## THE PARNAS FAMILY WIRE TRANSFERS RELEASED IN THE PUES LAWSUIT REVEAL MORE THAN YOU THINK

Much of what we know about the details of the transactions at the heart of the indictment of Lev Parnas and Igor Fruman was revealed in the lawsuit Michael Pues brought against Parnas for a scam in which Parnas got Pues to invest in a movie project that never came about. Because Parnas owed Pues \$500,000, Pues was able to obtain Parnas business and family financial records including wire transfer information. Back in June of this year, the Campaign Legal Center obtained those records and included them in its supplemental filing on their complaint about the \$325,000 contribution Parnas and Fruman made to America First Action.

The wire transfer records, which include a full page of incoming transactions and a full page of outgoing transactions, can be found as exhibits at the end of this filing by CLC. An accompanying explainer by CLC gives us this background on how the transaction broke the law (GEP is Global Environmental Partners):

And those documents reveal that GEP never contributed to America First Action.

Wire transfer records show that another LLC managed by Parnas. Aaron Investments I, LLC, transferred \$325,000 to America First Action on May 17, 2018. The super PAC never disclosed receiving money from Aaron Investments I, LLC—it instead attributed the contribution to GEP.

It is not clear why Parnas or Fruman asked America First Action to

misattribute the contribution, nor is it clear why the super PAC went along with this scheme. But in doing so, America First Action violated the straw donor ban: it accepted a contribution from one entity, and reported it as having come from another entity.

The explainer also gives us this on how the funds came into Aaron Investments I, LLC:

Other wire transfer records show that just two days before making the super PAC contribution, Aaron Investments I, LLC received a \$1.26 million transfer from the client trust account of a Miami real estate attorney named Russell S. Jacobs (the funds in a client trust account don't belong to the attorney: they belong to the attorney's client.) Absent that transfer, it appears that the LLC would not have had the funds to cover the \$350,000 contribution.

So the money used for the contribution appears to have come from Jacobs' client. We don't know who that client is—but Jacobs, the real estate attorney, specializes in working with foreign real estate buyers and advising realtors on how to avoid federal requirements aimed at disclosure of foreign buyers who use shell companies to launder money through U.S. real estate. In 2016, for example, he hosted a seminar titled "Avoid the Treasury Trap with Foreign Buyers."

And yes, when we look at the wire transfer records, we see \$1,260.329.80 coming in to Aaron Investments I, LLC on May 15, 2018 from Jacobs:

Only two days later ,on May 17, is the transfer of \$325,000 back out to America First Action:



But these records also show us two more transfers out of Aaron Investments I, LLC and five more coming into it. There is one more outgoing wire transfer, and it may be the most interesting. It is marked as coming from a personal account for Svetlana Parnas, who married Lev in 2012. The transaction occurred on May 11, or four days before the \$1.26 million transfer came in. It is for \$3556.75. The recipient is marked as Victor Imber:

SENT		ORIGINATOR		BENEFI	CIARY	TD BANK, NA
)5/11/18 10:4		SVETLANA M		Victor Imber		ABA SET UP
)5/11/18	21842	CYPRESS PALM	CT 5778	NW 23rd Way	10:44AM	BOCA RATON FL
3428	Boca	Raton, FL, 33496		alm Beach FL	\$3,556.75	DOGRITORIE
PHONE			B&P CHECKING		40,000.70	SET UP BY
VETLANA I	M PARN			R SVETLANA M	PARNAS	\$0.00 FEE
		17618 FED # G0	181313963501 0	OPAL ID	FARNAS	\$0.00 FEE

That is a very interesting name. The Daily Beast was first to investigate the contribution to America First Action and this is what they found back on July 19 of 2018:

We end today's edition with a mystery.
Leading pro-Trump super PAC America
First Action disclosed nearly \$5 million
in second-quarter contributions this
week. Among its donors was a company
called Global Energy Producers LLC
(GEP). It donated \$375,000 in May,
putting the company among the deeppocketed group's top 20 donors. But
there's very little indication of what
the company does or who's behind it.

It appears that GEP was incorporated in April in Delaware, a notorious black hole for corporate disclosure. But FEC filings listed its address as a Boca Raton, Florida, property owned by someone named Victor Imber. The FEC has no record of the Russian-born Imber or

GEP making any previous federal political contributions. Additional public records indicate that Imber may have rented the property to someone named Michael Braid, who likewise has no other apparent connections to the company or history of political contributions. Braid did not respond to questions about GEP. Numerous calls to Imber went unanswered.

Hmm. So six days before Victor Imber's address was used as a false location for Global Energy Partners Producers in a false representation that GEP made the contribution to America First Action, Sevetlana Parnas wired Victor Imber a little over \$3500. Perhaps that is the actual "rental" of this address that was going on. That stands out as pretty significant.

But there's more! I've heard mention of money going back out to Igor Fruman's company, and yes, there it is. A transfer of \$490,000 went out to FD Import & Export on May 16, only one day after the big transfer came in and a day before the America First Action transfer went out:



It's especially confusing for Fruman's company to get money from Aaron Investments I, LLC, because Fruman never shows up in any of the corporate filings for it. For further interest, David Correia was originally the Registered Agent and eventually a member, but Lev Parnas filed a form with the state on October 2, 2017 removing Correia from the company and making Svetlana the Registered Agent. Parnas backdated the form to June 15.

Mysteriously, there's also a transfer into Aaron Investments I, LLC from FD Import and Export for \$11,500 on May 10, five days before the big

transfer in from the real estate attorney:

Perhaps Parnas had some expenses in getting the large infusion of funds organized? The indictment describes the \$1.26 million as coming from "a private lending transaction between Fruman and third parties". Other reports in the media have said it was a private loan secured by property Fruman owns. At any rate, we can rest assured that the government knows who the third parties are and there's a good chance we will find out once the case goes to trial. It should also be noted here that in other reports, Parnas has claimed the \$1.26 million came from the sale of a condo.

Getting back to the rest of the wire transfers, we find another outgoing transfer on the same day as the funds going to Fruman's company, May 17. This transfer is for \$12,950 and went to JetSmarter, Inc. That company has been described as an Uber service for private aircraft. This could well be payment for one of the many trips Parnas and/or Fruman made. I've tried to see if that time coincides with any of the trips we've seen reported, but so far nothing:



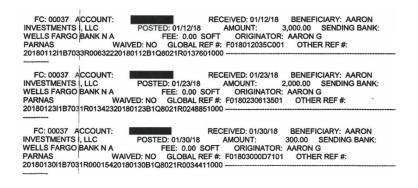
But the choice of flight provider is very interesting. Virtually every name associated with JetSmarter is Russian. In 2017, the then-CEO, Edward Gennady Barsky, resigned when he was indicted for embezzling \$11 million from the real estate investment company he had just left to come to JetSmarter. The current CEO, who is one of the founders, is Sergey Petrossov, who is only 30. His father spent 15 years in Russian prisons and is best friends with "Vyacheslav Ivankov, a.k.a. Yaponchik, who's been called the John Gotti of the Russian mob and once had a

crew of 100 soldiers in Brighton Beach". Yes, that Brighton Beach, aka South Brooklyn, where Lev Parnas grew up and got his first job selling co-ops for Fred Trump. I'm pretty sure this isn't the first time Ivankov's name has come up in the stories about Parnas and Fruman.

The earliest transaction we see in the wire transfer records is on May 30, 2017. Since it is so far removed in time from these other events, I'm not going to put the name in here from whom the money came, but it was for \$30,000 received into Aaron Investments I, LLC. The name is Russian and comes up on searches as a male in his mid-20's living in South Florida. The name also turns up in an email address for a Toyota dealership's Russian flyer, but not on that dealership's current staff list. The name is also associated with a defunct LLC incorporated in January of 2018 and dissolved by the state last month. At any rate, that's a lot of money for a kid in his mid-20's to have if he's also helping to sell Toyotas.

On December 18, 2017, we have income of \$10,000 into Aaron Investments I, LLC from WeHold, LLC. The one person affiliated with this company, which is still active, appears to be quite active in commercial real estate.

The final three wire transfers, which all came into Aaron Investments I, LLC within an 18 day period in the middle of January, 2018, totaled \$5,300. These transfers came from Aaron G. Parnas. Aaron Parnas is the son of Lev Parnas and would have been in the middle of his first year of law school at the time of these transfers:



Much about Aaron, Lev and Svetlana Parnas can be read here, where we learn that this summer, Aaron interned at the Miami office of Rudy Giuliani's former law firm. He also managed to get his undergraduate degree simultaneously with his high school diploma, which enabled him to enter law school at the age of 18. He volunteered for the Trump campaign and has said he wants to be president some day.

We of course don't know the source of these funds Aaron put into one of many entities his father named after him. Some were incorporated around the time Aaron was born. The money could be as innocent as birthday gifts from friends and family. Recall, though that the Parnas family was at that time actively avoiding paying the \$500,000 awarded to Pues in the lawsuit. And to put those funds into an entity that was being used to break the law is not a good plan for someone wanting to be president. That is, unless that someone plans to mirror the path of Donald Trump and the illegal schemes Fred used to funnel money to Donald.