



**APPLICANT:**

**Nozat Fraidoon Mohammed Mohammed**

# DUE DILIGENCE INVESTIGATION REPORT

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Prepared for:

Saint Lucia Citizenship by  
Investment Program (CIP)

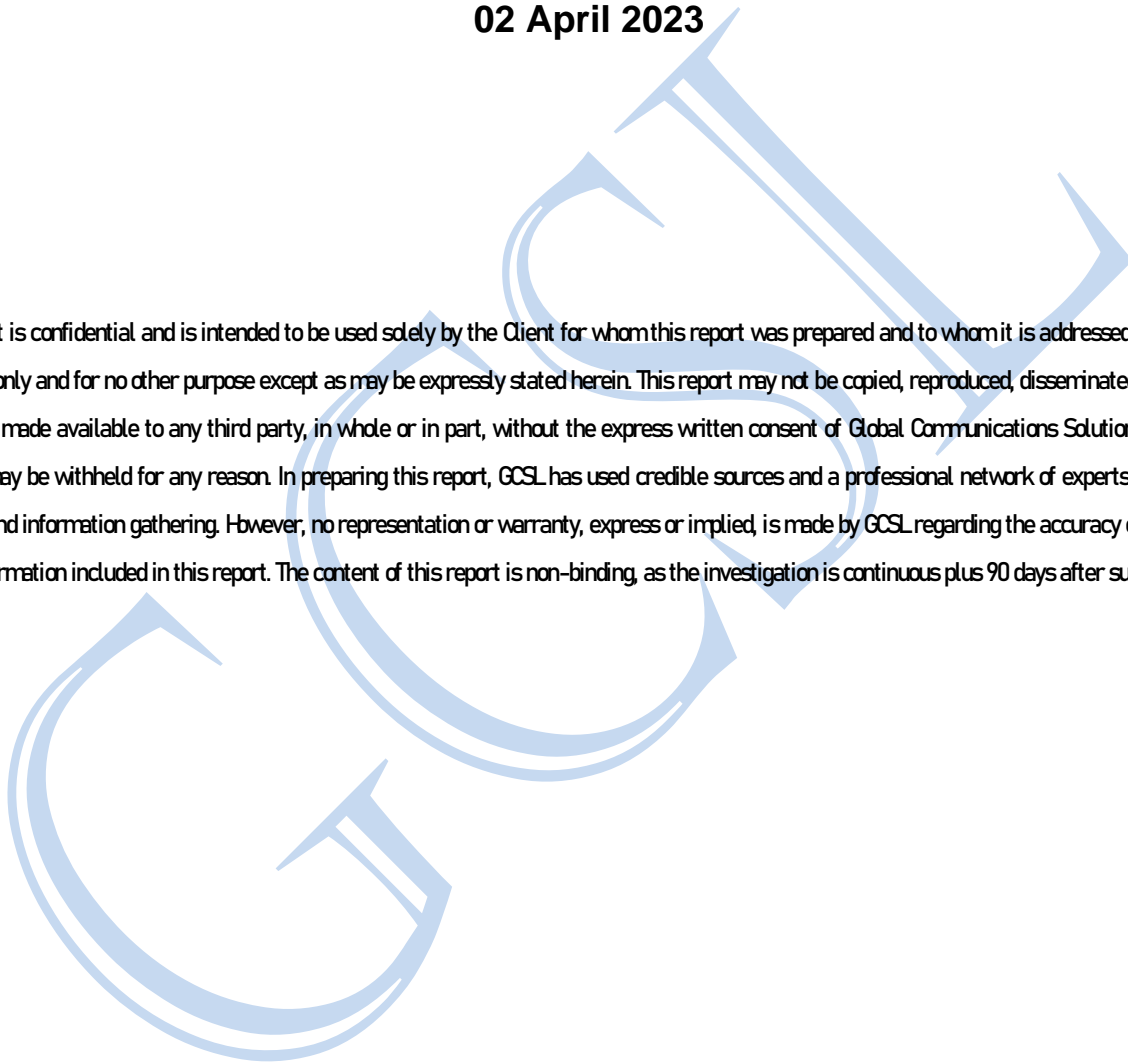
**CONFIDENTIAL**

## **REPORT**

**SUBMITTED:**

**02 April 2023**

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## Contents

Introduction .....	4
Summary.....	5
Derogatory Information .....	5
Family Inquiries.....	5
Most Important Persons/ Companies .....	6
Inquiries – Mr. NOZAT FRAIDOOON MOHAMMED MOHAMMED .....	6
Civil Litigation Investigation.....	6
Criminal Record Investigation .....	6
Bankruptcy Investigation.....	6
Corporate Interests Investigation .....	6
World Compliance Investigation .....	6
Media and Internet Searches.....	7
Investigator Report.....	7
Risk Management Review .....	8
Security Risk Matrix .....	9

## Introduction

Saint Lucia Citizenship by Investment Programme has retained Global Communications Solutions Limited (GCSL) to conduct professional security vetting surrounding the following individual:

**Nozat Fraidoon Mohammed Mohammed**

Mr. Mohammed intends to conduct business with Saint Lucia Citizenship by Investment Program. A global security vetting was recommended to determine the applicant's suitability to do business. GCSL commissioned an international security check on the subject name and the other information provided to satisfy the recommendation.



## Summary

	Candidate Provided Details	Verified	Issues
Name	NOZAT FRAIDOOON MOHAMMED MOHAMMED	YES	
Place of Birth	BAGHDAD, IRAQ	YES	
Date of Birth	13 JUNE 1972	YES	
P.P. ID	A20685863	YES	
ID Card	19233297779	YES	
Known Address	HOUSE NO, 217/001/668/00 ITALIAN CITY 2 ERBIL, IRAQ	YES	
Corporate Affiliations	NOZAT BUREAU FOR CURRENCY EXCHANGE	NO	See sections below

## Derogatory Information

### Type of Inquiries

Sources searched	Clear	Comments
Civil Litigation	Yes	
Criminal Record	Yes	
Bankruptcy records	Yes	
Global Sanctions and Watchlists: <ul style="list-style-type: none"> <li>• Global Sanction Database (GSD)</li> <li>• Office of Foreign Access Control (OFAC)</li> <li>• Excluded Parties List System (EPLS)</li> <li>• U.S. Department of State</li> </ul>	Yes	
Global Law Enforcement Data	Yes	
International Embassies/Mission	Yes	
Global Regulatory Data	Yes	
Global P.E.P/High-Profile persons/ Foreign Government Official Data	Yes	
Adverse Media and Internet Searches	Yes	

## Family Inquiries

Family Member	Relation	Date of Birth	Passport Number	Place of Birth	Comments
Kashan Nozat Fraidoon Fraidoon	Child	01-JUL-2009	A17749048	IRAQ	Cleared

## Most Important Persons/ Companies

Name	Location	Comments
Top View Company	Erbil, Iraq	No Security Issues Detected
Bawand Company	Erbil, Iraq	No Security Issues Detected

## Inquiries – Mr. NOZAT FRAIDOOON MOHAMMED MOHAMMED

### Date of Birth, Nationality, and Address Details

	Details provided by the candidate	Findings by GCSL
Date of Birth	13 JUNE 1972	13 JUNE 1972
Place of Birth	BAGHDAD, IRAQ	BAGHDAD, IRAQ
Nat. ID	19233297779	19233297779
Current Address	HOUSE NO, 217/001/668/00 ITALIAN CITY 2 ERBIL, IRAQ	HOUSE NO, 217/001/668/00 ITALIAN CITY 2 ERBIL, IRAQ

### Civil Litigation Investigation

Civil litigation investigation on the subject's name and information; reported no findings.

### Criminal Record Investigation

A criminal record investigation on the subject's name and information at National Central Bureau, Baghdad; reported no findings.

### Bankruptcy Investigation

Global bankruptcy investigation on the subject's name and information; reported no findings.

### Corporate Interests Investigation

Global corporate investigation on the subject's name and information; reported no findings.

### World Compliance Investigation

Searches conducted using a certified database; reported no findings.

## Blacklist Investigation

Searches conducted through certified criminal databases and foreign government embassies reported that the applicant is unknown. However, in 2007 the US State Department discovered a Jordanian company Al-Anmar Office which they suspected of being used to funnel prohibited weapons and money into Iraq for use by the former regime. Further investigation by our investigators found two different Al-Anmar companies operating in Iraq in addition to the Al-Anmar Office for Money Exchange, as disclosed by the applicant.

Sources include:

- U.S. Federal Investigation Bureau (F.B.I.)
- International Police (INTERPOL)
- European Police (EUROPOL)
- National Crime Agency (NCA)
- U.S. State Department (Foreign Investigation & Intelligence)
- U.S. Department of Treasury and the Excluded Parties list in the United States

## Media and Internet Searches

The applicant has a limited digital footprint with no security concerns. However, investigators reviewed a social media page with the applicant's name: **Nawzad Faraydon**. The investigation surrounding this name did not unearth any security issues.

**Source:-** <https://www.facebook.com/nawzad.faraydon.7>

## Investigator Report

The applicant passed all the necessary due diligence checks, as reflected in the table under the Derogatory Information section. Investigators did not uncover illegal or criminal activity records, international bans, and "red" or "restrictive lists of international law enforcement bodies.

There were no adverse findings, such as disreputable partners and undisclosed associates; however, the applicant's source of funds for investment is questionable. The investigators reported that on SL5 Form, the applicant declared he is a director or shareholder in Nozat Bureau For Currency Exchange; however, investigators could not locate any official

business license or government records for establishing or registering the currency exchanged business.

Investigators also confirmed the Blacklist findings, which indicated Al-Anmar Company registered in Jordan, was used as a front company and engaged in significant illegal activities in 2007 for the former Iraqi regime. Investigators note that the applicant was an accountant from 1990-2007 for Al-Anmar Office for Money Exchange, operating in Iraq.

## Risk Management Review

The Risk Management Team (R.M.T) reviewed the investigators' report and found no direct connection between the Al-Anmar Company registered in Jordan and Al-Anmar Office for Money Exchange operating in Iraq. However, the RMT recognizes the credibility of the investigators finding to include other Al-Anmar Office companies operating inside Iraq that could have ties to the Jordanian company.

The RMT also reviewed the Nozat Bureau For Currency Exchange, owned by the applicant, and concluded that the applicant needs to provide additional documentation surrounding his business operation, given that this is his main source of income for investment.

The RMT, in its review of all documents provided by the applicant, noted that the National Bank of Iraq document dated 21 December 2022 with an approved seal was addressed to the Government of Saint Kitts and Nevis with an operational date of 15 September 2022. Investigator found no indication that the applicant conducted business with the Government of St. Kitts and Nevis. The questioning of the applicant's source of funds remains valid due to the opening date of his bank account no—163786 and business activities.

The applicant's background survey and cross-reference checks did reveal some financial and national security issues. The rigorous research and investigations deem the applicant of questionable character with possible national security threat and reputational risk to the island of St Lucia until the applicant provides additional information for further security verification.

All documents submitted with the application are genuine and verified per the legal requirements. The Risk Management Team recommends advance scrutiny and secondary review of this application.



## Security Risk Matrix

APPLICANT RISK RATING KEY	<b>LOW</b> 0 – ACCEPTABLE	<b>MEDIUM</b> 1 – ALARP as low as reasonably practicable	<b>HIGH</b> 2 – GENERALLY UNACCEPTABLE	<b>EXTREME</b> 3 – INTOLERABLE
	— OK TO PROCEED	— TAKE MITIGATION EFFORTS	— SEEK SUPPORT	— PLACE EVENT ON HOLD

		SEVERITY			
		ACCEPTABLE LITTLE TO NO EFFECT TO NATIONAL SECURITY	TOLERABLE EFFECTS ARE FELT, BUT NOT CRITICAL TO NATIONAL SECURITY	UNDESIRABLE SERIOUS IMPACT TO NATIONAL SECURITY	INTOLERABLE COULD RESULT IN NATIONAL SECURITY CRISIS
LIKELIHOOD					
IMPROBABLE RISK IS UNLIKELY TO OCCUR	<b>LOW</b> – 1 –	<b>MEDIUM</b> – 4 –	<b>MEDIUM</b> – 6 –	<b>HIGH</b> – 10 –	
POSSIBLE RISK WILL LIKELY OCCUR	<b>LOW</b> – 2 –	<b>MEDIUM</b> – 5 –	<b>HIGH</b> – 8 –	<b>EXTREME</b> – 11 –	
PROBABLE RISK WILL OCCUR	<b>MEDIUM</b> – 3 –	<b>HIGH</b> – 7 –	<b>HIGH</b> – 9 –	<b>EXTREME</b> – 12 –	

Based on our evaluation of the information surrounding the applicant. The National Security risk to the country is 2-2.

<b>Risk Categories to Determine Matrix</b>	
<b>Personal Details</b>	<b>Legal / Regulatory Matters</b>
<ul style="list-style-type: none"> <li>• Country of residency</li> <li>• Undisclosed, incorrect, incomplete personal information</li> <li>• Unable to validate ID information</li> </ul>	<ul style="list-style-type: none"> <li>• Criminal record</li> <li>• Criminal record involving Integrity</li> <li>• Subject of litigation</li> <li>• Affiliated person/entity subject to litigation</li> <li>• Subject of bankruptcy</li> <li>• Affiliated person/entity subject to bankruptcy</li> <li>• Professional license disbarment/revocation</li> </ul>
<b>Business Details</b>	<b>PEP / Sanctions / Watchlist</b>
<ul style="list-style-type: none"> <li>• Ties to offshore activity</li> <li>• Ties to high-risk jurisdictions</li> <li>• Ties to high-risk industries</li> <li>• Incomplete business disclosure</li> </ul>	<ul style="list-style-type: none"> <li>• PEP / Close association with PEP</li> <li>• Listed in sanctions or watchlist</li> <li>• Affiliated person/entity listed in sanctions or watchlist</li> </ul>
<b>Source of Wealth / Source of Funds</b>	<b>Media</b>
<ul style="list-style-type: none"> <li>• A person who is the source of wealth/funds not included</li> <li>• Questions concerning the source of wealth/funds</li> </ul>	<ul style="list-style-type: none"> <li>• Negative news</li> <li>• Negative news on affiliated person/entity</li> <li>• Negative Social Media activities</li> </ul>
<b>Additional Risk Factors</b>	
<ul style="list-style-type: none"> <li>• Additional information that raises the risk</li> </ul>	

GCSL was retained to conduct research into the applicants. GCSL risk and compliance researchers gathered and assessed information in this document exclusively for the government of St. Lucia and according to the specifications of the terms of engagement between GCSL and the government of St. Lucia. This document is meant for the Client only. Distribution of this document or its contents, in whole or in part, to any party outside the Agreement is prohibited except as approved in the Agreement. GCSL accepts no liability for any decisions or actions made or not made based on the information in this document. All information in this document is based on information available to GCSL when writing the document. GCSL assumes no responsibility to update the document to include new information unless otherwise specified in this document, in the Agreement, or in case a new Agreement is created.

