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MM 62-4956

FRED PHILLIPS of the Registrar General's Department, (commonly called Registry Office), Nassau, Bahamas, has been known to the reporting Agent for a number of years and has always been most cooperative. He was furnished a list of the various insurance companies, agencies and firms described in report of SA WILLIAM F. HOOD, JR., dated January 31, 1963, at Chicago, in the case entitled "JAMES RIDDLE HOFFA; CHARLES W. BRAY; ET AL" (Bureau file 63-7893), but found that only the following were registered:

British International Insurance Company, Ltd.; Tropical Holdings, Ltd.; Jonsphilips, Ltd. together with Intercontinental Life and General Insurance Company, Ltd., which turns out to be a firm operated by JOHN MICHAEL KEARNEY.

FD 302's are set out concerning the registry of these four firms.

PHILLIPS stated that during July 16-18, 1963, he had attempted to make discreet inquiries among his contacts in the pertinent law firms as to the true ownership of these companies but had met no success, probably because the firms are inactive and the files in the law firms would not be accessible to his contacts.

STANLEY R. MOIR, Superintendent, Criminal Investigation Branch, Bahamas Police, upon being asked about TAYLOR, ALBURY, STEVENSON and MOREE, officers and directors of Intercontinental Life and General Insurance Company, Ltd, stated that they were all members of the extreme left wing of the Progressive Liberal Party and that if interviewed, the next edition of STEVENSON's paper, "The Herald" would doubtless have a big headline about the FBI snooping around the Progressive Liberal Party. For this reason, no direct contact with these people is contemplated; It further being suggested that they are merely figurehead officers in this firm which actually was run by JOHN MICHAEL KEARNEY.

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Mr. FRED PHILLIPS of the Registrar General's Department, Nassau, Bahamas, (commonly known as the Registry Office), related that there are approximately 6,000 corporations listed in the Registry Office, probably 75% of these corporations having been founded in the last 10 years, because of the growing awareness among American investors and operators, of the tax advantages offered by the Bahama Islands.

Mr. PHILLIPS further stated that approximately half of these corporations are bona fide visibly operating firms, whereas the other 3,000 or so do not operate visibly and many of them do not even file the reports of annual meetings required by Bahama law.

Mr. PHILLIPS stated that these reports consist simply of any changes in officers, directors, capitalization, etc. No reports are required as to operations, finances, or employees or stock transfers.

Mr. PHILLIPS further added that there is a statutory penalty of five pounds (\$14.00) for each day of delinquency in filing these reports, however, this penalty is never imposed. Therefore, Mr. PHILLIPS pointed out, as to these 3,000 or so corporations whose operations are not visible, and who do not file their reports, the Registry Office has only a list of incorporators, officers and directors. Typically, such firms are incorporated by an attorney whose fees run from 100 guineas (\$294.00) to \$600.00, the latter figure being that charged by STAFFORD L. SANDS, the leading Nassau Attorney.

When such firms are thus founded through an attorney's office, the stockholders, officers and directors will invariably be clerical personnel of the attorney's office and sometimes the attorney himself. The purpose, of course, being to obscure the true owners and operators of the corporation. Mr. PHILLIPS stated that the incorporating attorney, of course, will not furnish any information as to the true owners of the corporation, advancing the attorney - client relationship as his reason.

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FD-302 (Rev. 1-25-60)

FEDERAL BUREAU OF INVESTIGATION

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Mr. FRED PHILLIPS, of the Registrar General's Department, (commonly called the Registry Office), Nassau, Bahamas, advised that his records show that Jonsphilips, Ltd. was organized October 16, 1961 with an authorized capital of 10,000 shares at one pound each. The officers, directors and subscribers are shown as follows:

> President-Director LIONEL LEVINE, Nassau Solicitor: Vice President-Director BARBARA MARIAN GAMBLIN, Nassau Clerk; Secretary-Treasurer and Director ANN MARGARET BUNTING, Nassau Secretary; DOUGLAS EUGENE DUNCOMBE, Nassau Bookkeeper; EUSTACE GORDON CHEE, Nassau Bookkeeper.

Each of the above owned one share.

Mr. PHILLIPS commented that the above people are, to his knowledge, employees of the law firm of STAFFORD L. SANDS in Nassau.

The articles and Memorandum of Association contain 48 "objects", the first of which is "To carry on the business of insurance agents and brokers in all their branches". The remaining 47 paragraphs set forth various powers to do business. The registered office of the corporation is shown as building 309, north side of Bay Street, which Mr. PHILLIPS observed is the law office of STAFFORD L. SANDS.

The file further shows that as of May 16, 1962, following a meeting, the officers and directors are now:

> President-Treasurer-Director JOHN T. RUDDY, Nassau Executive; Vice President-Secretary and Director JAMES W. EAGAN, Denver, Colorado Executive.

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FEDERAL BUREAU OF INVESTIGATION

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Mr. FRED PHILLIPS of the Registrar General's Office, (commonly called the Registry Office), produced the file on the Intercontinental Life and General Insurance Company, Ltd., which was organized June 14, 1962 with an authorized capital of 1,000 shares at one pound each. The subscribers were shown as:

LIONEL LEVINE, Nassau Solicitor;
BARBARA MARIAN GAMBLIN, Nassau Clerk;
DOUGLAS EUGENE DUNCOMBE, Bookkeeper;
ANNE MARIE BUNTING, Secretary Executive Nassau;
EUSTACE GORDON CHEE, Nassau Bookkeeper.

Each of the above, according to the files, subscribed for one share each.

The "objects" of the firm were detailed in 48 paragraphs, the first of which is "To carry on the business of an insurance company in all its branches", the other 47 paragraphs setting forth other related powers.

The officers and directors of the firm were shows as:

President-Director HENRY MILTON TAYLOR,
Nassau company Director;
Vice President-Director PRESTON ALBURY, Company
Director;
Vice President-Director CYRCIL ST. JOHN
STEVENSON, Nassau Company Director;
LYCIUS MOREE, Company Director of Nassau;
Secretary-Treasurer-Director JOHN MICHAEL
KEARNEY, Executive.

There were no entries subsequent to June 14, 1962.

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Mr. PHILLIPS stated that the subscribers are all employees of the office of STAFFORD L. SANDS, prominent Nassau Attorney.

Mr. PHILLIPS further pointed out that the officers, TAYLOR, ALBURY, STEVENSON and MOREE, are all prominent members of the Progressive Liberal Party of the Bahamas, adding that CYRILAST. JOHN is publisher of the Nassau Herald", the organ of that political party, and that HENRY MILTON TAYLOR has operated several small financial institutions connected with that political party.

Mr. PHILLIPS stated that he understands that Mr. KEARNEY is an American citizen and has operated several firms in Nassau recently.

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FRED PHILLIPS of the Registrar General's Department, (commonly called the Registry Office), Nassau, Bahamas, furnished a file relating to Tropical Holdings, Ltd. which showed that this name was assumed after an extraordinary general meeting April 12, 1957 of the firm previously called Ventures, Ltd. which was founded March 8, 1957. Mr. PHILLIPS pointed out that no subsequent entries have been received in this file.

The file shows that Ventrues, Ltd. was incorporated March 8, 1957 with an authorized capital of 1,000 shares at one pound each. The subscribers and directors are shown as:

President-Treasurer and Director PETER DONALD GRAHAM, Nassau Attorney;

Secretary and Director JOLANTA MARIA GRAHAM, Nassau Economist and Secretary;

Director DAISY MARGARETTA BETHEL, Nassau Secretary; EDITH LUCRETIA GRAHAM, Nassau widow; IDA POPLOWSKI, Nassau widow.

Each of the above persons were shown as owning one share of stock.

Mr. PHILLIPS commented that each of the above persons is either connected with the law office of PETER DONALD GRAHAM or is related to him, adding that the registered office of the firm is located in the Rootes Building where Mr. GRAHAM maintains his office.

The "objects" of this firm are set out in 39 paragraphs and generally enable the firm to buy, sell, hold, exchange, and pledge securities and obligations of private companies and to operate as traders, investors and brokers in such securities.

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Mr. FRED PHILLIPS of the Registrar General's Department, (commonly called the Registry Office), Nassau, Bahamas, furnished a file on the British International Insurance Company, Ltd., which was organized January 26, 1960 with an authorized capital of 1,000 shares at one pound each. The officers, directors and subscribers are shown as:

President and Director STAFFORD LOFTHOUSE SANDS,
Nassau Attorney;
Vice President-Treasurer and Director BARBARA
MARIAN GAMBLIN, Nassau Clerk;
Secretary and Director EILEEN HART DE GREGORY,
Nassau Secretary;
MARY CATHERINE MALONE, Secretary;
YVONNE ARANHA, Secretary.

Each of the above held one share of stock.

The last entry in this file was a report of an extraordinary meeting held July 18, 1961 wherein an additional 249,000 shares of stock were created, making a total of 250,000 shares at one pound each. Also it was shown that following this meeting, DOUGLAS EUGENE DUNCOMBE was elected Secretary replacing EILEEN HART DE GREGORY.

The articles and Memorandum of Association contained 48 paragraphs or "objects", the first of which is "To carry on the business of an insurance company in all its branches", the remaining paragraphs generally detailing other related powers of the corporation. The registered office of the firm is building 309, north side of Bay Street, which is the office of STAFFORD SANDS, prominent Nassau Attorney, according to Mr. PHILLIPS, who also pointed out that all the names appearing in the file are those of employees of Mr. SANDS.

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Superintendent W. G. BAILEY of the Criminal Intelligence Branch, Bahamas Police, advised that JOHN MILTON KEARNEY's business landlord for the Intercontinental Companies was W. G. ELCOCK, owner of the Hampshire House.

Mr. BAILEY stated that ELCOCK is a fugitive from the United Kingdom being wanted there on a fraud charge which is not extraditable. Mr. BAILEY stated that no cooperation could be reasonably expected from ELCOCK.

Efforts were made to contact ELCOCK during July 17 & 18, 1963. He was finally reached by telephone late July 18, 1963, at which time he stated that he had very little information to offer and was quite busy and did not wish to be interviewed.

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