

## OVERVIEW STATEMENTS AND POINTS OF SEVERITY – CASE ML 000001-6-30-25-1111, R2-7-1-25-329

This is a critical situation and raises significant red flags in Canadian securities law and anti-money laundering (AML) compliance and am asking investigators to act in haste for the protection of the public.

If a company sells a security in Canada and does not have a registered agent for KYC (or, more broadly, if it's not a registered firm or does not comply with KYC/AML obligations), here's what it means and the potential consequences:

Canadian Allowance of

1. Illegal Operation
2. Major Violations of Securities Laws
3. Major Violations of AML/ATF Laws (FINTRAC)
4. Serious Consequences

For the company:

- Fines and Penalties
- Criminal Charges
- Cease Trade Orders
- Freezing Assets
- Investigation into illicit activities

For the investor: Failure for the OSC to act for over 20 years, being notified of these activities and nothing done for 6 months for the general public means

- Lack of Protection: No regulatory body to oversee the transaction or mediate disputes.
- High Risk of Fraud: These situations are ripe for investment fraud, scams, and Ponzi schemes.
- Difficulty of more Canadians Recovering Funds without restitution: If the company disappears or is engaged in fraud, recovering invested funds can be extremely difficult or impossible.
- Canadian Citizen Exposure to Illicit Funds: Unwittingly participating in a transaction that aids money laundering could put investors at risk, though usually, the focus is on the company, and government failing its obligations.

Current Situation:

A company selling securities in Canada is not properly registered and not fulfilling its KYC/AML obligations:

1. Reported to Regulators: Full report made to the OSC in Ontario. Fraudsters still in operation 6 months later.

ECI Development is a ring of individuals operating out of a company selling securities in Canada without fulfilling its KYC obligations (or being a properly registered entity that can do so) is operating illegally and poses extreme risks to investors, citizens, and the integrity of the financial system.

This document is an ammended document which was given to the Ontario Securities Commission and to the Ontario Whistleblower Program for overview.

After much investigation, I found that Canadian Know Your Customer Law (KYC) has been 100% breached by what is CLEARLY, and DEFINATIVLY, an international money laundering ring. The OSC has not provided details. This information had to be researched directly from me. This would classify ECI Development, and the people who run this organization, an international racketeering ring selling fraudulent securities / investments.

They have privately sold me, and many others, investments without any necessary KYC background checks. They have not used any formally registered entities allowed for private securities to verify my accreditation or my permissabilty to purchase private securities. No formal information was provided in regards to protection from illegal securities from the OSC on these matters.

Neither party has requested the formal **Accredited Investor Certificate** used in Ontario and across Canada. (**Form 45-106F9**) under **National Instrument 45-106 – Prospectus Exemptions**. This form is used by issuers to confirm that an individual qualifies as an accredited investor and is legally permitted to purchase exempt securities and is a requirement for private securities purchase. These forms were NOT requested by ECI Development, or the OSC, to verify status and legalities. This should have been the **FIRST** thing to protect a taxpayer citizen in these circumstances.

SAMPLE FORM FOR OFFICIAL CANADIAN ACCREDITATION. I DO NOT HAVE THIS STATUS WITH ANY INSTITUTION.

Scotiabank SAMPLE

[https://www.scotiabank.com/ca/common/pdf/investments/Accredited\\_Investor\\_Certification.pdf](https://www.scotiabank.com/ca/common/pdf/investments/Accredited_Investor_Certification.pdf)

BACKUP ITEM SAVED TO DRIVE

[https://drive.google.com/file/d/1EBqlljHycPs2a0F-3rjajVlL0eG2O2Ff/view?usp=drive\\_link](https://drive.google.com/file/d/1EBqlljHycPs2a0F-3rjajVlL0eG2O2Ff/view?usp=drive_link)

Below are reciepts and ALL paperwork which was given for the sale of private securities. No other checks, or forms were submitted, or done. Also see section **Formal procedural oversights NOT accomplished before sale of securities**.

**Image of Shares Certificate** (current value per share is \$2.25, apparently they did a "share split", after concerns raised to appease investors, and increased the "value" of my investment)

→ [https://drive.google.com/file/d/1n4J65F-ycsmgILVR3rHB6Xv\\_FCgCIDo\\_/view?usp=drive\\_link](https://drive.google.com/file/d/1n4J65F-ycsmgILVR3rHB6Xv_FCgCIDo_/view?usp=drive_link)

Copy of countersigned shares agreement. Please NOTE Page 5 Address of ECI Development in Belize

→ [https://drive.google.com/file/d/1U0ejn4v-oWHEV7BVXZvg3kU2rNLcpdS\\_/view?usp=drive\\_link](https://drive.google.com/file/d/1U0ejn4v-oWHEV7BVXZvg3kU2rNLcpdS_/view?usp=drive_link)

Money wire for shares, teak lot, and house payment in Gran Pacifica resort to Caye Bank

→ [https://drive.google.com/file/d/1jbhjSawDqkgUM7cZMWa9LgYgyNKFVUQJ/view?usp=drive\\_link](https://drive.google.com/file/d/1jbhjSawDqkgUM7cZMWa9LgYgyNKFVUQJ/view?usp=drive_link)

Search results for ECI Development in Belize as noted in Shareholder agreement and on sales receipt

→ <https://drive.google.com/file/d/1OngVQ8Y4Qt60jY9DIRlx261z3BErK2IJ/view?usp=sharing>

At no point was it explained what an accredited investor is when filling out paperwork. (I do not fit accreditation in Canada, and am not permitted to purchase foreign securities even with exemption) I was asked to check a box, and didn't understand what it meant.

→ [https://drive.google.com/file/d/1nwUCGVP2eLcq1nWV1KvMSErHvnZg8MIC/view?usp=drive\\_link](https://drive.google.com/file/d/1nwUCGVP2eLcq1nWV1KvMSErHvnZg8MIC/view?usp=drive_link)

This falls under OSC Misrepresentation and false declaration from issuer, Improper reliance on exemption, Failure to meet disclosure obligations, Failure to meet disclosure obligations, misleading conduct under the **Securities Act, R.S.O. 1990, c. S.5**

Also falls under Canadian Criminal Code fraud, forgery or falsification of documents (s. 366–368), declaration is used to deceive regulators and investors, false pretence or misrepresentation (s. 361), issuer knowingly misleads the investor about what they're signing. If Bill C-332 passes coercion with lack of informed consent may apply.

Michael Cobb arranging a call to discuss securities sales.

→ [https://drive.google.com/file/d/18xfiODs\\_ZdbMtdNPB-kTgRpp7ZAuFWoe/view?usp=drive\\_link](https://drive.google.com/file/d/18xfiODs_ZdbMtdNPB-kTgRpp7ZAuFWoe/view?usp=drive_link)

Rachel Jensen an ECI agent, who lives in Belize followed up with email to Mike Cobb after he called about selling me shares. Illegal COERSION

→ [https://drive.google.com/file/d/1Ois7xq4HNL4fKWc84yxIJOZ0Dty8vdmW/view?usp=drive\\_link](https://drive.google.com/file/d/1Ois7xq4HNL4fKWc84yxIJOZ0Dty8vdmW/view?usp=drive_link)

April Ahess, an ECI agent who by voluntary action, said KYC was required "by the bank" only, which to my current understanding is now an implicitly deceptive, and false statement. KYC is a preliminary

requirement.

→ [https://drive.google.com/file/d/1EpD96XstLWevUv2f8qWC71GmFjTPu\\_xQ/view?usp=drive\\_link](https://drive.google.com/file/d/1EpD96XstLWevUv2f8qWC71GmFjTPu_xQ/view?usp=drive_link)

This is the link to the document which was attached and claimed was needed for KYC. This is clearly a document ECI Development used in order to deceive, and lure, unsuspecting Canadians into believing they are following Ontario KYC Law.

→ [https://drive.google.com/file/d/1FHLNDCBjtmcjBQRR9Er7DZ42HanTsUCj/view?usp=drive\\_link](https://drive.google.com/file/d/1FHLNDCBjtmcjBQRR9Er7DZ42HanTsUCj/view?usp=drive_link)

Arceila Sanchez, an ECI agent who has admitted that they no longer use ANY FORM for KYC.

→ [https://drive.google.com/file/d/1AXlkawvzhqxaFCds\\_Z\\_72NHQWchZXlcN/view?usp=drive\\_link](https://drive.google.com/file/d/1AXlkawvzhqxaFCds_Z_72NHQWchZXlcN/view?usp=drive_link)

Certified Mail to Valeria Esponiza in regards to KYC compliance, waiting for response

→ [https://drive.google.com/file/d/1evTax4YGgr6tffsaD4LklwCpwIH0hb9k/view?usp=drive\\_link](https://drive.google.com/file/d/1evTax4YGgr6tffsaD4LklwCpwIH0hb9k/view?usp=drive_link)

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## **PUNISHABLE OFFENSES CURRENTLY NOT ACTED ON**

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ONTARIO Securities Act, R.S.O. 1990, c. S.5.

→ [https://drive.google.com/file/d/1A1axnQEldyT8XjggawV1GZcnLuFBjBkh/view?usp=drive\\_link](https://drive.google.com/file/d/1A1axnQEldyT8XjggawV1GZcnLuFBjBkh/view?usp=drive_link)

## **SECTION 25 REGISTRATION**

25 (1) Unless a person or company is exempt under Ontario securities law from the requirement to comply with this subsection, the person or company shall not engage in or hold himself, herself or itself out as engaging in the business of trading in securities unless the person or company,

(a) is registered in accordance with Ontario securities law as a dealer; or

(b) is a representative registered in accordance with Ontario securities law as a dealing representative

of a registered dealer and is acting on behalf of the registered dealer.

## **SECTION 53 PROSPECTUS REQUIRED**

53 (1) No person or company shall trade in a security on his, her or its own account or on behalf of any other person or company if the trade would be a distribution of the security, unless a preliminary prospectus and a prospectus have been filed and receipts have been issued for them by the Director. 2006, c. 33, Sched. Z.5, s. 2.

ECI DEVELOPMENT DID NOT PROVIDE EXEMPTION PROSPECTUS UNDER THIS ACT FROM THE OSC, I ALSO DO NOT FIT EXEMPTIONS FOR BEING A VALID PURCHASER. WHEN ASKED FOR EVIDENCE OF SUCH PROSPECTUS FROM THE SELLER WHEN IT WAS FOUND OUT ECI DEVELOPMENTS DID NOT FOLLOW ACCREDITATION PROCEDURES. EMAIL EVIDENCE IS PROVIDED IN THIS DOCUMENT WITH A CERTIFIED DELIVERED MESSAGE SENT.

Legal Certified Email expressing concerns of the potential illegal nature of the shares after finding out about the points above. Registered email was delivered, and ignored by ECI Development.

→ [https://drive.google.com/file/d/15XC94oWND5zdDQbi8oIFMYeoVUQZKANI/view?usp=drive\\_link](https://drive.google.com/file/d/15XC94oWND5zdDQbi8oIFMYeoVUQZKANI/view?usp=drive_link)

## **SECTION 122 GENERAL CONTRAVENTION OF ONTARIO SECURITIES LAW**

122 (1) Every person or company that,

(a) makes a statement in any material, evidence or information submitted to the Commission, a Director, any person acting under the authority of the Commission or the Chief Executive Officer of the Commission or any person appointed to make an investigation or examination under this Act that, in a material respect and at the time and in the light of the circumstances under which it is made, is misleading or untrue or does not state a fact that is required to be stated or that is necessary to make the statement not misleading;

(b) makes a statement in any application, release, report, preliminary prospectus, prospectus, return, financial statement, information circular, take-over bid circular, issuer bid circular or other document required to be filed or furnished under Ontario securities law that, in a material respect and at the time and in the light of the circumstances under which it is made, is misleading or untrue or does not state a fact that is required to be stated or that is necessary to make the statement not misleading; or

(c) contravenes Ontario securities law, is guilty of an offence and on conviction is liable to a fine of not more than \$10 million or to imprisonment for a term of not more than five years less a day, or to both.

## **SECTION 126 FRAUDULENT CONDUCT IN CONNECTION WITH SECURITIES – FREEZE DIRECTION**

126 (1) If the Commission considers it expedient for the due administration of Ontario securities law or the regulation of the capital markets in Ontario or expedient to assist in the due administration of the securities laws or the regulation of the capital markets in another jurisdiction, the Commission may,

(a) direct a person or company having on deposit or under its control or for safekeeping any funds, securities or property of any person or company to retain those funds, securities or property;

(b) direct a person or company to refrain from withdrawing any funds, securities or property from another person or company who has them on deposit, under control or for safekeeping; or

(c) direct a person or company to maintain funds, securities or property, and to refrain from disposing of, transferring, dissipating or otherwise dealing with or diminishing the value of those funds, securities or property. 2014, c. 7, Sched. 28, s. 13 (1).

ALL ASSETS CONTROLLED BY ECI DEVELOPMENT, CAYE BANK, OR GRAN PACIFICA NICARAGUA  
SHOULD HAVE BEEN FROZEN BY OSC?

## **SECTION 127 CASE FOR NO HEARING**

(see document of former conviction of fraud by Caye Bank in Belize below in document)

127 - No hearing if prior conviction, etc.

127-(4.0.1) Despite subsection (4), if any of the following circumstances exist, the Tribunal may make an order described in paragraphs 1 to 8.5 of subsection (1) without giving the person or company that is subject to the order an opportunity to be heard:

1. The person or company has been found by a court in any jurisdiction to have contravened the laws of the jurisdiction respecting securities or derivatives.
2. The person or company has been convicted in any jurisdiction of an offence under

laws respecting securities or derivatives.

3. The person or company has been convicted in any jurisdiction of an offence arising from a transaction, business or course of conduct related to securities or derivatives. 2023, c. 21, Sched. 10, s. 6 (2).

**(4.1) Despite subsection (4), the Commission may make an order under paragraph 2 or 2.1 of subsection (1) without giving the person or company that is subject to the order an opportunity to be heard if the person or company fails to file a record required to be filed under this Act. 2015, c. 20, Sched. 39, s. 3.**

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## FORMAL PROCEDURAL OVERSIGHTS. NOT ACCOMPLISHED BEFORE SALE OF SECURITIES.

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### 1. Initial Investor Intake

- You're asked to complete a **Know Your Client (KYC)** form.
- This includes personal details, financial background, investment experience, and risk tolerance.

### 2. Accredited Investor Certification

- You must sign an **Accredited Investor Certificate** (as per NI 45-106F9 in Ontario).
- This form outlines the specific financial threshold you meet (e.g., income, net worth, financial assets).
- You also sign a **Risk Acknowledgement Form** (Form 45-106F12), confirming you understand the risks of investing without a prospectus.

### 3. Verification of Financial Status

The issuer or dealer must take **reasonable steps** to verify your status. This may include:

- **Tax returns** (to confirm income)
- **Bank or brokerage statements** (to confirm financial assets)
- **Net worth statements** (with liabilities listed)
- **CPA or lawyer letters** attesting to your financial standing

### 4. Suitability Assessment (if using a dealer)

- If an **Exempt Market Dealer (EMD)** is involved, they must assess whether the investment is **suitable for you**, even if you're accredited.
- This includes evaluating your investment goals, liquidity needs, and risk profile.

### 5. Filing with the OSC

- The issuer must file a **Report of Exempt Distribution (Form 45-106F1)** within 10 days of the sale.
- This report includes your investor category and confirms reliance on the accredited investor exemption.

What Should Be Investigated or Verified?

Item	Why It Matters
Your financial thresholds	To confirm you legally qualify as accredited
Your understanding of risk	To ensure informed consent (via Risk Acknowledgement)
The issuer's registration status	To confirm they're allowed to sell securities
Use of a registered EMD	Required unless the issuer qualifies for a direct exemption
Filing of Form 45-106F1	Mandatory for legal compliance with OSC

If a seller:

- Doesn't verify financial records
- Doesn't provide or collect the required forms
- Doesn't file with the OSC
- Or isn't registered to sell securities

**⚠ The security is unquestionably illegal.**

**ECI Development did NOT request any of this, thus are NOT compliant with OSC expectations. Securities are illegal, and the issuer is in breach of Sections 25, 53, 122, and 126.1 of the Ontario Securities Act.**

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**Deeply seeded concerns, and official notice to all local, OPP, and RCMP to attempt proceeding in haste in regards to the safety of Canadian Citizens who have been affected by these matters. This is without doubt, CLEARLY a criminal organization / ponzi scheme / racketeering ring, of individuals involved in international theft who are also operating illegally and breaching law around the world. I am currently in process of this company unwilling to honor warranty on a home built by them (for solar systems catching on fire, that are not engineered properly). This company is clearly siphoning money from north americans. I have included documentation about the lawsuit at the end of this document for review, with lawyer contact information.**

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## **CONCERNS WITH THE ONTARIO SECURITIES COMMISSION WHISTLEBLOWER PROGRAM**

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These breaches of Ontario Law were submitted to the Ontario Securities Commission (OSC) Whistleblower system, yet ECI Development are still not registered, are still operating a bank while committing fraud, are still soliciting and selling securities to Canadians, and do not use an official broker to sell securities to Canadians.

### **OSC Case Reference 467-540**

**OSC INITIAL SUBMISSION (OCT 8 2024)** Mistakenly thought ECI Development was based out of Bahamas but is not the same entity, as shares paperwork indicate ECI Development address as based out of Belize

→ [https://drive.google.com/file/d/1k0nykxQfFXW8Qgi0edNuBmpWqhG\\_jpa4/view?usp=drive\\_link](https://drive.google.com/file/d/1k0nykxQfFXW8Qgi0edNuBmpWqhG_jpa4/view?usp=drive_link)

### **OSC SECOND SUBMISSION IN REGARDS TO EXTENDED CONCERNS**

→ [https://drive.google.com/file/d/1fWnBDDiZPXsSvfHz6fO\\_5w-gF6M534KX/view?usp=drive\\_link](https://drive.google.com/file/d/1fWnBDDiZPXsSvfHz6fO_5w-gF6M534KX/view?usp=drive_link)

### **OSC RESPONSE TO CALL AND TOUCH BASE (CALL DID HAPPEN TO DISCUSS AND WAS PLACED UNDER WHISTLEBLOWER PROGRAM FOR REVIEW)**

→ [https://drive.google.com/file/d/1pqmITzLPMhD5AmAgX0lOVU6NPA11QtS2/view?usp=drive\\_link](https://drive.google.com/file/d/1pqmITzLPMhD5AmAgX0lOVU6NPA11QtS2/view?usp=drive_link)

**OSC FAILURE TO RESPOND TO THIS EMAIL WITH MAJOR CONCERNS INVOLVING FRAUD**

→ [https://drive.google.com/file/d/1fWnBDDiZPXsSvfHz6fO\\_5w-gF6M534KX/view?usp=drive\\_link](https://drive.google.com/file/d/1fWnBDDiZPXsSvfHz6fO_5w-gF6M534KX/view?usp=drive_link)

**OSC FINAL CORRESPONDANCE RECIEVED**

→ [https://drive.google.com/file/d/12FPKMHCVOeV9r\\_vb3SMOUJ4wWG7abZmq/view?usp=drive\\_link](https://drive.google.com/file/d/12FPKMHCVOeV9r_vb3SMOUJ4wWG7abZmq/view?usp=drive_link)

ECI Development is NOT a legitimate company, and **not a registered entity for securities solicitation, or sales within Canada, and has NOT fulfilled its obligations under OSC Securities Law.**

The list for verified securities sales agents is attached for verification purposes here. It is a list of active legal Canadian private security sales registrants taken from the Canadian OSC website. As mentioned, does NOT include any entity called ECI Development or agent Mike Cobb involved in soliciting, or selling securities legally in Canada. Please also note I do not meet any exemption status.

→ [https://drive.google.com/file/d/1B7uWNo58j\\_NA3bfFdrWy2C-CpSiZSUml/view?usp=drive\\_link](https://drive.google.com/file/d/1B7uWNo58j_NA3bfFdrWy2C-CpSiZSUml/view?usp=drive_link)

Under the **Securities Act, R.S.O. 1990, c. S.5**, the following violations apply:

- **Section 25:** Trading in securities without proper registration.
- **Section 53:** Distributing securities without filing a prospectus or qualifying for an exemption.
- **Section 122:** Making misleading or untrue statements to investors or regulators.
- **Section 126.1:** Engaging in fraud in connection with the sale of securities.

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**CANADIAN CRIMINAL CODE C-46 – LIKELY CRIMINAL VIOLATIONS**

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Criminal Code C-46

→ [https://drive.google.com/file/d/19SBI Muvqv0fiRc2bQEwKC7njqqFtnDAv/view?usp=drive\\_link](https://drive.google.com/file/d/19SBI Muvqv0fiRc2bQEwKC7njqqFtnDAv/view?usp=drive_link)

## Intentional deception, Criminal Code provisions:

- **SECTION 380 Fraud over \$5,000:** Punishable by up to 14 years in prison.  
380 (1) Every one who, by deceit, falsehood or other fraudulent means, whether or not it is a false pretence within the meaning of this Act, defrauds the public or any person, whether ascertained or not, of any property, money or valuable security or any service,
  - (a) is guilty of an indictable offence and liable to a term of imprisonment not exceeding fourteen years, where the subject-matter of the offence is a testamentary instrument or the value of the subject-matter of the offence exceeds five thousand dollars;
  
- **SECTION 462.31 - Laundering proceeds of crime:** If the evasion is used to disguise the origin of illicit funds.  
Laundering proceeds of crime  
462.31 (1) **Every one commits an offence who uses, transfers the possession of, sends or delivers to any person or place, transports, transmits, alters, disposes of or otherwise deals with, in any manner and by any means, any property or any proceeds of any property with intent to conceal or convert that property or those proceeds, knowing or believing that, or being reckless as to whether, all or a part of that property or of those proceeds was obtained or derived directly or indirectly as a result of**
  - (b) an act or omission anywhere that, if it had occurred in Canada, would have constituted a designated offence.** ( this reads to me as though if they had committed laundering there to a Canadian, it is the same as if they have committed laundering to a Canadian, as a Canadian )
  
- **SECTION 354 Possession of property obtained by crime**  
354 (1) **Every one commits an offence who has in his possession any property or thing or any proceeds of any property or thing knowing that all or part of the property or thing or of the proceeds was obtained by or derived directly or indirectly from**
  - (a) the commission in Canada of an offence punishable by indictment; or
  - (b) an act or omission anywhere that, if it had occurred in Canada, would have constituted an offence punishable by indictment.**
  
- **SECTION 465 Conspiracy to commit an indictable offence**

465 (1) Except where otherwise expressly provided by law, the following provisions apply in respect of conspiracy:

465 (1)(c) **every one who conspires with any one to commit an indictable offence not provided for in paragraph (a) or (b) is guilty of an indictable offence and liable to the same punishment as that to which an accused who is guilty of that offence would, on conviction, be liable; and (d) every one who conspires with any one to commit an offence punishable on summary conviction is guilty of an offence punishable on summary conviction.**

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## PROCEEDS OF CRIME (MONEY LAUNDERING) AND TERRORIST FINANCING ACT

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Under the **Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA)**:  
→ [https://drive.google.com/file/d/1DRNjQmW9VINcXzTuoeZBhKaLatZwmpxR/view?usp=drive\\_link](https://drive.google.com/file/d/1DRNjQmW9VINcXzTuoeZBhKaLatZwmpxR/view?usp=drive_link)

- **Section 74** – GENERAL OFFENCES *Failure to comply with record-keeping, client identification, or reporting obligations*: This is the core section that covers KYC violations.  
No official auditable reporting done to the OSC, or to investors for 20 years, no submission proper accreditation paperwork, no prospectus for exclusion
- **Section 75** – REPORTING AND REGULATIONS *Knowingly providing false or misleading information*.  
No official auditable reporting done to the OSC, or to investors for 20 years. (see video evidence)
- **Section 76** – DISCLOSURE *Failure to report suspicious transactions*.  
No official auditable reporting done to the OSC, or to investors for 20 years. (see video evidence)

KYC and Anti-Money Laundering (AML) Violations

Evading **KYC laws** breaching federal regulations under:

- **Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA)**  
This law requires firms dealing in securities to verify client identity, monitor transactions, and report suspicious activity.

VIOLATIONS OF CORE KYC violations Under Canadian Law

## Specific KYC Violations for Non-Submission

### 1. Failure to Identify Clients

- Not verifying the identity of individuals or entities before opening accounts or conducting transactions.
- Breaches **Section 5 and 6** of the PCMLTFA.

SECTION 5 (h.1), ii, iv, persons and entities that do not have a place of business in Canada, that are engaged in the business of providing at least one of the following services that is directed at persons or entities in Canada, and that provide those services to their clients in Canada:

SECTION 5 (i), persons and entities engaged in a prescribed business, profession or activity;

SECTION 5(j), persons and entities engaged in a prescribed business or profession, while carrying out a prescribed activity;

SECTION 6, Every person or entity referred to in section 5 shall keep records in accordance with the regulations.

### 2. Failure to Keep Records

- Not maintaining records of client identity, transactions, or beneficial ownership.
- Violates **Section 6** and **Section 75**.

### 3. Failure to Report Suspicious Transactions

- If no KYC is done, suspicious activity can't be flagged—this violates **Section 7** and **Section 76**.

SECTION 7 Subject to section 10.1, every person or entity referred to in section 5 shall, in accordance with the regulations, report to the Centre every financial transaction that occurs or that is attempted in the course of their activities and in respect of which there are reasonable grounds to suspect that

(a) the transaction is related to the commission or the attempted commission of a money laundering offence;

(b) the transaction is related to the commission or the attempted commission of a terrorist activity financing offence; or

(c) the transaction is related to the commission or the attempted commission of a sanctions evasion offence.

### 4. Failure to Implement a Compliance Program

- No KYC = no compliance of framework = breach of **Section 9.6** and **Section 71**.

· SECTION 9.6 9.61

(1) Every entity referred to in paragraph 5(e.1) shall take the prescribed measures related to the program referred to in subsection 9.6(1) and shall provide the prescribed information to the Centre in the prescribed circumstances.

(2) An entity referred to in paragraph 5(e.1) must provide to the Centre the name and address for service of a person who resides in Canada and who is authorized to accept, on behalf of the entity, notices that are served or caused to be served by the Centre under this Act.

**Additional Legal Consequences**

<b>Violation</b>	<b>Penalty</b>
Not identifying clients	Up to <b>\$500,000</b> (first offense)
Not reporting suspicious activity	Up to <b>\$2 million</b> and/or <b>5 years imprisonment</b>
Knowingly omitting KYC info	Treated as <b>criminal negligence</b> or <b>fraud</b>

Seriousness of these accusations provided the given evidence.

KYC is the **first line of defense** for Canadians against:

- Money laundering
- Terrorist financing
- Tax evasion
- Securities fraud

As evidenced, evading KYC entirely, regulators can assume these individuals are either **grossly negligent** or **intentionally facilitating crime without government oversight for the last 20 years against Canadians.**

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**Evidence of laundering from USA Citizens.**

**Aiding and Abetting under the Canadian Criminal Code**

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**SECTION 21 (1) OF CANADIAN CRIMINAL CODE Every one is a party to an offence who**

**(a) actually commits it;**

**(b) does or omits to do anything for the purpose of aiding any person to commit it; or**

**(c) abets any person in committing it.**

It should be noted, I am fully aware of these individuals hiding assets in Nicaragua to evade illegal security sales with the USA SEC, and who are aiding in these illegal activities. Teak is planted in Gran Pacifica Nicaragua as a security being sold, and being advertised as such (evidence following in this document). Teak sales, outright, have been evaded, legal matters ignored in response to public concerns, and community members assisting after being made aware of potentially illegal activity.

Other parties involved

Jason Taylor

Assisting Gran Pacifica as Home Owners Association / HPR administrator. He has signed the Golf Course to the Grand Pacifica Master Association which is the Home Owner Association. There is no official vote or authority to do this, and no public HOA agreement. This is in an attempt for ECI Development to evade USA Security Laws by hiding assets under a separate umbrella. This would leave "Gran Pacifica" as a company without assets and selling real estate only evading the need to register the company in the USA to sell securities. Below is a video with ear marks on a video that was submitted to my lawyer in Nicaragua who I believe is compromised. In the video, Mike Cobb has admitted to doing these acts, and continue to do these illegal acts to extract money from Canadian and American Citizens. Jason Taylor has also, worked with Gran Pacifica (a division of ECI Development) to rent golf carts, and move money through the HOA, to him personally? Kent Pain, is a co owner of the golf cart business. It is believed, the "Golf Kart business" is a front, and the proceeds actually go directly to Gran Pacifica. The HOA residents pay for upkeep of the Golf Course, while profits are never given to the HOA residents. Many other similar scandals, such as illegally taxing private home rentals, using security to extort individuals, failure to report resort day pass profits, failure to report wedding venue profits, failure to report confectionary and restaurant revenue to the US and Nicaraguan government are evident, existing, and have been documented for review. There is a lot more issues which have happened over the last 20 years. The scandal is rather large, and pre meditated.

Evidence

Conversation with Jason Taylor about who runs the Home Owners Association called Gran Pacifica Master Association (GPMA), and the legalities of making executive decisions residents do not agree on. Jason Taylor admits GPMA is run by "the developer", who is ECI Developments.

EMAIL 1 → [https://drive.google.com/file/d/16vWI7TiPg7Yye16HfoboZYupo5e2UiK2/view?usp=drive\\_link](https://drive.google.com/file/d/16vWI7TiPg7Yye16HfoboZYupo5e2UiK2/view?usp=drive_link)

EMAIL 2 → [https://drive.google.com/file/d/1coLJXcNITBDSmx7g7yLVMHOxOyDjfkXX/view?usp=drive\\_link](https://drive.google.com/file/d/1coLJXcNITBDSmx7g7yLVMHOxOyDjfkXX/view?usp=drive_link)

As noted, this is their standard response, to ignore or deflect. Ignore all pertinent requests to review HOA documents, or understand who is actually running it, which as stated is ECI Development

FINANCIAL REPORT GPMA 2022 (NO BUSINESS INCOME)

→ [https://drive.google.com/file/d/1-XkgnEGmS\\_GFWsDmGpa6Xjv7O6bKs\\_GP/view?usp=drive\\_link](https://drive.google.com/file/d/1-XkgnEGmS_GFWsDmGpa6Xjv7O6bKs_GP/view?usp=drive_link)

FINANCIAL REPORT GPMA 2023 (NO BUSINESS INCOME)

→ [https://drive.google.com/file/d/1phJBawqQitrzx58zJ8j9rX02mkLA85nJ/view?usp=drive\\_link](https://drive.google.com/file/d/1phJBawqQitrzx58zJ8j9rX02mkLA85nJ/view?usp=drive_link)

VIDEO OF MIKE COBB CONFESSING TO GOLF COURSE UNDER HOA, WHICH HE STATES “GRAN PACIFICA IS THE DEVELOPER” TIME STAMP 1:36:09

→ [https://drive.google.com/file/d/1qRjvDUm3fi6Lq0cKhFXVOscIKJIGh5h0/view?usp=drive\\_link](https://drive.google.com/file/d/1qRjvDUm3fi6Lq0cKhFXVOscIKJIGh5h0/view?usp=drive_link)

Nate Wilson (certified accountant)

While in discussion with Nate Wilson, he informed me he was under investigation by the USA SEC for Teak promotion which was a “mistake” as he claimed it was a “misunderstanding”, and assured me there was something similar happening with evidence I was seeing. The USA Securities Commission outright “ORDERED ABANDONED AND CLOSED” Mike Cobbs application to sell Teak, yet Mike Cobb has been selling it, and promoting it anyway. I have video of Nate Wilson advising Mike Cobb on “hiding assets”, and illegally using USA law to dodge taxes as well as suggest he is working for Mike Cobb. He lives and uses an investment house, in Nicaragua, but the IRA tax code implicitly states it cannot be used for the purpose of using to stay in. He admits this during an interview with Michael Cobb. A video on YouTube, and is infact living within that residence.

Message asking to aid in lawsuit for, at the time what was thought to be potential Securities Faud. TIME STAMPS (51 minutes suggests he is working for Mike Cobb), Mention of Nate Owning home in Nicaragua and using it in an IRA to avoid taxes, but lives in it, and uses it without renting. I believe this is illegal according to USA tax code.

→ [https://drive.google.com/file/d/1Gkl5VZTANt4F-iwMz\\_ze05MeFLI2iXI6/view?usp=drive\\_link](https://drive.google.com/file/d/1Gkl5VZTANt4F-iwMz_ze05MeFLI2iXI6/view?usp=drive_link)

Mike Cobb, and Joel Nagel are owners of ECI Development and also own Caye Bank. It should be noted Caye Bank is being used to move money. Deshawn, my Belize attorney and advisor, mentioned on the phone that Joel Nagel and Mike Cobb are well known individuals in Belize for moving money with high probability of fraud. Her contact information is below. I would suggest adding high level individuals at Caye Bank as suspect in this case for aiding in the involvement of these security fraud especially since Caye Bank advertizes Know Your Customer compliance protocols.

Advertisement of KYC compliance from owners of Bank, when clearly this is not the case.

→ [https://drive.google.com/file/d/1\\_CGTI7RweuMdtf8VFloceYu7kyh\\_6uz-/view?usp=drive\\_link](https://drive.google.com/file/d/1_CGTI7RweuMdtf8VFloceYu7kyh_6uz-/view?usp=drive_link)

Additional Individuals emailed, or spoken to in regards to KYC, or Securities and did not deliver information, or avoided responding in attachments in regards to this document.

Valeria Esponiza, Rachel Jensen, Arceila Sanchez, April Ahess, Alyssa Esquivel, – all refused to offer KYC documentation when requested, or mislead, or both in regards to ECI Development securities.

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#### **ADDITIONAL EVIDENCE OF SOLICITATION OF SECURITIES TO PEOPLE AROUND THE WORLD**

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Michael Cobb video soliciting sales of Teak, ECI Developments, to Americans, and Canadians illegally. Non of us were verified as being accredited. I signed up to his webinar under an alias. No information was gathered from me. TIME STAMP 0:56 FOR MANY CANADIANS AND AMERICANS BEING SOLICITED WITHOUT VERIFYING ACCREDITATION OR HAVING OSC EXCEPTION

→ [https://drive.google.com/file/d/1vBtsVv4OJw15\\_Xj0Nnmj9hOCAteEVY6h/view?usp=drive\\_link](https://drive.google.com/file/d/1vBtsVv4OJw15_Xj0Nnmj9hOCAteEVY6h/view?usp=drive_link)

**ECI Promoting Share Sales via email blast. Highly fraudulent activity!**

→ [https://drive.google.com/file/d/1wV22DZ1UlZntzEM33E9af5vnz3Fsyjc9/view?usp=drive\\_link](https://drive.google.com/file/d/1wV22DZ1UlZntzEM33E9af5vnz3Fsyjc9/view?usp=drive_link)

**Additional OSC Law violations**

→ [https://docs.google.com/document/d/13pgyrtMwXh1q1T-oW\\_vniuRaJOn3FF2E/edit?usp=drive\\_link&ouid=116394674591749949226&rtpof=true&sd=true](https://docs.google.com/document/d/13pgyrtMwXh1q1T-oW_vniuRaJOn3FF2E/edit?usp=drive_link&ouid=116394674591749949226&rtpof=true&sd=true)

**Legal Certified Email expressing concerns of the potential illegal nature of the shares after finding out about the bold points above. Registered email was delivered, and ignored by ECI Development.**

→ [https://drive.google.com/file/d/15XC94oWND5zdDQbi8oIFMYeoVUQZKANI/view?usp=drive\\_link](https://drive.google.com/file/d/15XC94oWND5zdDQbi8oIFMYeoVUQZKANI/view?usp=drive_link)

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## **Extended Concerns and Notice to Canadian Federal Agencies**

### **MATTER 1**

It is concerning how Canadian Federal Securities Agents are infact aware of these matters, but these people are still selling illegal securities to Canadian citizens, walking around the United States speaking in seminars for securities, and soliciting Canadians about purchasing illegal securities.

In leiu of these matters. I would like to use this chance request that the Local Police, OPP, and the RCMP investigate relevant agencies, companies and individuals for the protection of all citizens through the world who have been affected with personal gratitude. (I can provide several emails of share holders and even send email on request). Also I have emails where ECI Development refuses to release shareholder list at our request because we were all leary of their dealings, asking them to release auditable financials, and ECI would not under any circumstance, which was the beginning of my journey.

### **MATTER 2**

The individuals are selling Teak to Canadian non accredited investors in Nicaragua (I can forward contact information, they are afraid for their well being), and laundering money through illegal HPR and self imposed "laws" which are in my lawsuit against Gran Pacifica. I am asking the RCMP to contact the Nicaraguan Government to for protecting Canadians and to have the Nicaraguan government freeze all Gran Pacifica assets, and if possible arrest relevant individuals on the matters which were made clear.

### **MATTER 3**

The individuals who are fraudulently selling these securities, own an International Bank in Belize called Caye Bank. As with ANY banking institution around the world who claims to follow KYC protocols, people being caught violating KYC guidelines, or caught selling securities fraudulently, are not allowed to operate a bank. Caye Bank being no exception, yet is still in operation.

I am requesting the RCMP operate in haste in requesting to Belize authorities that this bank is **investigated in leiu of the aforementioned securities law violations, since the owners are unfit to operate a banking institution.**

Belizean law, particularly under the **Money Laundering and Terrorism (Prevention) Act (MLTPA)** and the **Banks and Financial Institutions Act**, sets out strict requirements for individuals involved in the ownership, management, or control of financial institutions. Here's how it breaks down:

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## BELIZE FIT AND PROPER TEST

Belize Legalities as well as “Fit and Proper” Test

- The Central Bank of Belize, as the supervisory authority, must assess whether individuals involved in a bank are “fit and proper.”
- This includes evaluating **integrity, competence, and financial soundness.**

A **criminal conviction for fraud** should **certainly disqualify** someone from being deemed “fit and proper.”

Belize Institutions Fit and Proper Test – Belize Financial Securities Commission (FSC) with link → [https://drive.google.com/file/d/1vXt6F4W25Cu\\_fgn9uRATga1xIVnU6Eh\\_/view?usp=drive\\_link](https://drive.google.com/file/d/1vXt6F4W25Cu_fgn9uRATga1xIVnU6Eh_/view?usp=drive_link)

### Section 3,

**ii (b)** Officers exercising shareholding and beneficial ownership interest (i.e., Shareholders and Beneficial Owners). As regards to corporate shareholders, the following will be considered: • financial soundness and strength • nature and scope of business • **fitness and propriety of key individuals**

### Section 5 I,

#### Integrity –

**(ii)** It is considered that the interest of customers or potential customers of the applicant would be threatened by the applicant’s business operations/ viability, including persons holding key positions may be considered to ascertain whether those threats identified would pose a risk to the applicant customers/investors best interests, including the reputation of Belize as a well-regulated jurisdiction.

**(iv)** Applicant, including its key individuals has been convicted of a criminal offence, particularly a financial crime<sup>1</sup> or has been subject of investigation for a regulatory breach.

**(vii) e.** Withholding of information required to be reported to the Commission without undue delay and for which the Commission determines that the information is damaging to the integrity of the applicant and any of its key individuals, including:

- **being the subject of any written customer complaint involving allegations of manipulation, deception, forgery, fraud, theft or misappropriation of funds or securities which has been proven.**
- **is named a defendant or respondent in any criminal or regulatory proceeding or any civil**

proceeding exceeding US\$25,000.00, whether in Belize or abroad may be a disqualifying factor if the outcome of the case shows culpability by relevant individuals which the Commission is not comfortable with.

**Section III.** Skill, Competence and Managerial Control – In determining the applicant's satisfaction as regards this element, the Commission will consider factors including:

i. **ability to perform duties in relation to the proposed business activity in a sound, prudent, fair, and reputable manner**

iii. the nature of the duties/**responsibilities intended to be performed or being performed, including satisfactory educational qualification, adequate expertise, skills, knowledge, as well as training** to fulfil the role for which a relevant person is to be employed or has been employed. (ECI Development employees are evading questions in regards to KYC laws)

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**BELIZE DOMESTIC BANKS AND FINANCIAL INSTITUTIONS ACT CHAPTER 263**

→ [https://drive.google.com/file/d/1NmaiB5qvLMLbwPbREqhh2EkIxRP9Ifb7/view?usp=drive\\_link](https://drive.google.com/file/d/1NmaiB5qvLMLbwPbREqhh2EkIxRP9Ifb7/view?usp=drive_link)

SECTION 5.-

(1) For the purposes of this Act, and subject to sub-section (2), whether a natural person is a fit and proper person to hold Substantial investment. **Fit and proper person.** [ ] Domestic Banks and Financial 28 [CAP. 263 Institutions THE SUBSTANTIVE LAWS OF BELIZE REVISED EDITION 2020 Printed by Authority of the Government of Belize shares or any particular position in a body corporate that applies for or holds a licence as defined in this Act shall be determined by the Central Bank, and in making such determination, the Central Bank shall make such investigations and inquiries as it deems necessary, and shall consider–

**(b) the background, experience, integrity, competence and soundness of judgment of the person;**

(2) Without prejudice to the generality of sub-section (1), in determining whether a person is a fit and proper person the Central Bank may have regard to the previous or existing conduct and activities in business or financial matters of the person in question, and, in particular, to any evidence that the person

**(a) has had any judgment (including a consent judgment) made against him or any penalty or fine imposed upon him by any court or other competent judicial authority in any country in**

any matter involving fraud, deception, dishonesty or breach of trust;

(b) engaged in any business practices appearing to the Central Bank to be deceitful or oppressive or otherwise improper (whether unlawful or not) or which otherwise discredit his method of conducting business;

(d) engaged in or been associated with any other business practices or otherwise conducted himself in such a way as to cast doubt on his competence and soundness of judgment;

(e) has, in the opinion of the Central Bank, as a director or senior officer of a bank or financial institution, insurance, or investment company participated in or contributed to decisions or other actions which seriously threatened the continued financial viability of that bank or financial institution, insurance, or investment company.

(3) In determining whether a company is a fit and proper person to be a controlling shareholder or substantial shareholder, regard shall be had to, but not limited by, the following criteria—

(b) whether the company has been found guilty of insider trading or fraud involving trading in securities by local or foreign authorities;

(g) whether in the opinion of the Central Bank the affairs of the company or any associated person are being conducted in a manner prejudicial to the soundness of the financial institution in question or the financial system of Belize; and

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## BELIZE CRIMINAL CODE CHAPTER 101

→ [https://drive.google.com/file/d/1WJi6xMLLBQGXRUn9hYxViNGyKydPVb0V/view?usp=drive\\_link](https://drive.google.com/file/d/1WJi6xMLLBQGXRUn9hYxViNGyKydPVb0V/view?usp=drive_link)

### Belize Criminal Code (Cap. 101)

- Defines fraud and related offenses, including **false accounting, obtaining property by deception, and dishonest retention of funds.**
- These offenses carry **criminal penalties** and would be material in any regulatory review of a person's eligibility to operate a bank.
- **Law 153 Obtaining property by deception**  
**153.-(1)** A person who by any deception dishonestly obtains property belonging to another, with the intention of permanently depriving the other to it, shall on indictment be liable to imprisonment for a term not exceeding 10 years.

**(4) For purposes of this section “deception” means any deception (whether deliberate or reckless) by words or conduct as to fact or as to law, including a deception as to the**

**present intentions of the person using the deception or any other person.**

- **Law 154 Obtaining money transfer by deception**

154.-(1) A person is guilty of an offence if by any deception he dishonestly obtains a money transfer for himself or another.

- **Law 155 Dishonesty retaining a wrongful credit**

155.-(b) he knows or believes that the credit is wrongful; and

(c) he dishonestly fails to take such steps as are reasonable in the circumstances to secure that the credit is cancelled.

- **Law 162 False Accounting**

162.-(1) Where a person dishonestly, with a view to gain for himself or another or with intent to cause loss to another—

(a) destroys, defaces, conceals or falsifies any account or any record or document made or required for any accounting purposes; \*\*\* SEE FALSE KYC DOCUMENT PROVIDED BY ECI DEVELOPMENTS\*\*\* or

(b) in furnishing information for any purpose produces or makes use of any account, or any such record or document as aforesaid, which to his knowledge is or may be misleading, \*\*\* SEE FALSE KYC DOCUMENT PROVIDED BY ECI DEVELOPMENTS\*\*\* false or deceptive in a material particular,

he shall, on conviction on indictment, be liable to imprisonment for a term not exceeding seven years.

- **Law 164 False statement by company directors**

164.-(1) Where an officer of a body corporate \*(ECI Development / Gran Pacifica)\* or unincorporated association (or person purporting to act as such), with intent to deceive members or creditors of the body corporate \*(ECI Development / Gran Pacifica)\* or association about its affairs, publishes or concurs in publishing a written statement or account which to his knowledge is or may be misleading, false or deceptive in a material particular, he shall on conviction on indictment be liable to imprisonment for a term not exceeding seven years.

- **Law 165 Suppression of documents**

165.-(1) A person who dishonestly, with a view to gain for himself or another or with intent to cause loss to another, destroys, defaces or conceals any valuable security \*(ECI SHARES AND TEAK)\*, any will or other testamentary document or any original document of or belonging to or filed or deposited in, any court of justice or any government department shall on conviction on indictment be liable to imprisonment for a term not exceeding seven years. \*(CONCEALED TO CANADIAN OSC)\*

- (2) A person who dishonestly, with a view to gain for himself or another or with intent to cause loss to another, by any deception procures the execution of a valuable security shall on conviction on indictment be liable to imprisonment for a term not exceeding seven years; and this subsection shall apply in relation to the making, acceptance, endorsement, alteration, cancellation or destruction in whole or in part of a valuable security and in relation to the signing or sealing of any paper or other material in order that it may be made or converted into, or used or dealt with as a valuable security, as if that were the execution of a valuable security.

- **Law 164A Offense of fraudsters**

164.-(1) Where an officer of a body corporate or unincorporated association (or person purporting to act as such), with intent to deceive members or creditors of the body corporate or association about its affairs, publishes or concurs in publishing

a written statement or account which to his knowledge is or may be misleading, false or deceptive in a material particular, he shall on conviction on indictment be liable to imprisonment for a term not exceeding seven years.

(2) For purposes of this section a person who has entered into a security for the benefit of a body corporate or association is to be treated as a creditor of it.

- **Law 20 – 24 Abetment and conspiracy**

20.-(1) Every person who—

(a) directly or indirectly instigates, commands, counsels, procures, solicits or in any manner purposely aids, facilitates, encourages or promotes the commission of any crime, whether by his act, presence or otherwise; or

(b) does any act for the purpose of aiding, facilitating, encouraging or promoting the commission of a crime by any other person, whether known or unknown, certain or uncertain, shall be guilty of abetting that crime and of abetting the other person in respect of that crime.

(2) Every person who abets a crime shall, if the crime be actually committed in pursuance or during the continuance of the abetment, be deemed guilty of that crime.

(3) Every person who abets a crime shall, if the crime be not actually committed, be punishable as follows, that is to say—

(a) if the commission of the crime be prevented by reason only of accident, or of circumstances or events independent of the will of the abettor, the abettor shall, where the crime abetted was murder, be liable to imprisonment for life, or shall where the crime abetted was any crime other than murder, be punishable in the same manner as if the crime had been actually committed in pursuance of the abetment; \*(MONEY TO BE RETURNED IN FULL)\*

(b) in any other case the abettor shall, if the crime which he abetted was a felony, be deemed guilty of a felony, or shall, if such a crime was a misdemeanour, be deemed guilty of a misdemeanour.

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### **BELIZE Domestic Banks and Financial Institutions Act**

→ [https://drive.google.com/file/d/1NmaiB5qvLMLbwPbREqhh2EkIxRP9Ifb7/view?usp=drive\\_link](https://drive.google.com/file/d/1NmaiB5qvLMLbwPbREqhh2EkIxRP9Ifb7/view?usp=drive_link)

**SECTION 18** Compliance Duties and False Statements (Criminalizes false Statements by directors or officers)

**SECTION 19** Restrictions on Dividends (No payouts when bank is non compliant)

**SECTION 27** Reports of Criminal Activity (Mandates reporting of suspicious or unlawful conduct)

**SECTION 33-36** Central Bank Examination Powers (Grants sweeping authority to inspect, audit and issue directives as they are accepting crypto currencies and gold as payments)

**SECTION 86-88** Statutory Administration and Enforcement (Allows Central bank to take over mismanaged or non compliant banks)

**SECTION 137A** Publication of Sanctions (Central Bank can now publicly name and shame violators for public safety)

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### **MLTPA (Revised 2020 & 2023 Amendments)**

- Requires financial institutions to implement **robust due diligence** and **reporting obligations**.
  - The Central Bank has the power to **sanction or revoke licenses** for non-compliance.
  - Individuals with a history of financial crime are considered **high-risk** and may trigger **regulatory intervention**.
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### **OTHER VALUABLE EVIDENCE GATHERED**

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ECI Developments was reported by me to the Canadian Ontario Securities Commission (OSC), United States Securities Commission (SEC), and the Belize Federal Securities Commission (FSC), and they are building a Marriot Hotel for investors in Belize at the moment. Joel Nagel as co founder of ECI Development, works with and has funded a large part of it using “his own”, and investor laundered money, as has Caye Bank which Joel Nagel, and Mike Cobb own and are founders of.

### **2023 Shareholder report**

[https://drive.google.com/file/d/1sXGEuFyF54RXMzwGM596CCQ0YD2ca8xB/view?usp=drive\\_link](https://drive.google.com/file/d/1sXGEuFyF54RXMzwGM596CCQ0YD2ca8xB/view?usp=drive_link)

**Shareholder video (Mike Cobb mentions they have no auditable financials for over 20 years for investors) TIME STAMP 10:40**

[https://drive.google.com/file/d/11aktX8OFxdvvgI\\_CF30f3GM9I1L7VWtW/view?usp=sharing](https://drive.google.com/file/d/11aktX8OFxdvvgI_CF30f3GM9I1L7VWtW/view?usp=sharing)

**Copy of 2020 financial report I found online. Rachel Jensen as ECI representative. She lives in Belize and was involved in the sale of illegal ECI Development shares to me.**

[https://drive.google.com/file/d/1dYAzT\\_S-iMgiNI3RRCqhtvUXnh73ECLK/view?usp=drive\\_link](https://drive.google.com/file/d/1dYAzT_S-iMgiNI3RRCqhtvUXnh73ECLK/view?usp=drive_link)

### **ECI building Marriot Hotel for shareholders in Belize**

FILE 1 (VIDEO OF MIKE COBB IN BELIZE AT HOTEL)

[https://drive.google.com/file/d/1KpqzAED-AGUZ57GSUFpFZ1xBldbyq-ba/view?usp=drive\\_link](https://drive.google.com/file/d/1KpqzAED-AGUZ57GSUFpFZ1xBldbyq-ba/view?usp=drive_link)

FILE 2

[https://drive.google.com/file/d/1SfCtczsQn0ZZ\\_5yC6cigFeOoMVM3k2aq/view?usp=drive\\_link](https://drive.google.com/file/d/1SfCtczsQn0ZZ_5yC6cigFeOoMVM3k2aq/view?usp=drive_link)

FILE 3

[https://drive.google.com/file/d/19L1XTm2a3u\\_hsB8AAvzzptjecaLJIHg/view?usp=drive\\_link](https://drive.google.com/file/d/19L1XTm2a3u_hsB8AAvzzptjecaLJIHg/view?usp=drive_link)

### **Information on Mike Cobb**

FILE 1

[https://drive.google.com/file/d/1TOzZfp5msN5UeMD1PIVZPbUllq6\\_BmYG/view?usp=drive\\_link](https://drive.google.com/file/d/1TOzZfp5msN5UeMD1PIVZPbUllq6_BmYG/view?usp=drive_link)

FILE 2

[https://drive.google.com/file/d/1ay67S1iQT-\\_uz-yh3Z4rBeUd6UY-iwPv/view?usp=drive\\_link](https://drive.google.com/file/d/1ay67S1iQT-_uz-yh3Z4rBeUd6UY-iwPv/view?usp=drive_link)

### **Information on Joel Nagel**

[https://drive.google.com/file/d/12cnsyvnCT7MioejS4-rOEc0eT71ZUcct/view?usp=drive\\_link](https://drive.google.com/file/d/12cnsyvnCT7MioejS4-rOEc0eT71ZUcct/view?usp=drive_link)

**Corporate Structure of ECI Development / Gran Pacifica company and individuals involved**

[https://drive.google.com/file/d/1Ty18nSe21-\\_wEj7gS2L1o1U8lvY7NKvx/view?usp=sharing](https://drive.google.com/file/d/1Ty18nSe21-_wEj7gS2L1o1U8lvY7NKvx/view?usp=sharing)

**NDA For viewing ECI Development financials (from what I understand now is illegal as reporting should be automatic and privledged at a moments notice) ECI Development did not disclose any financials after signing the NDA for release of the financials.**

FILE 1

[https://drive.google.com/file/d/1n1gdu8a145Z3ylwTI9L2YwgUwH-2pVJc/view?usp=drive\\_link](https://drive.google.com/file/d/1n1gdu8a145Z3ylwTI9L2YwgUwH-2pVJc/view?usp=drive_link)

FILE 2

[https://drive.google.com/file/d/1Uv9ySOgB\\_2q5C96P1korxHXLVq9ylqA5/view?usp=drive\\_link](https://drive.google.com/file/d/1Uv9ySOgB_2q5C96P1korxHXLVq9ylqA5/view?usp=drive_link)

FILE 3

[https://drive.google.com/file/d/1czY7RcskZbKhYFTNLxWVMPkRdAyYnp8\\_/view?usp=drive\\_link](https://drive.google.com/file/d/1czY7RcskZbKhYFTNLxWVMPkRdAyYnp8_/view?usp=drive_link)

FILE 4

[https://drive.google.com/file/d/1bjHbjmEX43QicvSIh9jRUvn62ufx18n3/view?usp=drive\\_link](https://drive.google.com/file/d/1bjHbjmEX43QicvSIh9jRUvn62ufx18n3/view?usp=drive_link)

FILE 5

[https://drive.google.com/file/d/1IFNdFUUp1Kekz-TKwJtFt6TwMcorr6DDP/view?usp=drive\\_link](https://drive.google.com/file/d/1IFNdFUUp1Kekz-TKwJtFt6TwMcorr6DDP/view?usp=drive_link)

**Email request to view financials, they asked me to sign an NDA, and never gave me the financials for review**

FILE 1

[https://drive.google.com/file/d/1h3nYwYxkejAqChSp\\_CXTZ4rgeUPpsRqz/view?usp=drive\\_link](https://drive.google.com/file/d/1h3nYwYxkejAqChSp_CXTZ4rgeUPpsRqz/view?usp=drive_link)

FILE 2

[https://drive.google.com/file/d/1\\_7SqOvQPUPBjvmqf7tklclWNGWSqV8XO/view?usp=drive\\_link](https://drive.google.com/file/d/1_7SqOvQPUPBjvmqf7tklclWNGWSqV8XO/view?usp=drive_link)

**Email to Mike Cobb and Alyssa Esquavel, as well as other share holders expressing concern over the video and Mike Cobb stating there are no auditable books**

→ [https://drive.google.com/file/d/1Z9ve0Kf7lfSHSG2R5xYTWMMbyWnQLuxc/view?usp=drive\\_link](https://drive.google.com/file/d/1Z9ve0Kf7lfSHSG2R5xYTWMMbyWnQLuxc/view?usp=drive_link)

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**ILLEGAL Teak Securities sales and solicitation.**

Promotion of Teak Sales

→ [https://drive.google.com/file/d/1ZwMuRMj8FolrSiRjEWODhugAw9wKpKZm/view?usp=drive\\_link](https://drive.google.com/file/d/1ZwMuRMj8FolrSiRjEWODhugAw9wKpKZm/view?usp=drive_link)

Panama Teak Sales Reciept

→ [https://drive.google.com/file/d/1Ly-ltqmzmxddCbWOeAh-vjmI2epMWLFS/view?usp=drive\\_link](https://drive.google.com/file/d/1Ly-ltqmzmxddCbWOeAh-vjmI2epMWLFS/view?usp=drive_link)

Panama Teak Sales Reciept 2

→ [https://drive.google.com/file/d/1CSEDxeddjrxBN-LII51PG3w3UAnKGEan/view?usp=drive\\_link](https://drive.google.com/file/d/1CSEDxeddjrxBN-LII51PG3w3UAnKGEan/view?usp=drive_link)

Teak purchase agreement

→ [https://drive.google.com/file/d/1FPXGS\\_GL6qzscXLL9xOylIV0WUnCM9O/view?usp=drive\\_link](https://drive.google.com/file/d/1FPXGS_GL6qzscXLL9xOylIV0WUnCM9O/view?usp=drive_link)

Email involving Teak Titling process

[https://drive.google.com/file/d/1yC6m1H5DXqi55N\\_KRCJA7FkMxvE\\_WeH6/view?usp=drive\\_link](https://drive.google.com/file/d/1yC6m1H5DXqi55N_KRCJA7FkMxvE_WeH6/view?usp=drive_link)

\*This is also when I suspected fraud. I was being given a legal Nicaraguan document for Teak I purchased in Panama.

→ [https://drive.google.com/file/d/1mElcsiOD9qfub0nNSiOn\\_AplaEEu9AV/view?usp=drive\\_link](https://drive.google.com/file/d/1mElcsiOD9qfub0nNSiOn_AplaEEu9AV/view?usp=drive_link)

Letter of valuation for Teak lot

→ [https://drive.google.com/file/d/1O7q4TI6DWKRLmM9t9DEFYHQ0WXjsgGFu/view?usp=drive\\_link](https://drive.google.com/file/d/1O7q4TI6DWKRLmM9t9DEFYHQ0WXjsgGFu/view?usp=drive_link)

Panama Paperwork for Teak

→ [https://docs.google.com/document/d/1z6oxke5XTBhS5jELi2p\\_8yU0D9pqTFDK/edit?usp=drive\\_link&oid=116394674591749949226&rtpof=true&sd=true](https://docs.google.com/document/d/1z6oxke5XTBhS5jELi2p_8yU0D9pqTFDK/edit?usp=drive_link&oid=116394674591749949226&rtpof=true&sd=true)

Teak Map

→ [https://drive.google.com/file/d/1Rpw8AVV3hL6Lfv3AfwJLrg\\_T7RGVsvIG/view?usp=drive\\_link](https://drive.google.com/file/d/1Rpw8AVV3hL6Lfv3AfwJLrg_T7RGVsvIG/view?usp=drive_link)

Teak Titling information

→ [https://drive.google.com/file/d/1fKNBV-QaX2T013yZuti7dPf94h7jhTn0/view?usp=drive\\_link](https://drive.google.com/file/d/1fKNBV-QaX2T013yZuti7dPf94h7jhTn0/view?usp=drive_link)

Confidential Teak Business Plan

→ [https://drive.google.com/file/d/1wV22DZ1UIZntzEM33E9af5vnz3Fsjc9/view?usp=drive\\_link](https://drive.google.com/file/d/1wV22DZ1UIZntzEM33E9af5vnz3Fsjc9/view?usp=drive_link)

"Confidential" Teak Business Plan

→ [https://drive.google.com/file/d/1EJAIsCq7k4TCWRQn1CS9SwcGfXB1Pkvx/view?usp=drive\\_link](https://drive.google.com/file/d/1EJAIsCq7k4TCWRQn1CS9SwcGfXB1Pkvx/view?usp=drive_link)

Website of Teak Hardwoods Securities being promoted online

→ <https://teakhardwoods.com/about-hardwoods-unlimited/>

More promotion of Teak sales

→ [https://drive.google.com/file/d/1sUdG4kJ3F\\_oJ9ITV\\_mhvOTezAApLcQvr/view?usp=drive\\_link](https://drive.google.com/file/d/1sUdG4kJ3F_oJ9ITV_mhvOTezAApLcQvr/view?usp=drive_link)

→ [https://drive.google.com/file/d/1wV22DZ1UIZntzEM33E9af5vnz3Fsjc9/view?usp=drive\\_link](https://drive.google.com/file/d/1wV22DZ1UIZntzEM33E9af5vnz3Fsjc9/view?usp=drive_link)

**ECI Promoting Sawmill in Panama**

→ [https://drive.google.com/file/d/1QD4l68wPxj3NBlhk2snanMYFFyzxYuxL/view?usp=drive\\_link](https://drive.google.com/file/d/1QD4l68wPxj3NBlhk2snanMYFFyzxYuxL/view?usp=drive_link)

## **ILLEGAL US SECURITIES SALES FOR U.S. CITIZENS**

There is a USA SEC Filing for a company called **Legacy Teak, LLC** which was filed by Michael Cobb that had a US SEC filing withdrawn in 2020, and abandoned in 2021. Soon after, they started to promote the Teak in Ambergris Caye Belize under "Hardwoods Unlimited, Ltd", and selling the Teak under that company, based out of CAYE FINANCIAL CENTRE, SUITE 300 SAN PEDRO TOWN, AMBERGRIS CAYE, BELIZE, PHONE 011(505)-226-5445. Also a non existant Belize Business.

### **Belize Business Search for Legacy Teak here**

→ [https://drive.google.com/file/d/1he8uWEoohcTEHdcamkwJpcht9wZOJcE/view?usp=drive\\_link](https://drive.google.com/file/d/1he8uWEoohcTEHdcamkwJpcht9wZOJcE/view?usp=drive_link)

I noticed in the USA oficial filing Michael Cobb made note in the filing that he owned 99% interest in Gran Pacifica, and states his ownership to ECI, "a Belize Company"

<https://drive.google.com/file/d/1DTf0-ANzZ9YU-slEJDiyOIYkULryviyz/view?usp=sharing>

LINKS TO SEC FILINGS AND ONLINE RESOURCES SHOWING MICHAEL COBB FILING FOR TEAK SALES IN THE US SEC.

### **SEC OFFERING STATEMENT**

<https://www.sec.gov/Archives/edgar/data/1766280/000176628020000003/teak.1a.htm>

### **SEC FILING ORDERED ABANDONED 9/3/21 (OFFERING WAS IN 2020)**

<https://eks.staging.bamsec.com/companies/1766280/legacy-teak-llc>

### **CORPORATION OPERATING AGREEMENT OUT OF WYOMING USA**

<https://www.lawinsider.com/contracts/1PSybejFTR8>

I have all these filings saved to the google drive as well here.

<https://drive.google.com/drive/folders/1CuUWRkDVnxjZQvisGcuodtPylv1eVKLe?usp=sharing>

Many other files are available for viewing securities law violations here to re enforce this case in many other matters including false advertizing, failure to deliver agreed to goods, failure to deliver services, failure to pay outstanding amounts owed, selling dangerous and illegally designed homes, as well as additional securities violations.

### **Securities Laws Violations**

[https://drive.google.com/drive/folders/1yhY45Sia6cs4IKHihdNYR0edQ45Y94rT?usp=drive\\_link](https://drive.google.com/drive/folders/1yhY45Sia6cs4IKHihdNYR0edQ45Y94rT?usp=drive_link)

Emails with Deshawn Torrez, Belize lawyer requested I release provided information to a third party for assessment. Currently refuses to circle back involving which party she disclosed the information to. Also, informed me over the phone Mr Joel Nagel, and Mr Mike Cobb were both well known individuals involving many potential and illegal money movements. She also commented on needing a legal opinion to launch a lawsuit, and never circled back. Her OK, seems to be an excuse to bypass client attorney privilege, and has not circled back to address my questions. This seems suspicious to suddenly go silent.

→ [https://drive.google.com/file/d/1ngRu-i4eFSE2dbTxOBjBu-I3OPTLXAG9/view?usp=drive\\_link](https://drive.google.com/file/d/1ngRu-i4eFSE2dbTxOBjBu-I3OPTLXAG9/view?usp=drive_link)

Contact information.

McKoy Torres LLP

Deshawn Torres (Mrs).

Barrister/Attorney-at-Law

30 Newtown Barracks

Belize City

Belize

27 Garbutt Creek Street

Belmopan City

Belize

Tel: (501) 223-1076/(501) 822-2746

Cel (501) 671-4981/ (501) 671-2745

Web:[www.mybelizeattorney.com](http://www.mybelizeattorney.com)

Alternate Email:[darzu8@aol.com](mailto:darzu8@aol.com)

Investigation involving fraud with ECI Developments as indicated by Deshawn Torres, it was revealed that Joel Nagel was evicted from Austria while working as a Belize Ambassador after losing a court case involving fraud with a Mr Tommy Haugan. Information is that Mr Haugan was forced out of Gran Pacifica after building the Golf course. His shares were seized by Caye Bank (owned by Joel Nagel, and Mike Cobb) of Belize wrongfully. Mr Tommy Haugan, was awarded damages, and Mr Joel Nagel and Tommy Haugan both came to an "agreement" in order to lift the fraud charges won in the court of Belize.

Court Case files Involving Tommy Haugen and Joel Nagel

→ [https://drive.google.com/file/d/11CZ4XhxdNNBUDVMx65eqSn2fc0G\\_Fi\\_A/view?usp=sharing](https://drive.google.com/file/d/11CZ4XhxdNNBUDVMx65eqSn2fc0G_Fi_A/view?usp=sharing)

→ [https://drive.google.com/file/d/14nYaSUHaGABNQ5XMAGmObrzg0bqvK7ts/view?usp=drive\\_link](https://drive.google.com/file/d/14nYaSUHaGABNQ5XMAGmObrzg0bqvK7ts/view?usp=drive_link)

Press Release Involving dishonorable discharge from position

→ [https://drive.google.com/file/d/1ek9VtNXoYrxpBoF42nDfkAOBBbsbdVuk/view?usp=drive\\_link](https://drive.google.com/file/d/1ek9VtNXoYrxpBoF42nDfkAOBBbsbdVuk/view?usp=drive_link)

**Material for existing lawsuit in Nicaragua involving Gran Pacifica Resort being prepared now by Nicaraguan Lawyer Gerald Esponiz Lopez Fonseca, Lawyer Number National ID Number 001-280600-1019A**

[https://docs.google.com/document/d/1jbJfSs3Sle1SGQ0rNRWNLQzgz31sgBb/edit?usp=drive\\_link&oid=116394674591749949226&rtpof=true&sd=true](https://docs.google.com/document/d/1jbJfSs3Sle1SGQ0rNRWNLQzgz31sgBb/edit?usp=drive_link&oid=116394674591749949226&rtpof=true&sd=true)

**Complete list of files gathered for alleged illegal, negligence and fraudulent activity within Nicaragua.**

[https://drive.google.com/drive/folders/1z4Awz5J1fSMCT-RGYe4nvEQPL7xGkbli?usp=drive\\_link](https://drive.google.com/drive/folders/1z4Awz5J1fSMCT-RGYe4nvEQPL7xGkbli?usp=drive_link)