

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY ICE		TECS ACCESS CODE (b)(2)high	
REPORT OF INVESTIGATION		PAGE 1	
		CASE NUMBER (b)(2)high	
TITLE: CIRCLE GROUP LIMITED			
CASE STATUS: INIT RPT			
REPORT DATE 052901	DATE ASSIGNED 032001	PROGRAM CODE (b)(2)high	REPORT NO. 001
RELATED CASE NUMBERS:			
COLLATERAL REQ:			
TYPE OF REPORT: INVESTIGATIVE FINDINGS			
TOPIC: CIRCLE INDUSTRIES: SEIZURE OF NEGOTIABLE INSTRUMENTS			

SYNOPSIS:

On March 16, 2001, a joint Office of Investigations/Office of Field Operations team at the Federal Express International Hub in Memphis, Tennessee seized a Federal Express (FedEx) package that contained three negotiable checks valued at \$1,515,523.13, and two non-negotiable checks. The negotiable checks were seized for violations of 31 USC 5316 and 31 USC 5317. (b)(6),(b)(7)(C) CIRCLE GROUP INTERNATIONAL, 2555 Marconi Drive, Alpharetta, Georgia 30005 shipped the package. The package was addressed to Zarina FITZGERALD, H&J CORPORATE SERVICES, Shirlaw House, Shirley Street, Box SS 19084, Nassau, Bahamas.

This Report of Investigation chronicles the results of a collateral request from the Office of the Resident Agent in Charge, Memphis, Tennessee (RAIC/Memphis) to the the Office of the Special Agent in Charge, Atlanta, Georgia (SAIC/Atlanta) to identify and interview the shipper of the unreported Monetary instruments.

DISTRIBUTION: SACAT RACME SACNO	SIGNATURE: (b)(6),(b)(7)(C) SPECIAL AGENT
	APPROVED: (b)(6),(b)(7)(C) OI GRP SUPERVISOR
	ORIGIN OFFICE: AT ATLANTA - SAC
	TELEPHONE: 770 994 (b)(6),(b)(7)(C)
	TYPIST: (b)(6),(b)(7)(C)

~~OFFICIAL USE ONLY~~

THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY, ICE. ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY
ICE

PAGE 2

R E P O R T O F I N V E S T I G A T I O N
C O N T I N U A T I O N

CASE NUMBER (b)(2)high

REPORT NUMBER: 001

CASE PROGRAM CODES:

(b)(2)high MONEY LAUNDERING CON (b)(2)high FEDERAL EXPRESS OPER

~~OFFICIAL USE ONLY~~

~~THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY, ICE. ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.~~

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 3
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER (b)(2)high
	REPORT NUMBER: 001

DETAILS OF INVESTIGATION

On March 16, 2001, a joint Office of Investigations/Office of Field Operations team at the Federal Express International Hub in Memphis, Tennessee (RAIC/Memphis) seized a FedEx package that contained three negotiable checks valued at \$1,515,523.13, and two non-negotiable checks. The negotiable checks were seized for violations of 31 USC 5316 and 31 USC 5317. (b)(6),(b)(7)(C) CIRCLE GROUP INTERNATIONAL, 2555 Marconi Drive, Alpharetta, Georgia 30005 shipped the package. The package was addressed to Zarina FITZGERALD, H&J CORPORATE SERVICES, Shirlaw House, Shirley Street, Box SS 19084, Nassau, Bahamas.

The RAIC/Memphis requested that the shipper of the FedEx parcel be fully identified and interviewed regarding her knowledge of and circumstances surrounding the shipment of the unreported monetary instruments, the source and intended use of the funds and the identities and involvement of the parties listed on the checks and air waybill. If possible, it was also requested to determine when and how previous shipments of negotiable instruments by either (b)(6),(b)(7)(C) or CIRCLE GROUP, LLC to the Bahamas were made and if (b)(6),(b)(7)(C) has reported the shipment of previous negotiable instruments. It was further requested to attempt to determine if either (b)(6),(b)(7)(C) or CIRCLE GROUP, LLC reports the existence of, if any, foreign bank accounts on Federal income tax returns.

On March 19, 2001, a telephone conversation was held between Special Agent (b)(6),(b)(7)(C) SAIC/Atlanta, and Special Agent (b)(6),(b)(7)(C) RAIC /Memphis, case agent who originated the collateral request. Special Agent (b)(6),(b)(7)(C) provided background information concerning the case. SA (b)(6),(b)(7)(C) also faxed a copy of the FedEx Airway bill and correspondence from the seized package.

Air Waybill 8194-5676-8731 contained the following information:

SHIPPER:

(b)(6),(b)(7)(C)
CIRCLE GROUP, LLC
2555 Marconi Drive
Alpharetta, GA 30005
Telephone: (678) 356-1000

CONSIGNEE: Zarina FITZGERALD
H&J CORPORATE SERVICES

Shirlaw House, Shirley St., Box SS 19084
Nassau, Bahamas

CIRCLE GROUP, LLC's Fed Ex account number is 178-375-369 . The contents of the

~~OFFICIAL USE ONLY~~

~~THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY, ICE. ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.~~

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 4
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER (b)(2)high
	REPORT NUMBER: 001

package were manifested on the air waybill as "Document" with a value of "\$1" declared. The package also contained included two letters.

The first letter was written on H & J Corporate Services Ltd. Letterhead. The address from the letterhead is:

Shirlaw House, Shirley Street
P.O. Box SS-19084
Nassau, Bahamas
TEL: (242) 322-8571
FAX (242) 328-6919
EMAIL
HYPERLINK mailto:hjcorp@bahamas.net.bs
hjcorp@bahamas.net.bs

The letter was dated March 12, 2001. It listed reference ZMF (b)(6), (b)(7)(C) 147/002, and was addressed "VIA COURIER" to:

(b)(6), (b)(7)(C)

The Circle Group Ltd.
2555 Marconi Drive, Suite 100
Alpharetta, Georgia 30005, U.S.A.

The letter stated: "Dear (b)(6), (b)(7)(C) Re: The Circle Group (Bahamas), Ltd. Further to our telephone conversation of today, we forward herewith Cheque Nos. 1240 and 1260 in favour of Circle Group Limited, as requested, for endorsement. Please acknowledge receipt of the cheques by signing and returning the attached copy of the letter to us. Yours sincerely, H & J CORPORATE SERVICES LTD. /s/ Zarina FITZGERALD, Enclosure".

The second letter was written on CIRCLE GROUP, LLC letterhead. The letterhead's address is:

2555 Marconi Drive
Suite 100
Alpharetta, Georgia 30005
(678) 356-1000
(678) 356-1001 (FAX)

The following cities were also listed as part of the letterhead: Atlanta, Charlotte, Tampa, Raleigh-Durham, Orlando, Columbia, Paradise Island, Bahamas.

The undated letter read: "Dear Zarina, Enclosed please find the endorsed checks for deposit into Turks and Caicos account. Just for your information,

~~OFFICIAL USE ONLY~~

~~THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY, ICE. ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.~~

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 5
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER (b)(2)high
	REPORT NUMBER: 001

we have not been paid in full on contract as (b)(6),(b)(7)(C) has informed Central Banking. I will contact you regarding the other wire transfer that is due Circle. I have also enclosed checks for your invoices 203195, 203161, 203202, and 203162. Cash them while you can (b)(6),(b)(7)(C) I will begin to address the profile data sheets with Jerry and (b)(6),(b)(7)(C) As always, thank you for your assistance. Sincerely, /s/ (b)(6),(b)(7)(C) Controller"

The checks are drawn on First Union National Bank in Jacksonville, Florida. The checks are drawn on Harborside At Atlantis Development Limited, US \$ Project Account, P.O. Box N-4777, Nassau, Bahamas company check numbers 1206, 1240 and 1265. The account number is (b)(4) The checks are made payable to CIRCLE GROUP LIMITED, 18 Miramar, Garden Street, P.O. Box N-8877, Nassau, Bahamas. The backs of the checks are endorsed with an illegible signature. Check number 1206 are dated January 12, 2001 and are for \$29,193.03. The attached statement indicates the check is for payment of invoice number 00001626-dated 12/21/00. Check number 1240, dated February 15, 2001 is for \$387,324.45. The attached statement indicates the check is for payment of invoice 00000090-dated 1/19/01 and invoices 00002377 dated 1/31/01. Check number 1265 are for \$1,099,005.65. The attached invoice indicates the check is payment for invoice 00000194-dated 9/30/00.

(b)(6),(b)(7)(C), DynCorp Analyst, conducted intelligence analysis. The Corporate Records detail from the Georgia Secretary of State's records disclosed the following:

THE CIRCLE GROUP, LLC
2555 Marconi Drive, Suite 100
Alpharetta, Georgia 30005

Domestic Limited Liability Company, Active-In Compliance, Date Incorporated: 07/14/2000, State of Incorporation: Georgia, Corporation number: 0031790.
Corporation Officers:

(b)(6),(b)(7)(C) Registered Agent, Alpharetta, GA
(b)(6),(b)(7)(C) Applicant, Atlanta, Georgia.

Gerard C. MARCHELLETTA's date of birth is June 10, 1965. MARCHELLETTA was issued SSN: 061-62-5519 in New York.

Other businesses linked to the 2555 Marconi Drive address are:

CIRCLE INDUSTRIES (Experian number G206406) and GBIC LLC (Experian (b)(4))
Both have the 2555 Marconi Drive address listed.

Analysis conducted on (b)(6),(b)(7)(C) disclosed the following:

~~OFFICIAL USE ONLY~~

~~THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY, ICE. ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.~~

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 6
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER (b)(2)high
	REPORT NUMBER: 001

Date of Birth: (b)(6),(b)(7)(C)
 Social Security Number: (b)(6),(b)(7)(C)
 Address: (b)(6),(b)(7)(C)
 Telephone number: (b)(6),(b)(7)(C)
 Home Value: \$180,000.00
 Spouse: (b)(6),(b)(7)(C)
 Spouse's date of birth: (b)(6),(b)(7)(C)
 Spouse's SSN: (b)(6),(b)(7)(C)
 Vehicles: 1994 Dodge Intrepid (Green)
 VIN: (b)(6),(b)(7)(C)
 Plate: (b)(6),(b)(7)(C)

Information obtained for Fed Ex account number #: (b)(4) from Federal Express Security indicated several shipments to and from the Bahamas:

Delivery date: 01/09/01
 Signed by: (b)(6),(b)(7)(C)
 Delivered to: 2555 Marconi Dr., Ste. 100

Package Details:

Shipper: (b)(6),(b)(7)(C)
 Sun International
 Nassau, BS

Recipient: (b)(6),(b)(7)(C)
 Circle Industries USA
 3000 Marconi Dr., Ste. 100
 Alpharetta, GA 30005

Delivery date: 01/10/01
 Signed by: (b)(6),(b)(7)(C)
 Delivered to: 2555 Marconi Dr., Ste. 100

Ship date: 01/02/2001

Shipper: SUN INTL BAH LTD
 DEVELOPMENT
 Nassau, BS

~~OFFICIAL USE ONLY~~

~~THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY, ICE. ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.~~

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 7
R E P O R T O F I N V E S T I G A T I O N C O N T I N U A T I O N	CASE NUMBER (b)(2)high
	REPORT NUMBER: 001

Recipient: Jerry Marcheletta
Circle Industries
2555 Marconi Dr., Ste. 100
Alpharetta, GA 30005

Delivery date: 01/16/01
Signed by: (b)(6),(b)(7)(C)
Delivered to: 2555 Marconi Dr., Ste. 100

Shipper: Jerry Marchelletta
Nastasi & Associates
147 Herricks Rd.
New Hyde Park, NY 11040-5210

Recipient: Jerry Marchelletta
Circle Industries USA
2555 Marconi Dr., Ste. 100
Alpharetta, GA 30005

Delivery date: 01/31/01
Signed by: (b)(6),(b)(7)(C)
Delivered to: 2555 Marconi Dr., Ste. 100

Shipper: (b)(6),(b)(7)(C)
Circle Group
Nassau, BS

Shipped: 01/30/01

Recipient: (b)(6),(b)(7)(C)
Circle Industries USA
3000 Marconi Dr., Ste. 100
Alpharetta, GA 30005

Delivery date: 01/31/01

Delivery date: 02/19/01
Signed by: (b)(6),(b)(7)(C)
Delivered to: 2555 Marconi Dr., Ste. 100

Shipper: Reception
Decoustics LTD.
Toronto, ON M9W 1M2

~~OFFICIAL USE ONLY~~

~~THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY, ICE. ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.~~

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 8
R E P O R T O F I N V E S T I G A T I O N C O N T I N U A T I O N	CASE NUMBER (b)(2)high
	REPORT NUMBER: 001

Shipped: 01/30/01

Recipient: (b)(6),(b)(7)(C)
 Circle Group LLC
 2555 Marconi Dr., Ste. 100
 Alpharetta, GA 30005

Delivery date: 02/19/01

Delivery date: 02/28/01
 Signed by: (b)(6),(b)(7)(C)
 Delivered to: 2555 Marconi Dr., Ste. 100

Shipper: (b)(6),(b)(7)(C)
 Circle Group
 Nassau, BS

Shipped: 02/27/01

Recipient: (b)(6),(b)(7)(C)
 Circle Group
 2555 Marconi Dr., Ste. 100
 Alpharetta, GA 30005

Delivery date: 2/27/01

Delivery date: 3/02/01
 Signed by: (b)(6),(b)(7)(C)
 Delivered to: 2555 Marconi Dr., Ste. 100

Shipper: Sun International BAH LTD
 Development
 Nassau, BS

Shipped: 01/30/01

Recipient: Jerry Marchelletta
 Circle Industries
 2555 Marconi Dr., Ste. 100
 Alpharetta, GA 30005

Delivery date: 3/06/01
 Signed by: (b)(6),(b)(7)(C)
 Delivered to: 2555 Marconi Dr., Ste. 100

~~OFFICIAL USE ONLY~~

~~THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY ICE. ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.~~

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 9
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER (b)(2)high
	REPORT NUMBER: 001

Shipper: (b)(6),(b)(7)(C)
Circle Group
2450 Reubens Ridge
Ritz C

Shipped: 03/05/01
Recipient: Accounting
Circle Group
2555 Marconi Dr., Ste. 100
Alpharetta, GA 30005

Delivery date: 03/06/01

Delivery date: 3/07/01
Signed by: (b)(6),(b)(7)(C)
Delivered to: 2555 Marconi Dr., Ste. 100

Shipper: Circle
Paradise island Drive
Nassau, BS

Shipped: 03/0601

Recipient: (b)(6),(b)(7)(C)
Circle Industries USA
2555 Marconi Dr., Ste. 100
Alpharetta, GA 30005

Delivery date: 03/06/01

Delivery date: 03/14/01
Signed by: (b)(6),(b)(7)(C)
Delivered to: 2555 Marconi Dr., Ste. 100

Shipper: Zarina M. Fitzgerald
Higgs & Johnson
Nassau, BS

Shipped: 03/13/01

Recipient: (b)(6),(b)(7)(C)
The Circle Group Ltd
3000 Marconi Dr., Ste. 100
Alpharetta, GA 30005

~~OFFICIAL USE ONLY~~

~~THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY, ICE ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.~~

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 10
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER (b)(2)high
	REPORT NUMBER: 001

Delivery date: 03/13/01
 Signed by: (b)(6),(b)(7)(C)
 Delivered to: 2555 Marconi Dr., Ste. 100

Shipper: (b)(6),(b)(7)(C)
 Circle Group
 Nassau, BS

Shipped: 03/12/01

Recipient: (b)(6),(b)(7)(C)
 Circle Group LLC
 2555 Marconi Dr., Ste. 100
 Alpharetta, GA 30005

Delivery date: 01/31/01

Delivery date: 01/09/01
 Signed by: (b)(6),(b)(7)(C)
 Delivered to: 2555 Marconi Dr., Ste. 100

Shipper: (b)(6),(b)(7)(C)
 Sun International
 Nassau, BS

Recipient: (b)(6),(b)(7)(C)
 Circle Industries USA
 3000 Marconi Dr., Ste. 100
 Alpharetta, GA 30005

Delivery date: 2/28/01
 Signed by: (b)(6),(b)(7)(C)
 Delivered to: 2555 Marconi Dr., Ste. 100

Shipper: (b)(6),(b)(7)(C)
 Circle Group
 Nassau, BS

Shipped: 02/27/01

Recipient: (b)(6),(b)(7)(C)
 Circle Group
 2555 Marconi Dr., Ste. 100
 Alpharetta, GA 30005

~~OFFICIAL USE ONLY~~

~~THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY, ICE ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.~~

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 11
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER (b)(2)high
	REPORT NUMBER: 001

Delivery date: 02/27/01

Delivery date: 03/06/01

Signed by: (b)(6),(b)(7)(C)

Delivered to: 2555 Marconi Dr., Ste. 100

Shipper: (b)(6),(b)(7)(C)
Circle Group

2450 Reubens Ridge
Ritz Carlton

Shipped: 03/05/01

Recipient: Accounting
Circle Group
2555 Marconi Dr., Ste. 100
Alpharetta, GA 30005

Delivery date: 03/06/01

Delivery date: 03/14/01

Signed by: (b)(6),(b)(7)(C)

Delivered to: 2555 Marconi Dr., Ste. 100

Shipper: Zarina M. Fitzgerald
Higgs & Johnson
Nassau, BS

Shipped: 03/13/01

Recipient: (b)(6),(b)(7)(C)
The Circle Group Ltd
3000 Marconi Dr., Ste. 100
Alpharetta, GA 30005

Delivery date: 03/13/01

Signed by: (b)(6),(b)(7)(C)

Delivered to: 2555 Marconi Dr., Ste. 100

Shipper: (b)(6),(b)(7)(C)
Circle Group
Nassau, BS

~~OFFICIAL USE ONLY~~

~~THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY, ICE. ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.~~

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 12
R E P O R T O F I N V E S T I G A T I O N C O N T I N U A T I O N	CASE NUMBER (b)(2)high
	REPORT NUMBER: 001

Shipped: 03/12/01

Recipient: (b)(6),(b)(7)(C)
 Circle Group LLC
 2555 Marconi Dr., Ste. 100
 pharetta, GA 30005

Delivery date: 01/31/01

TECS analysis disclosed the following:

Primary Query History passenger Activity for (b)(6),(b)(7)(C) was negative.
 Primary Query History passenger Activity for Gerard C. MARCHELLETTA, indicated the following international trips using US passport # 046116019:

Date	Destination
01/12/01	NASSAU BD, AP, PRE INTL
01/10/01	NAS -NASSAU INTL
11/17/00	NASSAU BD, AP, PRE INTL
11/15/00	NAS -NASSAU INTL
10/14/00	NASSAU BD, AP, PRE INTL
09/02/00	ARUBA QUEEN BEATRIX
08/28/00	AUA -REINA BEATRIX
05/08/00	NASSAU BD, AP, PRE INTL DOC:
04/13/00	NASSAU BD, AP, PRE INTL DOC:
06/10/99	NASSAU BD, AP, PRE INTL DOC:

A query of I-94 arrival/departure data yielded 22 entries for Zarina FITZGERALD. A Primary Query Passenger Activity History of Zarina FITZGERALD indicated three trips:

Date	Destination
07/21/00	NASSAU

~~OFFICIAL USE ONLY~~

THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY ICE. ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.

~~OFFICIAL USE ONLY~~

DEPARTMENT OF HOMELAND SECURITY ICE	PAGE 13
REPORT OF INVESTIGATION CONTINUATION	CASE NUMBER (b)(2)high
	REPORT NUMBER: 001

4/29/00 MIAMI

(Trinidad & Tobago Airlines from Barbados (Grantley Adams) to Miami using Barbados passport # (b)(6),(b)(7)(C))

04/18/00 NASSAU

Information was submitted to Intelligence Research Specialist (b)(6),(b)(7)(C) for analysis. Financial transaction information was negative for CIRCLE INDUSTRIES and Gerard MARCHELLETTA. The following Currency and Transaction Reporting Information concerning Zarina FITZGERALD and H&J CORPORATE SERVICES, Bahamas was discovered:

FITZGERALD, ZARINA 02191967 0463177 2000R20000731418132 02162000:
\$26,000 deposited into First Union account (b)(4) on 2/16/2000 by
(b)(6),(b)(7)(C) for Zarina Fitzgerald, both of the Bahamas.

FITZGERALD, ZARINA 02191967 263860 2000R20000873008932 01202000
\$25,000 deposited into First Union account (b)(4) on 1/20/2000 by
(b)(6),(b)(7)(C) on behalf of Zarina Fitzgerald.

FITZGERALD, ZARINA 02191967 263860 2000R20000873009932 02032000
\$20,000 deposited into First Union account (b)(4) on 2/3/2000 by (b)(6),(b)(7)(C)
(b)(6),(b)(7)(C) on behalf of Zarina Fitzgerald.

Eleven Currency Transaction Report (CTRs) were found for this account. Three separate owners and addresses are listed for the account. The owners are (b)(6),(b)(7)(C) Zarina FITZGERALD, and (b)(6),(b)(7)(C). The address for transactions conducted by (b)(6),(b)(7)(C) and Zarina FITZGERALD is Bernard Road, Apt. 2, Nassau, Bahamas. (b)(6),(b)(7)(C) used Box EE 17203, Nassau, Bahamas for one transaction. (b)(6),(b)(7)(C) used the address CUMMELEUN Road, Nassau, Bahamas. The transactions varied in amount from \$11,420.00 to \$40,000.00. The total amount for the 11 CTRs is \$195,376.00.

No records were for Account (b)(4) First Union National Bank, Jacksonville FL. No information was obtained on H&J CORPORATE SERVICES.

The Investigation continues.

~~OFFICIAL USE ONLY~~

~~THIS DOCUMENT IS LOANED TO YOU FOR OFFICIAL USE ONLY AND REMAINS THE PROPERTY OF THE DEPARTMENT OF HOMELAND SECURITY, ICE. ANY FURTHER REQUEST FOR DISCLOSURE OF THIS DOCUMENT OR INFORMATION CONTAINED HEREIN SHOULD BE REFERRED TO ICE HEADQUARTERS TOGETHER WITH A COPY OF THE DOCUMENT.~~