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BY ELECTRONIC MAIL

Mr. John Marzulli
United States Department of Justice
Eastern District of New York
271 Cadman Plaza East
Brooklyn New York, 11201
John.Marzulli@usdoj.gov

Re: Memo #1 - Goldman Sachs [Deferred Prosecution Agreement](#) Fiasco

Dear Mr. Marzulli:

How does New York based bank fraud happen from the inside?

People who commit crimes comprise departments and divisions of corporate organizations. Memo #1 comprises international Graduate research that teases incidents of Board Directors ethical malfeasance in protection of Deferred Prosecution

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guarantees. Empowering Goldman's CEO and CFO failure in secure justice and overall integrity fundamental to institutional bank design.

- International financial crime and corruption incubates when the private search for economic advantage and personal advancement clashes with laws and norms that condemn such behavior. Further complicating the picture, some illegal corrupt transactions drain public resources away from education, health care, and effective infrastructure—the kinds of investments that can improve economic performance and raise living standards for all.
- The cost of corruption is greater than the sum of lost money: distortions in spending priorities undermine the ability of the state to promote sustainable and inclusive growth. This is possible in a framework already characterized by "weak law" that creates both a certain alteration of the rules of the market and perverse dynamics distorting the economy and inhibiting free competition.

Mr. Marzulli, Memo #1 ultimately seeks the Department of Justice's (DOJ) guidance on Deferred Agreement compliance failures by Goldman's Board, CEO and CFO. Further, assessing the DOJ's appetite to engage enforcement of potential Deferred Agreement breaches.

The following section will outline four potential breaches for DOJ evaluation that directly impact xNY.io - Bank.org's global enterprise.

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Potential Deferred Agreement Compliance Failure(s)

The DOJ's enforcement of Deferred Agreement compliance may be necessary given the perpetual failure of Goldman's Board of Directors, CEO and CFO ethical engagement functions of human and civil rights law. xNY.io - Bank.org requests the DOJ's assessment of Goldman's fundamental integrity to self-police potential compliance failures core to the Deferred Agreement's mandate. Today it could be argued Goldman is exploiting no incentive to self-police failures of justice guaranteed by the United States of America. .

1. Turn this matter as we will, and look at it from any side whatsoever, and it presents the appearance of a cross-border criminal operation. Goldman's obvious disrespect to the Deferred Agreement's core values has cultivated new crimes that manipulate cross-border regulatory arbitrage AML frameworks.
2. For example, the graduate research behind Memo #1 is based in Nicosia, Cyprus. Nicosia is the southeasternmost of all EU member states' capitals. It has been continuously inhabited for over 4,500 years and has been the capital of Cyprus since the 10th century. The Greek Cypriot and Turkish Cypriot communities of Nicosia segregated into the south and north of the city respectively in early 1964, following the fighting of the Cyprus crisis of 1963–64 that broke out in the city.

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3. This separation became a militarised border between the Republic of Cyprus and Northern Cyprus after Turkey invaded the island of Cyprus in 1974, occupying the north of the island, including northern Nicosia. Today North Nicosia is the capital of Northern Cyprus, a state recognized only by Turkey, that is considered to be occupied Cypriot territory by the international community.

Apart from its legislative and administrative functions, Nicosia has established itself as the island's financial capital and its main international business centre. In 2018, Nicosia was the 32nd richest city in the world in relative purchasing power.

1. Consirpiane Act of Aggression (War Crime) , if properly implemented, invoice controls would ensure that JPMorgan was not funding corruption by labeling corrupt third-party payments as legitimate business expenses. the Bank granted many third-party intermediaries exemptions from invoice requirements without documenting or explaining the basis for doing so; because the Bank had no controls to ensure that the entity requesting payment was the same third-party intermediary that had contracted with the Bank; because the Bank had no controls to ensure that the third party intermediary had a contract or other agreement with the Bank before performing the services; and because the Bank could not reconcile actual payments with the invoices...

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Williams also raised concerns about JP Morgan's inaccurate books and records. There were inconsistencies between the TPI payment records and the Bank's centralized payment systems that feed into its general ledger. For example, a former government official ('TPI1') was a high risk JPMorgan third-party intermediary for Jamie Dimon ('Dimon'), JPMorgan's Chief Executive Officer. The Bank processed the invoices for TPI1 through the 'emergency payment method.' The Bank's policies made clear that the 'emergency payment method' should be used for urgent payments critical to the day-to-day operations of Chase such as emergency utility bills 'to prevent the lights from going out.' The TPI1 invoices did not satisfy this standard, thus leaving the payment method open to unchecked corrupt payments and violations of the Bank's accounting controls, the NPA, SEC Order, SEC rules and regulations, and provisions of Federal law relating to fraud against shareholders. Further, the payments as reflected in the general ledger did not correspond with management's general or specific authorization for the invoice payments, thereby creating inaccurate records that also constituted violations of the NPA, the SEC Order, SEC rules and regulations and/or provisions of Federal law relating to fraud against shareholders.

In the current case, the SEC is relying on the Audit Committee of the Board of Directors of JPMorgan Chase to oversee a newly hired "Compliance Consultant." This is the same Board of Directors that has retained the same Chairman and CEO, Jamie Dimon,

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throughout this unprecedented crime wave – even giving Dimon a \$50 million bonus less than a year after the bank had notched its fourth and fifth felony count.

This serial crime wave at the largest federally-insured bank in the United States warrants the urgent attention of the Senate’s Permanent Subcommittee on Investigations, which previously investigated the bank and issued a 300-page report which found that it had used deposits to gamble in derivatives in London and lose at least \$6.2 billion. Dimon also sat at the helm of the bank at that time.

Respectfully yours with anticipation,



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