[redacted]

[redacted]

[redacted]

Filing Information

Type of Report	Initial Report Joint Report
Filing Date	03/11/2020
Received Date	03/11/2020
Entry Date	03/12/2020
Submission Method	Electronic batch filing

Subject Information

Subject 1 of 2 : BORGERSON

Role	Subject	
Subject Type	Both Purchaser and Payee	
Individual/Organization	Individual	
Last(or Entity) Name	BORGERSON	
First Name	SCOTT	
Middle Name	G	
Gender Type	Male	
Date of Birth	[redacted]	
SSN/ITIN		
Address(es)	Address Type	Subject permanent/mailing address
	Street Address	[redacted]
	City	[redacted]
	State	MA
		MA - Enhanced
	ZIP Code	[redacted]
	Country	US
		US - Enhanced
Phone Number(s)	**Phone Number 1 of 2**	
	Type	Mobile
	Number	[redacted]
	Phone Number 2 of 2	
	Type	Residence
	Number	[redacted]
Email(s)	[redacted]	

[redacted]

[redacted]

[redacted]

[redacted]

Subject Information

	[redacted]	
Occupation/Type of Business	CEO of Cargo Metrics	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	[redacted]
	Relationship of Subject	Customer: Yes
Relationship to Financial 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 2 of 2 : MAXWELL		
Role	Subject	
Subject Type	Both Purchaser and Payee	
Individual/Organization	Individual	
Last(or Entity) Name	MAXWELL	
First Name	GHISLAINE	
Gender Type	Female	
Date of Birth	[redacted]	
SSN/ITIN		
Address(es)	Address Type	Subject permanent/mailing address
	Street Address	[redacted]
	City	
	State	MA
		MA - Enhanced
	ZIP Code	[redacted]
	Country	US
		US - Enhanced
Phone Number(s)	**Phone Number 1 of 2**	
	Type	Mobile

[redacted]

[redacted]

[redacted]

[redacted]

Subject Information

	Number	[redacted]
	Phone Number 2 of 2	
	Type	Mobile
	Number	[redacted]
Email(s)	[redacted]	
Occupation/Type of Business	Executive Management	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	[redacted]
	Relationship of Subject	Customer: Yes
Relationship to Financial 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]

Suspicious Activity Information

Amount Involved	$1,906,662
Date or Date Range of Activity	02/18/2015 - 10/17/2019
Money laundering	Other: Suspicion concerning the use of funds: Suspicious EFT/wire transfers Suspicious concerning the source of funds Suspicious use of third-party transactors (straw-man) Transaction out of pattern for customer(s)
Other suspicious activities	Human trafficking
Financial product	Deposit account Credit card
Financial instrument or payment mechanism	Funds transfer

Activity Location

Financial Institution Location 1 of 2		
No Branch Activity Involved	Yes	
Type of Financial Institution	Depository institution	
Primary Regulator	OCC	

[redacted]

[redacted]

[redacted]

[redacted]

Activity Location

RSSD Number	[redacted]	
Legal Name	[redacted]	
EIN	[redacted]	
Role in Transaction	Selling/Paying Location	
Address	Address Type	Address where transaction occurred
	Street Address	[redacted]
		[redacted] Enhanced
	City	[redacted]
		[redacted] Enhanced
	State	[redacted]
		[redacted] Enhanced
	ZIP Code	[redacted]
		[redacted] Enhanced
	Country	US
		US - Enhanced
Financial Institution Location 2 of 2		
No Branch Activity Involved	Yes	
Type of Financial Institution	Depository institution	
Primary Regulator	FDIC	
RSSD Number	[redacted]	
Legal Name	[redacted]	
EIN	[redacted]	
Role in Transaction	Selling Location	
Address	Address Type	Address where transaction occurred
	Street Address	[redacted]
		[redacted] - Enhanced
	City	[redacted]
		[redacted] Enhanced
	State	[redacted]
		[redacted] - Enhanced
	ZIP Code	[redacted]
		[redacted] - Enhanced
	Country	US
		US - Enhanced

Filer Information

Primary Regulator	OCC

[redacted]

[redacted]

[redacted]

Filer Information

Filer Name	[redacted]	
EIN	[redacted]	
Address	Address Type	Reporting party address
	Street Address	[redacted] - Enhanced
	City	[redacted] Enhanced
	State	[redacted] Enhanced
	ZIP Code	[redacted] - Enhanced
	Country	[redacted] Enhanced
Type of Financial Institution	Depository institution	
RSSD Number	[redacted]	
Contact for Assistance	Full Name	[redacted]
	Phone Number	
	Phone Type	Work

Law Enforcement Information

Law Enforcement Agencies Contacted	Agency Name	FBI New York Office
Law Enforcement Contact(s)	Full Name	[redacted]
	Phone Number	
	Phone Type	Work
	Contact Date	03/02/2020

Narrative

CASE ID: C2002421770 DISCOVERY DATE: 02/11/20 ADVISORY HUMAN TRAFFICKING THIS SAR IS BEING FILED JOINTLY ON BEHALF OF [redacted] BASED ON SUSPICIOUS ACCOUNT ACTIVITY AGGREGATING $1,906,661.94. BETWEEN 02/18/15 AND 10/17/19, SUSPICIOUS ACH FUNDS TRANSFERS, WIRE ACTIVITY, AND USB CREDIT CARD PAYMENTS WERE CONDUCTED WITHIN THE [redacted] FSB AND [redacted] ACCOUNTS HELD BY SCOTT G. BORGERSON AND GHISLAINE MAXWELL. DUE TO ASSOCIATION BETWEEN MRS. MAXWELL AND MR. EPSTEIN, THE SUSPICIOUS NATURE OF HER ABRUPTLY ABANDONING HER PROJECT AFTER HIS ARREST, DUE TO THE UNKNOWN SOURCE OF FUNDS, FROM OUTSIDE SOURCES, ITS UNABLE TO BE DETERMINED IF THE ACTIVITY MAY BE ASSOCIATED WITH JEFFERY EPSTEIN AS WELL AS THE,

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Narrative

THE UNKNOWN PURPOSE OF THE RENTAL PROPERTIES AND THE SCOPE OF JEFFREY EPSTEIN'S WEALTH, INFLUENCE AND EPSTEIN'S ABILITY TO SOURCE AND MOVE FUNDS TO SUPPORT HIS ALLEGED SEX TRAFFICKING APPARATUS, [redacted] BELIEVES THE ACTIVITIES ARE SUSPICIOUS. THE [redacted] PERTAINS TO $1,571,009.92. THE [redacted] SAR PERTAINS TO $335,652.02. MR. BORGENSON IS 44 YEARS OLD, A 23-YEAR [redacted] CUSTOMER AND CURRENTLY RESIDES IN MANCHESTER, MASSACHUSETTS. INTERNAL RECORDS INDICATE THAT HE IS IN EXECUTIVE MANAGEMENT POSITION, AND A SOCIAL MEDIA PRESENCE INDICATED HE IS THE CEO OF CARGO METRICS TECHNOLOGIES, A DATA SCIENCES COMPANY WORTH OVER $100M WHICH WAS CORROBORATED BY EXTERNAL RESEARCH. MR. BORGERSON CURRENTLY MAINTAINS [redacted] CHECKING AND SAVINGS ACCOUNTS [redacted] CREDIT CARD ACCOUNT, [redacted] PROPERTY AND CASUALTY (P&C) POLICY, AND [redacted] LIFE COMPANY PRODUCTS [redacted] DID NOT IDENTIFY ANY NEGATIVE NEWS OR CRIMINAL HISTORY ON MR. BORGENSON. MRS. MAXWELL IS 58 YEARS OLD, IS A THREE-YEAR [redacted] CUSTOMER AND CURRENTLY RESIDES IN MANCHESTER, MASSACHUSETTS. INTERNAL RECORDS INDICATE SHE IS IN AN EXECUTIVE MANAGEMENT POSITION AND EMPLOYED BY TERRAMAR, AN OCEAN CONSERVATION CHARITY INCORPORATED IN 2013 BY MRS. MAXWELL IN SALISBURY, UNITED KINGDOM. MRS. MAXWELL CURRENTLY MAINTAINS [redacted] CHECKING ACCOUNT, [redacted] CREDIT CARD ACCOUNT, AND A [redacted] P&C POLICY. MRS. MAXWELL REPORTED HER ANNUAL INCOME AS $250,000.00 TO $499,999.00 WITH A NET WORTH OF $1,000,000.00. EXTERNAL RESEARCH REVEALED THAT IN 2012, MRS. MAXWELL FOUNDED THE TERRAMAR PROJECT, AN ENVIRONMENTALIST NONPROFIT ORGANIZATION WITH A FOCUS ON OCEAN PROTECTION THAT WAS ABRUPTLY ABANDONED BY MRS. MAXWELL DAYS AFTER HER ASSOCIATE JEFFREY EPSTEIN WAS ARRESTED ON SEX TRAFFICKING CHARGES. ADDITIONALLY, THERE ARE NUMEROUS ALLEGATIONS, DUE TO HER TIES TO JEFFERY EPSTEIN, THAT SHE MAY HAVE PROCURED AND SEXUALLY TRAFFICKED UNDERAGE GIRLS FOR JEFFERY EPSTEIN AND OTHERS. ON 02/11/20, [redacted] CONDUCTED A REVIEW OF ALL [redacted] ACCOUNTS HELD BY MR. BORGENSON AND MRS. MAXWELL, FOR THE PERIOD OF 02/04/15 TO 02/04/20. [redacted] IDENTIFIED SUSPICIOUS ACTIVITY WITHIN [redacted] CHECKING ACCOUNT [redacted] AND [redacted] CREDIT CARD ACCOUNT [redacted]. ON 04/15/12, [redacted] CREDIT CARD ACCOUNT [redacted] HELD BY MR. BORGENSON AND MRS. MAXWELL WAS ESTABLISHED. ON 04/16/12, [redacted] CHECKING ACCOUNT [redacted] HELD BY MR. BORGENSON AND MRS. MAXWELL WAS ESTABLISHED. BETWEEN 02/18/15 AND 10/12/19, 95 ACH FUNDS TRANSFERS TOTALING $602,000.00 CREDITED [redacted] CHECKING ACCOUNT [redacted], RANGING FROM $1,000.00 TO $20,000.00. THE ORIGINATOR, SCOTT G. BORGERSON, UTILIZED EXTERNAL ACCOUNT [redacted] AT CITIZENS BANK N.A., AS THE DEBITED

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Narrative

PARTY. THIS ACTIVITY WAS DEEMED SUSPICIOUS DUE TO THE UNKNOWN SOURCE OF THE FUNDS FROM THE EXTERNAL ACCOUNT. BETWEEN 03/05/15 AND 06/01/18, 48 ACH FUNDS TRANSFERS TOTALING $208,575.00 DEBITED [redacted] FSB CHECKING ACCOUNT [redacted] RANGING FROM $1,625.00 TO $7,300.00. THE BENEFICIARIES OF THE ACH FUND TRANSFERS ARE SHELVING ROCK TRUST, UTILIZING EXTERNAL ACCOUNT [redacted] AT SANTANDER BANK, LOCATED IN PENNSYLVANIA. DIANA CHEN, UTILIZING EXTERNAL ACCOUNT [redacted] AT EAST WEST BANK, LOCATED IN CALIFORNIA AND SCOTT BORGERSON, UTILIZING ACCOUNT NUMBER [redacted] AT WELLS FARGO BANK. EXTERNAL RESEARCH IDENTIFIED SHELVING ROCK AS A PURCHASER AND SPECIALTY ASSET MANAGEMENT FIRM. INTERNAL RECORDS SHOW THE SHELVING ROCK TRUST ACCOUNT IS LINKED TO THE CUSTOMER'S PROFILE AND SUBTITLED "RED COTTAGE RENT". ADDITIONALLY, DIANA CHEN'S LINKED ACCOUNT IS SUBTITLED AS "36 BEACON RENT 7100 PMONTH". THE TRANSFERS ARE PRIMARILY FUNDED BY THE ACH TRANSFERS FROM MR. BORGERSON'S EXTERNAL ACCOUNT HELD AT CITIZENS BANK N.A. EXTERNAL RESEARCH SHOWS BOTH MR. BORGENSON AND MS. CHEN PREVIOUSLY RESIDED AT "36 BEACON ST, BOSTON, MA" WHICH CURRENTLY RENTS FOR $7,500 PER MONTH. THESE PAYMENTS WERE DEEMED SUSPICIOUS DUE TO THE UNKNOWN PURPOSE OF THE RENTAL PROPERTY. USAA AMLI DID NOT IDENTIFY ANY NEGATIVE NEWS OR CRIMINAL HISTORY ON SHELVING ROCK TRUST OR DIANA CHEN. BETWEEN 05/26/15 AND 10/17/19, 48 USB CREDIT CARD PAYMENTS TOTALING $335,652.02 DEBITED USAA FSB CHECKING ACCOUNT 140723668, RANGING FROM $2.12 TO $22,307.24. THE CREDIT CARD PAYMENTS WERE APPLIED TO USB CREDIT CARD ACCOUNT 4270826003905034 AND WERE FUNDED BY TRANSFERS FROM THE CUSTOMER'S EXTERNAL ACCOUNT AT CITIZEN'S BANK N.A WHEREAS THE ULTIMATE SOURCE OF FUNDS IS UNKNOWN. THIS AMOUNT WILL BE COUNTED TWICE DUE TO FUNDS CROSSING TO DISTINCT LINES OF BUSINESS. BETWEEN 01/03/17 AND 07/01/19, 11 INCOMING WIRES TOTALING $424,782.90 CREDITED USAA FSB CHECKING ACCOUNT 140723668, RANGING FROM $1,581.66 TO $62,726.14. THE INCOMING WIRES ORIGINATE FROM ANGARA TRUST VIA NUTTER MCCLENNEN & FISH LLP, UTILIZING EXTERNAL ACCOUNT Y1 36510 AT UBS AG AND MONTPELIER TRUST VIA NUTTER MCCLENNEN & FISH LLP, UTILIZING EXTERNAL ACCOUNT Y1 45614 AT UBS AG, AS THE DEBITED PARTY, WITH NO ASSOCIATED MEMOS. ONLINE RESEARCH SHOWS ANGARA LLC TO BE A DOMESTIC LIMITED LIABILITY COMPANY FORMED IN 2016 IN WHICH RECORDS WERE MAINTAINED C/O NUTTER MCCLENNEN & FISH LLP. ADDITIONALLY, THERE IS A PUBLISHED ARTICLE THAT IDENTIFIES ANGARA LLC AS A TRUST FORMED IN 2016 BY MRS. MAXWELL'S SISTER, CHRISTINE MAXWELL AND MR. BORGENSON. THE COMPANY WAS DISSOLVED ON 01/02/18. ALTHOUGH ONLINE RESEARCH RESULTS ARE INCONCLUSIVE, MONTPELIER TRUST APPEARS TO BE AN ACCOUNT WHOSE PURPOSE IS TO

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Narrative

PRESERVE, CONSTRUCT AND/OR REHABILITATE AFFORDABLE HOUSING UNITS. THE ACTIVITY WAS DEEMED SUSPICIOUS DUE TO THE SCOPE OF JEFFREY EPSTEIN'S WEALTH, INFLUENCE AND EPSTEIN'S ABILITY TO SOURCE AND MOVE FUNDS TO SUPPORT HIS ALLEGED SEX TRAFFICKING APPARATUS. USAA AMLI DID NOT IDENTIFY NEGATIVE NEWS OR CRIMINAL HISTORY FOR ANGARA TRUST, MONTPELIER TRUST OR NUTTER MCCLENNEN & FISH LLP ADDITIONAL ACTIVITY WITHIN THE CUSTOMERS' ACCOUNT CONSIST OF BILL PAYMENTS, PHONE PAYMENTS, AND AMERICAN EXPRESS CREDIT CARD PAYMENTS WHICH APPEARS TO BE NORMAL CONSUMER RELATED BEHAVIOR. USAA AMLI DID NOT IDENTIFY SUSPICIOUS ACTIVITY WITHIN THE CUSTOMER'S OTHER USAA ACCOUNTS. USAA AMLI BELIEVES THE ACTIVITIES ARE SUSPICIOUS AS THE CUSTOMERS RECEIVED FUNDS TRANSFERS INTO THEIR USAA FSB CHECKING ACCOUNT FROM A RELATED EXTERNAL ACCOUNT AND INCOMING WIRE TRANSFERS FROM ANGARA TRUST AND MONTPELIER TRUST VIA NUTTER MCCLENNEN & FISH LLP. ONLINE RESEARCH SHOWS ANGARA LLC WAS FORMED BY MRS. MAXWELL'S SISTER, CHRISTINE MAXWELL AND MR. BORGENSON. NO CONCLUSIVE INFORMATION WAS LOCATED FOR THE MONTPELIER TRUST. THE FUNDS EXITED THE ACCOUNT VIA USB CREDIT CARD PAYMENTS AND ACH TRANSFERS TO THE BENEFIT OF THE SHELVING ROCK AND DIANA CHEN, WHOSE ACCOUNTS ARE LINKED TO OUR CUSTOMERS PROFILE. THE PURPOSE OF THE TRANSACTIONS APPEARS TO BE RENTAL PROPERTY PAYMENTS. ALTHOUGH MR. BORGERSON IS THE CEO OF A TECH COMPANY WORTH MILLIONS OF DOLLARS AND MRS. MAXWELL'S ANNUAL INCOME OF $250,000.00 TO $499,999.00 WITH A NET WORTH OF $1,000,000.00 IS ENOUGH TO SUBSTANTIATE THE FUNDS TRANSFERS, THE OVERALL ACTIVITY IS DEEMED SUSPICIOUS DUE TO THE UNKNOWN PURPOSE OF THE RENTAL PROPERTIES, THE ASSOCIATION AND ALLEGATIONS FOUND FOR MRS. MAXWELL TOWARDS HER POTENTIALINVOLVEMENT TO PROCURE SEX TRAFFICKING VICTIMS AND THE SCOPE OF JEFFREY EPSTEIN'S WEALTH, INFLUENCE AND EPSTEIN'S ABILITY TO SOURCE AND MOVE FUNDS TO SUPPORT HIS ALLEGED SEX TRAFFICKING APPARATUS. TO DATE, THE USAA FSB CHECKING ACCOUNT AND USB CREDIT CARD REMAIN OPEN PENDING FURTHER INVESTIGATION. SUPPORTING DOCUMENTATION WILL BE PROVIDED TO LAW ENFORCEMENT UPON REQUEST. FOR ASSISTANCE, CONTACT INFORMATION SHARING TEAM WITH USAA AMLI AT 1-210-498-8970 OR LAWENFORCEMENTTEAM@USAA.COM

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