

JPMorgan Chase Bank (JPMC) is filing this Suspicious Activity Report (SAR) which originated from an external referral for transactions involving non-JPMC accounts held by a Politically Exposed Person (PEP) who remitted funds to various JPMC and non-JPMC customers, some of the recipients have ties to the adult entertainment industry, while others were unknown, or were listed in prior SAR filings related to human trafficking (HT). Additionally, the source of funds for the transactions is unknown and inconsistent with the known line of business. This activity was transacted by non-JPMC customers ROBERT HUNTER BIDEN ("HUNTER") and his law firm OWASCO PC. Activity being reported totals \$149,843.00 (rounded up) between the dates of 10/24/2016 and 05/10/2019.

OWASCO PC was identified to be a sole proprietorship law firm owned by HUNTER and established in 2006. Per internet research, the law firm specializes in intellectual property and international law.

HUNTER is a former JPMC customer who previously held a home mortgage that was paid off in 2017, as well as a credit card that was closed by JPMC due to non payment in 2016.

OWASCO PC (WELLS FARGO #9084065142) and HUNTER (using unknown account, as well as WELLS FARGO #729109035738578) sent electronic fund transfers (EFT) and checks totaling \$149,842.44 to 13 JPMC customers and non-customers between 10/24/2016 and 05/10/2019. Two of the JPMC customers were listed in prior SAR filings by JPMC reporting transactions consistent with possible Human Trafficking which are detailed below. Also, three of the JPMC customers have KYC and/or public media and social media ties to the adult entertainment industry. The other recipients have no identifiable relationship with either HUNTER or OWASCO PC which would explain the activity being reported.

ANNA DEKHTIAR (JPMC 356067030 (closed 06/14/2019)) is a Miami FL non-resident alien and Ukrainian citizen. KYC reflects she is a student born in 1995. She received a wire for \$5,100 on 12/10/2018 from OWASCO PC which was reported in SAR_NA_114256858 filed on 04/19/2019. On the same day, 12/10/2018, HUNTER also sent \$1,300 to ANNA DEKHTIAR via three (3) EFTs. The funds ANNA DEKHTIAR received from OWASCO PC and HUNTER were subsequently remitted to Oksana Naratovska located in the Ukraine via a \$7,000 wire on 12/13/2018. The wire to Oksana Naratovska, and Oksana Naratovska, were reported under the prior SAR filing, and are only being discussed here to show the full flow of funds.

OLGA KUDASHKINA (JPMC 270297812, closed on 04/30/2019) is a Russian citizen and non-resident alien residing in

OLEZIA KUDASHKINA (JPMC 270297812, closed on 04/30/2019) is a Russian citizen and non-resident alien residing in Manhattan NY. She is born in 1984 and listed "Zara" as her employer. She received an EFT from HUNTER for \$1,200.00 on 03/11/2019. Those funds were subsequently included in a wire to an individual in Russia. This activity was reported under SAR_NA_124521834 filed on 07/16/2019, but is also being included in this filing to show the full source and use of funds.

PAOLA A MARTINEZ (JPMC 266779283), ZOE G KESTAN (JPMC 755098626) and LEHUA M ALAMA-JORDAN (JPMC 290390167) each appear to be in the adult entertainment industry and are receiving payments from HUNTER and OWASCO PC. It is unclear what relationship HUNTER or OWASCO PC have with these individuals, and based on public media it appears possible the payments may be associated to prostitution or adult entertainment services.

PAOLA A MARTINEZ is a NY resident, and employed at Scores NY a high end gentlemen's club. She received three (3) quickpays for \$3,500.00 from HUNTER between 12/28/2017 and 03/26/2018.

ZOE G KESTAN is a NY resident, and employed as "freelance." Per internet research, she is a social media influencer and adult entertainer. She received six (6) quickpays for \$6,250.00 from HUNTER between 03/29/2018 and 11/20/2018.

LEHUA M ALAMA-JORDAN is a CA resident, and is employed with "Cali Girls," a gentlemen's club. She received two (2) wires totaling \$6,000.08 from OWASCO PC between 07/24/2018 and 08/27/2018, and three (3) quickpays for \$2,500.00 from HUNTER between 08/27/2018 and 10/05/2018.

Erin N Straughter is a CA resident currently employed with "FSS Management." Between June 2018 and October 2018, Erin N Straughter was employed by OWASCO PC as evidenced by her receipt of bi-weekly payroll remittances from OWASCO PC. However, during this same period of time Erin N Straughter also received large round dollar wires from OWASCO PC which referenced "new hire," "8k wage," "10k golf member," and "Pay." Erin N Straughter received five (5) wires totaling \$44,500.08 in a 4 month period between 06/12/2018 and 10/02/2018.

ANNA DEKHTIAR, OLESIA KUDASHKINA, PAOLA A MARTINEZ, ZOE G KESTAN, and LEHUA M ALAMA-JORDAN will be listed as subjects because they were either: (1) listed as subjects in prior SAR filings for transactions consistent with possible human trafficking; or (2) for their association to the adult entertainment industry and potential association with prostitution. The transactions involving the additional individuals named in this narrative and found within the attached CSV file are not included as subjects on this SAR as the individuals lack both of the characteristics detailed previously. Refer to attached CSV file for full transactional data.

Suspicious Activity Report

Home

Step 1. Filing Institution
Contact Information

Step 2. Financial Institution
Where Activity Occurred

Step 3. Subject
Information

Step 4. Suspicious
Activity Information

Step 5. Narrative

linked to negative media that alleged potential corruption, which included subjects HUNTER and OWASCO PC. Reported activity occurred between 02/03/2014 and 08/02/2019 totaling \$2,461,962.60.

SAR_NA_114256858 filed on 04/19/2019 for possible structuring, foreign wires and funding derived from an individual tied to the escort industry transacted by ANNA DEKHTIAR occurring between 11/14/2018 and 03/01/2019 totaling \$274,873.00.

OWASCO PC was also a subject in this SAR

SAR_NA_102479763 filed on 11/30/2018 (\$267,887.00 between 04/24/2018 and 10/09/2018), SAR_NA_111820881 filed on 03/20/2019 (\$134,810.00 between 01/10/2019 and 03/01/2019) and SAR_NA_124521834 filed on 07/16/2019 (\$503,420.00 between 03/09/2016 and 07/03/2019) reported structuring and possible human trafficking activity transacted by OLESIA KUDASHKINA. OWASCO PC was also listed as a subject in SAR_NA_124521834 on 07/16/2019.

Please note, effective 05/18/2019, Chase Bank USA ("Chase Bank") merged into JPMorgan Chase Bank, NA ("JPMC"). Some transactions reported herein may have been conducted through Chase Bank prior to the merger.

Supporting documentation associated with this report (SAR #: SAR_NA_133738921) includes, but may not be limited to, documents maintained or identified in case file # CASE_AML_NA_132000483 and can be retrieved upon request. Upon the