

See email from Appleby re Popovic KYC. What should we do?

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Sent from my Wireless Handheld

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**From:** Allister Crossley [ACrossley@applebyglobal.com]  
**Sent:** 20.02.2013 16:04 GMT  
**To:** Alexey Bely; Sergey Bezborodov  
**Cc:** Aidan McCowliff <AMcCowliff@applebyglobal.com>; Juan Thornley <JThornley@applebyglobal.com>  
**Subject:** FW: A Group - CLG structuring slides.pptxs

Dear Alexey & Sergey

Thank you for the below. This has been forwarded to me as we would handle the incorporation and management of the new structure.

I have carried out our initial research on the ultimate client as we have identified him as a PEP. During these checks it has been highlighted that there are allegations that the client has not filed reports to the Anti-Corruption Agency in respect of contracts that have been signed in respect of his companies. I have attached the link for your information.

<http://www.business-anti-corruption.com/en/country-profiles/europe-central-asia/serbia/corruption-levels/public-procurement-and-contracting/>

Given the proposed structure will hold the clients various businesses, could you please provide further information on the above to allow us to satisfy our Compliance requirements.

Your assistance in this matter is greatly appreciated.

With kind regards

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## **APPLEBY**

**THE RIGHT PEOPLE THE RIGHT PLACES**

**Bermuda BVI Cayman Islands Guernsey Hong Kong Isle of Man Jersey London Mauritius Seychelles Shanghai Zurich**

**From:** Juan Thornley  
**Sent:** 20 February 2013 12:46  
**To:** Allister Crossley  
**Subject:** FW: A Group - CLG structuring slides.pptxs