounts [REDACTED] and [REDACTED] continued to receive concerning wire payments over the course of the continuing activity monitoring period.

Target account [REDACTED] was opened on 12/18/2007 and is titled Nobu Moscow LLC C/O Nobu Restaurant Group with Merrick Rhodes as the authorized signer on the account. According to internal bank records, Nobu Moscow LLC has a physical address of [REDACTED]; Internet research shows an address of Bolshaya Dmitrovka Street 20, Moscow, Russia for the actual location of the restaurant associated with this Delaware LLC. Nobu Moscow LLC receives licensing fees and royalty income from the aforementioned Russian restaurant. Internal records and external research indicate Merrick Rhodes is the Corporate Controller of NOBU Restaurant Group.

Target account [REDACTED] was opened on 02/06/2014 and is titled NOBU CROCUS MOSCOW, LLC with Merrick Rhodes, [REDACTED] and [REDACTED] as the accountsigners. Internet research indicates that the Nobu Crocus City restaurant is physically located in a satellite city of Moscow inside the Crocus City shopping mall with a physical address location of Volokolamskoye Shosse and the Moscow Ring Road at MKAD 66KM, 2, Moskva, Russia. The FRB target account receives licensing payments and royalties from this Russian restaurant.

External research and commercial database queries failed to identify pertinent information concerning the aforementioned FRB account signers. External research and commercial database searches did identify concerning information regarding the beneficial owners of the Crocus International entity, which is the business entity that appears to operate the Nobu locations in Russia. Specifically, Aras Agalarov who is the President of Crocus is identified as a Politically Exposed Person because of ties with the Russian government and his status as a Member of the Executive Board of the Russian Union of Industrialists and Entrepreneurs.

Target accounts [REDACTED] and [REDACTED] were reviewed for the period of 07/03/2015 to 10/29/2015 for this continuing

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BSA: [REDACTED]

### BSAR Transcript

BSA: [REDACTED] and DCN: [REDACTED]

#### Narrative

activity investigation, and eight (8) wire credits were concerning. The review identified three (3) suspicious incoming wire credits to account [REDACTED] between 07/14/2015 and 08/28/2015 totaling \$22,369.81, and five (5) suspicious incoming wire credits to account [REDACTED] between 07/14/2015 and 10/22/2015 totaling \$32,618.50

The details of the eight (8) suspicious wire credits are identified below.

On 07/14/2015 account [REDACTED] was credited with an incoming wire transfer of \$8,767.82 from Denso Trading Ltd, London via Trasta Komercbanka, Riga, Latvia. The bank has an address of PALASTA STREET 1, RIGA, LV 1050 LATVIA. The wire details state the wire is for the purpose of "PMNT BY INV W/N DD 05.2015 FOR CLOTHES".

On 08/12/2015 account [REDACTED] was credited with an incoming wire transfer in the amount of \$6,886.74 from the same above-referenced originator and Latvian bank for "PMNT BY INV W/N DD 06.2015 FOR CLOTHES. On 08/28/2015 the account receives a third wire from the same originator and originating Latvian bank in the amount of \$6,715.25 for "PMNT BY INV W/N DD 07.2015 FOR CLOTHES".

On 07/14/2015, account [REDACTED] was credited with an incoming wire transfer in the amount of \$10,312.66 from the same above-referenced Denso Trading LTD originating entity with the funds originating from the same Latvian bank and account number ([REDACTED]). Similar to the wires above, wire notes indicate that the purpose of the wire payment is for "PMNT BY INV 05.2015 FOR CLOTHES". On 08/12/2015, account [REDACTED] was credited with an incoming wire transfer in the amount of \$7,636.23 from the same aforementioned Denso LTD entity and the same Latvian bank account. Target account [REDACTED] received three additional concerning wire payments from the same originating Denso Trading entity and Latvian financial institution (TRASTA KOMERCBANKA) on 08/28/2015 for \$6,330.83, on 09/15/2015 for \$1,055.14, and on 10/22/2015 for \$7,283.64. The 09/15/2015 wire credit utilized the following instructing bank to facilitate the wire payment: [REDACTED] Account [REDACTED]. The 10/22/2015 wire credit to target account utilized the following instructing bank: [REDACTED]. Account [REDACTED].

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BSAR Transcript

BSA: [REDACTED] and DCN:

**Narrative**

Bank records indicate that these wires are being sent on behalf of Crocus International who has an apparent operating interest in the Nobu Moscow restaurants according to external research. External research also indicates that Crocus International is a Russian business and development firm owned by Aras Agalarov who is a Member of the Executive Board of the Russian Union of Industrialists and Entrepreneurs according to external research. The indirect nature of the wire activity from the Crocus entity (via the Denso Trading business entity) through a high-risk jurisdiction via a Latvian financial institution with a history of anti-money laundering concerns was deemed suspicious.

The use of funds in the reviewed accounts consists primarily of transfers to entities who appear to have beneficial ownership in the Nobu Restaurant group and appear non-concerning at this time.

FRB customer Merrick Rhodes communicated with a representative of Nobu Moscow and Nobu Crocus via electronic mail on 08/27/2015 indicating that the licensing payments for the two Russian restaurants must be sent from a Crocus International Account.

At the time of this report, the accounts remain open and will be monitored for any continuing activity. This continuing suspicious activity report [REDACTED] identified continued activity involving incoming wire transfers that lacked a clear apparent business purpose from what appears to be a potential shell entity.

The continuing suspicious activity, which occurred between 07/14/2015 and 10/22/2015, totaled \$54,988.31. The total cumulative amount of suspicious activity, which occurred between 11/27/2013 and 10/22/2015, totals \$224,845.31.

Supporting documentation is available upon request for authorized law enforcement and/or regulatory agencies. For assistance, contact First Republic Bank's BSA/AML Group at [REDACTED]. Please reference case [REDACTED].

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