UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

WIGBERTO LUGO-MENDER as the duly appointed Trustee in the liquidation of EURO PACIFIC INTERNATIONAL BANK, INC. *Plaintiff,* vs. **QENTA, INC.; PETER D. SCHIFF; BRENT DE JONG; ABC INSURANCE COMPANY; XYZ INSURANCE COMPANY; and DEFENDANTS A and B.** *Defendants,* **EURO PACIFIC FUNDS SCC LTD.; EURO PACIFIC SECURITIES, INC.; EURO PACIFIC CARD SERVICES LTD. AND GLOBAL CORPORATE STAFFING LTD.** *Parties in Interest.*	CASE NO.: VIOLATION OF THE COMMODITY EXCHANGE ACT, 7 U.S.C. § 1, *et. seq.;* VIOLATION OF THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, 18 U.S.C. §1962; DECLARATORY JUDGMENT; REQUEST FOR PROVISIONAL REMEDIES PURSUANT TO THE PUERTO RICO RULES OF CIVIL PROCEDURE; DEMAND FOR TRIAL BY JURY

VERIFIED COMPLAINT

COMES NOW, Wigberto Lugo-Mender, in his capacity as the duly appointed Trustee in the liquidation of **Euro Pacific International Bank, Inc.**, through its undersigned counsel, and very respectfully STATES, ALLEGES and PRAYS:

INTRODUCTION

This case arises from a calculated scheme by Qenta, Inc., its affiliates, and Peter D. Schiff --the sole shareholder of Euro Pacific International Bank, Inc.-- to misappropriate nearly

$50 million in assets belonging to the bank's customers. Disguised as a good-faith effort to assume and service customer accounts through a *Purchase and Assumption Agreement*, Defendants instead orchestrated a campaign of coordinated deception intended to lull customers into believing their assets were safe, while systematically stripping them of control over those assets. The facts summarized herein are set forth in detail in the *Declaration of Wigberto Lugo-Mender* (the "Trustee Declaration"), submitted as part of this *Verified Complaint*. See, **Addendum**. The Trustee Declaration describes, under oath and based on personal knowledge and extensive investigation, the Defendants' scheme and its impact on EPIB's customers.

As part of the OCIF-ordered liquidation of Euro Pacific International Bank, Inc., customers were given the option to either remain within the liquidation process ("opt-out" customers) or transfer their assets to Qenta, Inc. under the *Purchase and Assumption Agreement* ("opt-in" customers). Those who opted out continued to be fully protected by OCIF's liquidation framework and remain entitled to have their claims resolved in the ordinary course of the Trustee's liquidation process. In stark contrast, the "opt-in" customers, who were misled by Defendants into believing their assets would be safe with Qenta, Inc., have been instead deprived of their property. It is these "opt-in" customers, holding tens of millions of dollars in deposits, securities, and precious metals, who have been left exposed and defrauded by Defendants' scheme.

From September 2022 through mid-2025, Defendants, in joint agreement and with the intent to defraud, issued a steady stream of communications to "opt-in" customers, reassuring them that the migration of their accounts and investments was underway. These updates,

frequent and coordinated, were presented as evidence of progress but were, in reality, false assurances intended to conceal Defendants' true objective: to gain unfettered access to and control of customer cash, securities, and precious metals. Schiff, leveraging his position as Euro Pacific International Bank, Inc.'s sole shareholder and public face, lent credibility to Qenta's narrative and knowingly furthered the scheme, while ignoring all fiduciary duty to the entities' customers.

By July 2025, Defendants had taken control of approximately $50 million in customer assets --including more than $25 million in precious metals expressly designated as customer property-- and then unilaterally terminated the *Purchase and Assumption Agreement*, proposing to return only a portion of the assets after self-serving deductions. Today, most of those assets have vanished. Customers have been left without access to their property and have been deceived by Defendants into believing that they can bring claims against the liquidating entity for the value of the missing assets, when the same Defendants have deprived the Trustee of essential client information needed to fulfill any liquidation mandate. Defendants continue to evade accountability while instead resorting to deceitful information to conceal fraudulent endeavors *vis a vis* these assets.

The Trustee, appointed by the Puerto Rico Office of the Commissioner of Financial Institutions, brings this action because his statutory and fiduciary duty requires it. He is charged with preserving and recovering customer assets in an orderly liquidation process. His duty is to the entity and its customers, not the Defendants. Defendants' misconduct has not only violated federal law --including the Racketeer Influenced and Corrupt Organizations Act as well as the Commodity Exchange Act-- but also directly undermined the OCIF-ordered

liquidation. Unless this Court intervenes, Defendants' scheme will succeed in permanently depriving customers of their property and obstructing the Trustee's ability to perform his mandate. As described in the Trustee Declaration, the Defendants' actions have been documented through financial records, customer communications, regulatory filings, and the Trustee's direct oversight of the liquidation process, all of which confirm the urgent need for relief.

Through this action, the Trustee seeks treble damages, declaratory relief, and urgent provisional remedies to prevent further dissipation of assets and to ensure that Defendants are held accountable for their fraudulent enterprise. The urgency of this matter cannot be overstated: the longer Defendants' scheme goes unchecked, the greater the risk that customers' assets will remain beyond recovery.

THE PARTIES

1. **Wigberto Lugo Mender, Esq., CPA** (hereinafter "Lugo-Mender") is duly appointed Trustee in the liquidation of **Euro Pacific International Bank, Inc.** (hereinafter "EPIB"), with its principal place of business located in Centro Internacional de Mercadeo, Road 165, Tower I, Suite 501, Guaynabo, Puerto Rico. EPIB was, in turn, a Puerto Rico International Financial Entity ("IFE") licensed by the Office of Commissioner of Financial Institutions for Puerto Rico ("OCIF" in its Spanish Acronym) to offer financial services to non-residents of Puerto Rico.

2. **Qenta Inc**., a corporation formed under the laws of the State of Delaware, with principal place of business in 777 Post Oak Blvd. #430, Houston, Texas 77056.

3. **Brent de Jong**, Chairman, CEO, owner, shareholder, and responsible officer of Qenta Inc., and the now-cancelled entities G-Commerce DMCC, and Responsible Gold Trading DMCC, with offices located in 777 Post Oak Blvd. #430, Houston, Texas 77056, or in a jurisdiction other than Puerto Rico.

4. **Peter D. Schiff**, sole shareholder and responsible officer of Euro Pacific International Bank, Inc., and resides in 22 Dorado Beach Estates, Dorado, Puerto Rico 00646.

5. Defendants **ABC Insurance Company** and **XYZ Insurance Company** are the insurance carriers who may have furnished liability insurance coverage to those defendants individually named in the instant complaint, and who may be liable to satisfy any losses related to the claims set forth herein, to pay all or part of a possible judgment entered in the instant action or to identify or reimburse for payments made to satisfy any judgment. Since discovery has not commenced, Plaintiff is not able to confirm the identities of all insurance carriers for the defendants or whether such parties may need to be brought into this action.

6. **Defendants A** and **B** are undetermined co-defendants of unknown names who may also be liable to Plaintiff. Once known, Plaintiff will explore amending its Complaint accordingly.

7. **Euro Pacific Funds SCC Ltd.**, **Euro Pacific Securities, Inc.**, **Euro Pacific Card Services Ltd**. and **Global Corporate Staffing Ltd.** are subsidiaries of EPIB and are joined as "Parties in Interests" to the instant litigation, inasmuch as some of the assets which the Plaintiffs mismanaged, and now the customers seek to recover from the Trustee in the instant action, may have been under the custody of some of these entities, and later disposed of by the named Defendants. At all times relevant to the bank's liquidation process the

shareholder and responsible officer of these EPIB subsidiaries is co-defendant **Peter D. Schiff**, who resides in 22 Dorado Beach Estates, Dorado, Puerto Rico 00646.

JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1331, as this case involves claims arising under federal law, specifically the Racketeer Influenced and Corrupt Organizations Act ("RICO").

9. Jurisdiction is also proper pursuant to 18 U.S.C. § 1964(c), which provides for civil remedies for violations of RICO.

10. The venue is proper under 28 U.S.C. §1391(a) and (b) since Plaintiff is a resident of this district, the events giving rise to the claim occurred in this district, and the Defendants have engaged in activities that have caused harm in this district.

FACTS APPLICABLE TO THE CLAIMS FOR RELIEF

11. On June 30, 2022, OCIF issued an Administrative Complaint and Order to Cease and Desist ("Querella y Orden de Cese y Desista") against EPIB, whose sole shareholder was Peter D. Schiff. See, **Addendum**.

12. This enforcement action was based on EPIB's failure to meet capital requirements under Article 2(g) of *The Internation Financial Center Regulatory Act*, Act 273-2012, P.R. Laws Ann. §3081, *et. seq.*, its noncompliance with the Consent Order dated October 28, 2021, and concerns over the bank's overall solvency and ongoing licensing status.

13. On August 9, 2022, OCIF and EPIB entered a Consent Order for Liquidation and Dissolution, where EPIB agreed to surrender its IFE license and liquidate operations.

14. Pursuant to this Consent Order, Lugo-Mender was appointed as Trustee for the liquidation of EPIB.

15. On September 1, 2022, EPIB submitted its Voluntary Liquidation Plan (hereinafter the "Liquidation Plan"), prepared by Schiff himself, which established the framework for the EPIB liquidation process.

16. An essential component of the Liquidation Plan was a transaction involving Qenta Inc. and its now-cancelled Dubai subsidiaries, G-Commerce DMCC and Responsible Gold Trading DMCC (collectively referred to as "Qenta").

17. On September 8, 2022, Qenta was publicly identified by Schiff as the acquiring entity through a signed welcome letter issued by its Chairman and CEO, Brent de Jong, and Managing Director, Mariame McIntosh. Throughout the whole negotiations process leading to this Voluntary Plan of Liquidation, Schiff represented this entity as the best alternative available to manage and resolve this process for the benefit of the bank's customers in an efficient and transparent process.

18. As part of the liquidation process, customers were required to elect whether to "opt out" and remain within the OCIF-supervised liquidation of EPIB, or to "opt in" by transferring their accounts and assets to Qenta pursuant to the *Purchase and Assumption Agreement* (the "PAA") to be executed by Schiff and Qenta. The Trustee Declaration provides additional details on the notice process, the number of customers electing to opt out, and the approximately $18.5 million wired to close those accounts. See, **Addendum**.

19. In this letter, Qenta described itself as a "global financial technology company," headquartered in Texas and operating through regulated subsidiaries in Dubai.

20. Qenta assured EPIB future "op in" clients of continued access to their deposits, precious metals, brokerage accounts, and mutual funds following the corresponding account migration from EPIB to Qenta.

21. The distinction between these groups is critical. "Opt-out" customers retained the protections of the OCIF liquidation plan, their claims being processed by the Trustee under the supervision of Puerto Rico's banking regulator. "Opt-in" customers, however, were effectively diverted outside the liquidation process and placed at the mercy of Defendants, who promised continuity of service and asset security under Qenta's control.

22. On September 30, 2022, the PAA was executed between EPIB (represented by Schiff) and Qenta.

23. Under the PAA, Qenta agreed to assume certain EPIB's deposit obligations, both cash and precious metals, ensuring that "opt-in clients" would have access to their assets following the transfer.

24. The execution of the PAA triggered an initial payment of $500,000 by Qenta, with an additional $750,000 due 30 days thereafter.

25. As part of the PAA, Qenta assumed control of EPIB's liquidated assets and, through its acquisition of the EPIB subsidiaries named herein as "Parties in Interests," it also acquired customer-owned precious metals, mutual funds, and FX positions.

26. According to EPIB's internal reporting dated June 30, 2022, the bank held custody of customer gold holdings totaling 11,244.29 ounces, valued at USD $19,333,213.40 and customer silver holdings totaling 321,885.76 ounces, valued at USD $6,127,739.27 at then current market price in client-designated precious metals, This inventory was expressly

marked as client-owned assets. The Trustee Declaration provides a full reconciliation of these holdings as of June 30, 2022, including supporting exhibits. See, **Addendum**.

27. In addition to the precious metals inventory, on account of this transaction, Defendants did receive $20,531,463.90 in customers funds and the value of moneys owed to customers of the other subsidiaries named in this complaint. Global Corporate Staffing Ltd., a company domiciled in St. Vincent and the Grenadines was, in turn, the operating arm of the bank, at all times handling most of the employees, electronic and banking systems as well as all customers personal information and transactions and accounting records. At all times relevant hereto and starting upon the appointment of the Trustee and to this date, this entity and the information of the customers has been and remains in control of the named Defendants.

28. Between September 28 and November 9, 2022, Qenta and Schiff jointly issued a series of repeated written communications to EPIB customers transferred to Qenta, assuring them that the migration of accounts and assets was proceeding and that any delays were temporary. These communications were frequent and continuous, designed to project an image of progress and stability, while in reality no such migration was occurring. Moreover, these communications were made, for years, through the EPIB website https://europacbank.com/ (which was under the exclusive control of Schiff and/or Qenta), creating a false sense of legitimacy to the information being relayed through this platform. The Trustee Declaration attaches samples of these communications and describes their effect on customer decision-making. See, **Addendum**.

29. These communications instructed customers to take specific actions --such as liquidating mutual fund holdings, validating account details, and submitting wire requests--

under the guise of facilitating the transition to Qenta. In truth, these directives served to strip customers of independent control of their assets and consolidate those assets under Qenta's custody.

30. In reality, this distinction meant that "opt-in" customers were uniquely vulnerable. While "opt-outs" retained the safeguards of the OCIF process, "opt-ins" were misled into relinquishing those protections and entrusting their assets to Defendants, who subsequently misappropriated or concealed those assets. By creating a false narrative of progress and inevitability, Defendants exploited the trust of "opt-in" customers, diverting them, and their assets, away from the OCIF liquidation process.

31. By December 5, 2022, Qenta publicly acknowledged that no transfers had been completed. This admission came only after months of misleading updates from both Qenta and Schiff, who knowingly participated in crafting and disseminating false assurances to customers. These communications were not mere administrative errors; they formed part of a coordinated scheme between Schiff and Qenta to create a false narrative of progress and inevitability, inducing customers to forgo independent action while their assets were being misappropriated.

32. As of the first quarter of 2025, and after almost three years of financial transactions, approximately $20.6 million in subsidiary account assets were transferred to Qenta pursuant to the liquidation framework. During this period, assets from EPIB and its subsidiaries were commingled, giving clients the impression that all were part of a single pool of assets.

33. The total value of the estate under the Trustee's administration stood at $47.56 million. Per the terms of the Joint Order of Liquidation, outstanding obligations to be paid by the Trustee are $18,524,780.60, subject to the filing of claims and approval by OCIF.

34. On July 11, 2025, Qenta sent a formal notice of termination of the PAA, alleging impossibility of performance, frustration of purpose, and breach of covenant of good faith.

35. In this termination notice, Qenta proposed returning $38.37 million after various deductions, including a "termination costs" deduction of $4.94 million. This amount purportedly includes commingled amounts of all customers transferred to them as well as the cash value of the remaining precious metals inventory adjusted to the price value existing as of 2022. This value is substantially less than the appraised quoted value as of this date.

36. On July 21, 2025, the Trustee's counsel responded, rejecting Qenta's claims and emphasizing that the assets in question are "customer-owned assets" that cannot be liquidated without customer instructions.

37. In this context, the letter from the Trustee's counsel unequivocally stated: "no liquidation, transfer, or return of such assets or their value shall be undertaken without the written, individualized direction from each relevant customer."

38. Upon information and belief, both the funds received by Qenta on account of the PAA and the precious metals inventory pertaining to these customers have disappeared and are no longer available to honor the compromise with customers. Regarding the customers' inventory of silver holdings, and due exclusively to Qenta's own fault, this inventory was never transferred to customers and remains in custody of a third-party custodian. As further explained in the Trustee Declaration, the Trustee has confirmed that the silver inventory

remains under the custody of a third-party custodian in Singapore, while the customer-owned gold inventory, valued at approximately $18.5 to $20.4 million, has been dissipated or otherwise misappropriated by Defendants.

39. Schiff, as sole shareholder and officer of EPIB, knowingly facilitated Qenta's assumption of control over these customer assets and continued to lend his personal credibility to Qenta's narrative, thereby furthering the conspiracy to defraud customers.

40. Although Schiff has more recently claimed to have "lost contact" with Qenta, such claims only underscore his role in the scheme: having actively partnered with Qenta in misleading customers throughout 2022, and up to this date, while he now seeks to distance himself after the disappearance of assets. His conduct demonstrates both knowledge of, and willful participation in, a pattern of fraudulent misrepresentations that caused direct harm to EPIB's customers.

41. Upon information and belief, either Schiff and/or Qenta, through their control of the EIPB subsidiaries transferred through the PAA, presently maintain exclusive possession and control over the personal identifying information and contact details of EPIB's clients." By withholding this information, Defendants have effectively deprived the Trustee, EPIB customers, and, perhaps more importantly, regulatory agencies of several jurisdictions in charge of monitoring suspicious money laundering activities, of crucial information regarding assets, transactions and claims as part of the OCIF liquidation process. This conduct has obstructed, and continues to obstruct, the orderly liquidation process mandated by OCIF, in effect holding hostage a critical component of that process and preventing customers and other parties in privy from receiving accurate, timely information from the duly appointed Trustee.

The Trustee Declaration details how Defendants' retention of customer records and personal data has obstructed both the liquidation and regulatory oversight functions. See, **Addendum**.

42. The assets that have disappeared include approximately $50 million in customer assets, including $25.46 million in client-designated precious metals, $5.87 million in mutual fund positions, and additional funds and securities totaling approximately $18.67 million.

43. Defendants' unlawful actions further harm those EIPB's "opt-in" customers, who are now attempting to seek redress under the OCIF liquidation plan. The Trustee is forced to attempt to resolve these claims without access to the necessary client information or the assets required to process them, thereby undermining both the customers' rights and the integrity of the ongoing liquidation process.

44. The Trustee brings this action in his capacity as the duly appointed liquidating trustee of EPIB, pursuant to the Liquidation and Dissolution Order entered by OCIF.

45. Under the referenced Liquidation Order, the Trustee is vested with authority and responsibility to identify, marshal, and preserve the assets of EPIB, whether belonging to the bank itself or held in custody for the benefit of EPIB's depositors and customers.

46. The assets wrongfully assumed, controlled, and dissipated by Qenta and the other defendants include customer-designated assets --cash deposits, securities, and precious metals-- that were held by EPIB in a custodial capacity. Although those assets are beneficially owned by the customers, the Trustee has a fiduciary obligation to safeguard such assets during liquidation and to take all necessary measures to preserve and recover them for ultimate distribution to the rightful owners.

47. The Trustee therefore has both statutory authority under the OCIF Liquidation Order and fiduciary standing to pursue recovery of such assets on behalf of the estate and the customers whose assets were entrusted to EPIB.

48. The claims asserted herein, including claims under the Commodity Exchange Act, RICO and for declaratory judgment, are directly tied to the Trustee's mandate to preserve, protect, and recover assets for the benefit of EPIB's customers and creditors.

49. The Trustee therefore has standing to prosecute this action to redress injuries to business and property caused by defendants' wrongful acts, and to obtain declaratory and provisional relief necessary to preserve assets pending final resolution.

CLAIMS FOR RELIEF

COUNT I - VIOLATION OF 7 U.S.C. §1, *et. seq.* (AGAINST ALL DEFENDANTS)

50. Plaintiff repeats and realleges the allegations set forth in paragraphs 1 through 49 as if fully set forth herein.

51. The Commodity Exchange Act ("CEA"), 7 U.S.C. §§ 1, *et. seq*., prohibits fraud, manipulation, and deceptive devices in connection with transactions in commodities, including precious metals such as gold and silver.

52. At all times relevant hereto, Defendants, acting individually and in concert, engaged in the fraudulent solicitation, misappropriation, and conversion of commodities and commodity-related assets belonging to EPIB's "opt-in" customers.

53. Specifically, under the guise of the PAA, Defendants assumed control of customer-designated precious metals, including gold and silver, falsely representing to

customers that their accounts and property would remain secure, accessible, and properly custodied.

54. These representations were materially false and misleading. Defendants knew, or acted with reckless disregard for the truth, that they did not intend to safeguard the customer-owned commodities, but rather to commingle, dissipate, or otherwise misappropriate such assets for their own benefit.

55. In furtherance of this scheme, Defendants used interstate and international wires, electronic platforms, and written communications to disseminate false assurances to customers regarding the security, transfer, and future availability of their commodity holdings.

56. The Trustee has been able to preserve the customers' silver holdings because those assets remain under the custody of a third-party custodian in Singapore, and now outside Defendants' direct control. However, upon information and belief, the customer-owned gold has been lost as a result of Defendants' scheme, with an estimated value of approximately $20,404,046.98.

57. As a direct and proximate result of Defendants' violations of the CEA, EPIB's customers, and derivatively the Trustee acting in his fiduciary capacity, have suffered actual damages in excess of $20,404,046.98.

58. Plaintiff, acting on behalf of the affected EPIB's customers, is entitled under the CEA to recover actual damages proximately caused by Defendants' fraudulent acts.

59. In addition, because Defendants' conduct was willful, intentional, and undertaken with reckless disregard for customer rights, Plaintiff seeks punitive damages as authorized under the CEA, up to twice the amount of actual damages sustained.

60. Plaintiff also seeks any equitable relief this Court deems appropriate to prevent further violations of the CEA, including but not limited to an accounting, restitution, and injunctive relief to preserve and recover customer-owned commodities.

COUNT II - VIOLATION OF 18 U.S.C. §1962
(AGAINST DEFENDANTS QENTA INC. AND BRENT DE JONG)

61. Plaintiff repeats and realleges the allegations set forth in paragraphs 1 through 60 as if fully set forth herein.

62. Defendants conducted or participated in the conduct of an enterprise through a pattern of racketeering activity.

63. Defendant Qenta and Brent de Jong formed an association-in-fact enterprise that had a common purpose, relationships among those associated with the enterprise, and longevity sufficient to permit the associates to pursue the enterprise's purpose.

64. The enterprise was engaged in, or its activities affected, interstate or foreign commerce, as it involved the transfer and control of assets between entities in Puerto Rico, Texas, and Dubai, as well as other international jurisdictions.

65. Defendants actively participated in the operation and management of the enterprise by executing the PAA, taking control of EPIB's assets, issuing communications to customers about migration timelines, and ultimately causing the disappearance of customer assets.

66. Defendants engaged in a pattern of racketeering activity.

67. From September 2022 to July 2025, Defendants engaged in multiple related acts of racketeering activity that were continuous over this closed period of nearly three years.

68. Defendants committed multiple acts of wire fraud in violation of.

69. Defendants used interstate wire communications to issue false and misleading statements to EPIB customers about migration timelines and access to their assets. Specifically, between September 28 and November 9, 2022, defendants issued a series of regular written updates to EPIB customers, informing them of continued operational delays, migration timelines, and shifting opt-out deadlines, while knowing that these commitments would not be fulfilled.

70. Defendants committed multiple acts of financial institution fraud.

71. Defendants obtained customer assets under false pretenses by representing that they would assume EPIB's deposit obligations and ensure clients would have access to their assets following the transfer, while knowing that these representations were false or with reckless disregard for their truth.

72. Plaintiff suffered injury to business or property by reason of defendants' RICO violations.

73. The Trustee and EPIB customers suffered injury to their business and property in the form of approximately $50 million in lost customer assets, including $25.46 million in client-designated precious metals, $5.87 million in mutual fund positions, and additional funds and securities.

74. These injuries were directly and proximately caused by Defendants' pattern of racketeering activity, as the disappearance of customer assets was a direct result of Defendants' fraudulent scheme to acquire control of these assets through false representations.

COUNT III - VIOLATION OF 18 U.S.C. § 1962
(AGAINST ALL DEFENDANTS)

75. Plaintiff repeats and realleges the allegations set forth in paragraphs 1 through 74 as if fully set forth herein.

76. Defendants knowingly agreed to facilitate a scheme that included the operation or management of a RICO enterprise through a pattern of racketeering activity.

77. Defendants Qenta, Brent de Jong, and Peter D. Schiff entered into an agreement as evidenced by the PAA executed on September 30, 2022, and their subsequent coordinated actions.

78. Each Defendant knew of and agreed to the overall objective of acquiring control of EPIB customer assets through false representations and then misappropriating those assets.

79. This knowledge and agreement is evidenced by Defendants' coordinated actions, including the execution of the PAA, the series of communications to customers, the transfer of assets to Qenta's control, and the ultimate disappearance of those assets.

80. Each defendant agreed that members of the conspiracy would commit multiple predicate acts of wire fraud and financial institution fraud to accomplish their objectives.

81. Specifically, defendants agreed to use interstate wire communications to issue false and misleading statements to EPIB customers and to obtain customer assets under false pretenses.

82. Plaintiff suffered injury to business or property by reason of Defendants' RICO conspiracy.

83. The Trustee and EPIB customers suffered injury to their business and property in the form of approximately $50 million in lost customer assets, which was directly and proximately caused by defendants' conspiracy.

COUNT IV - DECLARATORY JUDGMENT 28 U.S.C. § 2201
(AGAINST ALL DEFENDANTS)

84. Plaintiff repeats and realleges the allegations set forth in paragraphs 1 through 70 as if fully set forth herein.

85. An actual case or controversy exists between the parties having adverse legal interests.

86. An actual controversy exists between the Trustee and the defendants regarding the ownership, control, and disposition of approximately $50 million in customer assets. This controversy principally concerns the "opt-in" customers, whose assets were diverted to Qenta and away from the OCIF liquidation process, in contrast to the "opt-out" customers, who remain under the protection of the ongoing liquidation framework.

87. Defendants claim the right to liquidate assets, deduct "termination costs," and retain control of EPIB subsidiaries, while the Trustee maintains that the assets are customer-owned and cannot be liquidated without customer instructions.

88. This is evidenced by Qenta's July 11, 2025, termination notice proposing to return only a portion of the assets and the Trustee's July 21, 2025, response asserting that the assets are customer-owned.

89. The controversy is of sufficient immediacy and reality to warrant issuance of a declaratory judgment.

90. The fact that the assets have allegedly disappeared makes the need for judicial declaration even more urgent, as the parties' rights and obligations with respect to these assets must be determined to facilitate recovery efforts.

91. The Court possesses an independent basis for jurisdiction over this declaratory judgment action.

92. The Court has jurisdiction based on the federal RICO claims under 28 U.S.C. § 1331 and.

93. A judicial declaration is necessary to determine the rights and obligations of the parties with respect to the customer assets, including whether defendants have the right to liquidate assets, deduct "termination costs," or retain control of EPIB subsidiaries.

94. Plaintiff also seeks a judicial declaration that it, as Trustee: (i) is entitled to full and exclusive authority to administer and distribute assets of EIPB in accordance with the OCIF liquidation process; and, (ii) is authorized to recover, distribute, and/or cause to be returned to EIPB's "opt-in" customers all funds, securities, and other property currently in the possession, custody, or control of Qenta (or its affiliates), including but not limited to precious metals such as silver.

COUNT V
REQUEST FOR PROVISIONAL REMEDIES
(AGAINST DEFENDANTS QENTA INC., RESPONSIBLE GOLD TRADING DMCC, G-COMMERCE DMCC, AND BRENT DE JONG)

95. Plaintiff repeats and realleges the allegations set forth in paragraphs 1 through 94 as if fully set forth herein.

96. Rule 64 of the Federal Rules of Civil Procedure provides that the provisional remedy of attachment and garnishment is available in federal court proceedings, and that state law governs the same.

97. Rules 56 of the Puerto Rico Rules of Civil Procedure provide a plaintiff, such as the Trustee in this case, with a mechanism to secure satisfaction of judgment through attachment or garnishment. See, 32 P.R. Laws Ann., Ap. V, R. 56.

98. Pursuant to Rule 64 of the Federal Rules of Civil Procedure and Rule 56 of the Puerto Rico Rules of Civil Procedure, 32 P.R. Laws Ann., Ap. V, R. 56, Plaintiff hereby moves this Honorable Court for an order against Qenta and its Dubai-based affiliates attaching or garnishing all EIPB customer monies and assets, estimated in approximately $50 million, and enjoining and restraining Qenta and its affiliates from alienating or transferring any such monies, assets or interests belonging to EPIB customers.

99. Plaintiff also requests a temporary restraining order pursuant to Rule 65 of the Federal Rules of Civil Procedure, restraining Defendants, their officers, agents, employees, and all persons acting in concert with them, from selling, transferring, encumbering, dissipating, or otherwise disposing of any assets belonging to EPIB or its customers, including but not limited to precious metals, cash, securities, and other financial instruments, pending the resolution of this action or further order of the Court.

100. The provisional remedies sought by Plaintiff are necessary to secure satisfaction of the anticipated judgment in the present action, given Qenta's threatened misuse and/or disposition of these assets, in clear detriment of EPIB's "opt in" customers.

PRAYER FOR RELIEF

Plaintiff incorporates by reference the Trustee Declaration and supporting exhibits, included as the Addendum to the instant *Verified Complaint*, which substantiate the factual allegations and demonstrate the necessity of the relief requested herein.

WHEREFORE, Plaintiff hereby prays that the Court enters judgment in its favor and against Defendants as follows:

1. An award of damages to Plaintiff, including compensatory and punitive damages, as allowed under the Commodity Exchange Act, arising from Defendants' wrongful acts or omissions.

2. Treble damages against all defendants in the amount of $150 million (three times the approximately $50 million in lost customer assets) pursuant to 18 U.S.C. §1964.

3. A declaration that the assets in question are customer-owned assets that cannot be liquidated, transferred, or returned without the written, individualized direction from each relevant customer pursuant to 28 U.S.C. §2201.

4. A declaration that defendants have no right to deduct "termination costs" or other amounts from the customer assets pursuant to 28 U.S.C. §2201.

5. A declaration that defendants have no right to retain control of EPIB subsidiaries without fulfilling their obligations under the *Purchase and Assumption Agreement* pursuant to 28 U.S.C. §2201.

6. A declaration that Trustee: (i) is entitled to full and exclusive authority to administer and distribute assets of EIPB in accordance with the OCIF liquidation process; and, (ii) is authorized to recover, distribute, and/or cause to be returned to EIPB's "opt-in" customers all funds, securities, and other property currently in the possession, custody, or control of Qenta (or its affiliates), including but not limited to precious metals such as silver.

7. An order requiring defendants to provide a full accounting of all customer assets received, transferred, or disposed of, and to preserve any remaining assets pursuant to 28 U.S.C. § 2202.

8. An order pursuant to Rule 64 of the Federal Rules of Civil Procedure and Rule 56 of the Puerto Rico Rules of Civil Procedure, 32 P.R. Laws Ann., Ap. V, R. 56, attaching or garnishing all EIPB customer monies and assets, estimated in approximately $50 million, and enjoining and restraining Qenta and its affiliates from alienating or transferring any such monies, assets or interests belonging to EPIB customers.

9. A temporary restraining order pursuant to Rule 65 of the Federal Rules of Civil Procedure, restraining Defendants, their officers, agents, employees, and all persons acting in concert with them, from selling, transferring, encumbering, dissipating, or otherwise disposing of any assets belonging to EPIB or its customers, including but not limited to precious metals, cash, securities, and other financial instruments, pending the resolution of this action or further order of the Court.

10. Pre-judgment interest on all damages awarded from the date of injury until the date of judgment pursuant to 28 U.S.C. § 1961.

11. Post-judgment interest on all damages awarded from the date of judgment until payment pursuant to 28 U.S.C. § 1961.

12. Reasonable attorneys' fees and costs incurred in bringing this action pursuant to 18 U.S.C. § 1964.

13. Trial by jury; and,

14. Whatever other relief the Court deems just and proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 16th day of September 2025

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DECLARATION OF WIGBERTO LUGO MENDER
PURSUANT TO 28 U.S.C. SECTION 1746
IN SUPPORT OF VERIFIED COMPLAINT

I, **Wigberto Lugo-Mender,** hereby make the following declaration based upon my personal knowledge:

1. I am of legal age, attorney and certified public accountant, residing in Guaynabo, Puerto Rico. Since June 30, 2022, I am appointed by the Commissioner of Financial Institutions of Puerto Rico (the "Commissioner") to serve as Trustee-Receiver ("Trustee") for Euro Pacific Intl. Bank, Inc. ("EPB"), an international financial entity once licensed pursuant to Act No. 273 of September 25, 2012, the Commonwealth of Puerto Rico International Financial Center Regulatory Act ("Act No. 273"), as amended and according to rules and regulations issued by the Commissioner.

2. At the time of my appointment on June 30, 2022, as Trustee-Receiver of EPB, I did not assume operational control, custodial authority, or governance over EPB's affiliated entities, including Euro Pacific Securities, Inc. ("EPS"), Euro Pacific Advisors, LLC ("EPA"), and Global Custody Services, Inc. ("GCS"). These entities, while historically associated with EPB through shared ownership, branding, or personnel, were not subject to the Consent Order issued by the Office of the Commissioner of Financial Institutions ("OCIF") and were not included within the scope of the Liquidation Plan approved for EPB.

3. My authority as Trustee-Receiver was limited to EPB's assets, liabilities, and operations as defined by Act No. 273 and the regulatory instruments governing international financial entities in Puerto Rico. Any references to EPS, EPA, or GCS within this declaration are based solely on information obtained through document review, third-party communications, or public representations made by the Defendants, and do not reflect direct oversight or custodial access.

4. During the course of my work and investigations, I have:

a. Reviewed documents provided by the defendants including but not limited to financial statements, financial reports and accounting records, corporate formation documents and organizational documents, customers documents, correspondence and emails.

b. Reviewed and monitored websites and electronic messages published by the Defendants.

c. Reviewed account statements and other documents associated with the accounts maintained in EPB.

d. Obtained, reviewed and analyzed bank records from financial institutions for accounts opened in the name of EPB.

e. Conducted and participated in meetings with EPB and defendants' employees or agents during the different stages of the transactions among the parties.

f. Conducted and participated in interviews and email communications with customers who maintained accounts with EPB.

SUMMARY OF FACTS

I. Appointment and Liquidation Authority

5. On June 30, 2022, the Office of the Commissioner of Financial Institutions of Puerto Rico ("OCIF") issued a Complaint and Order to Cease and Desist and Order Appointing a Trustee against Euro Pacific Intl. Bank, Inc. ("EPB"). **Exhibit 1**: OCIF Cease and Desist and Trustee Appointment Order.

6. Pursuant to this Order, I was appointed as Trustee and Liquidation Receiver of EPB, with authority to safeguard depositor assets, oversee liquidation, and ensure compliance with Act No. 273-2012.

7. On August 9, 2022, EPB, represented by Peter Schiff ("Schiff"), who signed the Consent Order but no longer held authority as a corporate officer following the Receiver's designation, and OCIF, entered a Consent Order for Liquidation and Dissolution of International Financial Entity. **Exhibit 2**: Consent Order for Liquidation.

II. Identity of the Parties:

8. **Peter Schiff – Individual Defendant**

Sole shareholder and former director for EPB who orchestrated the Voluntary Plan of Liquidation that caused the transfer of EPB's infrastructure and assets at the time of the entry of the liquidation order by OCIF. Even after the transaction entered with Qenta Inc., He Schiff has remained actively participating on the liquidation process and is identified as a co perpetrator of the acts and endeavors that triggered the complaint. To this date Schiff remains in control of EPB's website www.europacbank.com and of the list of customers' electronic email addresses , which remain as the communication channel used by Schiff to continue disseminating false and misleading information about this liquidation process. His conduct confirms centralized control and coordination across the process to continue with the pattern of deceit on EPB customers.

9. **Euro Pacific International Bank Inc. (EPB)**

Incorporated on February 23, 2011, in St. Vincent and the Grenadines and re-domiciled to Puerto Rico on November 20, 2017. EPB was licensed under Act No. 273 by OCIF to operate as an International Financial Entity. EPB provided multi-currency payment services, and through other subsidiaries, investment custody, and managed fund access. EPB is currently subject to a liquidation proceedings initiated in 2022. Information taken from Audited Financial Statement. provided by EPB and other documents received from OCIF. Refer to **Exhibit 3**: Euro Pacific International Bank Inc. Consolidated Financial Statements (as of December 31, 2020).

10. **Euro Pacific Securities Inc. (EPS)**

Originally incorporated as Global Trading Ltd. in Anguilla (2001), re-domiciled to the British Virgin Islands in 2017. EPS provided brokerage services and maintained two wholly owned subsidiaries:

a. **Euro Pacific Advisors Ltd.** (EPA)

Served as sole advisor to Euro Pacific Funds SCC Ltd., responsible for fund strategy, portfolio construction, and investment oversight.

b. **Global Corporate Staffing Ltd. (GCS)**

Provided human resources and operational staffing across EPB and affiliated entities, centralizing personnel management and administrative functions.

11. **Euro Pacific Cards Services Ltd. (EPCS)**

UK-registered entity under the Companies Act 2006. EPCS issued prepaid debit cards to EPB clients, enabling offshore liquidity access and transactional mobility.

12. **Euro Pacific Funds SCC Ltd. (EPF)**

Segregated cell company domiciled in St. Vincent and the Grenadines. Licensed to create discreet portfolios of investments, assets, and liabilities.

13. **Schiff Gold Inc.**

Most recently, marketed by Schiff as a precious metals dealer controlled by him. Promoted alongside EPB services and referenced in client onboarding materials. Starting in August 2025, over 100 EPB customers transferred to Qentas submitted written instructions to transfer silver to Schiff Gold as a conduit for asset migration, offshore storage, or alternative custody arrangements.

14. **Schiff Sovereign**

Media platform operated by Schiff. Used to promote EPB, Schiff Gold, and affiliated investment products. Formerly known as Schiff Radio, Peter merged with the popular website Sovereign Man and its founder James Hickman in 2023.

15. **Euro Pacific Asset Management LLC (EPAM)**

SEC-registered investment advisor founded by Peter Schiff and headquarters in Dorado, Puerto Rico. May have shared branding, infrastructure, personnel, or client onboarding pathways with EPB and affiliated entities.

16. **Brent de Jong**

Brent de Jong ("De Jong") at all times represented to be Qenta's Chief Executive Officer who controlled all negotiations with Schiff and EPB. De Jong signed the Asset Purchase Agreement ("APA") and represented Qenta's intent to onboard EPB clients and manage asset recovery. The failure to execute the APA terms is central to EPB's claims.

17. **Qenta Inc.**

Corporation organized in the State of Delaware with address at 777 Post Oak, Blvd. #430 Houston, TX 77056. On September 30, 2022, executed with two related entities the APA negotiated with Schiff on behalf of EPB. This entity, or additional controlled subsidiaries or related entities acquired all subsidiaries and assumed custody of around $20.5M in customer cash deposits, plus the inventory of gold and silver in custody of EPB. After close to three years claiming to be working with the customers, it was confirmed that the onboarding of those customers' accounts received from the APA has not been completed.

On July 11, 2025, Qenta remitted a termination notice requesting to set aside on its specific terms, the APA entered almost three years before. Qenta retains unreconciled assets outside

Trustee control, legal control over gold and silver owned by customers and all proprietary information on customers and transactions of EPB. **Exhibit 4: EPB-Qenta Term Notice 071125**

18. **G-Commerce DMCC – APA Affiliates**

A Dubai-based entity named in the APA, was designated to retain custody of EPB's infrastructure and digital assets following the liquidation. It was described as assuming operational control of client-facing systems, including banking platforms and compliance environments. However, its actual post-liquidation activity remains unverified, and its current legal and corporate status is unclear. Notably, G-Commerce DMCC is not referenced in Qenta's APA Termination Notice (Exhibit 4), despite its designation as a purchaser and custodian in the original APA.

19. **Responsible Gold Trading DMCC - APA Affiliates**

Responsible Gold Trading DMCC ("RGTD") represented as a Dubai-based company named in the APA. It was expected to support custody and continuity of EPB's assets following liquidation. While RGTD appears in public records as an active entity, its current operations and corporate activity are unclear.

20. **Carlos Garduño – Head of Legal and Regulatory Affairs at Qenta**

Appeared as general counsel for Qenta Inc. and signatory to multiple APA-related correspondence. Participated with De Jong in the negotiations of the APA, the legal strategy to be implemented and continued communications with EPB clients and regulators.

21. **Mariame McIntosh Robinson – Former President of Qenta Inc.**

Appeared as Managing Director of Qenta Inc. from 2022 to 2023 and as President since 2023. Participated on behalf of Qenta in the negotiations following the execution of the APA and

business strategy to be implemented and continued communications with EPB clients and regulators.

22. **Mark Underwood – Head of Compliance and Chief Compliance Office**

Appeared as Head of Compliance at Qenta Inc. and Chief Compliance Officer of Responsible Gold Trading DMCC, a Dubai-based affiliate named in the APA. His dual roles confirm centralized oversight of onboarding, and asset custody across Qenta's operations. Underwood's involvement in both entities reinforces me believe that Qenta and RGTD operated as a unified structure during EPB's liquidation period. His conduct and communications remain under review in connection with disputed asset disposition and client outreach.

23. While these are the main actors and participants identified by me on the documents and information gathered during the past three years working in this case, I understand there may be additional entities and individuals that have participated in the scheme orchestrated by the named defendants to affect EPB customers and their holdings.

III. The Initial Negotiations and Operations to the Date of the Transfer to Qentas:

24. At some point during the year , 2021, Schiff presented to OCIF a request for change of ownership of EPB naming Qenta as the successor entity. Specifically, Schiff's initial proposal for resolving the lack of capitalization issues raised by OCIF was the sale of EPB to Qentas. This first proposal was rejected by OCIF. Then, upon EPB's continued failure to correct the issues identified by OCIF, the Cease and Desist and Trustee Appointment Order was entered.

25. At the time of entry of the Cease and Desist and Trustee Appointment Order, the banking operations as well as all information and systems infrastructure were administered by GCS. On my initial visit to EPB offices in Puerto Rico, I confirmed that the Puerto Rico branch was

basically a shell office, with limited banking operations and personnel. It was then informed that most of the banking operations were being conducted from GCS's offices at Saint Vincent.

26. Regarding the EPB subsidiaries, these entities maintained their independent operations, with books and records purportedly conforming to the laws and regulations of the jurisdiction from where they were operating.

27. At no time during my appointment, either EPB, as the entity in liquidation, nor I had any participation in business affairs or administration of any of the subsidiaries. These subsidiaries were managed and controlled by Schiff, Qentas or both.

28. Then, shortly after the entry of the Cease-and-Desist Order, Schiff provided OCIF and the undersigned a reconciliation of EPB cash assets and customers' obligations. This report, with information provided as of June 30, 2022, proved as the main financial supporting document offered by Schiff to structure the Joint Order for Liquidation and Dissolution executed on August 8, 2022. Refer to **Exhibit 1**.

29. In summary, this report showed:

a. EPB cash assets in the amount of $68,109,302.

b. EPB obligations to 3,711 customers in the amount of $66,747,758.

c. As a separate line item on the report, an inventory of 11,244.289 ounces of gold holdings for 334 customers, then in custody of a third-party custodian and with an aggregate value of $19,333,213.40 as of that date.

d. As a separate line item on the report, an inventory of 321,885.76 ounces of silver holdings for 287 customers, in custody of a third-party custodian and with an aggregate value of $6,128,704.89 as of that date.

e. In addition to cash assets, EPB owned inventory of gold and silver with a cash value of $25,461,910.51 as of that date.

Refer to **Exhibit 5** attached.

30. From July 2, 2022, and up to September 30, 2022, the effective date for implementation of the Voluntary Liquidation Plan proposed by Schiff, EPB's transactions with its customers were managed by EPB's management under the supervision of Schiff. Operations and employees remained working at the GCS's offices at St. Vincent.

31. During this period and while the liquidation plan presented by Schiff was completed, my work as Trustee was limited to supervision duties to ascertain that the process was conducted following the terms of Consent Order for Liquidation and Dissolution entered by OCIF. I reviewed reports and approved those requests for payment of operating expenses from EPB's operating team. I either paid from EPB's bank accounts or authorized the release of funds to cover said expenses.

IV. Schiff and Qenta Execution of a Purchase and Assumption Agreement

32. As was always Schiff's goal, just 3 days after the approval of the Joint Order, Qenta remitted a proposal for the acquisition of certain EPB assets. I understand that the negotiations of these terms were exclusively among Schiff and Qenta. Refer to **Exhibit 6: EPB-Qenta Purchase and Assumption Agmt 093022 FINAL**.

33. Then, in accordance with the Consent Order, Schiff submitted EPB's Voluntary Liquidation Plan ("VLP"). Refer to **Exhibit 7: Approved Voluntary Liquidation Plan**.

34. The VLP was approved by the Commissioner on September 6, 2022, and in summary proposed as follows:

a. EPB would fully liquidate its operations;

b. EPB would surrender its banking license and tax decree; No further operations from Puerto Rico would be conducted.

c. Dissolve the corporate entity in the most efficient and inexpensive manner;

d. Schiff would obtain a purchaser or entity to which assets and accounts will be transferred so that this entity could complete the liquidation process in the most efficient manner.

35. During the two months following the entry of the Cease and Desist, Schiff insisted that the best way to complete an orderly implementation of the liquidation order was to allow the transfer of EPB's business to Qenta.

36. Schiff represented during this time that neither OCIF nor me as trustee will have any work problems with the liquidation process as the entity He was proposing will take care of all work and that everything will flow smoothly for all parties at stake. The Trustee's duties would be limited to cutting some checks following the transfer of all assets and obligations to Qentas. **Refer to Exhibit 8 Letters and Emails**.

37. However, OCIF made clear that its approval of this proposed closing strategy for implementing EPB's liquidation was expressly conditioned on protecting customer choice. Specifically, any customers unwilling to participate in the transaction had to be afforded a defined period to request the closure of their accounts and receive an immediate disbursement of their funds.

38. Within the framework of the liquidation process entrusted to me, these customers were designated as the "**Opt-Out**" customers.

39. The closing of the Opt-Out customer accounts was as to be carried out through outgoing wire transfers processed through EPB's banking system, managed by the GCS's team at St.

Vincent, with funds withdrawn from EPB's correspondent bank account in Novo Banco (a Portuguese bank).

40. Following EPB's notice to all customers on September 28, 2022, those wishing to "Opt-Out" were given the opportunity to confirm their election. By the closing election date, wire transfer requests from 420 customers had been posted to EPB's banking system to exclude their accounts from the transfer transaction. The total value of these accounts scheduled for closure amounted to $18.5 million as of September 30, 2022. **Refer to Exhibits 9: Notice and List of Outgoing Wires**.

41. It was made expressly clear in the postings prepared for this transaction that all customers who did not elect to "Opt-Out" would be deemed "Opt-In" customers, with their accounts and obligations transferred to Qenta.

42. On September 6, 2022, Qenta Inc. deposited $500,000 into the reserve account pursuant to G-Commerce's Letter of Intent. A second payment of $750,000 was due within fifteen business days after the final closing date but to this date, this second payment was never received.

43. By September 30, 2022, Schiff, as sole shareholder of EPB, negotiated and executed the Purchase and Assumption Agreement ("APA") with Qenta Inc., G-Commerce DMCC, and Responsible Gold Trading DMCC. **Exhibit 6: EPB-Qenta Purchase and Assumption Agmt 093022 FINAL**

44. By the effective date of this agreement, all the subsidiaries, including GCS, who remained as the operating unit for EPB, were transferred to Qentas. Employees in the St. Vincent offices were terminated by EPB with some being retained by Qentas. From that date on, EPB customers continued to be served from these other entities using EPB's banking system and data.

45. Following execution of the APA, Schiff and Qenta initiated a series of service transfers and vendor engagements to assume control of EPB's digital banking infrastructure. These included a Cloud Order Form Change Request dated September 28, 2022, designating Qenta as the operational assignee for EPB's hosted banking systems; an Addendum to the QT Services LLC Order Form dated April 14, 2023, confirming Qenta's continuation of EPB's core banking service subscriptions; and two Temenos SaaS invoices (INV#90048174 and INV#90045202) issued to Qenta Inc., reflecting ongoing licensing and platform usage for EPB's client data and transaction systems. Upon these transfers, Qenta assumed functional control of EPB's infrastructure, including client-facing platforms, compliance environments, and data repositories.

46. On the other hand, at the request of Schiff, multiple authorizations and requests for transfer of funds and accounts were requested. All these transfers were initiated by Schiff or his assistants and then reviewed by Me pursuant to the agreed terms of the Order on Liquidation and following the VLP. . The same happened with the metals, Schiff caused these metals to be transferred to Qentas. Refer to **Exhibit 10:**

47. While this transfer process was ongoing, OCIF confirmed that no further authorizations or approvals were required as all were included in the Order of Liquidation and the Plan proposed by Schiff. **Exhibit 7: Approved Voluntary Liquidation Plan**

V. Initial Delays in Paying "Opt-Out" Customers:

48. Notwithstanding the efforts of the undersigned and OCIF to ensure that GCS staff could complete the wire transfers for "Opt-Out" customers from EPB's correspondent account at Novo Banco, an ongoing investigation by the Government of Portugal resulted in that account being frozen for several months.

49. It was not until August 2024, that these funds were remitted to the undersigned for further distribution to the Opt-Out customers.

VI. Qentas Willful Delays in Onboarding "Opt-In" Customers and Calls for Cancellation:

50. In the meantime, Schiff and Qenta continued with their process as detailed in the APA. A Client Acquisition Strategy and Partial Close Proposal published in EPB's website confirmed that, as of February 2023, they planned to onboard approximately 570 clients with $32 million in balances, including gold, silver, mutual funds, and brokerage accounts. The strategy proposed converting precious metals to Responsible Gold, liquidating mutual funds into USD, and maintaining brokerage accounts through Interactive Brokers.

51. From the effective transition date, communications to the website continued. Townhalls and meetings with customers were coordinated by Qenta to maintain interest and show the path for the transition process directed by them. Refer to **EXHIBIT 11:**

52. On the other hand, aside from the issues with the funds tied to the Novo Banco accounts, there was no significant issue to continue with the onboarding of "Opt-In" customers. Being customer owned inventory, gold and silver holding should have been transferred without problems by Qenta as they were authorized to do so. Investment funds in the subsidiaries were never part of the liquidation ordered by OCIF so this could have been transferred as well.

53. Then, in May 2023, a revised distribution plan was submitted for the first time. This plan deviated from what had been approved in the Order and the VLP, as it attempted to reclassify the obligations of Opt-In customers and redirect them to be paid as Opt-Out customers through the distribution component of the liquidation plan mandated by OCIF. Refer to **EXHIBIT 12:**

54. This attempted reclassification created significant administrative burdens for the Trustee, primarily because all customer and transaction information was controlled by Qenta and, aside from the list of pending outgoing wires, there was no corroborating data to validate either the customers or the proposed distribution. At the same time, Qenta informed that any distributions to their newly defined "Opt-Out/In" customers would have to be carried out by the Trustee, not by them.

55. Again this proposal deviated substantially from the Plan structure proposed by Schiff that called for all payments to customers to be done through the same computer banking system, which up to September 30, 2022, was managed by EPB and after that date by Qentas.

56. Given the lack of information to advance the process and the ongoing uncertainty regarding the recovery of "Opt-Out" funds from Novo Banco, in May 2023 I, as Trustee, undertook a manual reconstruction of customer identities (based on Know Your Customer opening documents) and account balance information. Establishing a reliable database for the customers Qenta had newly designated as "Opt-Out" was essential before commencing any distribution process.

57. Considering that the definition and distribution of "Opt-Out" customers was unilaterally modified by Qenta, I insisted that any such adjustment or modification had to be authorized by OCIF. To the extent that my authority for distribution arises from the Liquidation Order and VLP presented by Schiff, any change to these documents had to be approved by the Commissioner.

58. For most of the remaining of the year 2023 and up to May 2024, the purported reconciliation process required by Qenta upon modification of the terms of the APA continued. I received at least six different proposed distributions presented with different numbers and combinations thereto. At the same time, we continued with the manual reconciliation and record construction of Qentas' proposed "Opt-Out" customers.

59. Notwithstanding, the information and transactions of Qenta's selected customers—those it defined as "Opt-Ins"—remained entirely under Qenta's control. Throughout much of 2023, no details regarding their assets, transactions, or holdings were provided.

60. The reconciliation of Qenta's proposed "Opt-Out" customers revealed significant, undisclosed, and unwarranted transactions and practices, including the following:

a. Customers' obligations from EPB and the subsidiaries were all commingled for customers analysis and classifications.

b. Mutual funds and precious metals holdings were cancelled or disposed with the obligation charged to the "Opt-Out" customer balance to be handled by the Trustee but with the funds transferred to Qentas account.

c. No reports were ever produced on Qentas accounts or transactions. Customers balances were all informed on manual ("excel") files with no reference to source data or documentation.

61. On August 31, 2024, now with more information and documents obtained and with a print-out of bank statements produced by Qentas for their defined "Opt-Out" customers, I could confirm significant differences on the amounts proposed for distributions. Refer to **EXHIBIT 13**.

62. On June 28, 2024, Responsible Gold Trading DMCC—the APA counterparty responsible for tokenizing and managing EPB's gold inventory—was formally dissolved and deregistered under Swiss law. The dissolution followed a court-ordered liquidation and bankruptcy suspension due to lack of assets.

Exhibit 14: Commercial Register – Responsible Gold Trading DMCC (Dissolved)

63. On December 12, 2024, at instances by the Trustee, a liquidation and migration summary outlining the procedural steps required to finalize EPB's asset disposition was presented by Qentas. The presentation confirmed that Qenta's onboarding process was contingent on customer opt-in, and that any failure to complete onboarding would result in reclassification to the Trustee's liquidation track.

64. Qentas timeline included reconciliation deadlines, OCIF approvals, onboarding windows, and fund transfer protocols. It confirmed that Qenta's migration obligations were time-bound and conditional, and that failure to complete onboarding triggered reversion to Trustee control.

65. This document supports the undersigned position that Qenta's execution was incomplete, that customer reclassification was anticipated, and that unreconciled assets remain subject to recovery.

66. Our internal analysis provided by Qenta confirms that a subset of EPB customers—designated as Category C—were classified as opt-out and excluded from onboarding. These customers held balances totaling over $1.5 million across deposit accounts, mutual funds, and brokerage positions.

67. The analysis confirmed that many balances were consolidated through internal transfers, never moved externally, and remain within Qenta's custody. Several entries reflect reclassification of mutual fund proceeds, brokerage liquidations, and internal ledger adjustments.

68. The document details internal transfers, fund consolidations, and reclassifications that occurred between July and November 2022. It confirms that many balances were never moved externally but were instead consolidated through internal ledger adjustments. Several entries reflect mutual fund liquidations credited to deposit accounts, brokerage proceeds reclassified into new currency accounts, and SWIFT instructions that were reversed or never executed.

69. These entries confirm that Qenta retained custody of unreconciled assets and failed to onboard or liquidate them per APA terms.

70. Lastly, on January 23, 2025, Qenta remitted to the Trustee their last reconciliation and liquidation proposal for EPB. To my surprise, Qenta again deviates from the last analysis provided and for the first time insert unwarranted claims for charges and fees. Refer to **EXHIBIT 15**

71. Qenta has never submitted a formal financial report, audit, or certified accounting statement to the Trustee since execution of the APA. Instead, Qenta remains transmitting informal spreadsheets and settlement proposals which attempt to justify asset shortfalls, haircut deductions, and without any explanation of asset appreciation.

72. These documents are not independently verified and have repeatedly altered the original customer accounts, balances, and opt-out classifications set forth in EPB's approved Liquidation Plan. Each version introduces new figures and assumptions, creating confusion and undermining the reliability of Qenta's representations. The Trustee has not accepted these proposals, and the EPIB Cash Position Report remains the only verified record of liquidation outcomes and unrecovered holdings.

Exhibit 4: EPB-Qenta Term Notice 071125

73. The Trustee recovered a total of $48,538,758.28 in customer assets, deposited into accounts under exclusive Trustee control. Qenta Inc., despite failing to on-board the customers, it retained custody of $19,938,956.32 in customer assets. Qenta is also the custodian per the APA of the silver owned by EPB customers. As to the gold holdings, there is no record nor location as to what happened to this inventory that also was under Qentas' care.

74. Schiff has contributed to the confusion created by Qenta. As time passed without any valid reason for delaying the onboarding of customers, his response to the problems caused by Qenta—

the very entity he introduced to acquire the assets—was to place blame on me and OCIF for the delays in the liquidation process. He went further by questioning the necessity of gathering customer information.

75. On July 12, 2025, Qenta then remitted a termination notice of the APA. In essence, Qenta now proposes returning to customers only the value of the silver and gold on valuations dated as of September 30, 2022. They intend to retain any appreciation (estimated in at least 50% of the 2022 valuations) and deducting $5 million in termination fees. These deductions were proposed unilaterally and without any contractual or regulatory support.

Exhibit 4: EPB-Qenta Term Notice 071125

76. The APA does not authorize retention of appreciation, imposition of fees, or unilateral liquidation of customer assets. Such actions violate the express terms of the APA and breach the fiduciary obligations owed to EPB customers.

77. On the other hand, Schiff's proposal, while different, is as unwarranted and illegal as the Qentas'. Initially, Schiff's position was that the silver and metals inventory are owned by EPB and that any appreciation should come back for distribution to customers. Again, this idea is flawed and unwarranted and contradicts the basic agreements entered with EPB customers. It is uncontested that the silver and gold holdings are customer-owned assets. EPB –and now Quentas—were simply acting as custodians of these precious metals. Refer to **EXHIBIT 16**.

78. Moreover, Schiff or Qenta remain completely silent about the customers and transaction records they still retain and/or control. Despite the operational takeover, Qenta has refused to issue client statements, complete onboarding, or assume legal responsibility for the EPB's accounts under its purview.

VII. Mismanagement of Customers' Assets and Accounts

79. The account reconciliation process triggered by Qenta's delay in onboarding its customers has uncovered a pattern of mismanagement of customers' information and balances for distribution.

80. One of the most dramatic claims promoted by Schiff concerned the EPB customer account of Ewan Forsyth Incorporated. Schiff portrayed this account as evidence of a serious flaw in OCIF's liquidation process and as an example of delays allegedly caused by the undersigned. In reality, this account—whose ultimate beneficial owner was an individual who tragically committed suicide—was one of Qenta's proposed "Opt-Out" customers and had not been included in the distribution list provided in September 2022. Once the transaction information for this account was finally obtained, it became clear that Schiff's assertions were not only misleading but blatantly false.

a. First, the subject account was not from an individual but from a corporation. The balance of around $800,000, imputed as a claim against the Opt-Out designated by Qenta, was in fact caused by the cancellation of an investment position from the mutual fund subsidiary. This subsidiary's obligations are not part of the liquidation process conducted by OCIF.

b. While Qenta attempted to transfer this obligation to the undersigned, the funds associated to the cancellation of these funds were never transferred to the undersigned's custody.

c. This account was never part of the Opt-Out accounts subject to the OCIF order. Even if it was, the balance reported by Schiff for EPB's liquidation purposes was $2,932 not the $791,088.96 informed by Qentas.

d. To this date, the documentation required for the transfers, as well as the proceeds on cancellation of this investment account, remain under the control of Qentas or Schiff. Refer to **EXHIBIT 17**

81. Through further reconciliation work, we have confirmed the following categories of discrepancies in accounts and customer records::

A - Cancelled Brokerage Account After Closing Order- Funds Not Found in EPB Cash Accounts

B - Sold PM Inventory After Closing Order - Funds Not Found in EPB Cash Accounts

C - Distribution to this Customer is In PM - No Dividend from EPB

D - Liquidation of PM and the Combined with Deposit Account - Partial Allowance

E - Novo Banco / Internal Transfers balances posted before the Order

F - Verified for Liquidation Process

G - Verified for Migration

H - Below $50

I - Cancelled Brokerage Account and Combined with Deposits

J - Unidentified

K - Other Accounts in Zero or Negative Balance

L - Deposits cancelled to Brokerage

VIII. Qentas and Schiff Recent Endeavors – Opt-in Customers at Peril

82. While I have sufficient funds available to comply with the distribution to Opt-Out customers—who are part of the OCIF liquidation and were identified as of September 30, 2022, as mandated in the liquidation order—the same is not true for the Opt-In customers, who were transferred under the APA and for whom Qenta and Schiff remain ultimately responsible.

83. The defendants have in turn entered on a coordinated operation to spread false and incorrect information to these customers. These communications are all geared to cover the potential mismanagement or misappropriation of assets that belong to former customers of EPB. It is now clear that Qentas has effectively abandoned all customers, has cut all communications with them and simply seems to be on the run with the gold and cash that was once transferred to them, seeking authorizations for settlement on reduced terms.

84. On the other hand, after learning of the termination of the APA, Schiff began using the website previously operated by Qenta to communicate with customers. Through this platform, he has disseminated incorrect and fraudulent information aimed at covering up the problems he created in negotiating the APA. Several of the misleading and untenable positions conveyed by Schiff—which seriously jeopardize the liquidation efforts for Opt-In customers—are as follows:

a. "The APA never closed and as such He agreed with the termination". **This statement is simply false as this does not conform with the agreement I or OCIF were provided with in September 2022**.

b. "Silver and metals pertain to the bank, not to Qentas". **False, the basic account agreement with these customers, confirms that these assets are customer-owned.**

c. "the Trustee bears fiduciary responsibility for mutual fund holdings transferred to Qenta". **False, mutual funds investments were managed through a subsidiary domiciled in a foreign jurisdiction. These subsidiaries were never part of the liquidation order entered by OCIF. Actually, it would be illegal to consolidate these entities without proper authorization from the corresponding foreign jurisdictions.**

d. "the Trustee has the silver, with a written authorization from him this can be transferred to customers. As such instructed customers to request that the silver be transferred to Schiff Gold". **False, this is not the position informed by the current custodian. This inventory is subject to an active dispute and a proper legal instruction (resolving the contested issue with Qenta) is required prior to any distribution to the owner. Moreover, EPB, was never and is not now chartered to market these commodities. Exhibit 18** Silver Transfer Request and Spreadsheet

e. "Opt-In customers should write the trustee via email to get their claims paid as He has all the information on their accounts". **False, at all times following the appointment order customers' personal and transaction information was managed, first by Schiff and then by Qentas. Other than the proofs of claims filed by Opt-In customers, I have no information whatsoever on these accounts or customers that could allow the distribution of funds following the laws and regulations imposed by OCIF and the Liquidation Order.**

85. On August 25, 2025, OCIF issued a formal Cease-and-Desist letter to Peter Schiff and his counsel regarding unauthorized and misleading statements published on the website https://europacbank.com/

86. The letter confirms that:

- EPB's license has been surrendered pursuant to the Liquidation Plan;
- All authorities reside exclusively with the Receiver under OCIF supervision;
- Mr. Schiff retains no legal or operational authority to represent EPB;

- Communications on the website falsely suggest EPB remains licensed and operational.

87. Qenta, for its part, structured a separate scheme to further capitalize on the problems created by its failure to onboard the customers it acquired in September 2022. I have received information confirming that, on August 21, 2025, Qenta sent emails to EPB customers offering to purchase mutual fund holdings at thirty-five cents on the dollar.

Exhibit 19: Qenta Customer Outreach (Aug 21, 2025)

IX. Impact on Liquidation and Distribution

88. Regrettably, the defendants' unwarranted acts and omissions, together with their continued misleading representations, have materially compromised the liquidation process under my charge, to the detriment of EPB's former customers.

89. Specifically, there are around 1,971 customers which obligations were transferred to Qentas that to this date have not been paid. Out of these customers, 144 have filed claims in the ongoing liquidation process with an aggregate cash amount claimed of $27,262,194. Refer to **Exhibit 20**: Filed Claims Report.

90. In addition to the claims for cash accounts, there remains an inventory of silver stored at The Safe House SG Pte Ltd belonging to these customers, which was abandoned by Qenta. This inventory must be returned to the lawful owners through the mechanisms provided in the Order of Liquidation.

91. With respect to the gold inventory—valued at approximately $18,518,520.62—and the cash reported in the amount of $44,052,039, both of which were transferred to Qenta for the payment of Opt-In customers, these assets are now missing. The Trustee is nevertheless being

called upon to satisfy these claims, even though the assets and obligations were transferred to Qenta by Schiff back in September 2022.

Wigberto Lugo Mender, Esq., CPA
Trustee Appointed by,
The Office of the Commissioner of Financial Institutions, Puerto Rico

EXHIBIT 1
OCIF Cease and Desist and Trustee Appointment Order

GOBIERNO DE PUERTO RICO
OFICINA DEL COMISIONADO DE INSTITUCIONES FINANCIERAS
SAN JUAN, PUERTO RICO

OFICINA DEL COMISIONADO DE INSTITUCIONES FINANCIERAS **Querellante** **v.** **EURO PACIFIC INTL., BANK, INC.** **Querellados**	**CASO NUM.: C22-D-006** **SOBRE: Violaciones a la Ley Núm. 273-2012, según enmendada, conocida como "Ley Reguladora del Centro Financiero Internacional**

QUERELLA Y ORDEN DE CESE Y DESISTA
Y
ORDEN PROVISIONAL DE NOMBRAMIENTO DE SÍNDICO

I. INTRODUCCIÓN

La Querella y Orden de Cese y Desista y Orden Provisional de Nombramiento de Síndico ("Orden") de epígrafe constituye una acción de emergencia de carácter sumario que persigue soslayar un peligro inminente para la seguridad de la industria de entidades financieras internacionales que operan desde la jurisdicción de Puerto Rico y persigue proteger el interés público consistente en garantizar el total y estricto cumplimiento con todas las leyes y/o reglamentos aplicables a las licencias expedidas por la Oficina del Comisionado de Instituciones Financieras ("OCIF").

Euro Pacific Intl. Bank, Inc., (t/c/c Euro Pacific Bank, en adelante "Euro Pacific") es una entidad financiera internacional ("EFI") con una licencia expedida por la OCIF para operar desde la jurisdicción de Puerto Rico al amparo de la Ley Núm. 273-2012, según enmendada, conocida como "Ley Reguladora del Centro Financiero Internacional" (Ley Núm. 273-2012), 7 L.P.R.A § 3081 *et seq.*, entre otros estatutos aplicables. El estatuto rector antes mencionado impone mandatos claros y específicos sobre el capital mínimo requerido para que una EFI pueda garantizar su seguridad financiera y adecuacidad operacional ante la OCIF, quien ostenta amplios poderes delegados para velar, supervisar, fiscalizar y examinar a estas entidades con el fin de que cumplan con las leyes y/o reglamentos aplicables.

Desde el inicio de su operación bancaria en Puerto Rico, la OCIF le ha garantizado a Euro Pacific el debido proceso de ley en el curso de todos los trámites administrativos ante el ente regulador. Sin embargo, y a pesar de múltiples oportunidades para evidenciar el fiel cumplimiento con la Ley Núm. 273-2012, Euro Pacific incurrió en un patrón sistémico de incumplimiento con los requisitos legales relacionados al capital mínimo para operar una EFI de manera viable. La documentación y/o información, incluyendo récords de negocios y Estados Financieros Auditados, disponible en el expediente administrativo de Euro Pacific ante la OCIF, establece con meridiana claridad que la entidad financiera enfrenta un escenario de insolvencia, según definido en la Ley Núm. 273-2012. Por ende, al presente, existe un peligro inminente: (i) a la seguridad y adecuacidad operacional de Euro Pacific,

II. JURISDICCIÓN

La Ley Núm. 4 de 11 de octubre de 1985, según enmendada, conocida como "Ley de la Oficina del Comisionado de Instituciones Financieras", 7 L.P.R.A. § 2001 *et seq.*, (Ley Núm. 4-1985), le impone a la OCIF, la responsabilidad de fiscalizar y supervisar las instituciones financieras que operen o hagan negocios en Puerto Rico. Según dispuesto por la Ley Núm. 4-1985, la OCIF tiene el deber ministerial de administrar e implementar la Ley Núm. 273-2012. Conforme a la misma, la OCIF supervisa y fiscaliza las entidades financieras internacionales organizadas al amparo de ésta.

La Ley Núm. 4-1985, la Ley Núm. 273-2012 y la Ley Núm. 38-2017, según enmendada, conocida como "Ley de Procedimiento Administrativo Uniforme del Gobierno de Puerto Rico" (Ley Núm. 38-2017), 3 L.P.R.A. § 9601, *et seq.*, así como el Reglamento Núm. 3920 de 23 de junio de 1989, según enmendado[1], conocido como "Reglamento para Reglamentar los Procedimientos de Adjudicación bajo la Jurisdicción de la Oficina del Comisionado de Instituciones Financieras" (Reglamento Núm. 3920), facultan al Comisionado a emitir cualquier orden necesaria, apropiada y conveniente para hacer valer las leyes y/o reglamentos bajo su jurisdicción.

A la fecha de emisión de este documento, la OCIF cuenta con prueba suficiente a los fines de establecer que Euro Pacific incurrió en serias violaciones a la Ley Núm. 273-2012, al Reglamento Núm. 5653 adoptado por la OCIF bajo la Ley Núm. 52-1989, según enmendada, conocida como "Ley Reguladora del Centro Bancario Internacional" (Ley Núm. 52-1989) y cuyas disposiciones son aplicables a las entidades financieras internacionales a tenor con lo dispuesto en el Artículo 27 de la Ley Núm. 273-2012[2] y al *Consent Order* de 1 de noviembre de 2021.

Como consecuencia de lo antes expuesto, y de conformidad con las disposiciones legales aplicables, la OCIF emite la presente **QUERELLA Y ORDEN DE CESE Y DESISTA Y ORDEN PROVISIONAL DE NOMBRAMIENTO DE SÍNDICO** ("**ORDEN**"). Disponiéndose, además, que, conforme al Artículo 19 de la Ley Núm. 273-2012, 7 L.P.R.A. §3098, los Exhibits mencionados en esta **ORDEN** se radican junto a la misma en un sobre sellado marcado confidencial para beneficio único de Euro Pacific y su representación legal, excepto cuando medie una Orden requiriendo su divulgación pública.

III. INFORMACIÓN DE LA PARTE QUERELLADA

Nombre: **Euro Pacific Intl. Bank, Inc.**
Dirección física: Calle Palmeras 53, Piso 10, Barrio Puerta de Tierra, San Juan, Puerto Rico, 00901
Dirección postal: Calle Palmeras 53, Piso 10, Barrio Puerta de Tierra, San Juan, Puerto Rico, 00918
Dirección de correo electrónico de persona contacto:
marka@europacbank.com
PSchiff@europac.net

IV. HECHOS

1. El 28 de enero de 2016, Euro Pacific Intl. Bank, LTD., presentó ante la OCIF una Solicitud de Permiso para Organizar una Entidad Financiera Internacional (la Solicitud) como subsidiaria de dicha entidad bajo el nombre de Euro Pacific Intl. Bank, LLC. **(Exhibit 1)**

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[1] La Ley Núm. 38-2017 derogó la Ley Núm. 170 de 12 de agosto de 1988, según enmendada, conocida como la "Ley de Procedimiento Administrativo Uniforme del Estado Libre Asociado de Puerto Rico". La Sección 8.3 de la Ley Núm. 38-2017

2. El 25 de febrero de 2016, la OCIF otorgó a Euro Pacific Intl. Bank, LLC., un permiso para organizarse como EFI (el "Permiso"), bajo las disposiciones de la Ley Núm. 273-2012. **(Exhibit 2)**

3. Desde el 2016, y conforme al texto expreso del Permiso, la OCIF le apercibió a Euro Pacific Int. Bank, LLC sobre los niveles de capital mínimo requerido para la operación legal de la EFI. Específicamente, dicho documento establece lo siguiente:

> AUTHORIZED CAPITAL AND INITIAL CAPITALIZATION
> As submitted in your application, the proposed capitalization of the IFE will be five million dollars ($5,000,000.00). We also understand that at least two hundred and fifty thousand dollars ($250,000.00) shall be fully paid-in at the time the license to operate as an international financial entity is issued by the Commissioner.
>
> We thus authorize the IFE to organize itself with an authorized minimum capital of five million dollars ($5,000,000.00), of which the amount of $250,000.00 shall be fully paid in at the time of commencement of operations.
>
> Please note that the increases and decreases in the IFE's authorized capital are governed by the IFE Act and Regulation 5653.
>
> UNENCUMBERED ASSETS
> In addition, as represented in the application, the IFE shall also purchase a certificate of deposit or pledge unencumbered assets in the amount of $300,000.00, which shall be pledged in favor of and for the benefit of the Commissioner, to comply with the unencumbered assets requirement established in Section 8(a)(7) of the IFE Act.
>
> RESERVE REQUIREMENT
> The IFE shall comply with the reserve requirements established in Article 4 of the IFE Act or as otherwise subsequently agreed with the Commissioner as a condition precedent for the issuance of the license.
>
> In the absence of an additional subsequent determination on this matter in the permit to commence operations, the reserve to be maintained by the IFE in no case shall be less than twenty percent (20%) of the total demand deposits maintained by the international financial entity (except the demand deposits maintained from the Government Development Bank for Puerto Rico and the Economic Development Bank of Puerto Rico duly secured with acceptable collateral).
> ...

4. La nota al calce número 2 de dicho Permiso establece requisitos adicionales sobre la forma y manera en que se interpretan los niveles de capital mínimo requerido en el Permiso otorgado por OCIF:

> For the purpose of a permit from the Office to organize an international financial entity and, ultimately, for the purpose of authorizing such entity to commence operations, the unencumbered assets required by the IFE Act do not constitute "capital" to the extent such unencumbered assets are pledged in favor of the Commissioner and may not be used in the operations of the entity nor to pay a shareholder's interest in the entity during the life of the

6. El 9 de junio de 2016, Euro Pacific Intl. Bank, LLC notificó a la OCIF que el 6 de junio de 2016, Euro Pacific Intl. Bank, LLC se incorporó como una corporación con fines de lucro en el Departamento de Estado del Gobierno de Puerto Rico, Registro Núm. 374354. **(Exhibit 4)**

7. Según el Operating Agreement of Euro Pacific Intl. Bank, LLC, con fecha de 20 de mayo de 2016 y anejado como parte de la carta fechada 9 de junio de 2016, el Artículo IV, Sección 4.1 (a): "[t]he authorized capital of the IFE shall not be less than five million dollars ($5,000,000.00) or such other amount that OCIF may request from time to time". **(Exhibit 4, a la pág. 22)**

8. El 11 de agosto de 2016, Euro Pacific Intl. Bank, LLC solicitó un término adicional de seis (6) meses para completar los requisitos de la Solicitud de Licencia. **(Exhibit 5)** Mediante carta de 24 de agosto de 2016, la OCIF concedió dicha extensión, la cual vencía el 25 de febrero de 2017. **(Exhibit 6)**

9. El 19 de octubre de 2016, Euro Pacific Intl. Bank, LLC solicitó un cambio de dirección y sometió varios documentos requeridos para la Solicitud de Licencia. **(Exhibit 7)**

10. El 20 de octubre de 2016, la OCIF otorgó la licencia reiterando la necesidad de dar cumplimiento a los requisitos de reserva establecidos en la ley. Específicamente, la OCIF estableció que:

> RESERVE REQUIREMENT
> The IFE shall comply with the reserve requirements established in Article 4 of the IFE Act or as otherwise subsequently agreed with the Commissioner. In the absence of an additional subsequent determination on this matter, the reserve to be maintained by the IFE in no case shall be less than twenty percent (20%) of the total demand deposits maintained by the international financial entity (except the demand deposits maintained from the Government Development Bank for Puerto Rico and the Economic Development Bank of Puerto Rico duly secured with acceptable collateral). **(Exhibit 8, a la pág. 3)**

11. El 21 de octubre de 2016, Euro Pacific Intl. Bank, LLC presentó evidencia de capital pagado de $250,000.00 y del Certificado de Depósito en el Banco Popular de Puerto Rico por la cantidad de $300,000.00. **(Exhibit 9)**

12. El 14 de diciembre de 2016, Euro Pacific Intl. Bank, LLC notificó a la OCIF que no comenzarían operaciones como subsidiaria de Euro Pacific Bank, LTD en la jurisdicción de San Vicente y las Granadinas, y solicitó que el Permiso se traspasara completamente a nombre de Euro Pacific Intl. Bank, Inc. **(Exhibit 10)**

13. El 4 de enero de 2017, la OCIF concedió el Permiso a Euro Pacific Intl. Bank, Inc. con las mismas condiciones y requisitos requeridos para el Permiso anterior. **(Exhibit 11)**

14. El 14 de enero de 2017, Euro Pacific solicitó mercadearse bajo el nombre comercial Euro Pacific Bank. **(Exhibit 12)**

15. El 1 de febrero de 2017, Euro Pacific presentó en la OCIF los documentos presentados para la inscripción y el registro al Departamento de Estado junto con los By-Laws of Euro Pacific Intl. Bank, Inc., de 1 de febrero de 2017, que establecen en el Artículo VIII, Sección 8.1 (a) que: "[t]he authorized capital of the IFE shall not be less than five million dollars ($5,000,000.00) or such other amount that OCIF may request from time to time. It shall be constituted by Class A common stock." Además, presentó el Certificado de

RESERVE REQUIREMENT

The IFE shall comply with the reserve requirements established in Article 4 of the IFE Act or as otherwise subsequently agreed with the Commissioner. In the absence of an additional subsequent determination on this matter, the reserve to be maintained by the IFE in no case shall be less than twenty percent (20%) of the total demand deposits maintained by the international financial entity (except the demand deposits maintained from the Government Development Bank for Puerto Rico and the Economic Development Bank of Puerto Rico duly secured with acceptable collateral). **(Exhibit 15)**

18. El 21 de febrero de 2017, Euro Pacific presentó a la OCIF el Certificado de Disolución de Euro Pacific Intl. Bank, LLC. **(Exhibit 16)**

19. El 19 de mayo de 2017, Euro Pacific solicitó a la OCIF que autorizara enmiendas a los Artículos de Incorporación para un aumento en su capital de $5,000,000.00 a $5,400,000.00 mediante la emisión de acciones comunes. **(Exhibit 17)**

20. El 16 de junio de 2017, la OCIF autorizó la enmienda a los Artículos de Incorporación para aumentar el capital autorizado a $5,400,000.00 y la emisión de 2,400,000 acciones comunes. **(Exhibit 18)**

21. El 12 de octubre de 2017, Euro Pacific notificó que comenzaría operaciones el 12 de octubre de 2017. **(Exhibit 19)**

22. El 20 de noviembre de 2018, Euro Pacific informó que, conforme al capital autorizado, el señor Peter David Schiff ("Peter Schiff") es dueño del 50% de las acciones Clase A de Euro Pacific, y el señor Mark D. Anderson es dueño del restante 50% de las acciones Clase A de Euro Pacific. Sin embargo, solicitan aprobación de la OCIF para vender 540,000 acciones Clase A o el 10% de dicha participación al señor Adrian Murray reflejando que cada accionista anterior retendrá el 45% de las acciones en Euro Pacific. Anejaron con su solicitud varios de los documentos requeridos. **(Exhibit 20)** El 27 de noviembre de 2018 varias deficiencias fueron señaladas. **(Exhibit 21)**

23. El 15 de enero de 2019, la OCIF autorizó la venta de acciones a Adrian Murray. **(Exhibit 22)**

24. El 4 de febrero de 2019, Euro Pacific presentó su solicitud de renovación junto con el Estado Financiero consolidado a 31 de diciembre de 2018. **(Exhibit 23)**

25. El 5 de marzo de 2019, Euro Pacific presentó, además, evidencia del Certificado de Depósito ahora vigente en First Bank Puerto Rico por la cantidad de $301,893.10. **(Exhibit 24)** Ese mismo día, la OCIF impuso una multa administrativa por radicación tardía a Euro Pacific ascendente a $500.00 y la misma fue pagada en su totalidad el 14 de marzo de 2019. **(Exhibits 25 y 26)**

26. El 10 de enero de 2020, Euro Pacific solicita a la OCIF autorización para emitir 900 acciones preferidas. **(Exhibit 27)** Dicha emisión no fue objetada por la OCIF mediante carta de 5 de febrero de 2020. **(Exhibit 28)**

27. El 8 de mayo de 2020, la OCIF notificó a Euro Pacific que no habían solicitado la renovación de la licencia y le impuso una multa de $500.00. **(Exhibit 29)**

31. El 1 de julio de 2021, Euro Pacific notificó a la OCIF que efectivo el 14 de junio de 2021, Sr. Peter Schiff se convirtió en el único accionista de Euro Pacific al ostentar la titularidad del 100% de las acciones. **(Exhibit 33)**

32. El 6 de agosto de 2021, Euro Pacific notificó a la OCIF que el Federal Reserve Bank of New York no le extendería el periodo para someter los documentos requeridos bajo el Account and Financial Services Handbook, por lo que si al 1 de septiembre de 2021 no habían sometido los documentos le cerrarían la cuenta. Por esta razón, Euro Pacific notificó a sus clientes que para el 27 de agosto de 2021 suspendería los servicios bancarios con dólar de Estados Unidos. **(Exhibit 34)**

33. Los hallazgos del examen fueron discutidos con la Gerencia y con la Junta Directiva y el examen fue emitido de manera confidencial. El examen, junto al *Cover Letter*, las facturas por concepto de derecho de examen y multa, una Orden y el propuesto *Consent Order*, fue entregado a los representantes de Euro Pacific el 13 de septiembre de 2021 para que procedieran contestar el mismo. El 24 de septiembre de 2021 Euro Pacific notificó una carta a la OCIF exponiendo su posición sobre los asuntos regulatorios levantados por OCIF mediante el examen. **(Exhibit 35)**

34. El 30 de septiembre de 2021, Euro Pacific presentó un escrito titulado *Motion for Reconsideration*. En la misma, indica que pagó la multa impuesta en la Orden y derechos de examen, y que el 21 de septiembre de 2021 se reunió con representantes de la OCIF para discutir las implicaciones operacionales de la Orden y las alternativas. Alegó que presentó como alternativa que el mejor curso de acción sería vender las acciones comunes, pero esto no fue considerado por la OCIF quien autorizó la venta de activos y futura liquidación ordenada de la EFI. Entre otros asuntos, solicitan que la fecha de efectividad para la Orden sea en noviembre de 2021, de manera que puedan tener tiempo para buscar compradores y que le permita emitir acciones adicionales. **(Exhibit 36)**

35. El 4 de octubre de 2021, la OCIF declaró **No Ha Lugar** la moción de reconsideración presentada. En la misma, la OCIF informó que enviaría un nuevo borrador de *Consent Order* para la consideración de Euro Pacific, de manera que éstos pudiesen presentar sus comentarios al mismo antes del 21 de octubre de 2021 para ser firmado el 1 de noviembre de 2021, según solicitado por Euro Pacific. **(Exhibit 37)**

36. El 13 de octubre de 2021, Euro Pacific presentó su *Progress Report* en respuesta al examen de la OCIF. **(Exhibit 38)**

37. El 28 de octubre de 2021, efectivo el 1 de noviembre de 2021, la OCIF emitió un *Consent Order*, mediante el cual Euro Pacific consintió, entre otras cosas, a cumplir cabalmente con los siguientes requisitos reglamentarios:

> ...
> 2. Board
>
> a) Within ninety (90) days after the effective date of this Order, the Entity must submit to the Commissioner, for its approval, the necessary amendments to the Entity's By-Laws, in order to provide for the following:
>
> At least thirty three percent (33%) of the members of the Board of the Entity must be "independent directors" and must be considered to be "financial experts".
>
> ...

> i. As of thirty (30) days after the Board's approval of the Capital Plan non-objected by the Commissioner pursuant to paragraph (b) above, the Entity must have and must maintain the capital levels required for a "well capitalized" institution, as defined in 12 C.F.R. §324.403(b)(1). For purposes of this ORDER, the leverage ratio and total capital ratio must be calculated in accordance with Part 324 of the FDIC Rules and Regulations ("Part 324"), 12 C.F.R. Part 324.
>
> ii. Should the Entity be unable to maintain the required capital levels specified in subparagraph (i) above, the Entity must notify the OCFI within the next 24 hours. Then within thirty (30) days of receipt of a written notification from the Commissioner, the Entity must develop, adopt, and implement a written plan including specific steps for dealing with the Entity and its subsidiaries in order to:
>
> a. obtain a sufficient capital investment into the Entity to fully meet the capital requirements of subparagraph (i) above as soon as possible, taking into consideration the time needed for any legal transaction to take place thereafter; or
>
> b. sell or merge itself into another financial institution in accordance with Section 10 of Act No. 273-2012 titled Transfer of capital or control of an international financial institution; or
>
> c. voluntarily liquidate the Entity, ensuring the protection of deposits for the Entity's customers. Énfasis suplido.
>
> In the event that the Entity's written plan falls under paragraph 4(c) (ii) (a) or (b), the Entity will then file weekly reports with the OCFI providing the status of and/or progress report of the proposed transaction." **(Exhibit 39).**

38. El *Consent Order* requirió además que Euro Pacific sometiera varios documentos bajo los acápites titulados STRATEGIC AND BUDGET PLAN, CAPITALIZATION PLAN Y LIQUIDITY POLICY AND CONTINGENCY PLAN. Además, el *Consent Order* advierte que:

> The Entity affected by this Order is hereby given notice that, pursuant to the provisions of Article 20(c) of Act No, 4, the OCFI may impose an administrative fine not greater than Five Thousand ($5,000.00) Dollars for each day of non-compliance with the orders issued under the provisions of that act, up to a maximum of Fifty Thousand ($50,000.00) Dollars. In the event of total or partial non-compliance with this Order, the OCFI, in support of the statutory jurisdiction granted by Act No. 4, may request the Court of First Instance, San Juan Superior Section, to enforce the same, under penalty of contempt, and to impose fines and sanctions in addition to the ones the OCFI may deem to be proper, with any other determination which is proper as a matter of law.

39. El 2 de noviembre de 2021, Euro Pacific presentó un *Executive Summary of the Terms and Conditions for the Acquisition of the Shares of Euro Pacific Intl. Bank, Inc. and Subsidiaries*. Dicho documento asevera que Emergent Technology & Payments Inc. ("ETP") adquirirá todas las acciones emitidas y en circulación tanto de la EFI como de sus subsidiarias. ETP fue incorporado en Delaware el 10 de septiembre de 2021 por Brent William de Jong ("Sr. De Jong"). Anejaron al mismo, el *Securities Purchase Agreement* de 28 de octubre de 2021 otorgado entre ETP y Peter Schiff mediante el cual ETP acuerda obtener el control de la

embargo, los borradores de los documentos requeridos, aunque fueron presentados dentro del término establecido en el *Consent Order*, no cumplían con las exigencias requeridas por la OCIF. **(Exhibit 41)**

41. Del análisis de los documentos sometidos el 30 de noviembre de 2021, en el *Strategic and Budget Plans* se identificaron las siguientes deficiencias:

a. Inconsistencias entre la información de estrategia y las proyecciones financieras;
b. Las proyecciones contemplan un cambio de control, y productos y servicios no autorizados en la licencia;
c. Aunque se menciona la relación con el *Federal Reserve Bank of New York* no indican que la cuenta había sido cerrada durante el tercer trimestre del 2021;
d. En las proyecciones financieras no incluyeron los resultados de las subsidiarias que impactan la entidad;
e. Consideraron cifras al cierre de agosto 2020 y 2021 cuando su año fiscal es a diciembre;
f. No entregaron los Estados Financieros Auditados del año 2019 y 2020, así como tampoco la carta de compromiso de los auditores externos;
g. No se demuestra que los *assumptions* se refieran a análisis de mercado y/o tendencias históricas;
h. La provisión para *Allowance for Loan and Lease Losses* (ALLL) no refleja metodología aceptada; y
i. No incluyeron métrica de los *ratios* de capital requeridos, ni cómo alcanzarlos.

42. Continuando el análisis de los documentos presentados el 30 de noviembre de 2021, el *Capital Planning Program Policy* presentado por Euro Pacific, según requerido en el *Consent Order,* no contiene las normas para monitorear las políticas y procesos de cumplimiento, y hace referencia a un *Enterprise Wide Risk Management Program Policy* que no fue sometido ante la OCIF.

43. Finalmente, el *Asset Liability Liquidity Management Policy* no contiene las normas o límites para monitorear las políticas y procesos de cumplimiento.

44. El 14 de enero de 2022, Euro Pacific presentó su Solicitud de renovación de licencia, junto con varios documentos. Según el *Balance Sheet* no auditado presentado al 31 de diciembre de 2021, Euro Pacific mantiene $112,504,946 en depósitos de clientes y un capital de $2,453,653. **(Exhibit 42)**

45. El 28 de enero de 2022, el Área de Exámenes a Instituciones Depositarias de la OCIF remitió una carta a Euro Pacific notificando ciertas deficiencias en los documentos presentados y concediéndole hasta el 1ro de marzo de 2022 a las 5:00 p.m. para que sometieran la información completa para cumplir con el *Consent Order*. **(Exhibit 43).** Para atender las deficiencias identificadas, la OCIF requirió que Euro Pacific:

a. Completara la solicitud de cambio de control;
b. Enmendara el *Strategic and Budget Plans*;
c. Completara la información financiera y sometiera los Estados Financieros Auditados de 2019 y 2020; y
d. Sometiera un Plan de Capitalización que contenga cantidades específicas, "*ratios*" y "*target dates*", etc.

46. El 29 de enero de 2022, Euro Pacific solicitó autorización para *Request for a Change of Control*. **(Exhibit 44)**

48. El 8 de febrero de 2022, la OCIF le notificó a Euro Pacific las deficiencias encontradas en el *Request for a Change of Control*. En dicha misiva se le notifica a Euro Pacific el incumplimiento con la producción de varios documentos relevantes y requeridos por la OCIF, incluyendo, pero no limitado a los estados financieros del Sr. de Jong, información y documentos de Aurin Germany, e información financiera de Qenta, Inc. La OCIF le concedió 30 días para someter la totalidad de los documentos, de lo contrario se entendería voluntariamente desistida la autorización del cambio de control. **(Exhibit 46)**

49. El 1 de marzo de 2022, Euro Pacific sometió los Estados Financieros Auditados de 2019, el Certificado de Cumplimiento, el *Attestation* de la Gerencia y el *Strategic and Budget Plans* revisado al 28 de febrero de 2022. No obstante, no presentaron los Estados Financieros Auditados de 2020 ni el contrato de servicios profesionales pactado con alguna firma de contabilidad para la preparación de los Estados Financieros Auditados de 2021, y para lo cual solicitaron prórroga. (**Exhibit 47)**

50. En cuanto a los Estados Auditados de 2019, los mismos reflejan serias deficiencias de capital, entre otros problemas. En primer lugar, dichos estados confirman que fue necesario ajustar mediante un "re-statement" los estados financieros de 2018 para aumentar el déficit financiero que tiene acumulado la entidad en sus libros. Así, un balance inicial de negativo $1,589,073, los libros de Euro Pacific se ajustaron para reflejar un balance ajustado de negativo $3,185,750. **(Exhibit 47)** Es decir, las ganancias retenidas (con balance negativo) eran el doble de lo reportado por Euro Pacific en el 2019. La realidad económica que surge inequívocamente de los Estados Auditados de 2019 provistos por la propia entidad evidencian que la entidad está en incumplimiento con los requisitos de capital mínimo aplicables debido a la pérdida significativa acumulada en sus libros y que la información financiera no auditada que reporta la entidad a la OCIF periódicamente no es certera y carece de suficientes garantías de confiabilidad ya que está sujeta a ajustes materiales futuros.

51. En segundo lugar, los Estados Financieros Auditados del 2019 reflejan una pérdida neta de $750,997.00 al cierre de dicho año, incrementado las pérdidas acumuladas (o ganancias retenidas negativas) a un total de negativo $3,936,727. La posición de capital de la entidad al cierre del 2019 era de un "total stockholder's equity" de $1,860,573, **(véase, Exhibit 47)** lo cual constituye un incumplimiento de parte de Euro Pacific con el nivel de solvencia y/o capital mínimo requerido por el Artículo 2(g) de la Ley Núm. 273-2012.

52. La disposición legal relevante al tema del capital mínimo requerido dispone que una entidad financiera internacional estará insolvente "cuando sea incapaz de pagar sus deudas a su vencimiento o cuando su capital pagado se haya reducido a menos de una tercera (1/3) parte." En lo aquí pertinente, el capital pagado de Euro Pacific al 31 de diciembre de 2019 era de $6,938,370 y la tercera parte de dicho monto era $2,312,790. Por ello, un "total stockholder's equity" de $1,860,573, dentro de la realidad de su operación bancaria, constituye un escenario de insolvencia.

53. En tercer lugar, Euro Pacific incumplió con su obligación regulatoria de reportar los *ratios* o métricas de capital, de manera que la OCIF pudiera estar en posición de evaluar y/o pasar juicio sobre si la entidad cumplía con el nivel de "well-capitalized institution" establecido en las Reglas y Regulaciones del *Federal Deposit Insurance Corporation* ("FDIC"), 12 C.F.R. Part 324, aplicables. Ante el incumplimiento con la producción de dicha información altamente relevante para garantizar el cumplimiento de la entidad con las leyes y/o reglamentos aplicables, la OCIF se vio forzada a tener que estimar estas métricas. Por ejemplo, el "*Leverage Ratio*" (Total *Capital / Total Assets*) de la entidad para el cierre del 2019 era de un 1%, colocando a la entidad en incumplimiento. El "*Liquidity Ratio*" (*Cash / Total Deposits*) era de 0.88,

	A	B	C	D	E	F	G	H	I	J	K	L	M
1										*Unaudited data*			
2													
3		2018		2019			2020			2021			
4	**ASSETS**	FS Audited	Easy Call	FS Audited	Difference	Easy Call	FS Audited	Difference		Easy Call			
5	Total cash and due from depository institutions	$ 165,377	$ 147,686	$ 157,334	$ 9,648	$ 119,239	$ 132,653	-$ 13,414		$ 66,146			
6	Securities		$ 339	$ 391	$ 52	$ 391	$ 422	-$ 31		$ 443			
7	Due from Home office account and loans to parent		$ 19,747	$ 27	-$ 19,720	$ 3,992		3,992		$ 12,156			
8	Other receivables				$ -	$ 1,013		1,013		$ 3,186			
9	Trading assets and Derivative assets				$ -	$ -		-					
10	Premises and fixed assets - Net of accumulated depreciation	$ 248	$ 212	$ 235	$ 23	$ 156	$ 217	-$ 61		$ 78			
11	Other real estate owned				$ -	$ -		-					
12	Investments in subsidiaries and affiliates				$ -	$ 855		855		$ 854			
13	Intangible assets			$ 1,370	$ 1,370	$ 1,296	$ 1,296	-					
14	Other assets - Precious metals	$ 19,718	$ 19,624	$ 23,417	$ 3,793	$ 33,868	$ 35,357	-$ 1,489		$ 31,020			
15	**Total assets**	$ 185,343	$ 187,608	$ 182,774	-$ 4,834	$ 160,810	$ 169,945	9,135		$ 113,883			
16													
17	**LIABILITIES**												
18	Total deposits	$ 180,754	$ 181,171	$ 179,755	-$ 1,416	$ 154,718	$ 170,137	$ 15,419		$ 110,835			
19	Due to Home office, borrowings from parent, affiliates and related parties	$ 437		$ 779	$ 779	$ 5,016	$ 648	-$ 4,368		$ 285			
20	Other liabilities	$ 283	$ 632	$ 380	-$ 252	$ 282	$ 460	$ 178		$ 318			
21	**Total liabilities**	$ 181,474	$ 181,803	$ 180,914	-$ 889	$ 160,016	$ 171,245	$ 11,229		$ 111,438			
22													
23	**STOCKHOLDER'S EQUITY:**												
24	Common Stock, at par value	$ 4,043		$ 4,141		$ 6,840	$ 7,045	$ 205		$ 3,000			
25	Additional paid in capital	$ 2,797		$ 2,797		-$ 1,043	-$ 1,248	-$ 205		$ 8,924			
26	Retained earnings (deficit)	-$ 1,589		-$ 3,937		-$ 5,003	-$ 7,097	-$ 2,094		-$ 9,479			
27	Accumulated other comprehensive income					$ -				$ -			
28	Other equity capital components (schedule E - 2, line 11f)	-$ 1,043		-$ 1,141		$ -				$ -			
29	**Total equity capital**	$ 4,208	$ 5,805	$ 1,860	-$ 3,945	$ 794	-$ 1,300	-$ 2,094		$ 2,445			
30													
31	**Total liabilities and equity capital**	$ 184,962	$ 187,608	$ 182,774	-$ 4,834	$ 160,810	$ 169,945	$ 9,135		$ 113,883			
32	Total Capita / Total Assets	2%		1%			-1%			2%	NonComliance with Leverage Ratio		
33	Liquidity Ratio	0.91		0.88			0.78			0.60	Liquidity Problems		
34	1/3 Paid in Capital	$ 1,913		$ 1,913	$ -		$ 1,913	$ -		$ 3,935			
35				Insolvent			Insolvent			Insolvent			

55. De otra parte, los estados financieros auditados de Euro Pacific incluyen párrafos de "*Emphasis of Matter*" **(véase, Exhibit 47)** realizados por sus auditores independientes, donde dichos profesionales levantan *dudas sustanciales* sobre la viabilidad operacional de Euro Pacific como entidad en marcha ("*going concern*") y su capacidad financiera para satisfacer sus obligaciones según éstas venzan en el curso ordinario de los negocios.

56. Los estados financieros auditados del 2019 incluyen el siguiente párrafo de "*Emphasis of Matter*":

> **Emphasis of Matter**
> The accompanying consolidated financial statements have been prepared assuming **Euro Pacific Intl. Bank, Inc. and Subsidiaries** will continue as a going concern. As discussed in Note 1 (b) to the consolidated financial statements, **Euro Pacific Intl. Bank, Inc. and Subsidiaries** incurred a substantial loss from operations and had negative cash flows from operating activities for the year ended December 31, 2019. **Euro Pacific Intl. Bank, Inc. and Subsidiaries**' operating plan indicates that it will continue to incur losses from operations and generating negative cash flows from operating activities during the year ended December 31, 2021. These projections and certain liquidity risks raise substantial doubt about the **Euro Pacific Intl. Bank, Inc. and Subsidiaries**' ability to meet its obligations as they become due within one year after the date of this report and continue as a going concern. Management's plans in regard to these matters are also described in Note 1 (b). The consolidated financial statements do not include any adjustments that might result from the outcome of this uncertainty. Our opinion is not modified with respect to this matter.

57. Los estados financieros auditados del 2020, entregados el 17 de mayo de 2022, incluyen el siguiente párrafo de "Emphasis of Matter" **(Exhibit 48)**:

> **Emphasis of Matter**
> The accompanying consolidated financial statements have been prepared assuming **Euro Pacific Intl. Bank, Inc. and Subsidiaries** will continue as a going concern. As discussed in Note 1 (b) to the consolidated financial statements, **Euro Pacific Intl. Bank, Inc. and Subsidiaries** incurred a substantial loss from operations and had negative cash flows from operating activities for the year ended December 31, 2020. **Euro Pacific Intl. Bank, Inc. and Subsidiaries**' operating plan indicates that it will continue to incur losses from operations and generating negative cash flows from operating activities during the year ended December 31, 2022. These projections and certain liquidity risks raise substantial doubt about

- $132,103,279 en efectivo,
- $33,868,370 en inventario de metales preciosos, y
- $170,137,270 en depósitos de clientes.

59. Estas cifras demuestran la insuficiencia de liquidez de Euro Pacific para cubrir la totalidad de los balances de sus depositantes a esa fecha, dejando al descubierto la suma de $4,165,621. Esta cantidad pudiera ser mayor si el inventario de metales preciosos no se pudiera vender o liquidar al valor reflejado en los libros de la entidad.

60. Estos resultados financieros recalcan las deficiencias reflejadas al cierre del 30 de junio de 2020 en el Reporte de Examen realizado por la OCIF a Euro Pacific, el cual identificaba una concentración de deficiencias en (i) los libros y registros contables, (ii) la falta de controles internos, e (iii) incumplimiento con el deber de fiducia de la entidad para con sus depositantes, entre otros.

61. Al cierre del 2021, la posición financiera de Euro Pacific aparenta ser aún más precaria, según la información no auditada presentada en los reportes financieros trimestrales **(Exhibit 49)** preparados y suministrados por la entidad. A dicha fecha, Euro Pacific contaba con:

- $66,146,000 en efectivo,
- $31,020,000 en otros activos (presumiblemente su inventario de metales preciosos), y
- $110,835,000 en depósitos de clientes.

62. Las cifras presentadas al cierre del 2021 demuestran la insuficiencia de liquidez de Euro Pacific para cubrir la totalidad de los balances de sus depositantes a esa fecha, potencialmente dejando al descubierto la suma de $13,669,000.

63. Además, del propio informe trimestral presentado ante la OCIF para el primer trimestre del año 2022, surge que Euro Pacific ha tenido una pérdida operacional ("*net loss*") ascendente a $547,000. **(Exhibit 50)** Ello muestra que el patrón de incumplimiento sistémico con los requisitos de solvencia y/o capital mínimo continúa al presente, lo que agrava aún más la crítica situación financiera en la que se encuentra la entidad y, por ende, pone en riesgo a la misma y a las partes interesadas de sufrir daños irreparables.

64. Los problemas sistémicos de capital demostrados por Euro Pacific en el 2019, 2020 y 2021 continúan presentes en el 2022, según los reportes financieros trimestrales de la entidad.

65. Al momento en que se emite esta **ORDEN**, la OCIF ha recibido cuatro (4) reclamaciones de clientes de Euro Pacific en donde alegan en síntesis incumplimiento por parte de Euro Pacific con órdenes de transacciones monetarias. **(Exhibit 51)**

66. Luego de la evaluación de los documentos e información pertinente, y ante el incumplimiento en la producción de documentos y/o información relevante, la OCIF determina que Euro Pacific incumplió con el *Consent Order* y se encuentra en violación del requisito de nivel de solvencia establecido en el Artículo 2(g) de la Ley Núm. 273-2012 y en incumplimiento con el nivel de capital requerido para que esta sea un "well-capitalized institution" según establecido en las Reglas y Regulaciones del FDIC.

67. A la fecha en que se emite esta **ORDEN**, no se desprende que Euro Pacific cumpla con el Capital requerido en la Ley Núm. 273-2012 ni con las órdenes emitidas por esta Oficina poniendo en peligro y causando o pudiendo causar daño inmediato a la industria, ciudadanía o personas en particular y daño irreparable a

2. El Artículo 8(d) de la Ley Núm. 273-2012 dispone como sigue:

(d) Renovación de licencia.
(1) Cada licencia permanecerá en vigor hasta su vencimiento, que será a la fecha del aniversario de haberse expedido la licencia original.
(2) **Toda solicitud de renovación de licencia, deberá radicarse dentro de los treinta (30) días anteriores a la fecha de expiración de cada licencia.** La misma debe contener:
(A) Descripción de cualquier cambio material en la información suministrada al Comisionado en la solicitud de licencia inicial.
(B) **Evidencia de que el concesionario mantiene el capital requerido por el Comisionado a tenor con lo dispuesto en el Artículo 5 de esta Ley, calculado de acuerdo a los principios de contabilidad generalmente aceptados.** (Énfasis añadido).

3. El Artículo 5(b)(3)(A) de la Ley Núm. 273-2012 dispone, en lo pertinente, lo siguiente:

(b) Los artículos de incorporación, el contrato de sociedad o cualquier documento escrito que establezca una entidad financiera internacional deberán especificar:
(1) ...
(2) ...
(3)
(A) Se especificará el capital autorizado en acciones y el capital inicial pagado. **En el caso de una corporación, la cantidad de su capital autorizado en acciones no deberá ser menor de cinco millones de dólares ($5,000,000), o aquella cantidad mayor que requiera el Comisionado, y del cual por lo menos doscientos cincuenta mil dólares ($250,000) deberán estar totalmente pagados al momento en que se expida la licencia, el cual se considerará como el capital inicial pagado para todos los fines de esta ley**... (Énfasis añadido).

4. Según expuesto en el marco fáctico de esta **ORDEN**, Euro Pacific ha operado como una entidad financiera internacional sin estar adecuadamente capitalizada e incumpliendo las órdenes emitidas por la OCIF. El patrón de incumplimiento sistémico con los requisitos de capital mínimo y/o solvencia no ha sido subsanado, a pesar de que la OCIF le ha garantizado un debido proceso para ello y le ha provisto múltiples oportunidades y tiempo en exceso para cumplir. Por tanto, el incumplimiento injustificado con los niveles de capital requerido por la Comisionada, a tenor con lo dispuesto en el Artículo 5(b)(3)(A) de la Ley Núm. 273-2012 y con los niveles de "well-capitalized institution" establecidos en las Reglas y Regulaciones del FDIC, 12 C.F.R. Part 324, aplicables, configuran violaciones a los Artículos 5(b)(3)(A) y 8(d)(2)(B) de la Ley Núm. 273-2012.

5. El Artículo 2 (g) de la Ley Núm. 273-2012 define insolvencia como:

(g) Insolvencia.— Se refiere a la situación financiera en que pueda estar una entidad financiera internacional o la persona de la cual una entidad financiera internacional es una unidad, cuando sea incapaz de pagar sus deudas a su vencimiento o cuando su capital pagado se haya reducido a menos de una tercera (1/3) parte.

6. Según expuesto en el marco fáctico de esta **ORDEN**, Euro Pacific se encuentra en un estado de insolvencia al no mantener 1/3 del Capital Pagado según la Ley Núm. 273-2012.

8. El Artículo 13(2) del Reglamento Núm. 5653 dispone lo siguiente:

> 1. ...
> 2. Penalidades
>
> Cualquier violación a la Ley o a este Reglamento será sancionada con las penalidades fijadas por la Ley y de no proveerse en la Ley penalidad para alguna violación, el Comisionado podrá imponer la multa administrativa que estime apropiada que no sea menor de quinientos dólares (US $500) ni mayor de cinco mil dólares (US $5,000) por cada violación separada.

9. De otro lado, el *Consent Order* de 1 de noviembre de 2021 establece que:

> The Entity affected by this Order is hereby given notice that, pursuant to the provisions of Article 20(c) Of Act No, 4, the OCFI may impose an administrative fine not greater than Five Thousand ($5,000.00) Dollars for each day of non-compliance with the orders issued under the provisions of that act, up to a maximum of Fifty Thousand ($50,000.00) Dollars. In the event of total or partial non-compliance with this Order, the OCFI, in support of the statutory jurisdiction granted by Act No. 4, may request the Court of First Instance, San Juan Superior Section, to enforce the same, under penalty of contempt, and to impose fines and sanctions in addition to the ones the OCFI may deem to be proper, with any other determination which is proper as a matter of law.

10. Según surge del expediente administrativo objeto del proceso de epígrafe, al día de hoy Euro Pacific incumplió el *Consent Order* de 1 de noviembre de 2021, según le fue requerido por la Comisionada al no haber sometido un Plan de Capitalización que satisfaga a la OCIF. De igual forma, Euro Pacific falló, en repetidas ocasiones, en mantener los niveles de capital requeridos por ley y por el *Consent Order*, poniendo en peligro los depósitos de los clientes de la institución, con el agravante que dichos depósitos no son asegurados. Así, los problemas operacionales que enfrenta Euro Pacific, los cuales han redundado en pérdidas operacionales recurrentes y continuas, tienen el efecto adverso de lacerar los intereses de los depositantes de dicha institución a poder recobrar todos los fondos confiados a Euro Pacific. Lo anterior va a la esencia de una entidad depositaria y a la relación de fiducia que dicha entidad tiene para con sus clientes. En vista de que la insolvencia financiera de Euro Pacific se continúa agravando en la medida que pasa el tiempo y que dicha entidad ha sido incapaz de remediar dicha situación, la OCIF, en el descargo de sus amplios poderes, se ve forzada a tomar medidas extraordinarias para atender esta situación con la premura que ello requiere.

11. Además, el permitir que una entidad financiera internacional con un cuadro de capital como el exhibido por Euro Pacific continue operando, sin a su vez haber diseñado y puesto exitosamente en vigor un plan de capitalización de sus operaciones, en violación de la Ley Núm. 273-2012, pone en entredicho y menoscaba la confianza pública en la jurisdicción de Puerto Rico como un sistema bancario de ley y orden, que vela por el estricto cumplimiento con el marco regulatorio aplicable. No actuar decisivamente y con premura sería el equivalente a dar un paso atrás en la recuperación financiera de Puerto Rico, pues podría lacerar la reputación de la Isla como un destino financiero internacional para hacer negocios.

12. De igual manera, resulta importante resaltar (a manera ilustrativa) que los problemas de capital que llevan a Euro Pacific a estar en incumplimiento son asuntos de primer orden e importancia. Tan es así, que la propia Ley Núm. 273-2012, en su sección de Penalidades (7 L.P.R.A. § 3097), cataloga como delito el que un empleado de una entidad financiera internacional reciba a nombre de dicha entidad depósitos o haga

14. El Artículo 10 de la Ley Núm. 4, 7 L.P.R.A. §2010, establece lo siguiente:

(a) El Comisionado, además de los poderes y facultades transferidos por la presente, tendrá poderes y facultades para:

...

(4) Interponer cualesquiera remedios, acciones o procedimientos legales que fueran necesarios o convenientes para hacer efectivos los propósitos de este capítulo o cualquier otra ley o reglamento, cuyo cumplimiento o fiscalización le haya sido asignada, ya sea representado por sus abogados o por el Secretario de Justicia, previa solicitud a tales efectos.

...

(9) Imponer multas administrativas por las violaciones a las leyes que administra o las reglas, reglamentos y órdenes aprobados o dictados por él, según se señala en la sec. 2020 de este título.

...

(10) (A) Cuando alguna de las leyes y reglamentos que administre no disponga lo contrario, emitir previa notificación y vista, órdenes para cesar y desistir y prescribir los términos y determine son para el beneficio del público [sic]. Cuando de acuerdo al Comisionado la referida violación causa o puede causar un grave daño inmediato a la industria, ciudadanía o personas en particular, éste podrá emitir dicha orden de carácter sumario, obviando el requisito de notificación y celebración de la vista, hasta tanto se disponga en forma final cualquier procedimiento instituido de acuerdo con esta sección. Al dictar la orden el Comisionado deberá prontamente notificar, según se especifica más adelante, que la misma ha sido dictada y las razones a que la misma obedece y que dentro de quince (15) días contados a partir del recibo de solicitud escrita el asunto será señalado para vista. Si no solicitase la celebración de vista y el Comisionado no la ordenase, la orden continuará en vigor hasta tanto sea modificada o dejada sin efecto por el Comisionado. Si se solicitase u ordenase la celebración de una vista, el Comisionado, luego de notificar dicha vista y de dar oportunidad a cada persona, según se especifica más adelante, de ser oída en la misma, podrá notificar o dejar sin efecto la orden o prorrogarla hasta tanto se disponga de la cuestión en forma final.

...

(B) El Comisionado podrá dejar sin efecto o modificar una orden si determina que las condiciones que le indujeron a dictarla han cambiado o que por alguna otra razón conviene al interés público así hacerlo.

...

(11) Recurrir al Tribunal de Primera Instancia de Puerto Rico en solicitud de que se ponga en vigor cualquier orden de cesar y desistir por él emitida.

(12) ...

(E) No podrá dictarse una orden bajo ninguna parte de la presente sección excepto la segunda oración en la cláusula (10)(A) de este inciso, sin que:

(i) Se dé notificación previa apropiada a las personas que corresponda en su sitio de negocios, o donde se localicen personalmente o por correo certificado a su última dirección conocida;

institución financiera en cuestión y que lo faculte similarmente, el Comisionado podrá asumir la dirección y administración de la institución financiera, y nombrar con prontitud un síndico, que en el caso de instituciones financieras aseguradas podrá ser su ente asegurador. El Comisionado deberá celebrar una vista antes de emitir una orden para colocar una institución financiera bajo su dirección o la de un síndico. No obstante, el Comisionado podrá emitir una orden provisional nombrando un síndico administrador sin necesidad de celebrar una vista cuando a su juicio la situación de la institución financiera sea de tal naturaleza que se esté causando o pueda causarse daño irreparable a los intereses de la misma, o de las personas y entidades con fondos o valores en la institución. Cuando el Comisionado emita una orden provisional a los fines de nombrar un síndico, deberá notificar al Gobernador los detalles y fundamentos de su determinación y deberá celebrar una vista administrativa dentro de los diez (10) días siguientes a la fecha de notificación de la misma para determinar si se hace permanente o se revoca. El síndico así nombrado administrará la institución financiera de acuerdo a las disposiciones de la ley y reglamentos que gobiernan dicha institución y a tenor con los reglamentos promulgados por el Comisionado para sindicaturas o medidas de emergencia declaradas bajo esta sección.

Dicha sindicatura terminará con la total liquidación de la institución financiera si así fuere necesario o cuando las operaciones de la misma según lo certifique el síndico, permitan, a juicio del Comisionado, devolver la administración de la institución a sus funcionarios y oficiales, debidamente electos y nombrados, bajo aquellas circunstancias que estipule el Comisionado. El Comisionado podrá fijar una compensación razonable por los servicios del síndico y los empleados de éste. La determinación del Comisionado de asumir la administración y dirección de una institución financiera o de nombrar un síndico podrá ser revisada por el Tribunal del Circuito de Apelaciones, mediante recurso radicado dentro del término de diez días contados a partir de la fecha de la determinación.

15. Conforme a los hechos antes esbozados, la Comisionada tiene suficientes razones para entender que la situación de Euro Pacific se ha tornado tan precaria y de tal naturaleza que se está causando o pudiera causar un daño irreparable a los intereses de la misma, o de las personas y entidades con fondos o valores en la institución.

VI. ORDEN DE CESE Y DESISTA y MULTAS

A tenor con los poderes y facultades que le confieren al Comisionado la Ley Núm. 4, la Ley Núm. 273-2012, la Sección 3.9 de la Ley Núm. 38-2017 y los reglamentos emitidos, se expide la presente **ORDEN** a Euro Pacific para que:

(A) cese y desista de llevar a cabo negocios como entidad financiera internacional con una licencia vencida por:

1. no completar el proceso de renovación al no presentar evidencia de que mantiene el capital requerido por la Comisionada;
2. no cumplir con el capital mínimo requerido por el Artículo 2(g) de la Ley Núm. 273-2012; y
3. no cumplir con el *Consent Order* emitido.

(B) pague una multa de **CINCO MIL DÓLARES ($5,000.00)** por cada día en que ha operado sin cumplir con

(D) pague una multa de **CINCUENTA MIL DOLARES ($50,000.00)**, máximo establecido en el *Consent Order*, por incumplir con el mismo desde el 2 de marzo de 2022 hasta el presente.

(E) asegure los depósitos de sus clientes; y

(F) entregue a la OCIF mediante cheque certificado a nombre del Secretario de Hacienda el dinero correspondiente al Certificado de Depósito, según antes mencionado, por la cantidad total de $300,000.00.

El total de la multa, ascendente a **SETECIENTOS SESENTA Y CINCO MIL DÓLARES ($765,000.00),** deberá ser pagadera mediante cheque certificado a favor del Secretario de Hacienda.

A tenor con lo dispuesto en la Sección 3.20 de la Ley Núm. 38-2017, dicha multa incluirá intereses sobre la cuantía impuesta en la misma desde la fecha en que se ordenó dicho pago y hasta que éste sea satisfecho, al 4.25% anual que es el tipo que para sentencias judiciales de naturaleza civil fija por reglamento la Junta Financiera, según el mismo sea certificado por el Comisionado de Instituciones de Puerto Rico y que esté en vigor al momento de dictarse la decisión.

Se **ORDENA** a **Euro Pacific**, bajo el más estricto apercibimiento de severas sanciones, a: (i) tomar las más estrictas medidas de seguridad para asegurar, garantizar, conservar y mantener íntegros, en lugar seguro, la totalidad de los activos identificados en los estados financieros consolidados y auditados de Euro Pacific (incluyendo efectivo, metales preciosos y cuentas por cobrar, entre otros), documentos, informes, libros, récords, registros, récords de contabilidad, papeles y cualesquiera otros documentos y evidencia relacionados con su operación, de forma que la OCIF pueda inspeccionarlos de así estimarlo necesario; (ii) notificar inmediatamente (incluyendo por vía de medios electrónicos) a todos los bancos con los cuales tiene acuerdos de corresponsalía sobre la presente Querella y Orden y entregar copia de la misma; (iii) notificar inmediatamente (incluyendo por vía de medios electrónicos) la presente Querella y Orden y entregar copia de la misma a todos los reguladores de las subsidiarias de Euro Pacific en las distintas jurisdicciones donde éstas están establecidas y operan.

VII. APERCIBIMIENTOS GENERALES EN CUANTO A LA ORDEN DE CESE Y DESISTA

A tenor con la Ley Núm. 38-2017 y el Reglamento Núm. 3920, se apercibe a **Euro Pacific** que puede allanarse a la multa y sanciones propuestas e informar su cumplimiento o pago según dispuesto en esta **ORDEN** en o antes del **6 de julio de 2022 antes de las 4:30 pm**, y cumplir con lo ordenado dentro de los términos establecidos.

De conformidad con lo expuesto en esta **ORDEN,** la parte afectada podrá presentar su Contestación por escrito en o antes del **6 de julio de 2022 antes de las 4:30 pm** en la Secretaría de la Oficina del Comisionado de Instituciones Financieras. Por existir justa causa, conforme detallado en las determinaciones de hechos y conclusiones de derecho aquí esbozadas, la OCIF, en el ejercicio de sus amplios poderes y discreción, determinó acortar el término para contestar la presente Querella y Orden, de conformidad con la Regla 4 del Reglamento 3920 de OCIF. La OCIF señalará el asunto para vista dentro de los próximos quince (15) días contados a partir del recibo de la Solicitud de Vista escrita, a los fines de brindarle a la parte afectada la oportunidad de ser oído, pudiendo la OCIF, luego de concluido el procedimiento adjudicativo formal, confirmar, modificar o dejar sin efecto la **ORDEN**, conforme a las recomendaciones del Oficial Examinador designado. La solicitud de vista no le exime de presentar alegaciones responsivas a esta **ORDEN**, en el término antes indicado y continuará en vigor hasta tanto sea modificada o dejada sin efecto por la OCIF. La radicación de una solicitud de vista no paralizará, ni modificará

copia de la notificación de la orden o resolución de la agencia es distinta a la del depósito en el correo ordinario o del envío por medio electrónico de dicha notificación, el término se calculará a partir de la fecha del depósito en el correo ordinario o del envío por medio electrónico, según corresponda. La solicitud de reconsideración deberá ser por escrito, consignándose claramente el término "*Moción de Reconsideración*" como título para la solicitud. La radicación de una *Moción de Reconsideración* no paralizará, ni modificará de manera alguna los términos de la presente **ORDEN** a menos que la Comisionada disponga otra cosa.

Dentro de los quince (15) días de haberse presentado dicha moción la OCIF deberá considerarla. Si la rechazare de plano o no actuare dentro de los quince (15) días, el término para solicitar revisión comenzará a correr nuevamente desde que se notifique dicha denegatoria o desde que expiren esos quince (15) días, según sea el caso. Si se tomare alguna determinación en su consideración, el término para solicitar revisión empezará a contarse desde la fecha en que se archive en autos una copia de la notificación de la resolución de la agencia resolviendo definitivamente la moción de reconsideración. Tal resolución deberá ser emitida y archivada en autos dentro de los noventa (90) días siguientes a la radicación de la moción de reconsideración. Si la OCIF acoge la moción de reconsideración pero deja de tornar alguna acción con relación a la moción dentro de los noventa (90) días de ésta haber sido radicada, perderá jurisdicción sobre la misma y el término para solicitar la revisión judicial empezará a contarse a partir de la expiración de dicho término de noventa (90) días, salvo que la agencia, por justa causa y dentro de esos noventa (90) días, prorrogue el término para resolver por un período que no excederá de treinta (30) días adicionales. Si la fecha de archivo en autos de copia de la notificación de la orden o resolución es distinta a la del depósito en el correo ordinario o del envío por medio electrónico de dicha notificación, el término se calculará a partir de la fecha del depósito en el correo ordinario o del envío por medio electrónico, según corresponda.

Una parte adversamente afectada por una orden o resolución final de la OCIF y que haya agotado todos los remedios provistos por la OCIF podrá presentar una solicitud de revisión judicial ante el Tribunal de Apelaciones de Puerto Rico, dentro de un término de treinta (30) días conforme a la Sección 4.2 de la Ley Núm. 38-2017.

La presente **ORDEN** no releva a Euro Pacific de otras violaciones que surjan como resultado de esta **ORDEN** o que la OCIF advenga en conocimiento luego del archivo en autos de la notificación de esta. En dicho caso, la OCIF se reserva el derecho de enmendar la **ORDEN** para incluir alegaciones, violaciones, multas y remedios adicionales, sujeto a las leyes aplicables.

Se apercibe a **Euro Pacific**, que a tenor con lo dispuesto en el Artículo 20(c) de la Ley Núm. 4-1985, la OCIF podrá imponer una multa administrativa no mayor de **CINCO MIL ($5,000.00) DÓLARES** por cada día que se deje de cumplir con las órdenes dictadas bajo las disposiciones de ley, hasta un máximo de **CINCUENTA MIL ($50,000.00) DÓLARES**. En caso de incumplimiento total o parcial de esta **ORDEN,** la OCIF, en auxilio de la jurisdicción estatutaria conferida por la Ley Núm. 4-1985, podrá solicitar del Tribunal de Primera Instancia, Sala Superior de San Juan, que ponga en vigor la misma, so pena de desacato, e imponga multas y sanciones adicionales a las que la OCIF entienda que correspondan, con cualquier otro pronunciamiento que en derecho proceda.

VIII. ORDEN PROVISIONAL DE NOMBRAMIENTO DE SÍNDICO

En vista del escenario de insolvencia que enfrenta Euro Pacific, el cual crea un riesgo de daño irreparable al interés público, según antes descrito, y a la seguridad operacional y adecuacidad financiera de la EFI, y a tenor con los amplios poderes y facultades que le confieren a la Comisionada la Ley Núm. 4, la Ley Núm. 273-2012, la Sección 3.9 de la Ley Núm. 38-2017 y los reglamentos emitidos para hacer valer dichos estatutos, se expide la

1. Tomar posesión inmediata de los activos y pasivos, libros, registros, documentos y archivos que le pertenezcan a la entidad financiera internacional. De conformidad con lo anterior, el Síndico habrá de ocupar y ejercer las funciones que el cuerpo de la Junta de Directores de la entidad financiera internacional tiene al día de hoy. Además, será el objetivo principal del Síndico organizar los asuntos de la entidad de manera tal que se pueda completar el proceso de la disolución y liquidación de la entidad financiera internacional sin mayor dilación.

2. El Síndico tomará el control inmediato de las cuentas de banco de Euro Pacific, así como de todas sus inversiones y activos, incluyendo las acciones de capital u otros intereses propietarios de Euro Pacific en las subsidiarias que dicha entidad posee y reporta en sus estados financieros consolidados. El Síndico deberá cobrar simultáneamente todos los préstamos, cargos y honorarios que se adeuden a la entidad financiera internacional. Además, deberá ser apoderado para suscribir todos los documentos que fueren necesarios ante instituciones financieras o terceros para realizar estas funciones.

3. El Síndico podrá contratar a aquellos profesionales expertos en su disciplina particular para que, a su discreción y de acuerdo a criterios de razonabilidad, le asistan en el desempeño de sus funciones, tales como abogados, contadores e investigadores forenses, así como cualquier otro profesional que sea necesario para llevar a cabo las funciones de Síndico a la luz de la totalidad de las circunstancias particulares de la entidad financiera internacional.

4. El Síndico será el encargado de pagar las obligaciones y deudas de la entidad financiera internacional, después de haber realizado el pago de los gastos necesarios y directamente relacionados a la sindicatura.

5. El Síndico habrá de preparar un presupuesto operativo para implementar de acuerdo con la condición financiera de la entidad a la vez que revise los costos de la entidad y dirigidos a completar la liquidación sin mayor dilación.

6. El Síndico podrá realizar las auditorías de cuentas e investigaciones que estime necesarias y/o convenientes y las que solicite la OCIF a su entera discreción. El Síndico presentará los resultados del asunto investigado a la OCIF una vez concluya la investigación, según corresponda.

7. El Síndico habrá de rendir informes trimestrales durante los primeros diez (10) días del mes subsiguiente al trimestre en cuestión. Dichos informes se presentarán a la OCIF bajo juramento y se enviará copia digital a cada cliente registrado de la entidad que así lo solicite dentro del curso ordinario de sus negocios con la institución.

8. Como parte de los esfuerzos para liquidar los activos de la entidad, el Síndico deberá conducir sus esfuerzos y actos para: (i) maximizar el valor a obtenerse por la venta o disposición de dichos activos; (ii) minimizar la cantidad de pérdida realizada en la resolución de los asuntos ante su consideración; y (iii) asegurar un trato justo y consistente a cualquier entidad o persona que interese adquirir dichos activos.

9. El Síndico preparará un Registro de Reclamaciones y Adeudos de la entidad financiera internacional y examinará todas aquellas reclamaciones que se presenten para pago por clientes. El Síndico tendrá discreción a la hora de determinar el o los medios adecuados para razonablemente notificar a todas las partes con interés de los procesos a ser llevados a cabo por el Síndico. El Síndico podrá contratar a aquellos profesionales o servicios dirigidos a recibir y procesar estas reclamaciones para que a su discreción le asistan en la preparación del informe final de liquidación.

(c) Cualquier otra deuda "senior" o general de la institución.
(d) Cualquier otra obligación que haya sido subordinada al pago de los depósitos de clientes o acreedores generales.
(e) Cualquier depósito, deuda u obligación hacia los accionistas, afiliadas, subsidiarias o miembros de Euro Pacific.

12. La intención de esta **ORDEN PROVISIONAL**, conforme los poderes conferidos a la OCIF en su ley orgánica, es darle preferencia y certeza jurídica al pago de los depósitos de los clientes de la institución financiera internacional en el orden antes establecido. A estos efectos, y en base a sus poderes amplios dirigidos a lograr el cumplimiento de los propósitos de las leyes bajo su jurisdicción, incluyendo la Ley 273-2012, la OCIF adopta, para fines del trámite ordenado de la Sindicatura aquí impuesta, los parámetros de prioridad desarrollados por la FDIC en sus reglamentos aplicables, particularmente aquellos dispuestos en las reglas de "*Resolution and Receivership*" codificadas en el título 12 CFR Part 360.3.

13. El Informe Final debe ser firmado por el Síndico bajo pena de perjurio y deberá certificar que todos los activos de la entidad financiera internacional han sido liquidados o contabilizados adecuadamente y que los fondos de la liquidación están disponibles para su distribución. El Informe Final debe prepararse tan pronto como se haya cobrado todo el dinero, todas las reclamaciones hayan sido revisadas o determinadas, y luego que la fecha de radicación de reclamaciones por clientes y acreedores haya expirado. El Informe Final debe presentarse ante la OCIF antes de cualquier distribución de fondos a los acreedores o clientes ***y cualquier reclamación presentada antes de la OCIF completar su revisión del Informe Final se entenderá prematura***.

14. La OCIF revisará el Informe Final para evaluar si el Síndico ha administrado adecuada y razonablemente la propiedad de la entidad financiera internacional. De existir deficiencias materiales en la administración del Síndico u otros problemas o errores, los mismos serán señalados al Síndico para que tome medidas correctivas. Una vez completada esta revisión, el Informe Final, así como la distribución en liquidación propuesta se notificará a todos las partes con interés en el proceso de liquidación. Si hay disputa entre el Síndico y alguna parte con interés en la distribución propuesta, será la OCIF quien resolverá con respecto al informe y la distribución. Las partes con interés podrán presentar, *dentro de un término jurisdiccional de treinta (30) días luego de notificado el Informe Final*, un escrito ante la OCIF donde detallen su posición en cuanto a las distribuciones y pagos contemplados en el Informe Final y las razones por las cuales entienden los mismos no son correctos. Estos reclamos se tramitarán conforme el Reglamento 3920 de OCIF, que rige los procesos de adjudicación administrativa en vigor. El Síndico aprobará cualesquiera documentos sean necesarios para implementar lo aquí expuesto.

15. El Síndico no está autorizado a actuar como entidad financiera internacional y su función se limita al proceso de disolución y liquidación dispuesto en esta **ORDEN**.

16. El Síndico estará autorizado a solicitar directamente al Tribunal de Primera Instancia con competencia, órdenes de desacato a aquella parte que incumpla con las órdenes administrativas emitidas y que estén dentro de su mandato legal expedir y hacer cumplir.

17. Las controversias relacionadas con el desempeño del Síndico en el manejo de los asuntos de la disolución y liquidación de la entidad financiera internacional podrán traerse a la atención de la OCIF únicamente dentro del proceso de adjudicación administrativa identificado en el punto número 14 de esta sección. Cualquier reclamación o controversia presentada antes de comenzar a contar el término jurisdiccional de treinta (30) días dispuesto en esta sección, se entenderá prematura. Las partes interesadas deberán agotar estos remedios administrativos antes de poder llevar sus reclamos a los tribunales de justicia de Puerto Rico.

hace permanente o se revoca y (ii) brindarle a Euro Pacific la oportunidad de ser oído sobre la procedencia de la **Orden de Cese y Desista** y confirmar, modificar o dejar sin efecto la misma. Se le advierte que deberá comparecer asistido de abogado. De no comparecer, la OCIF continuará con los procesos para confirmar, modificar o dejar sin efecto la **ORDEN PROVISIONAL**, así como la **ORDEN DE CESE Y DESISTA**.

La determinación de la OCIF de asumir la administración y dirección de una institución financiera o de nombrar un síndico podrá ser revisada por Euro Pacific mediante la presentación de un recurso de revisión ante el Tribunal de Apelaciones dentro del término de diez (10) días contados a partir de la fecha de la notificación de dicha determinación.

De igual forma, Euro Pacific podrá, como parte afectada por la determinación final de la OCIF en relación con la **ORDEN DE CESE Y DESISTA,** de optar por no solicitar reconsideración según los apercibimientos generales arriba indicados, presentar un recurso de revisión ante el Tribunal de Apelaciones dentro del término de treinta (30) días contados a partir de la fecha de la notificación de la misma.

Dada en San Juan, Puerto Rico, hoy 30 de junio de 2022.

REGÍSTRESE Y NOTIFÍQUESE.

Lcda. Natalia I. Zequeira Díaz
Comisionada de Instituciones Financieras

EXHIBIT 2
Consent Order forLiquidation

GOBIERNO DE PUERTO RICO
OFICINA DEL COMISIONADO DE INSTITUCIONES FINANCIERAS
SAN JUAN, PUERTO RICO

OFICINA DEL COMISIONADO DE INSTITUCIONES FINANCIERAS Querellante, **v.** **EURO PACIFIC INT'L. BANK, INC.** Querellado.	**CASO NÚM.**: C22-D-006 **SOBRE:** Violaciones a la Ley Núm. 273-2012, según enmendada, conocida como "Ley Reguladora del Centro Financiero Internacional"

CONSENT ORDER FOR LIQUIDATION AND DISSOLUTION OF INTERNATIONAL FINANCIAL ENTITY

WHEREAS, this Consent Order for Liquidation and Dissolution of International Financial Entity ("Liquidation Order") is made and is effective this 9 day of August 2022 ("Effective Date") by and among Euro Pacific Int'l Bank, Inc., (hereinafter referred to interchangeably as "Euro Pacific" or "IFE"), an International Financial Entity organized and operating pursuant to Act No. 273-2012, as amended, known as the "International Financial Center Regulatory Act"[1] ("Act No. 273-2012"), its officers, directors, executives, managers, employees, agents, attorneys, divisions, related and subsidiary entities, affiliates, successors and assigns and the Office of the Commissioner of Financial Institutions ("OCFI"), collectively hereinafter referred to as the "Parties".

WHEREAS, Euro Pacific, by and through its duly elected and acting Board of Directors ("Board"), has executed a Stipulation to the Issuance of a Liquidation Order dated August 8, 2022 that is accepted by the OCFI. With this Stipulation, Euro Pacific has consented to execute this Liquidation Order.

WHEREAS, the execution of the Liquidation Order, including adequate protection and/or payment of all deposits held in the institution, disposes of the controversies before Administrative Hearing Examiner, Luis Torres Méndez, Esq., in the matter captioned: Oficina del Comisionado de Instituciones Financieras v. Euro Pacific Int'l. Bank, Inc., case number: C22-D-006, dated June 30, 2022, (hereinafter, the "Complaint"). Accordingly, the Parties have agreed to file a joint motion informing the Administrative Hearing Examiner of this Liquidation Order so that he can issue a Resolution disposing of the case, while also retaining jurisdiction to address any potential issues that may arise, if any, with respect to Euro Pacific's compliance with its obligations and terms and conditions related to the liquidation proceeding set forth herein.

WHEREAS, OCIF and Euro Pacific recognize and acknowledge that this Liquidation Order shall be interpreted to guarantee compliance with the policy objectives underlying Act No. 273-2012, including but not limited to the adequate protection of all client deposits held in the international financial institution.

[1] 7 L.P.R.A. §§ 232 *et seq.*

WHEREAS, Euro Pacific acknowledges that it has been advised and is fully aware of its rights, including the right to challenge the OCFI's enforcement action through an adversarial administrative process, and has instead voluntarily elected to close this matter, in its entirety, with the execution of the present Liquidation Order.

NOW, THEREFORE, the Parties hereby adopt and sets forth this Plan of Liquidation and Dissolution of the IFE.

I. JURISDICTION

Act No. 4 of October 11, 1985, as amended, known as the "Office of the Commissioner of Financial Institutions Act" ("Act No. 4") entrusts the OCFI with the main responsibility of controlling and supervising the financial institutions that operate or do business in Puerto Rico. The Commissioner of Financial Institutions (the "Commissioner") has been authorized by Act No. 4 to examine and to carry out all types of investigations, studies and research on matters related to the banking, financial, or securities industry for which he/she may request the necessary, relevant, and essential information for achieving such purposes.

Pursuant to Act No. 4, the OCFI has the responsibility for monitoring and supervising the financial institutions that operate or do business in Puerto Rico. In conjunction with Act No. 4, the Commissioner administers Act No. 273-2012 and Regulation No. 5653, known as "Regulation of the International Banking Center Regulatory Act" ("Regulation No. 5653")

Act No. 273-2012 allows the Commissioner to monitor and regulate the operations of any person or institution that offers or provides services as an International Financial Entity (IFE) in Puerto Rico.

II. RELEVANT FACTUAL BACKGROUND

1. On June 30, 2022, and due to a non-compliance with the minimum regulatory capitalization requirements set forth under Act No. 273-2012 and to avoid an irreparable harm to the operational adequacy and financial security of the institution, OCFI filed a Complaint and Order to Cease and Desist and Provisional Order for Designation of Trustee ("Complaint") against Euro Pacific ordering (i) the suspension of the IFE's banking activities for non-compliance with the minimum capitalization requirements under applicable law; and (ii) designating a Trustee-Receiver to take over the administration of Euro Pacific and effectively manage the liquidation process of the international financial entity. **Exhibit A and attachments thereto.**

2. OCFI and Euro Pacific hereby incorporate by reference the contents of the Complaint and all attachments thereto to this Liquidation Order, subject to Section V, Paragraph 16 herein.

3. As of today, and as set forth in the Complaint, Euro Pacific is under the provisional administration of the Trustee-Receiver, Wigberto Lugo-Mender, esq., who has duly complied with all his obligations arising under the Designation Order issued by OCFI, including the implementation of certain measures to reasonably guarantee the payment of all ordinary expenses, including payroll, operational expenses, lease agreement payments; advisor fees; and fines and penalties due to governmental authorities, related to the IFE's business operations and affording adequate protection to all client deposits held in the international financial institution.

4. OCFI and Euro Pacific have engaged in extensive discussions and negotiations regarding Euro Pacific's noncompliance with the minimum capitalization requirements set forth in Act No. 273-2012, which poses a significant risk to the financial institution's operational adequacy. To that effect, the parties

have agreed to provide the transfer or liquidation of Euro Pacific in a period not to exceed ninety (90) days as further detailed below.

5. Therefore, the Parties have jointly agreed that, considering the totality of the circumstances related to the financial institution and the captioned enforcement action, including the implementation of certain measures to reasonably guaranteeing the adequate protection of client deposits and safeguarding the credibility of Puerto Rico's international financial industry, it is in their best interest to execute this Liquidation Order with respect to Case No. C22-D-006; by means, among others, of the actions, terms, conditions and measures expressly and/or implicitly provided for it in this document.

III. DEFINITIONS

As used herein, the following words and terms shall have the following meanings:

"**Business Day**" means any day of the year other than a Saturday, Sunday or a day on which banks in the Commonwealth of Puerto Rico are authorized or required by law, regulation or executive order to close.

"**Cash Reserve Account**" means a cash reserve established by the Trustee on behalf of the IFE with sufficient funds in cash or readily available funds to pay ALL the Deposits.

"**Creditor(s)**" means a person with whom the IFE has an outstanding contractual payment obligation, including but not limited to depositors, lenders, lessors, service providers and employees.

"**Department of State**" means the Department of State of the Commonwealth of Puerto Rico.

"**Deposit(s)**" means liabilities of Euro Pacific in the form of demand deposits or time deposits but does not include trust or custody accounts held with the IFE.

"**Depositor(s)**" means a person that holds a Deposit(s) in Euro Pacific.

"**Effective Date**" shall be 9 day of August 2022.

"**Expense(s) of the Corporation**" means the following expenses of the IFE: (i) payroll, (ii) operational expenses, including but not limited to leases, utilities, licensing of software; (iii) fees of advisors including but not limited to accountants, attorneys, auditors, management and compliance consultants; and (iv) fines, penalties and administrative penalties due to governmental authorities.

"**Inactive Accounts**" means Deposit accounts that have been inactive for the last twelve (12) months.

"**Non-Related Parties**" means a person that is not a Related Party.

NO

"**Related Party**" means the persons listed in **Exhibit B**.

IV. LIQUIDATION ORDER

Therefore, in view of all the above, pursuant to the powers and authority granted to OCFI, in executing this Liquidation Order, Euro Pacific and the OCFI agree to the following and Euro Pacific is therefore ORDERED to take all affirmative actions as follows:

1. Euro Pacific acknowledges that OCFI has legal authority and jurisdiction with regards to the Complaint, the remedies imposed/requested therein, the designation of the Trustee, and entry of the Liquidation Order, and thus, expressly waives all claims and defenses to the contrary.

2. Based on the nature and circumstances of the legal and/or regulatory violations averred in the Complaint, including the entity's failure to comply with the minimum capitalization requirements applicable to an IFE, and the significant risk that this noncompliance poses to the deposits held in the international financial entity, by virtue of this Liquidation Order, Euro Pacific expressly and irrevocably agrees to:

    a. Surrender it's IFE License under Act No. 273-2012, through a Sworn Statement duly authorized by Euro Pacific's Board, which clearly establishes that the entity will cease its banking operations in Puerto Rico.
    b. Surrender the IFE's Tax Decree, should there be one in place, for all legal purposes, through a Sworn Statement duly authorized by Euro Pacific's Board.
    c. Cease and desist from engaging in conduct, including acts and/or omissions, constituting or which could constitute a violation of Act No. 273-2012 and its Regulation, including without limitation, recurrence of the conduct described in the Complaint.
    d. Provide OCFI with a Voluntary Liquidation Plan ("Voluntary Liquidation Plan") within fifteen (15) days of the execution of this Liquidation Order, which acceptance shall be subject to OCFI and the Trustee's approval and strictly aligned with the policy objectives arising under Act No. 273-2012 and requirements of this Liquidation Order, including the adequate protection of all client deposits. All costs, directly or indirectly, related to the Voluntary Liquidation will be defrayed by Euro Pacific.
    e. Produce to OCFI the Audited Financial Statements for the year 2021 and sufficient and adequate third party certification regarding the accuracy of EPB's financial information for fiscal year 2022.

3. Voluntary Liquidation Plan: The Voluntary Liquidation Plan shall be subject, at a minimum, to the following terms and conditions, including any additional measures required, at the sole discretion of OCFI and the Trustee, that are reasonably designed and needed to comply with the policy objectives underlying Act No. 273-2012, including affording adequate protection to all Deposits held in Euro Pacific. The closing of operations, transfers and withdrawals of funds shall be as follows:

    (i) The Voluntary Liquidation Plan shall become effective on the date of the approval of the Plan by the affirmative written consent of Euro Pacific, the Trustee, and OCFI.

    (ii) The Liquidation Period shall not exceed ninety (90) days from the Effective Date.

    (iii) Euro Pacific may only maintain its business operations for the sole purpose of completing the operating tasks geared to the effective and adequate

implementation of this Liquidation Order, marshaling, winding up its business and affairs, and preserving the value of its assets.

(iv) At the date of the Effective Date, Euro Pacific shall provide the Trustee with a list of all accounts, including Inactive Accounts.

(v) Within five (5) Business Days of the Effective Date, Euro Pacific shall mail a notice to its Creditors, at their address shown on Euro Pacific's records, that Euro Pacific is undergoing a Voluntary Liquidation and thus, the deposits held at Euro Pacific will be transfer or pay accordingly, as set forth below.

(vi) The Voluntary Liquidation Plan shall provide that all deposits accounts held in Euro Pacific shall be transferred to an assuming institution that will make all monies available to clients immediately after the transfer.

(vii) Euro Pacific, as a corporate entity, shall be terminated as soon as the Voluntary Liquidation Plan is terminated, by submitting all required documents to the Department of State.

(viii) The assuming institution to which Euro Pacific client accounts are transferred may resume banking operations in any foreign jurisdiction other than Puerto Rico, subject to strict compliance with all statutory and/or regulatory requirements governing their business operations in the corresponding jurisdiction.

(ix) At the execution of the last payment obligation, Euro Pacific business locations and international banking operations in Puerto Rico will be closed permanently and irrevocably.

4. Preference and Payment of Claims: According to the information contained in Euro Pacific's business records, as reviewed by the Trustee, as of June 30, 2022, and the representations made by the IFE, the Net Cash Available, including proprietary precious metals to be monetized, is $68,109,302 USD. As of the same date, client deposits totaled the amount of $66,747,758. Therefore, as of June 30, 2022, Euro Pacific had an excess cash position to cover all deposits, assuming it is able to monetize its proprietary precious metals. Despite this cash position, Euro Pacific recognizes that is does not meet Act 273-2012's minimum regulatory capitalization requirements.

In view of Euro Pacific's failure to comply with the minimum capitalization requirements applicable to IFE's, OCFI has determined that the financial entity lacks sufficient assets to execute a complete distribution on general unsecured creditor claims (and any lower priority claims) and therefore, all such claims, asserted, or unasserted, are expected to recover less than the total amount of debts existing as of June 30, 2022, unless additional cash is injected into Euro Pacific or other unencumbered assets are monetized to adequately cover said cash shortfalls. As such, as a condition precedent to put in place and implement the Voluntary Liquidation Plan, Euro Pacific (through the Trustee) must create a Cash Reserve Account with sufficient funds in cash or readily available funds to pay ALL deposits and the Trustee's administrative expenses. The Parties agree that the Trustee shall certify whether the Cash Reserve Account satisfies the requirements set forth herein.

In compliance with the policy objectives underlying Act No. 273-2012, including affording adequate protection to all IFE held deposits and thus, safeguarding the credibility and granting legal certainty to Puerto Rico's international financial industry, the Voluntary Liquidation Plan shall, at a minimum, guarantee preference and provide adequate protection to all client deposits

held in Euro Pacific. To this effect, and based OCFI's delegated powers under Act No. 4, and Act No. 273-2012, for purposes of guaranteeing an adequate and effective liquidation of the IFE, it is hereby ordered that Euro Pacific's Voluntary Liquidation Plan shall comply with the priority parameters developed by the Federal Deposit Insurance Corporation ("FDIC") in its applicable laws and/or regulations, particularly those provided in the "*Resolution and Receivership*" rules codified in 12 CFR Part 360.3.

In compliance with the above, the Voluntary Liquidation Plan shall be formulated to satisfy all unsecured claims in the following order of priority:

(1) Administrative Expenses of the Trustee-Receiver related to the Liquidation Order.
(2) Any deposit of Euro Pacific clients, excluding any deposited, debt or obligation, payable as described in paragraph five (5) below.
(3) Any other "senior" or general debt of the institution.
(4) Any other obligation that has been subordinated to the payment of the deposits of clients or general creditors.
(5) Any deposit, debt or obligation to shareholders, affiliates, subsidiaries, or members of the IFE.

For purposes of the Voluntary Liquidation Plan requirements set forth herein, the Parties incorporate by reference to this Liquidation Order, a document identifying Euro Pacific's Related Parties and setting forth a general overview of the transactions conducted with such parties. **Exhibit B**.

During the Voluntary Liquidation Period, Euro Pacific shall pay, discharge, or otherwise provide for payment or discharge of, all liabilities and obligations of the IFE, following the subsequent order:

A. First, Euro Pacific shall send a written notice ("Notice") to each Depositor and Creditor to the address on record. The notice shall be mailed within five (5) Business Days of the Effective Date. The Notice shall include the Trustee's official email address to receive claims and inquiries. The Notice shall state the procedure for withdrawing and/or transferring funds. Likewise, the Notice shall inform the procedures after the allotted time for withdrawing and/or transferring funds has lapsed.

B. Second, the funds shall be paid, discharged, or otherwise provide for payment or discharge as follows:

1. Within thirty (30) Business Days of the Notice, Euro Pacific shall pay its Depositors that are Non-Related Parties, that have a right to withdraw their Deposits in cash (wire transfer or check), either because they are demand deposits or time deposits that become due. Within said period, Euro Pacific shall also transfer any Non-Related Parties Deposits, to the extent that Depositors prefer to transfer their Deposits to an assuming institution.
2. Within two (2) Business Days of the Depositor transfer instruction, Euro Pacific shall transfer Deposits of Non-Related Parties to the assuming institution. In the event the Non-Related Parties does not answer the Notice within the allotted timeframe to do so, Euro Pacific shall transfer the Accounts and Deposits to an assuming institution, which shall provide notice to all new Accounts regarding the transfer.
3. After completing the payment or transfer of Deposits, as contemplated above, and after completing payment of any claims following the order of priority set forth above, but within the Liquidation Period, Euro Pacific shall transfer deposits of Related Parties to the assuming

institution or other depository institution authorized to receive such deposits, *provided however* that such transfer of deposits of Related Parties shall only occur in the event that (i) Euro Pacific has established and fully funded the IFE's Cash Reserve Account, which shall have sufficient funds in cash or readily available funds to pay all deposits held in the international financial institution and (ii) there are no outstanding account receivables due to Euro Pacific from said Related Parties.

4. During the Voluntary Liquidation Period, Euro Pacific shall pay any liabilities before they are due to its Creditors, other than Depositors, provided however, that such payments shall only occur if the IFE has established and fully funded the Cash Reserve Account to pay all Deposits.
5. If Euro Pacific is unable to pay, discharge or otherwise provide for any of its liabilities during the Voluntary Liquidation Period, the IFE may, however, retain cash or cash equivalents in an amount that the Trustee estimates necessary and reasonable to discharge any unpaid liabilities, expenses of the corporation, and obligations on the entity's books as of the Effective Date, payable for the period prior to the Liquidation, and pay such contingent liabilities against the remaining assets of Euro Pacific, consistent with the order of priority set forth above.
6. No distribution of assets of Euro Pacific shall be made to the Shareholder, Peter Schiff, until all Deposits are either paid in cash or transferred to the assuming institution or another depository institution with the consent of the Depositor, as provided herein; provided however, that such distribution of assets to the Shareholder, Peter Schiff, shall be allowed, following the order of priority set forth above, if Euro Pacific has established and fully funded the Cash Reserve Account to pay all Deposits held in the institution.
7. Euro Pacific shall cause the Shareholder, Peter Schiff, to endorse for cancellation and deliver to the entity the shares of the IFE owned by its represented certificates, which shall be redeemed and canceled by the corporation in accordance with the requirements arising under applicable laws and/or regulation.

5. Disposal and Sale of Assets: As of the Effective Date, the Trustee, on behalf of Euro Pacific, shall have the authority to either dispose or sell and liquidate its assets and engage in such other transactions as maybe appropriate to its dissolution and liquidation, including, without limitation, obtaining all necessary approvals and authorizations from the OCFI. The disposal and sale of Euro Pacific's assets shall be subject to the following terms and conditions:
    a. All proceeds of the sale of assets shall be used to (i) pay the administrative expenses of the Trustee; (ii) fund the Cash Reserve Account to pay all Deposits; (iii) pay any fines imposed by OCFI; and (iv) pay expenses of Euro Pacific.
    b. All assets of clients or customers of Euro Pacific held in trust accounts or in custody accounts, if any, shall be transferred as per instructions of said clients or customers. Securities held in such accounts shall be transferred to securities accounts designated by such clients, or in the event the client so orders that the securities be sold, such securities will be sold, and the proceeds shall be delivered to the client or customer.

6. Liquidation by the Trustee: The Trustee shall be in charge of completing the liquidation to Euro Pacific to the best of his ability, consistent with the parameters set forth in the Designation Order, in the event that Euro Pacific is unable to establish and fully fund the Cash Reserve Account and in the event that Euro Pacific is unable to complete the Voluntary Liquidation Plan during the Liquidation Period.

7. Taxes: On or after the Effective Date, Euro Pacific shall file a request for an administrative determination or ruling with the Department of Treasury for the Government of Puerto Rico confirming that the Voluntary Liquidation is not subject to Puerto Rico taxation pursuant to the Act and the Internal Revenue Code to provide such determination to the OCFI and the Department of State.

8. Fines and Penalties: In full settlement of the Complaint, Euro Pacific will issue a check payable to the Secretary of the Treasury on the date of the execution of this LIQUIDATION ORDER in the sum of **THREE HUNDRED THOUSAND DOLLARS ($300,000.00).** Such Settlement Amount constitutes an administrative fine which includes all monetary remedies of any kind relating to the Complaint, including but not limited to, fines, penalties, and interest.

9. Time is of the Essence. The Parties agree and acknowledge that time is of the essence regarding the Settlement Payment; therefore, Euro Pacific agrees to issue full payment in favor of OCFI; and OCFI agrees to voluntarily dismiss the Complaint filed against Euro Pacific within thirty (30) days after receiving notification from Euro Pacific certifying its full compliance with all the terms of this Liquidation Order.

10. The OCFI and Euro Pacific, as well as their attorneys and agents agree to execute all documents that are legally required for the execution of this Liquidation Order and the policy objectives of Act No. 273-2012.

V. NOTICES

1. Nothing herein shall preclude the Government of Puerto Rico, its departments, agencies, boards, commissions, authorities, political subdivisions, and corporations, or any other federal or state agency, from asserting any claims, causes of action, or applications for compensatory, nominal, and/or punitive damages, administrative, civil, criminal, or injunctive relief against Euro Pacific.

2. This Liquidation Order includes the settlement of the totality of all claims by the OCFI against Euro Pacific, arising under the provisions of Act No. 273-2012 and Regulation No. 5653, as well as any other applicable laws and regulations in connection with the facts described in the Complaint.

3. Except as explicitly provided in this Liquidation Order, nothing herein is intended to nor shall be construed to have created, compromised, settled, or adjudicated any claims, causes of action, or rights of any person whomsoever, other than as between the OCFI and Euro Pacific, in accordance with this Liquidation Order.

4. The Parties are entering into this Liquidation Order freely, knowingly, and voluntarily, under the advice of counsel of their choices and with a full understanding of its terms. This Liquidation Order is final and irrevocable for all legal purposes.

5. The Parties warrant that they are not subject to any statute or contractual obligation, which may make unlawful the execution and performance of this Liquidation Order.

6. Euro Pacific warrants that the person appearing on its behalf in this Liquidation Order is duly authorized by Euro Pacific to execute the same.

7. This Liquidation Order reflects the total agreement between the Parties and any statement, promise or representation given by any of the Parties, which is not included herein, shall be null and void.

8. This Liquidation Order shall be interpreted for all purposes consistent with the laws of the Government of Puerto Rico. If any clause of this Liquidation Order should ever be determined to be unenforceable, it is agreed that this will not affect the enforceability of any other clause or the remainder of this Liquidation Order.

9. Euro Pacific hereby acknowledges that the failure to comply with all or any of the terms and conditions set forth in this Liquidation Order which are applicable to Euro Pacific may result in the exercising of any right or prerogative possessed by the OCFI, as provided by Act No. 4 or any other applicable law.

10. This Liquidation Order will become part of Euro Pacific's permanent record and may be considered in any future actions brought by the OCFI or any other regulator against Euro Pacific.

11. OCFI and Euro Pacific (together, "the parties"), their officers, directors, agents and/or representatives, mutually agree that they shall not make any disparaging remarks, or any remarks that could reasonably be construed as disparaging of one another and/or regarding their officers, directors, employees, stockholders, representatives, or agents, including Peter Schiff. The parties shall, except to the extent otherwise required by applicable laws, rules, or regulations or as appropriate in the exercise of their fiduciary duties (as determined by each party with advice of counsel), exercise reasonable efforts to cause the following individuals to refrain from making any disparaging statements, orally or in writing, regarding the parties from and after the termination of the Liquidation period: OCIF's executive officers, Euro Pacific's executive officers, and Peter Schiff.

12. Euro Pacific, through the execution of this Liquidation Order, voluntarily waives any rights Euro Pacific may have to seek judicial review or otherwise challenge or contest the terms and conditions of this Liquidation Order and the Complaint.

13. Euro Pacific and the OCFI agree that this Liquidation Order is entered into for purposes of resolving only the matters as described herein.

14. This Liquidation Order is binding upon Euro Pacific, its officers, directors, and Euro Pacific's affiliates, successors, and assignees as well as to the successors and assignees of relevant affiliates with respect to all conduct subject to the provisions established above and all future obligations, responsibilities, undertakings, commitments, limitations, restrictions, events, and conditions.

15. Nothing in this Liquidation Order precludes the OCFI from: (a) taking adverse action based on other conduct; (b) taking this Order and the conduct described above into account in determining the proper resolution or action based on other conduct; (c) taking any and all available steps to enforce this Order; (d) taking any action against other entities or individuals,

regardless of any affiliation or relationship between the IFE and the entities or individuals; or (e) be construed to limit the OCFI's jurisdiction in any other proceeding after its issuance.

16. Neither this Liquidation Order nor anything contained within it shall be admissible in any proceeding as evidence of liability or wrongdoing on the part of either party. However, this Liquidation Order may be introduced into evidence in any proceeding instituted to enforce its terms. Moreover, Euro Pacific agrees to this Liquidation Order without admitting or denying the findings herein, except as to OCFI's jurisdiction over Euro Pacific and the subject matter of these proceedings and the findings concerning Euro Pacific's noncompliance with the minimum capitalization requirements set forth in Act No. 273-2012.

17. Each of the parties has participated in the negotiation of this Liquidation Order.

18. Euro Pacific, its directors and officers, do hereby release and forever discharge the OCFI, its attorneys, insurers, assignees, transferors, transferees, principals, partners, officers, directors, employees, agents servants, subsidiaries, parent corporations, affiliates, successors, stockholders, agents and representatives, including the Trustee (the "Releasee(s)"), from any and all claims, demands, damages, debts, liabilities, obligations, contracts, agreements, causes of action, suits, of whatever nature, character or description, that Euro Pacific may have or may hereafter have or claim to have against each other Releasee(s) arising out of or related to the facts or allegations made in any of the papers or pleadings filed in the Complaint and any conduct, including actions and omissions, to enforce the Complaint.

19. Euro Pacific waives any right to recover from the OCFI, costs, expenses, and attorney's fees in connection with the Complaint.

20. This Liquidation Order is the complete agreement between the OCFI and Euro Pacific concerning their disagreement. The Parties certify that they have made no other written or oral agreement relating to their disagreement. This Liquidation Order supersedes any prior agreements, understandings, or negotiations, whether written or oral, between the OCFI and Euro Pacific.

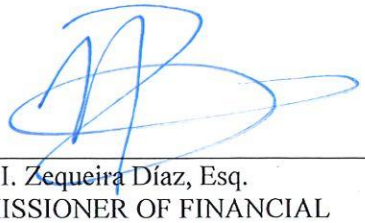
21. If any portions of this Liquidation Order are held invalid and unenforceable, all remaining portions shall nevertheless remain valid and enforceable, to the extent they can be given effect without the invalid portions.

22. Euro Pacific is hereby given notice that, pursuant to the provisions of Article 20(c) of Act No. 4, the OCFI may impose an administrative fine not greater than Five Thousand ($5,000.00) Dollars for each day of non-compliance with the orders issued under the provisions of that Act, up to a maximum of Fifty Thousand ($50,000.00) Dollars. In the event of total or partial non-compliance with this Order, the OCFI, in support of the statutory jurisdiction granted by Act No. 4, may request the Court of First Instance, San Juan Superior Section, to enforce the same, under penalty of contempt, and to impose fines and sanctions in addition to the ones the OCFI may deem to be proper, with any other determination which is proper as a matter of law.

23. The terms of this Liquidation Order will become effective immediately upon its execution.

IT IS SO ORDERED BY THE COMMISSIONER.

This Liquidation Order is executed in San Juan, Puerto Rico, on August 9, 2022.



Natalia I. Zequeira Díaz, Esq.
COMMISSIONER OF FINANCIAL
INSTITUTIONS

GOBIERNO DE PUERTO RICO
OFICINA DEL COMISIONADO DE INSTITUCIONES FINANCIERAS
SAN JUAN, PUERTO RICO

OFICINA DEL COMISIONADO DE INSTITUCIONES FINANCIERAS Querellante, **v.** **EURO PACIFIC INT'L. BANK, INC.** Querellado.	**CASO NÚM.**: C22-D-006 **SOBRE**: Violaciones a la Ley Núm. 273-2012, según enmendada, conocida como "Ley Reguladora del

CONSENT FOR ORDER FOR LIQUIDATION AND DISSOLUTION OF INTERNATIONAL FINANCIAL ENTITY

Euro Pacific Int'l Bank, Inc., ("Euro Pacific") hereby acknowledges that it has been served with a copy of the Liquidation Order issued on this day and, after evaluating the same with the assistance of legal counsel, has waived its right to a hearing and appeal in this matter. Euro Pacific recognizes the jurisdiction of the Office of the Commissioner of Financial Institutions ("OCFI") for purposes of filing the captioned enforcement and admits the Facts contained in the Liquidation Order.

Euro Pacific has discussed the same with its respective attorneys and voluntarily consents to the entry of the Liquidation Order issued by the OCFI as settlement of the violations contained in the Complaint, avoiding protracted and expensive proceedings.

Euro Pacific states that no promise of any kind or nature was made to induce it to execute this Liquidation Order and expresses its Consent to comply with the terms therein which will be effective immediately upon its execution on August 9, 2022.

Mr. Peter Schiff, represents and warrants that he or she is a director and sole shareholder of Euro Pacific and that, as such, has been authorized through the corresponding Resolution to Consent to the Liquidation Order for and on behalf of Euro Pacific.

On August 8, 2022.

Euro Pacific Int'l Bank, Inc.

Exhibit 3
EPIB Consolidated
Financial Statement
(as of Dec 31, 2020)



Consolidated Financial Statements and Report of Independent Certified Public Accountants

Euro Pacific Intl. Bank, Inc. and Subsidiaries

December 31, 2020

Euro Pacific Intl. Bank, Inc. and Subsidiaries

Table of Contents

Report of Independent Certified Public Accountants 1-2

Consolidated Financial Statements:

- Consolidated Balance Sheet 3
- Consolidated Statement of Operations 4
- Consolidated Statement of Stockholders' Deficit 5
- Consolidated Statement of Cash Flows 6

Notes to the Consolidated Financial Statements 7-18

Supplementary information:

- Consolidating Balance Sheet 19
- Consolidating Statement of Operations 20

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Report of Independent Certified Public Accountants

To the Board of Directors of
Euro Pacific Intl. Bank, Inc.:

Report on the Consolidated Financial Statements

We have audited the accompanying consolidated financial statements of **Euro Pacific Intl. Bank, Inc. and Subsidiaries**, which comprise the consolidated balance sheet as of December 31, 2020 and the related consolidated statements of operations, stockholders' deficit and cash flows for the year then ended, and the related notes to the consolidated financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these consolidated financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these consolidated financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the consolidated financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the consolidated financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the consolidated financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the consolidated financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

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Kevane Grant Thornton

Opinion
In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of **Euro Pacific Intl. Bank, Inc. and Subsidiaries** as of December 31, 2020, and the consolidated results of operations and cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Emphasis of Matter
The accompanying consolidated financial statements have been prepared assuming **Euro Pacific Intl. Bank, Inc. and Subsidiaries** will continue as a going concern. As discussed in Note 1 (b) to the consolidated financial statements, **Euro Pacific Intl. Bank, Inc. and Subsidiaries** incurred a substantial loss from operations and had negative cash flows from operating activities for the year ended December 31, 2020. **Euro Pacific Intl. Bank, Inc. and Subsidiaries**' operating plan indicates that it will continue to incur losses from operations and generating negative cash flows from operating activities during the year ended December 31, 2022. These projections and certain liquidity risks raise substantial doubt about **Euro Pacific Intl. Bank, Inc. and Subsidiaries**' ability to meet its obligations as they become due within one year after the date of this report and continue as a going concern. Management's plans in regard to these matters are also described in Note 1 (b) to the consolidated financial statements. The consolidated financial statements do not include any adjustments that might result from the outcome of this uncertainty. Our opinion is not modified with respect to this matter.

Emphasis of Matter
As discussed in Note 7 to the consolidated financial statements, **Euro Pacific Intl. Bank, Inc. and Subsidiaries** have significant transactions with its affiliates at terms and conditions arranged by management of the affiliated group. Our opinion is not modified with respect to that matter.

Supplementary Information
Our audit was conducted for the purpose of forming an opinion on the consolidated financial statements as a whole. The supplementary information presented in the Consolidating Balance Sheet and Consolidating Statement of Operations is presented for purposes of additional analysis and is not a required part of the consolidated financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the consolidated financial statements. The information has been subjected to the auditing procedures applied in the audit of the consolidated financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the consolidated financial statements or to the consolidated financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the supplementary information is fairly stated in all material respects in relation to the consolidated financial statements taken as a whole.

Kevane Grant Thornton LLP

San Juan, Puerto Rico
May 16, 2022.

CERTIFIED PUBLIC ACCOUNTANTS
(OF PUERTO RICO)
LICENSE 217
EXPIRES DECEMBER 1, 2022.
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OF THE PUERTO RICO SOCIETY OF
CPAS WAS AFFIXED TO THE FILE
COPY OF THIS REPORT.

Euro Pacific Intl. Bank, Inc. and Subsidiaries

Consolidated Balance Sheet
December 31, 2020

Assets	
Cash and due from banks	$ 132,103,279
Restricted cash	550,112
Equity investments- at fair value	421,400
Precious metals	33,868,370
Property and equipment- net of accumulated depreciation	217,377
Intangible assets- net of accumulated amortization	1,296,227
Other assets	1,489,047
Total assets	$ 169,945,812
Liabilities and Stockholders' Deficit	
Liabilities:	
Deposits from customers	$ 170,137,270
Due to related parties	391,161
Due to director	257,189
Accounts payable and accrued expenses	459,664
Total liabilities	171,245,284
Commitments (Note 9)	
Stockholders' Deficit:	
Common stock	4,248,177
Additional paid-in capital	2,797,300
Due from shareholder	(1,248,177)
Accumulated deficit	(7,096,772)
Total stockholders' deficit	(1,299,472)
Total liabilities and stockholders' deficit	$ 169,945,812

The accompanying notes are an integral part of this consolidated balance sheet.

Euro Pacific Intl. Bank, Inc. and Subsidiaries

Consolidated Statement of Operations
For the Year Ended December 31, 2020

Revenues		
Fees and commission income	$	4,198,596
Interest income		306,163
Net unrealized/realized gain on equity investments– at fair value		30,233
Total revenues		4,534,992
Expenses		
Payroll and payroll related expense		2,415,756
General and administrative		2,021,785
Fees and commission expense		2,894,792
Depreciation and amortization		528,136
Total expenses		7,860,469
Operating loss		(3,325,477)
Other income		53,734
Loss before tax benefit		(3,271,743)
Income tax benefit - deferred		(111,698)
Net loss	$	(3,160,045)

Euro Pacific Intl. Bank, Inc. and Subsidiaries

Consolidated Statement of Stockholders' Deficit
For the Year Ended December 31, 2020

	Common Stock	Additional Paid-in Capital	Due from Shareholder	Accumulated Deficit	Total
Balance- December 31, 2019	$ 4,141,070	$ 2,797,300	$ (1,141,070)	$ (3,936,727)	$ 1,860,573
Net loss	-	-	-	(3,160,045)	(3,160,045)
Amortization of shareholder's loan	107,107	-	(107,107)	-	-
Balance- December 31, 2020	$ 4,248,177	$ 2,797,300	$ (1,248,177)	$ (7,096,772)	$ (1,299,472)

The accompanying notes are an integral part of this consolidated statement.

Euro Pacific Intl. Bank, Inc. and Subsidiaries

Consolidated Statement of Cash Flows
For the Year Ended December 31, 2020

Cash flows used in operating activities:	
Net loss	$ (3,160,045)
Adjustment to reconcile net loss with cash used in operating activities:	
Depreciation and amortization	528,136
Net unrealized/realized gain on equity investments	(30,233)
Deferred income tax benefit	(111,698)
Deferred rent	(4,769)
Changes in operating assets and liabilities:	
Precious metals	(12,039,748)
Other assets	211,090
Due from/to director	14,050
Due to related parties	(117,290)
Accounts payable and accrued expenses	84,537
Net cash used in operating activities	(14,625,970)
Cash flows used in investing activities:	
Acquisition of property and equipment	(81,337)
Acquisition of intangible assets	(355,465)
Net cash used in investing activities	(436,802)
Cash flows used in financing activities-	
Net change in non-interest bearing deposits from customers	(9,617,655)
Cash and due from banks:	
Net change during the period	(24,680,427)
Balance- beginning of year	156,783,706
Balance- end of year	$ 132,103,279

The accompanying notes are an integral part of this consolidated statement.

(1) Nature of business and significant accounting policies:

Euro Pacific Intl. Bank, Inc. (the "Bank") is an offshore bank incorporated on February 1, 2017, providing international banking services. The Bank's operations were originally domiciled in St. Vincent and the Grenadines, operating under Euro Pacific Bank Ltd. The Bank was incorporated on February 23, 2011 and re-domiciled to the Commonwealth Puerto Rico starting their operations on November 20, 2017. The Bank is licensed to operate as an international financial entity pursuant to Act No. 273 of September 25, 2012, the Commonwealth of Puerto Rico International Financial Center Regulatory Act ("Act No. 273"), as amended; and according to rules and regulations issued by the Commissioner of Financial Institutions of the Commonwealth of Puerto Rico (the "Commissioner"). The Bank is allowed to accept deposits and other types of borrowings from persons and entities domiciled outside of the Commonwealth of Puerto Rico.

The Bank makes no loans and does not engage in leverage or speculation with client assets. The Bank derives margins only from clients' commissionable transactions and standard bank fees. The principal activity of the Bank is offering customers multiple currency payment services, investments and managed funds. The operations are mainly denominated in United States of America dollars ("U.S. Dollars"). Unless otherwise indicated, all amounts presented and disclosed in the accompanying consolidated financial statements and within these notes are denominated in U.S. Dollars. Considering that Bank does not engage in lending activities, Management presents the format of the consolidated statement of operations similar to that of an investment company.

The Bank is subject to regulatory supervision by the Commissioner. The Bank must comply with certain banking regulations, including minimum capital requirements, among others.

The Bank is a member of the Euro Pacific Group. The affiliated group consists of the Bank and its wholly-owned subsidiaries: Euro Pacific Securities, Inc. ("EPS") and Euro Pacific Cards Services Limited ("EPCS"). EPS has two wholly-owned subsidiaries: Euro Pacific Advisors, Ltd ("EPA") and Global Corporate Staffing, Ltd ("GCS") (collectively all entities in the group, the "Companies" or "the Bank and subsidiaries"). The Companies have significant transactions with their affiliated companies. Such transactions and the terms thereof are arranged by management of the affiliated group, which may not be indicative of the terms that would have existed or the results of operations if the Companies had been operated as unaffiliated entities.

EPS was originally incorporated on March 21, 2001, as Global Trading Ltd, under the laws of Anguilla. On October 30, 2017, the company re-domiciled into the British Virgin Islands ("BVI"), trading on the new name of "Euro Pacific Securities, Inc." The principal activity of the company is the provision of brokerage services. EPS is regulated by the Financial Service Commission of the BVI. Its wholly-owned subsidiary EPA is engaged in providing advisory services for a management fee to EPF (its only client); and GCS is engaged in providing the human resources services to the other affiliated entities.

EPCS is a company limited by shares registered in England & Wales, United Kingdom under the Companies Act 2006. EPCS is engaged in offering prepaid debit cards to its customers (which are the Bank's customers).

In addition, the Bank is the owner of Euro Pacific Funds SCC Ltd. ("EPF"). EPF is a segregated cell company domiciled in St. Vincent and the Grenadines, incorporated on March 21, 2011 under the St. Vincent and the Grenadines International Business Companies Act Chapter 149 of the Revised Laws of St. Vincent and the Grenadines, 2009 and the International Business Companies Regulations, 2008, each as amended. EPF was licensed to create, from time to time, one or more segregated cells, each of such individual segregated cell containing a separate fund comprised of a discreet portfolio of investments, assets and liabilities.

As of and for the year ended December 31, 2020, EPF active mutual funds (the "Funds") and their investment objectives are as follows:

1. Natural Resources Fund SCC — To provide long-term capital appreciation by investing primarily in the common stocks of companies that own or develop natural resources and other basic commodities.

2. International Balanced Fund SCC — To achieve long term capital growth and income, while reducing volatility through diversification and an element of hedging.

3. Gold and Precious Metals Fund SCC — To seek long term capital gains and inflation protection, by investing in equity and debt instruments of global precious metal companies, that the fund managers believe are undervalued and have strong balance sheets.

4. International Growth Fund SCC — To seek to provide capital appreciation and income, by investing in a number of countries with positive macro-economic fundamentals (including trade surpluses, low government debt, high interest rates relative to other developing nations, and low inflation).

The consolidated financial statements of the Bank and subsidiaries, as well as the accounting policies used to prepare such consolidated financial statements, have been prepared using the accounting principles generally accepted in the United States of America (hereafter referred to as "generally accepted accounting principles" or "U.S. GAAP") and with general practices within the financial services industry. The following is a description of the more significant accounting policies:

(a) Principles of consolidation -
The consolidated financial statements include the accounts of the Bank and its wholly-owned subsidiaries. All intercompany balances and transactions have been eliminated in consolidation. Due to the fact that investments held by EPF are measured at fair value with changes in fair value recognized in operations, the majority of each segregated cell within EPF is owned by outside investors of the Companies (thus deeming the EPF segregated cells investment companies in accordance with ASC 946, Investment Companies), and that the Bank is not required to fund losses of EPF that could potentially be significant to EPF, the consolidated financial statements do not include the financial condition and results of operations of EPF.

(b) Going concern, liquidity, and management's plan -
The Bank incurred a substantial loss from operations and had negative cash flows from operating activities during the year ended December 31, 2020. The Bank's operating plan indicates that it will continue to incur losses from operations and generate negative cash flows from operating activities during the year ended December 31, 2022. These projections and certain liquidity risks raise substantial doubt about the Bank's ability to meet its obligations as they become due within one year after the date that these consolidated financial statements are issued and continue as a going concern.

Management's plans include exploring alternative sources of capital to supply the Bank's cash flow needs. Currently, the funding for the Bank's operations is being provided by one primary stockholder who has agreed on continuing to provide this financial support for at least one year and a day after these consolidated financial statements are available to be issued. In addition, during 2021, stockholders of the Companies provided approximately $5.0 million in additional capital financing to the Bank. Management believes the aforementioned plans and actions are sufficient to enable to the financial statements of the Companies to be prepared under the going concern basis of accounting as of the year ended December 31, 2020.

(c) Use of estimates -
The preparation of the consolidated financial statements in conformity with U.S. GAAP requires the Companies to make a number of estimates and assumptions relating to the reported amounts of assets and liabilities and the disclosure of contingent assets and liabilities at the date of the consolidated financial statements, and the reported amounts of revenue and expenses during the period. Actual results could differ from those estimates.

(d) Cash and cash equivalents -
Cash consist of notes and coins on hand, and unrestricted balances held which may be accessed on demand. The Companies consider all highly liquid debt instruments with original maturities at the time of purchase of three months or less to be cash equivalents. As of December 31, 2020, there were no cash equivalents. The Companies maintain its cash in bank deposit accounts which, at times, may exceed federally insured limits as guaranteed by the Federal Deposit Insurance Corporation.

(e) Restricted interest-bearing deposits -
The Bank is required by Act No. 273, to maintain $300,000 in assets free of any lien with a financial institution in the Commonwealth of Puerto Rico. To comply with this requirement, as of December 31, 2020 the Bank has two certificates of deposit amounting to $550,000 in a Commonwealth of Puerto Rico financial institution. The restricted interest-bearing deposits is not available for use in the Bank's day-to-day operations.

(f) Equity investments -
Investment in equity securities at December 31, 2020 consists of mutual funds whose underlying assets are comprised of domestic and international equity securities, including exchange traded funds. Those equity investments are recorded at fair value, which is measured using the net asset value of the underlying mutual funds as a practical expedient. Unrealized holding gains and losses on equity investments are included in earnings. Realized gains and losses from the sale of equity investments are included in earnings and are determined on a specific-identification basis.

Purchase and sales of securities are recorded on their trade date. Unsettled purchase transactions are recorded as part of the Companies' investment positions and as liability, while unsettled sales transactions are removed from the Companies' investment positions and recorded as a receivable.

(g) Transactions in foreign currencies -
These consolidated financial statements are presented in U.S. Dollars which is the Companies' functional currency. Functional currency is the currency of the primary economic environment in which the entity operates. Management believes that U.S. Dollars most faithfully represents the economic effects of the underlying transactions, events and conditions.

Transactions in foreign currencies are translated to the functional currency of the Companies at exchange rates at the dates of the transactions. Monetary assets and liabilities denominated in foreign currencies at the reporting date are translated to the functional currency at the exchange rate at that date. Non-monetary assets and liabilities denominated in foreign currencies are translated at the rates prevailing at the date of the transaction, or if measured at fair value, when the fair value was determined. Profit and losses arising from timing differences in foreign currency translation and on settlement of amounts receivable and payable in other currencies are dealt within other expenses in the consolidated statement of operations.

For the year ended December 31, 2020, the Companies recognized approximately $43,000 of foreign currency translation and/or settlements in other income in the consolidated statements of operations.

As of December 31, 2020, the Companies had the following balances denominated in foreign currency (in thousands):

	AUD	CAD	CHF	EUR	GBP	HKD	JPY	NOK	NZD	PLN	SEK	SGD
Cash	$ 2,007	$ 3,670	2,520 CHF	€ 42,768	£ 13,401	$ 192	¥ 3,058	4,662 kr	$ 355	3,455 zł	117 kr	$ 320
Deposits from customers	$ 1,763	$ 3,880	2,520 CHF	€ 44,506	£ 13,884	$ 65	¥ 14,787	4,516 kr	$ 368	2,587 zł	29 kr	$ 311

AUD - Australian Dollar
CAD - Canadian Dollar
CHF - Swiss Franc
EUR - Euro
GBP - Great Britain Pound
HKD - Hong Kong Dollar
JPY - Japanese Yen
NOK - Norwegian Krone
NZD - New Zealand Dollar
PLN - Polish Zloty
SEK - Swedish Krona
SGD - Singapore Dollar

(h) Precious metals -

The Bank is an approved dealer of precious metals, through which clients can fund the purchase of precious metals (i.e. gold, silver, and silver coins) with their individual Bank account. The precious metals are carried at fair value in the consolidated balance sheet.

(i) Property and equipment -

Property and equipment, including significant improvements to existing facilities, are stated at cost. Maintenance and repairs are expensed as incurred. Cost of renewals and betterments are capitalized. Depreciation of property and equipment is provided using the straight-line method over the estimated useful lives of the assets (five years). Leasehold improvements are amortized over the lease term or useful life, whichever is shorter.

When assets are disposed of, the cost of the asset and related accumulated depreciation are removed from the accounts, and any gain or loss is reflected in earnings for the period.

(j) Intangible assets -

Software acquired by the Bank is measured at cost less accumulated amortization. Expenditure on internally-developed software is recognized as an asset when the Bank is able to demonstrate the intention and ability to complete the development and use the software in a manner that will generate future economic benefits, and that can reliably measure the costs to complete the development. The capitalized costs of internally developed software include all costs directly attributable to developing the software and capitalized borrowing costs and are amortized over its useful life.

Subsequent expenditures on software assets are capitalized only when it increases the future economic benefits embedded in the specific asset to which it relates. All other expenditures are expensed as incurred.
Software is amortized on a straight-line basis over its estimated useful life from the date on which it is available for use. The estimated useful life of the software is five years.

(k) Long-lived assets -

Long-lived assets, such as property and equipment, and purchased intangible assets subject to amortization, are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount of an asset may not be recoverable. If circumstances require a long-lived asset or asset group be tested for possible impairment, the Company first compares undiscounted cash flows expected to be generated by that asset or asset group to its carrying amount. If the carrying amount of the long-lived asset or asset group is not recoverable on an undiscounted cash flow basis, an impairment is recognized to the extent that the carrying amount exceeds its fair value. Fair value is determined through various valuation techniques including discounted cash flow models, quoted market values and third-party independent appraisals, as considered necessary. No impairment charges were recorded during the year ended December 31, 2020.

(l) Revenue recognition -

FASB ASC 606 establishes principles for reporting information about the nature, amount, timing and uncertainty of revenue and cash flows arising from the entity's contracts to provide goods or services to customers. The core principle requires an entity to recognize revenue to depict the transfer of goods or services to customers in an amount that reflects the consideration that it expects to be entitled to receive in exchange for those goods or services recognized as performance obligations are satisfied, either at a point in time or over time.

A portion of the Bank’s revenue-generating transactions are not subject to FASB ASC 606, including revenue generated from financial instruments, as these activities are subject to other U.S. GAAP discussed elsewhere within our disclosures.

Revenue-generating activities that are within the scope of FASB ASC 606 is mainly related to service charges on deposit accounts and other service fees (i.e. account-related charges, investment management fees, convenience fees, reporting fees, and transfer fees) and commissions for services rendered to the clients. The Bank is an approved dealer of precious metals through which clients can fund the purchase of precious metals (i.e. gold, silver, and silver coins) with the individual’s Bank account and generate a commission fee through this transaction.

These transaction-based fees are recognized at a point in time, upon occurrence of the activity or event or upon the occurrence of a condition which triggers the fee assessment. The Bank is acting as principal in these transactions.

(m) Dividend income -

Dividend income is recognized at declaration date.

(n) Fees and commission expenses -

Fee and commission expenses relate mainly to transaction and service fees, which are expensed as the services are received based on contract terms.

(o) Income taxes -

The Companies, except the Bank and EPCS, are exempt of income tax: a) EPS is exempt from all tax provisions of the BVI Income Tax Ordinance (Chapter 206) and Stamp Duty Act (Chapter 202), under the BVI Business Companies Act No. 16 of 2004; b) EPA and GCS are exempt from taxes in St. Vincent and the Grenadines, including income, capital gains and withholding taxes, under Act No. 34 of 2007 (as amended) the International Business Companies Act Chapter 149 Part XII as long they comply with the provisions of the Income Tax Act Section 7(1).

The Bank and EPCS account for income taxes pursuant to the provisions of FASB ASC No. 740, *Income Taxes*. Deferred income tax assets and liabilities are determined based on the difference between the financial statement carrying amounts and the tax bases of assets and liabilities using enacted tax rates in effect in the years in which the differences are expected to reverse. Deferred tax assets are evaluated for realization and may be reduced by a valuation allowance.

The Bank and EPCS recognize the tax benefit from uncertain tax positions only if it is "more likely than not" that the tax position will be sustained on an examination by the taxing authorities based on the technical merits of the position. The tax benefits recognized from such a position are measured based on the largest benefit that has a greater than fifty percent likelihood of being realized upon ultimate settlement. To the extent the Bank and EPCS' assessment of such tax position changes, the change in estimate will be recorded in the period in which the determination is made. Tax-related interest and penalties, if any, are recorded within the provision for income taxes in the consolidated statement of operations and are classified on the consolidated balance sheet together with the related liability for unrecognized tax benefits.

(p) Contingencies -

Liabilities for loss contingencies arising from claims, assessments, litigation, fines, and penalties and other sources are recorded when it is probable that a liability has been incurred and the amount of the assessment and/or remediation can be reasonably estimated. Legal costs incurred in connection with loss contingencies are expensed as incurred. As of December 31, 2020, there are no pending litigations and unasserted claims.

(q) Fair value measurements -

The Companies follow FASB ASC No. 820, "Fair Value Measurements and Disclosures". FASB ASC No. 820 defines fair value as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. In addition, FASB ASC No. 820 establishes disclosures about fair value measurements in financial statements based on hierarchical levels directly related to the amount of subjectivity associated with the inputs used to determine the fair value of financial instruments. The various inputs that may be used to determine the value of the Funds' investments are summarized in three broad levels. The inputs or methodologies used for valuing securities are not necessarily an indication of the risk associated with investing in those securities.

Level 1 -Quoted prices (unadjusted) for identical assets or liabilities in active markets that the Bank has the ability to access as of the measurement date.
Level 2 -Significant other observable inputs other than Level 1 prices such as quoted prices for similar assets or liabilities; quoted prices in markets that are not active; or other inputs that are observable or can be corroborated by observable market data
Level 3- Significant unobservable inputs that reflect a company's own assumptions about the assumptions that market participants would use in pricing an asset or liability.

Investments measured using net asset value as a practical expedient are not categorized within the fair value hierarchy.

(r) Recently issued accounting standards not yet adopted -

FASB ASU 2016-02, Leases (Topic 842)

The FASB issued this ASU to increase transparency and comparability among organizations by recognizing lease assets and lease liabilities on the balance sheet and disclosing key information about leasing arrangements. This standard sets out the principles for the recognition, measurement, presentation and disclosure of leases for both lessors and lessees. The main difference between previous GAAP (Topic 840) and Topic 842 is the recognition of lease assets and lease liabilities by lessees for those leases classified as operating leases under previous GAAP. Under the new standard, the lessees will be required to recognize the assets and liabilities on the balance sheet arising from leases greater than 12 months. Leases with a term of 12 months or less will be accounted for similar to before the implementation of Topic 842. Also, the new standard requires lessees to apply a dual approach, classifying leases as either finance or operating leases based on the principle of whether or not the lease is effectively a financed purchase by the lessee. This classification will determine whether lease expense is recognized based on an effective interest method or on a straight-line basis over the term of the lease, respectively.

The amendments of this update are effective for fiscal years, and interim periods within those fiscal years, beginning after December 15, 2019 (non-public entities), with early adoption permitted. Due to the COVID-19 pandemic, in April 2020 the FASB determined that the leasing standard will be effective for fiscal years beginning after December 15, 2021, and interim periods within fiscal years beginning after December 15, 2022. The Companies are currently evaluating the impact that this accounting standard will have on its consolidated financial statements.

FASB ASU 2018-15, Intangibles – Goodwill and Other – Internal-Use Software (Subtopic 350-40): Customer's Accounting for Implementation Costs Incurred in a Cloud Computing Arrangement That Is a Service Contract

The FASB issued ASU 2018-15 in August 2018 which, among other things, aligns the requirements for capitalizing implementation costs incurred in a hosting arrangement that is a service contract with the requirements for capitalizing implementation costs incurred to develop or obtain internal-use software, and clarifies the term over which such capitalized implementation costs should be amortized.
These updates are effective for the fiscal years, beginning after December 15, 2020 (non-public entities), early implementation is permitted. The Companies are currently evaluating the impact that this accounting standard will have on its consolidated financial statements.

Other recently issued accounting standards updates -
During the year ended December 31, 2020, the FASB issued other accounting standard updates that were not relevant to the Companies' operations.

(2) Precious metals:

Precious metals at December 31, 2020, consists of:

Silver	$ 8,796,872
Gold	25,071,498
Total	$ 33,868,370

(3) Property and Equipment:

Property and equipment at December 31, 2020, consist of:

Leasehold improvements	$	227,355
Office, furniture, and equipment		197,039
Computer equipment and software		167,218
Total		591,612
Less accumulated depreciation		(374,235)
Property and equipment—net	$	217,377

Total depreciation and amortization expense of property and equipment for the year ended December 31, 2020 was $98,818.

(4) Intangible assets:

Intangible assets consist of internally-developed software for the Bank. Total software cost as of December 31, 2020 amounted to $2,427,075 with an accumulated amortization of $1,130,848. The amortization expense for the period ended December 31, 2020 amounted to $429,318 and the estimated aggregate amortization expense for the succeeding four-years are as follows:

Year		Amount
2021	$	436,638
2022		420,533
2023		345,063
2024		71,093
2025		22,900
	$	1,296,227

(5) Other assets:

Other assets at December 31, 2020, consist of:

Deposits held at Silver Bullion	$	300,000
Net deferred tax assets		168,737
Prepaid software license		164,675
Account receivable other		364,388
Other		491,247
Total	$	1,489,047

(6) Common stock:

Common stock balance as of December 31, 2020, consists of:

EPB—

Common Stock—$1 par value—5,400,000 shares authorized; 5,400,000 shares issued and outstanding	$ 4,248,177

The due from shareholder at December 31, 2020 amounting to $1,248,177 (discounted as described below with an undiscounted balance of $1,151,823) is related to the initial capitalization of the Bank. The transaction was executed in exchange of a note receivable of $2,400,000 from the shareholder, non-interest bearing and payable within ten years. Based on the terms, the note receivable was discounted at an imputed interest of 8% considering the repayment term, and it was offset against the stockholders' equity.

(7) Related party transactions:

The Bank has material transactions with affiliated entities at terms and conditions arranged by management of the affiliated group. Accordingly, the accompanying consolidated financial statements may not necessarily be indicative of the conditions that would have existed or results of operations if the Companies had been operated as unaffiliated entities.

As of and for the year ended December 31, 2020, the Bank had the following balances and/or transactions with EPF:

Assets (liabilities)	
Equity investments – the Bank investment in EPF Funds	$ 421,400
Due to related parties	$ (391,161)
Other assets – the Bank investment in EPF	$ 1,000

(8) Income taxes:

Under Act No. 273, the income generated by an international financial entity holding a decree under such act from the conduct of the activities described in Section 12(a), is subject to a four percent fixed tax rate on its taxable income. The Bank was issued a decree by the Department of Economic Development and Commerce of the Commonwealth of Puerto Rico granting the four percent tax rate on income tax and a 100% exemption on property and municipal license taxes to the Bank effective February 9, 2017 for an initial period of 15 years.

Pursuant to the United Kingdom tax code, EPCS is subject to a tax rate of 19% of its profits.

Deferred income taxes reflect the tax effects of temporary differences between carrying amounts of assets and liabilities for financial reporting purposes and income tax purposes.

Deferred tax assets at December 31, 2020, consists of:

Net operating losses	$	156,616
Unrealized losses on equity investments		6,251
Depreciation disallowance		5,870
Deferred tax assets	$	168,737

The deferred tax assets as of December 31, 2020 were included as part other assets in the accompanying consolidated balance sheet.

In assessing the realization of the deferred tax assets, management considers whether it is more likely than not that some portion or all of it will not be realized. The ultimate realization of deferred income tax assets is dependent upon the generation of future taxable income during the periods in which these temporary differences become deductible. No valuation allowance was established, since Management believes that it is more likely than not that the Bank will realize the benefits.

As of December 31, 2020, the Bank has net operating loss carryforwards for income tax purposes of approximately $3.9 million which are available to offset future taxable income through 2030.

As of December 31, 2020, management of the Bank believes that there are no uncertain tax positions; accordingly, no liability for unrecognized tax benefits has been recorded in the accompanying consolidated balance sheet. The Bank's policy is to record interest and penalties related to income tax exposures as a component of the provision for income taxes.

The Bank is potentially subject to income tax audits in the Commonwealth of Puerto Rico for its taxable year 2020, until the applicable statute of limitations expires.

(9) Commitments:

The Bank, GCS, and EPS leases its office facilities under operating lease agreements extending through December 31, 2021. Future minimum annual commitments for these non-cancelable operating leases are as follows:

Year Ending December 31	Amount
2021	160,284
	$ 160,284

Lease expense including common area maintenance expense for the year ended December 31, 2020, amounted to approximately $323,000 and is included within general and administrative expenses in the accompanying consolidated statement of operations.

Off-Balance Sheet Commitments — EPS makes investments on behalf of clients. These investments are purchased from client deposits. EPS has no legal or equitable rights to/or beneficial interest in these investments and, therefore, they are excluded from these consolidated financial statements.

EPS collects or settles amounts related to these investments (acquisitions, redemptions, earnings, gains and losses) and the net amounts receivable from clients or payable to the clients are included in other assets or other liabilities.

(10) Regulatory requirement:

Each bank operating pursuant to Act No. 273 provisions is required to maintain minimum authorized and initial paid-in capital levels. At December 31, 2020, the Bank was in compliance with this requirement.

As discussed in Note 1, the Bank is also required to maintain at least $300,000 in unencumbered assets. At December 31, 2020, the Bank maintained reserved funds in the amount of $550,000 in two certificates of deposit with a financial institution in order to comply with the unencumbered assets requirement by the Office of the Commissioners of Financial Institutions.

(11) Fair value measurements:

As discussed in Note 1, the Companies use the fair value measurement framework under U.S. GAAP. This fair value measurement framework defines fair value as the price that would be received to sell an asset or paid to transfer a liability (an exit price) in an orderly transaction between market participants at the measurement date. This framework also establishes a fair value hierarchy which requires an entity to maximize the use of observable inputs and minimize the use of unobservable inputs when measuring fair value.
The Companies' assets as of December 31, 2020, that are measured at fair value on a recurring basis are as follows:

	Level 1	Level 2	Level 3	Investments measured at net asset value	Total
Assets:					
Equity investments	$ -	$ -	$ -	$ 421,400	$ 421,400
Precious metals	33,868,370	-	-	-	33,868,370
	$ 33,868,370	$ -	$ -	$ 421,400	$ 34,289,770

Following is a description of the Companies' valuation methodologies used for assets measured at fair value. There have been no changes in the methodologies used at December 31, 2020.

Precious metals -

The fair value for precious metals is determined using published market values attributable to the costs of the raw precious metal. Precious metals inventory is classified as Level 1 of the valuation hierarchy.

No transfers in or out of Level 1, 2 or 3 fair value measurements occurred during the year ended December 31, 2020.

Equity investments -

At December 31, 2020, the Bank had equity investments of $421,400 measured using net asset value as a practical expedient, which are not categorized in the fair value hierarchy.

The Companies do not have liabilities measured at fair value on a recurring basis.

(12) Subsequent events:

During 2021, the Bank received approximately $5.0 million in capital contribution from its shareholder to further capitalize the Bank. Also, the number of shareholders has been reduced.

Also during 2021 and 2022, the Commissioner instructed the Bank to comply with certain banking requirements and imposed certain improvement measures, which include, among other matters, the completion of the 2019, 2020, and 2021 audits of the Bank, and that the Bank address certain comments from the Commissioner around certain strategic and budgetary plans presented by the Bank to the Commissioner. The Bank is making operational and compliance arrangements to comply with all requirements imposed by the Commissioner. Any noncompliance with these requirements could result in the Commissioner taking certain actions against the Bank that as of the date the financial statements were available to be issued could not be determined.

The Companies evaluated subsequent events through May 16, 2022, the date the consolidated financial statements were available to be issued and determined that there are no other subsequent events considered material that would require further disclosure to the Companies consolidated financial statements.

Euro Pacific Intl. Bank, Inc. and Subsidiaries

Consolidating Balance Sheet
December 31, 2020

Assets	EPB (Parent Company)	EPS Consolidated	EPCS	Elimination Entries	Consolidated Balance
Cash and due from banks	$ 122,335,099	$ 7,007,843	$ 2,892,057	$ (131,720)	$ 132,103,279
Restricted cash	550,112	-	-	-	550,112
Equity investments- at fair value	421,400	-	-	-	421,400
Investment in subsidiaries	410,174	-	-	(410,174)	-
Precious metals	33,868,370	-	-	-	33,868,370
Property and equipment-net	158,063	59,314	-	-	217,377
Intangible assets-net	1,296,227	-	-	-	1,296,227
Other assets	1,215,516	26,349	247,182	-	1,489,047
Total assets	$ 160,254,961	$ 7,093,506	$ 3,139,239	$ (541,894)	$ 169,945,812
Liabilities and Stockholders' Equity					
Deposits from customers	164,056,619	$ 6,212,371	-	$ (131,720)	170,137,270
Due to related parties	31,028,217	156,980	3,415,343	(34,209,379)	391,161
Due from related parties	(34,052,628)	(155,755)	(996)	34,209,379	-
Due to director	255,189	2,000	-	-	257,189
Accounts payable and accrued expenses	267,036	157,956	34,672	-	459,664
Total liabilities	161,554,433	6,373,552	3,449,019	(131,720)	171,245,284
Stockholders' Deficit					
Common stock	4,248,177	2,797,300	-	(2,797,300)	4,248,177
Additional paid-in capital	2,797,300	-	-	-	2,797,300
Due from shareholder	(1,248,177)	-	-	-	(1,248,177)
Accumulated deficit	(7,096,772)	(2,077,346)	(309,780)	2,387,126	(7,096,772)
Total stockholders' deficit	(1,299,472)	719,954	(309,780)	(410,174)	(1,299,472)
Total liabilities and stockholders' deficit	$ 160,254,961	$ 7,093,506	$ 3,139,239	$ (541,894)	$ 169,945,812

Euro Pacific Intl. Bank, Inc. and Subsidiaries

Consolidating Statement of Operations
Year Ended December 31, 2020

Revenues	EPB (Parent Company)	EPS Consolidated	EPCS	Elimination Entries	Consolidated Balance
Fees and commission income	$ 3,677,655	$ 1,585,937	$ 249,557	$ (1,314,553)	$ 4,198,596
Interest income	306,163	-	-	-	306,163
Net unrealized/realized gain on equity investments– at fair value	30,233	-	-	-	30,233
Equity investment loss in subsidiaries	(389,630)	-	-	389,630	-
Total revenues	3,624,421	1,585,937	249,557	(924,923)	4,534,992
Expenses					
Payroll and payroll related expense	1,614,847	800,909	-	-	2,415,756
Professional fees	956,248	162,417	100,427		1,219,092
General and administrative	1,393,379	569,266	16,601	(1,314,553)	664,693
Fees and commission expense	2,339,145	188,404	367,243	-	2,894,792
Audit fees	120,000	-	18,000		138,000
Depreciation and amortization	515,769	12,367	-	-	528,136
Total expenses	6,939,388	1,733,363	502,271	(1,314,553)	7,860,469
Operating loss	(3,314,967)	(147,426)	(252,714)	389,630	(3,325,477)
Other income	43,224	9,316	1,194	-	53,734
Loss before tax benefit	(3,271,743)	(138,110)	(251,520)	389,630	(3,271,743)
Income tax benefit - deferred	(111,698)	-	-	-	(111,698)
Net loss	$ (3,160,045)	$ (138,110)	$ (251,520)	$ 389,630	$ (3,160,045)

Exhibit 4
EPB - Qenta Termination Notice
July 11, 2025

July 11, 2025

Wigberto Lugo Mender, Esq. CPA
Trustee in the Liquidation of
Euro Pacific Intl. Bank, Inc.
Centro Internacional de Mercadeo
Carr. 165, Torre 1, Suite 501
Guaynabo, PR 00968

Re: Notice of Termination of Purchase and Assumption Agreement

Dear Mr. Lugo Mender:

Reference is made to the Purchase and Assumption Agreement (the "Agreement") dated September 30, 2022 between Qenta Inc. and Responsible Gold Trading DMCC (together "Purchasers"), Euro Pacific Intl. Bank, Inc. ("EPB"), and Mr. Schiff as EPB's sole shareholder. Capitalized terms not defined herein have the meanings ascribed thereto in the Agreement.

1. Introduction

This letter constitutes formal notice of the Purchasers' termination of the Agreement concerning the acquisition of assets and customer relationships from EPB. After nearly three years of exhaustive efforts to reach a final closing, continued performance has become legally impossible due to:

- Irreconcilable disagreements on asset and customer splits between those who had initially opted to migrate to the Purchasers ("opt-ins") and those who had opted to participate in the liquidation of EPB ("opt-outs") led by you as its OCFI-appointed Receiver pursuant to the Cease-and-Desist Order dated June 30, 2022;
- Third-party interventions (correspondent banks, custodians) preventing final Closing;
- Lack of final regulatory approval to support the migration plan; and
- Frustration of the Agreement's core purpose.

2. Grounds for Termination

2.1. Impossibility of Performance

Despite good-faith efforts since the execution of the Agreement, the following unforeseen and unresolvable issues prevent final Closing:

- Third-party complications: EPB's correspondent banks refusing or delaying the release of assets for reasons outside of the Purchasers' control.
- Asset-split deadlock: The partial transfer by the Receiver or third parties of insufficient assets vis-à-vis the opt-in customer now being considered final by the Receiver; the inability of the parties to finalize the distribution of assets and customers, and your threatened legal actions, which have frustrated communication, fallen short of EPB's obligations under the Agreement, and created an indefinite impasse in the migration, rendering contractual obligations unfulfillable.
- Regulatory Approvals. The lack of final approval by the OCFI of your final liquidation plan including all necessary aspects of the migration to Purchasers to provide certainty to them and to the customers pursuant to section 6.1(c) of the Agreement.

2.2. Frustration of Purpose

The fundamental objective of the Agreement —seamless transfer of unencumbered assets and customers to ensure continuity of services and facilitating the liquidation of EPB— has been irreversibly undermined by a fundamental misalignment between your liquidation mandate, and the Purchasers' expectation to acquire and serve customers.

Without viable options, the Purchasers have been forced to take the role of a de-facto manager of a portion of the assets without having the possibility of migrating any customers. The assets were preserved and readied for distribution upon what was thought to be an imminent receipt of customers at Qenta affiliates and the need to fulfill possible liquidity demands. Almost three years have passed. All the while Qenta has tried to help the Receiver resolve the transfer of customers and has incurred significant expense, time of personnel and reputational harm. First, in preservation of the spirit of the original transaction, the Purchasers paid a portion of the purchase price ($500,000) and assumed control of a number of EPB's liquidated assets — including precious metals, mutual funds, and FX positions. The Purchasers hired several of EPB's former employees and committed internal resources to manage the assets, assist in consolidating customer accounts and even help respond to requests for information sent to EPB by certain tax and other regulators.

At this point the original intent of the transaction has been irreparably frustrated as there is no chance of preserving customers. So, after nearly three years of continued but unsuccessful efforts to achieve final closing of the original deal, and receiving no recognition or reimbursement for the substantial costs incurred, the Purchasers are left with no option but to terminate the Agreement and return the assets for the ultimate benefit of the customers.

2.3. Breach of Covenant of Good Faith and Fair Dealing

By failing to act reasonably and with fidelity to the agreed-upon common purpose and justified expectations of the Purchasers, the Receiver has, on behalf of EPB, effectively deprived the Purchasers of the benefits of the Agreement.

As the agent for the seller under the Agreement, the Receiver is obligated not only to fulfill its express contractual duties (i.e. delivering assets, providing disclosures) but also to act in good faith throughout the transaction process, particularly during the period between signing and closing. Contrary to this principle, the Receiver, acting for EPB, has failed to, among other things: cooperate reasonably with the Purchasers to facilitate the closing conditions, take reasonable steps to preserve the value of the assets being sold, refrain from taking actions that intentionally or negligently undermine the Purchasers' ability to realize the benefits of the acquisition and, generally, proceed with a genuine intent to close the transaction on the agreed terms.

3. Resolution

To resolve this fairly and amicably we are returning to you all assets received on or around September 30, 2022 at their receipt values as of their receipt date, with a portion to be returned within 10 business days from your countersignature hereof, and the balance 60 days thereafter, net of a reasonable termination amount to compensate for the Purchasers' time, effort, and expenses. This is subject to the execution of customary releases.

With the same goal of facilitating the termination of the transaction and the liquidation of EPB, the Purchasers are prepared to keep the EPB subsidiaries, control of which they acquired pursuant to the Agreement (i.e. Euro Pacific Securities Inc., Euro Pacific Funds SCC Ltd., Euro Pacific Cards Services Ltd. and Global Corporate Staffing Ltd.), but the Purchasers will not be settling the unpaid portion of the purchase price since the condition for its payment (i.e. final Closing) has not occurred.

Attached is a document summarizing the liquidated assets, their value and the net amounts being returned.

4. Conclusion

We have exhausted all avenues to salvage the Agreement. Termination is the only viable path forward, as regulatory approvals have not occurred, performance is legally impossible, the purpose has been frustrated, and the Receiver –acting for EPB– has breached the implied covenant of good faith and fair dealing. We request written acknowledgment of this termination by July 21, 2025 and propose a meeting to coordinate asset returns.

We are convinced that this course of action will facilitate the liquidation of EPB and prioritize customer interests by ending this unsustainable limbo.

The grounds recited above are not meant as a complete statement of Purchasers' legal position or of their rights and remedies, all of which are hereby expressly preserved.



Brent de Jong, on behalf of
Qenta Inc. and Responsible Gold Trading DMCC

Acknowledged and agreed in the terms hereof:

Wigberto Lugo Mender, Esq. CPA,
as Trustee in the Liquidation of Euro Pacific Intl. Bank, Inc.

C.c. *Eyck O. Lugo, Esq. – EDGE Legal*

Appendix

Liquidated Assets

Asset	Received/Liquidated Value (USD)[1]
Silver Bullion Account[2]	24,749,109
Saxo - EPS	71,608
Interactive Brokers - EPS	17,558,862
Interactive Brokers - EPIB	520,116
Sensus, GBE Trading - EPS	870,659
Sensus, GBE Wallet - EPS	30,699
Mutual Fund positions	5,872,665
Initial EPIB investment in Mutual Funds[3]	385,008
Total:	**50,058,725**

Netted Values

Asset	Liquidated Value (USD)
Subsidiaries[4]	(367,241)
Partial Reimbursement of Purchase Price[5]	(500,000)
Mutual Fund positions[3]	(5,872,665)
Termination Costs[6]	(4,946,030)
Total:	**(11,685,936)**

Return of Funds:

$38,372,789.00

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[1] Values as of September 30, 2022 or as of date noted.

[2] Considers partial sales and wires to bank account under control of the Receiver for the purpose of settling storage fees.

[3] Represents the balance of EPIB's seed investment in the mutual funds, but is not the value of the mutual fund portfolios (shown in the preceding line). Given the acquisition and preservation of the corresponding entity (Euro Pacific Funds SCC Ltd.), the relevant customers and portfolios will remain with Purchasers and will be satisfied, thus appearing in the netted values section.

[4] Reflects negative book value of the subsidiaries that Purchasers propose to keep to facilitate EPB's liquidation, considering that Purchasers will incur additional costs to manage their wind-up.

[5] Represents the initial payment for entering into the Agreement that was never completed.

[6] On account of the extraordinary costs incurred due to the protracted nature of the transaction.

Exhibit 5
Net Cash Report
as of June 30, 2022

Balances June 30th 2022

	EUR	GBP	USD	AUD	CAD	PLN	NZD	JPY	CHF	HKD	SEK	SGD	NOK	RUB	ZAR	XCD
First Bank			685,082													
First Bank Petty Cash			4,943													
Intercash	333,650	107,922	465													
Interactive Brokers EPS	3,819,747	1,132,650	10,231,784	483,630	1,629,152	143	8,500	100,383	71,139	30,760	(104)	50,549	4,981	5,457	410	
Interactive Brokers EPIB	99,653		421,745													
Interactive Brokers EPF			1,045,450													
Saxo	7,241	22,070	35,092	(68)	7,202	38	250	31,753	-	-	3,076	-	13			
Saxo Settlement	7,473,062	5,938,815	876,924	467,035	3,110	49,970	63,995	2,000,059	1,150,405	238,818	24,239	153,704	1,467,918			
CM	516	2,132	1,145		-											
CM EPCS	403,844	686	168,801													
Novo	16,772,383	2,761,620	-		-	2,262,105			792,678							
Mizuho								373,814								
Sensus/GBE Trading	432,576		477,260													
Sensus/GBE Wallet	31,366		-													
BOSVG			60													198,909
Silver Bullion PTE Ltd			2,463,810													
Precious Metals			3,802,170													
	29,374,039	**9,965,895**	**20,214,731**	**950,597**	**1,639,464**	**2,312,256**	**72,745**	**2,506,009**	**2,014,222**	**269,578**	**27,211**	**204,253**	**1,472,912**	**5,457**	**410**	**198,909**

Conversion Rate	**$ 0.9550**	**$ 0.8228**	**$ 1.0000**	**$ 1.4502**	**$ 1.2873**	**$ 4.4872**	**$ 1.6023**	**$ 135.8215**	**$ 0.9555**	**$ 7.8471**	**$ 10.2419**	**$ 1.3902**	**$ 9.8539**	**$ 78.9646**	**$ 16.7303**	**$ 2.6700**
Cash Balances Converted to USD	$ 30,758,156	$ 12,112,171	$ 20,214,731	$ 655,494	$ 1,273,568	$ 515,300	$ 45,401	$ 18,451	$ 2,108,030	$ 34,354	$ 2,657	$ 146,923	$ 149,475	$ 69	$ 25	$ 74,498

Net Cash Available	$ 68,109,302
Account Balances - Due to Customers	$ (66,747,758)
Cash Over (Under)	**$ 1,361,543**

Global Corporate Staffing
Euro Pacific Bank
Euro Pacific Card Services
Euro Pacific Securities
Euro Pacific Funds

PRECIOUS METALS- CLIENTS ONLY

METAL	OUNCES	PRICE	USD VALUE
GOLD	11,244.29	1,719.38	19,333,205.62
SILVER	321,885.76	19.04	6,128,704.89
Grand Total	**333,130.05**		**$ 25,461,910.51**

Exhibit 6
EPB-Qenta
Purchase and Assumption Agreeement

PURCHASE AND ASSUMPTION AGREEMENT

THIS PURCHASE AND ASSUMPTION AGREEMENT (this "Agreement"), dated September 30, 2022 (the "Effective Date"), is entered into by and between **EURO PACIFIC INTL. BANK, INC.**, an International Financial Entity licensed under the laws of the Commonwealth of Puerto Rico, as seller ("Seller"), **PETER D. SCHIFF**, Seller's sole shareholder (the "Sole Shareholder"), **QENTA INC.**, a Delaware company ("Qenta"), **G-COMMERCE DMCC** and **RESPONSIBLE GOLD TRADING DMCC**, two free zone companies incorporated under the laws of the United Arab Emirates and licensed by the Dubai Multi Commodities Centre (respectively "G-Commerce" and "RGTD"; together with Qenta, the "Purchasers" and, together with Qenta, Seller and the Sole Shareholder, the "Parties").

WHEREAS, Seller is in the process of surrendering its International Financial Entity license and liquidating its assets, and for such purposes has presented and obtained approval from its receiver and the Office of the Commissioner of Financial Institutions of Puerto Rico ("OCFI") to a liquidation and dissolution plan on September 6, 2022; and

WHEREAS, in light of Seller's anticipated liquidation, Purchasers desire to acquire the Assets (as defined below) and undertake the Liabilities (as defined below).

NOW, **THEREFORE**, in consideration of their mutual promises and obligations and intending to be legally bound hereby, the Parties agree as follows:

ARTICLE 1
CERTAIN DEFINITIONS

1.1. Certain Definitions. As used in this Agreement, the terms below shall have the meanings set forth.

"Affiliate" of a person means any person directly or indirectly controlling, controlled by or under direct or indirect common control with such first person.

"Assets" means (i) all of Seller's current cash (whether denominated in USD or in any foreign currency and whatever the account where they may be deposited), cash equivalents, receivables, cash and receivables from depository institutions, including cash items in the process of collection, plus any accrued interest thereon computed to and including Closing, and precious metals deposits (including but not limited to all metals held through Silver Bullion Pte. Ltd.), a list of which as of the Effective Date is attached hereto as Exhibit 1; (ii) the Subsidiary Shares; (iii) the Assumed Contracts (including all of Seller's rights and obligations thereunder); (iv) the Records; (v) securities (other than the Subsidiary Shares), plus any accrued interest thereon computed to and including Closing, held by or in the Seller or the Subsidiaries; and (vi) the IT Equipment (also listed in Exhibit 1) and the Seller's website (domain europacbank.com, hereinafter the "Domain"); *provided, however,* that the Assets do not include: (a) the assets or the portion of the assets described in item (i) above that exceed the Liabilities at Closing (as such terms are defined below); (b) any deferred Tax assets, refunds for Taxes relating to the period prior to the Effective Date and prepaid Taxes; or (c) all or any portion of Assets backing Liabilities which, in the discretion of the OCFI, either may be required to satisfy it for any liquidated or contingent liability of any Eligible Customer arising from an unauthorized or unlawful transaction.

"Assumed Contracts" means the contracts listed on Exhibit 1 that, having originally been entered into by Seller, Purchaser will assume with all their rights and obligations as of the Effective Date and in the terms hereof and thereof.

"Bank Closing Date" has the meaning ascribed thereto in Section 5.3.

"Business Day" means a day on which banking institutions are required to be open for business in the State of New York which is not a Saturday, Sunday or another legal holiday.

"Closing" shall mean the moment in which all Assets and Liabilities have been transferred to the Purchasers pursuant to the terms hereof; *provided* that there may be one or more partial transfers hereunder until final Closing is achieved, as contemplated in Section 2.3.

"Confidential Information" has the meaning set forth in Section 5.1.

"Eligible Customers" means all of Seller's customers (i) whose names are not included in the Office of Foreign Assets Control (OFAC) Specially Designated Nationals and Blocked Persons List or in any other list published or utilized by the Financial Crimes Enforcement Network (FinCEN); (ii) who are not residents of Puerto Rico; (iii) who have not expressly "opted-out" from the transfer of the corresponding Liabilities to Purchasers hereunder in accordance with the processes established for such purposes by Seller and/or Purchasers; and (iv) whose accounts with Seller are not, as of the Effective Date, categorized as closed, blocked or "under liquidation" (unless with the express consent of either Purchaser) and which are compliant with Purchasers' KYC and general compliance policies.

"Encumbrances" means all mortgages, claims, charges, liens, encumbrances, easements, limitations, restrictions, commitments, security interests, pledges or other similar charges or liabilities, whether accrued, absolute, contingent or otherwise, except for statutory liens for ad valorem tax payments securing payments not yet due.

"IT Equipment" means the computer hardware, software and related equipment identified in Exhibit 1 and until the corresponding Closing owned by Seller which is needed by Seller's staff for managing or servicing the Assets in the ordinary course.

"Liabilities" means all of Seller's liabilities and obligations towards Eligible Customers as of the corresponding Closing.

"Losses" means losses, liabilities, damages (including forgiveness or cancellation of obligations), expenses, costs, legal fees and disbursements, collectively.

"Material Adverse Effect" means a material adverse effect, individually or in the aggregate, on the condition, financial or otherwise, or results of operations of Seller, or on its ability or that of either Purchaser to consummate timely the transactions contemplated hereby. Notwithstanding the foregoing, a Material Adverse Effect shall not be deemed to exist as a result of general economic conditions.

"Purchase Price" has the meaning set forth in Section 2.1(b).

"Records" means all information and documents in Seller's possession (including records maintained electronically and through third party applications) which pertain to and are utilized by Seller to administer, reflect, monitor, evidence or record information respecting the business or conduct of Eligible Customers, as well as any information on the Assets and/or the Liabilities.

"Regulatory Approvals" means all approvals, permits, authorizations, waivers or consents of governmental or regulatory agencies or authorities necessary or appropriate to permit consummation of the transactions contemplated herein, including without limitation those from the Seller's receiver, the Office

of the Commissioner of Financial Institutions of Puerto Rico ("OCFI") and each of the Subsidiaries' regulators, to the extent applicable and as such approvals must be given under applicable law.

"Subsidiaries" means Seller's subsidiaries Euro Pacific Funds SCC Ltd., Euro Pacific Securities, Inc., Euro Pacific Card Services Ltd. and Global Corporate Staffing Ltd.

"Subsidiary Shares" means all shares of stock issued by the Subsidiaries.

"Tax" refers to all federal, state, local, or foreign income, gross receipts, windfall profits, severance, property, production, sales, use, excise, transfer, license, franchise, employment, withholding or similar taxes or amounts required to be withheld and paid over to any government in respect of any tax or governmental fee or charge, including any interest, penalties, or additions to tax on the foregoing.

"Uncleared Cash" means all cash Assets held with, and not yet cleared for wiring by, Seller's correspondent banks, including but not limited to Novo Banco, S.A. as of the initial Closing date.

1.2. Use and Application of Terms. In using and applying the various terms, provisions and conditions in this Agreement, the following shall apply: (1) the terms "hereby", "hereof", "herein", "hereunder", and any similar words, refer to this Agreement; (2) words in the masculine gender mean and include correlative words of the feminine and neuter genders and words importing the singular numbered meaning include the plural number, and vice versa; (3) words importing persons include corporations, associations, general partnerships, limited partnerships, limited liability partnerships, limited liability limited partnerships, limited liability companies, trusts, business trusts, corporations and other legal organizations, including public and quasi-public bodies, as well as individuals; (4) the use of the terms "including" or "included in", or the use of examples generally, are not intended to be limiting; and (5) this Agreement shall not be applied, interpreted and construed more strictly against a person because that person or that person's attorney drafted this Agreement.

ARTICLE 2
THE TRANSACTIONS

2.1. Transfer and Consideration.

(a) Subject to the terms and conditions set forth in this Agreement, at the Closing, Purchasers shall purchase the Assets and assume the Liabilities object thereof, and Seller shall sell, assign, transfer, convey and deliver to Purchaser, free and clear of all Encumbrances, all of Seller's right, title and interest in and to such Assets and Liabilities.

(b) The purchase price for the Assets and Liabilities (the "Purchase Price") is US$1,250,000 (One Million Two Hundred Fifty Thousand Dollars), payable as follows:

(i) US$500,000 (Five Hundred Thousand Dollars), which were paid by Purchasers immediately after the execution of G-Commerce's Letter of Intention for the acquisition of the Assets and Liabilities by the Seller's receiver and OCFI, and which payment Seller and the Sole Shareholder hereby irrevocably acknowledge; and

(ii) US$750,000 (Seven Hundred Fifty Thousand Dollars), within 15 (fifteen) Business Days after the final Closing hereunder subject to Sections 2.2 and 2.3.

2.2. Initial Closing. Subject to all Regulatory Approvals having been obtained and remaining in full force and effect, an initial Closing shall take place between the execution date hereof and 23:59 CT

on September 30th, 2022, by virtue of Seller perfecting (at its own expense) the assignment, transfer, conveyance and delivery to Purchasers (and to their satisfaction) of the following Assets, and the assumption by Purchasers of all the Liabilities corresponding to such Assets, in each case free and clear of all Encumbrances, pursuant to the following:

(a) All of Seller's Assets listed in Exhibit 1 hereof (except for Uncleared Cash, if any) shall be transferred to Purchasers or a designated Affiliate by virtue of (A) the transfer, via wire of immediately available funds, of all cash to the account(s) designated by G-Commerce for such purposes; and (B) the transfer of all of Seller's right, title and interest in and to any precious metals held with third party depositors;

(b) All Subsidiary Shares shall be transferred, assigned or endorsed in favor of Qenta or a designated Affiliate, all share ledgers and other corporate records shall be delivered and shall duly reflect such transfer, and Seller or Sole Shareholder shall have resigned to any managerial positions in such entities and appointed representatives of Purchasers to replace them in such positions, as well as sole controlling parties over each Subsidiary's bank accounts indicated by Purchasers as necessary for the ongoing operation of such entities;

(c) The Assumed Contracts and all of Seller's rights and obligations thereunder shall be duly transferred or assigned to Purchasers or a designated Affiliate with the acknowledgement or consent of the relevant counterparty, if applicable, or in compliance with their respective terms, unless either Purchaser consents in writing to the transfer of all or part of such Assumed Contracts on a subsequent Closing as per Section 2.3;

(d) All Liabilities shall be assumed by Purchasers or a designated Affiliate, except for those related to Uncleared Cash, if any, or unless either Purchaser consents to the transfer of any such Liabilities on a subsequent Closing as per Section 2.3; and

(e) Custody over the Records shall be transferred by Sellers to Purchasers or a designated Affiliate in compliance with all applicable laws, through physical delivery to, and at the address indicated by, Purchasers or designated Affiliates, or through the granting to them of sufficient credentials for permanent access to such information (including through Assumed Contracts or otherwise), except for Records related to Liabilities for Uncleared Cash, if any, or unless either Purchaser consents to the transfer of any such Records on a subsequent Closing as per Section 2.3. Once Records have been transferred, the corresponding transferee Purchaser or Affiliate shall assume the sole responsibility of retention thereof, except for Records that the Sole Shareholder is required by OCFI to retain pursuant to Seller's Liquidation and Dissolution Plan.

(f) Ownership of the Domain shall be transferred by Seller and Sole Shareholder to Purchasers or a designated Affiliate; *provided* that ownership of the Domain shall be subsequently transferred by the relevant Purchaser or Affiliate to the Sole Shareholder on or before December 31st, 2022.

2.3. Additional Closing. An additional Closing shall take place on the earliest to occur between (a) the date of clearing of all Uncleared Cash, if any, by Seller's correspondent bank, or (b) the second Business Day following a request by either Purchaser to the Sole Shareholder. On such additional Closing, Seller and the Sole Shareholder shall be liable for the effective transfer to Purchasers or their designated Affiliates of any Uncleared Cash and the corresponding Liabilities, or any other Assets and/or Liabilities which transfer after the initial Closing was consented in writing by either Purchaser pursuant to Section 2.2, if any. Seller and the Sole Shareholder undertake the obligation to update Exhibit 1 hereof to include any Assets or Liabilities transferred on an additional Closing.

ARTICLE 3
REPRESENTATIONS AND WARRANTIES OF SELLER

Seller and the Sole Shareholder represent and warrant as follows:

3.1. Organization and Authority. Seller is an International Financial Entity (*Entidad Financiera Internacional*) duly organized and validly existing under the laws of the Commonwealth of Puerto Rico, and has the requisite corporate power and authority and has taken all corporate action necessary in order to execute and deliver this Agreement and to consummate the transactions contemplated hereby. This Agreement is a valid and binding agreement of Seller enforceable against Seller in accordance with its terms.

3.2. No Conflict; Licenses and Permits. The execution, delivery and performance of this Agreement by Seller does not, and will not, violate any provision of its charter or bylaws or violate or constitute a breach or contravention of, or default under, any law, rule, regulation, order, judgment, decree or filing of any government, governmental authority or court to which Seller is subject or under any agreement or instrument of Seller, or by which Seller is otherwise bound, or to which any of the Assets, Liabilities or Assumed Contracts are subject. Seller has all material licenses, permits or other authorizations of all foreign, federal, state and local governments and governmental authorities necessary for the lawful conduct of its business as currently conducted.

3.3. Approvals and Consents. Except as it relates to the Regulatory Approvals, no notices, reports or other filings are required to be made by Seller with, nor are any consents, registrations, approvals, permits or authorizations required to be obtained by Seller from, any governmental or regulatory authorities in connection with the execution and delivery of this Agreement by Seller and the consummation by Seller of the transactions contemplated hereby.

3.4. Title. Seller has good title to the Assets and Assumed Contracts, free and clear of all Encumbrances, and the value of cash and cash equivalents constituting the Assets is equal to or greater than the Liabilities.

3.5. Contracts. Each Assumed Contract constitutes a valid, binding and assignable obligation of Seller and there does not exist, with respect to Seller's obligations thereunder, any default, or event or condition which constitutes, or after notice or passage of time or both would constitute, a material default on the part of Seller under any Assumed Contract.

3.6. Fiduciary Obligations. Seller has no trust or fiduciary relationship or obligations in respect of any of the Assets or the Liabilities.

3.7. Employees. Seller has complied, and is currently in compliance, in all material respects, with applicable law (including, without limitation, the Employee Retirement Income Security Act of 1974, as amended ("ERISA")), rules and regulations relating to the employment of labor or the provision of compensation or benefits thereto, including without limitation those relating to wages, hours, unfair labor practices, employment discrimination and payment of social security and similar taxes with respect to its employees.

3.8. Proceedings. There is no action, suit, proceeding or investigation pending or, to Seller's knowledge, threatened against Seller, in, before, or by any court or governmental agency or authority related to the Assets, the Assumed Contracts or the Liabilities or that could reasonably be expected to have a Material Adverse Effect.

3.9. Regulatory Matters. There are no pending, or, to the knowledge of Seller or the Sole Shareholder, threatened, disputes or controversies between Seller and any federal, state or local governmental authority with respect to the Assets or the Liabilities, or that could reasonably be expected to have a Material Adverse Effect. Seller is unaware of any reason why the Regulatory Approvals and, to the extent necessary to consummate the transaction described herein, any other approvals, authorizations or filings, registrations and notices could be revoked or nullified.

3.10. Brokers' Fees. Seller has not employed any broker or finder or incurred any liability for any brokerage fees, commissions or finders' fees in connection with the transactions contemplated by this Agreement.

3.11. Compliance with Laws. To Seller's and the Sole Shareholder's knowledge, Seller's and the Subsidiaries' business has been conducted in compliance with all federal, state and local laws, regulations and ordinances applicable thereto.

3.12. Taxes.

(a) With respect to the Liabilities, Seller is in material compliance with the law (including the Foreign Account Tax Compliance Act and the Bank Secrecy Act) and IRS regulations relative to obtaining from the beneficiaries thereof executed IRS Forms W-8 and W-9.

(b) There are no liens for Taxes allocated to or imposed on Seller on any of the Assets and to the knowledge of Sellers or the Sole Shareholder there is no basis for the assertion of any such liens, other than normal and recurring ad valorem tax liens and sales and use taxes on assets being sold.

(c) Seller has paid when due Taxes in respect of the Assets.

(d) No tax is required to be withheld by Purchaser from the Purchase Price as a result of the transfers contemplated by this Agreement pursuant to the Code or any other provision of federal, state or local Tax law.

3.13. Off-Balance Sheet Liabilities. Seller has no liabilities except for (i) those which are adequately reflected or reserved against in its financial statements delivered to Purchasers and OCFI, and (ii) those which have been incurred in the ordinary course of business since the date of such financial statements and which do not, individually or in the aggregate, and together with all other liabilities of Seller and the Subsidiaries, exceed the total value of the assets of the Seller or Subsidiaries immediately before giving effect to Closing.

3.14. Subsidiaries and Subsidiary Shares.

(a) Each Subsidiary is duly organized and validly existing under the laws of its jurisdiction of incorporation.

(b) All Subsidiary Shares: (i) have been duly authorized, validly issued, fully paid, and non-assessable, (ii) have been issued in compliance with all applicable federal and state securities laws, (iii) have not been issued in violation of any agreement, arrangement, or commitment to which the relevant Subsidiary is a party or is subject to or in violation of any preemptive or similar rights of any person or entity, (iv) have the rights, preferences, powers, restrictions, and limitations set forth in the corporate documents of each Subsidiary, and (v) are free and clear of Encumbrances and the Sole Shareholder is the only holder thereof until the execution of this Agreement.

(c) No subscription, warrant, option, convertible or exchangeable security, or other right (contingent or otherwise) to purchase or otherwise acquire equity securities of any Subsidiary is authorized or outstanding, and there is no commitment by a Subsidiary to issue shares, subscriptions, warrants, options, convertible or exchangeable securities, or other such rights or to distribute to holders of any of its equity securities any evidence of indebtedness or asset, to repurchase or redeem any securities of such Subsidiary or to grant, extend, accelerate the vesting of, change the price of, or otherwise amend any warrant, option, convertible or exchangeable security or other such right. There are no declared or accrued unpaid dividends with respect to any shares of capital stock of any Subsidiary.

(d) The Subsidiaries have no liabilities except for (i) those which are adequately reflected or reserved against in their respective financial statements delivered to Purchasers, and (ii) those which have been incurred in the ordinary course of business since the date of such financial statements and which are not, individually or in the aggregate, material in amount.

(e) There are no Actions pending or, to Sole Shareholder's knowledge, threatened against or by any Subsidiary affecting any of its properties or assets, nor any event has occurred or circumstances exist that may give rise to, or serve as a basis for, any such Action.

(f) There are no outstanding governmental orders and no unsatisfied judgments, penalties or awards against or affecting any Subsidiary or any of their properties or assets.

(g) All Subsidiaries have complied, and are now complying, with all laws applicable to them or their business, properties or assets.

(h) All Permits required for any Subsidiary to conduct its business have been obtained by it and are valid and in full force and effect, and all fees and charges with respect to such Permits as of the date hereof have been paid in full.

(i) Each Subsidiary has been in compliance in all material respects with the terms of any collective bargaining agreements and other employee-related contracts and all applicable laws pertaining to employment and employment practices, including all laws relating to labor relations, equal employment opportunities, fair employment practices, employment discrimination, harassment, retaliation, reasonable accommodation, disability rights or benefits, immigration, wages, hours, overtime compensation, child labor, hiring, promotion and termination of employees, working conditions, meal and break periods, privacy, health and safety, workers' compensation, leaves of absence, and unemployment insurance. There are no actions against any Subsidiary pending, or to Seller's or Sole Shareholder's knowledge, threatened to be brought or filed, by or with any governmental authority or arbitrator in connection with the employment of any current or former applicant, employee, consultant, volunteer, intern, or independent contractor of any Subsidiary, including, without limitation, any claim relating to unfair labor practices, employment discrimination, harassment, retaliation, equal pay, wage and hours, or any other employment related matter arising under applicable laws.

(j) Neither Seller nor any Subsidiary or other person associated with or acting on behalf of either, including any director, officer, agent, employee or Affiliate has (i) used any corporate funds for any unlawful contribution, gift, entertainment, or other unlawful expense relating to political activity or to influence official action; (ii) made any direct or indirect unlawful payment to any foreign or domestic government official or employee from corporate funds; (iii) made any bribe, rebate, payoff, influence payment, kickback, or other unlawful payment; or (iv) violated or is in violation of any provision of the U.S. Foreign Corrupt Practices Act of 1977, as amended, and the rules and regulations thereunder.

3.15. Records. All Records and personally identifiable information have been obtained, maintained and processed in accordance with applicable law.

ARTICLE 4
REPRESENTATIONS AND WARRANTIES OF PURCHASERS

Purchasers represent and warrant as follows:

4.1. Corporate Organization and Authority. Purchasers are duly organized and validly existing under the laws of their respective jurisdiction of incorporation, have the requisite corporate power and authority and have taken all corporate action necessary in order to execute and deliver this Agreement, to consummate the transactions contemplated hereby and to own the Assets and undertake the Liabilities. This Agreement is a valid and binding agreement of Purchaser enforceable against Purchaser in accordance with its terms subject, as to enforcement, to bankruptcy, insolvency, fraudulent transfer, reorganization, moratorium and similar laws of general applicability relating to or affecting creditors' rights and to general equity principles.

4.2. No Conflict; Licenses and Permits. The execution, delivery and performance of this Agreement by the Purchasers does not, and will not, violate any provision of its charter or bylaws or, subject to the receipt of the Regulatory Approvals, violate or constitute a breach or contravention of, or default under, any law, rule, regulation, order, judgment, decree or filing of any government, governmental authority or court to which Purchasers are subject or under any agreement or instrument or Purchaser, or by which Purchaser is otherwise bound, which violation, breach, contravention or default could reasonably be expected to have a Material Adverse Effect.

ARTICLE 5
COVENANTS OF THE PARTIES

5.1. Confidentiality.

(a) Each party to this Agreement shall hold, and shall cause its respective directors, officers, employees, agents, consultants, advisors, investors or financing sources to hold, in strict confidence (unless disclosure to a regulatory authority is necessary in connection with any Regulatory Approval or unless compelled to disclose by judicial or administrative process or, in the written opinion of its counsel, by other requirements of law or the applicable requirements of any regulatory agency or relevant stock exchange) and, with respect to Purchasers, all non-public personal information of any consumer or customer of Seller, records, books, contracts, instruments, computer data, system requirements and other data and information (collectively, "Confidential Information") furnished to it by the other party or its representatives pursuant to this Agreement, except to the extent that such Confidential Information can be shown to have been (i) previously known by the receiving party on a non-confidential basis, (ii) in the public domain through no fault of the disclosing party, or (iii) later lawfully acquired from other sources by the receiving party and such other source is not subject to a confidentiality restriction with regard to such Confidential Information), and neither party shall release or disclose such Confidential Information to any other person or use it except for the performance of its obligations hereunder.

(b) This Section shall not prohibit disclosure of Confidential Information required by applicable law order from competent authority to be disclosed by either party, but such additional disclosure shall be limited to that actually required by law, and the party making disclosure shall give the other party as much notice as is practicable of such obligation (except where prohibited by applicable law) so that the other party may seek a protective order or other similar or appropriate relief, and also shall undertake in

good faith to have the Confidential Information disclosed treated confidentially by the party to whom the disclosure is made.

5.2. Further Assurances. From and after the date hereof, upon request from the Purchasers, Seller and/or the Sole Shareholder shall execute and deliver such instruments, documents and other writings as may be reasonably necessary or desirable to confirm and carry out and to effectuate fully the intent and purposes of this Agreement, including without limitation the execution of any document, granting of any consent, giving of any notice or requesting of information, actions or consents from third parties as may be necessary or appropriate to vest in Purchasers (or their designees under the terms hereof) the full legal and equitable title to the Assets and Liabilities, free and clear of all Encumbrances. Seller and Sole Shareholder acknowledge and accept that, upon their transfer, Purchasers and/or their Affiliates will convert cash or cash equivalent components of the Assets into precious metals and specifically into Responsible Gold™ and/or G-Coin®.

5.3. Notices of Default and Seller Liquidation. Seller and Sole Shareholder shall promptly give written notice to the Purchasers upon (a) becoming aware of the impending or threatened occurrence of any event which could reasonably be expected to cause or constitute a breach of any of their respective representations, warranties, covenants or agreements hereunder; and (b) upon Seller having been definitely liquidated and dissolved (the "Bank Closing Date").

5.4. Transaction Settlement and Customer Service. Seller and Sole Shareholder agree that, until such time as the assignment or transfer of all Assets and Liabilities to Purchasers has been perfected in the terms hereof and Seller has been effectively liquidated, they shall:

(a) comply with their obligations under section 5.2 and reasonably cooperate with Purchasers in their interactions with Seller's receiver, OCFI and/or any other relevant party (including vendors, correspondent banks, etc.) so as to achieve the purpose of this Agreement;

(b) redirect to Purchasers any Eligible Customers that reach out to them for customer service; and

(c) exclusively address any requests for assistance from non-Eligible Customers and be liable to them with respect to the corresponding liabilities.

ARTICLE 6
TERMINATION

6.1. Termination. This Agreement may be terminated at any time prior to the Closing Date:

(a) By the mutual written consent of Purchasers and Sole Shareholder;

(b) By either Purchaser in case of breach of any of Seller's and Sole Shareholder's representations, warranties or covenants herein which is not cured or cannot be cured within 10 (ten) Business Days; *provided, however*, that for the purpose of determining the truthfulness of a particular representation or warranty under this Section, the materiality qualifiers contained in such particular representation or warranty shall be disregarded, and, *provided further*, that termination pursuant to this Section shall not relieve the breaching party of liability for such breach or otherwise; and

(c) By either Purchaser in case of denial or revocation of any Regulatory Approval.

6.2. Effect of Termination. In the event of termination of this Agreement and abandonment of the transactions contemplated hereby, no party hereto (or any of its directors, officers, employees, agents or Affiliates) shall have any liability or further obligation to any other party, except (i) Seller and the Sole Shareholder for the portion of the Purchase Price paid as of the relevant date, which shall be returned in its entirety by Seller to Purchasers within 10 (ten) Business Days via wire transfer of immediately available funds; (ii) as provided in Article 7 hereof, and (iii) that nothing herein will relieve any party from liability for any breach of this Agreement.

ARTICLE 7
INDEMNIFICATION

7.1. Indemnification.

(a) Seller and Sole Shareholder shall jointly and severally indemnify and hold harmless Purchasers and their Affiliates, shareholders, directors, officers and agents from and against any and all Losses which such person may suffer, incur or sustain arising out of or attributable to (i) any breach of any representation or warranty made by Seller or Sole Shareholder pursuant to this Agreement, (ii) any breach of any covenant or agreement to be performed by Seller or Sole Shareholder pursuant to this Agreement, (iii) any third party claim, penalty asserted, legal action or administrative proceeding based upon any action taken or omitted to be taken by Seller or Sole Shareholder prior to the Closing or resulting from any transaction or event occurring prior to the Closing, relating in any such case to the Assets or the Liabilities, or (iv) any liabilities, obligations or duties of Seller or Sole Shareholder that are not Liabilities but are related to the Assets; *provided* that the Sole Shareholder's liability hereunder, including attorney fees and costs, shall be limited to the lesser of the Purchase Price or the cash amount that Sole Shareholder is able to withdraw from Seller after the final Closing and Seller's liquidation.

(b) Purchasers shall indemnify and hold harmless Seller and Sole Shareholder from and against any and all Losses which such person may suffer, incur or sustain arising out of or attributable to (i) any breach of any representation or warranty made by Purchasers pursuant to this Agreement, (ii) any breach of any covenant or agreement to be performed by Purchasers pursuant to this Agreement, (iii) any third party claim, penalty asserted, legal action or administrative proceeding based upon any action taken or omitted to be taken by Purchasers or resulting from any transaction or event occurring after the Closing, relating in any such case to the Assets or the Liabilities assumed by Purchasers at Closing up to the amount of the Purchase Price.

(c) To exercise its indemnification rights under this Section as the result of an assertion against it of any claim or potential liability for which indemnification is provided, the indemnified party shall promptly notify the indemnifying party of the assertion of such claim, discovery of any such potential liability or the commencement of any action or proceeding in respect of which indemnity may be sought hereunder. Notwithstanding the foregoing, notice of any claim for indemnification arising out of a third party lawsuit or other similar legal action shall be made within 10 (ten) calendar days after the indemnified party receives the summons and complaint or similar documents in connection therewith; *provided, however,* that an indemnified party's failure to timely give such notice shall not affect its right to indemnification in connection therewith except to the extent the indemnifying party is materially prejudiced as a result of such failure to timely give such notice. The indemnified party shall advise the indemnifying party of all facts relating to such assertion within the knowledge of the indemnified party, and shall afford the indemnifying party the opportunity, at the indemnifying party's sole cost and expense, to defend against such claims for liability. In any such action or proceeding, the indemnified party shall have the right to retain its own counsel, but shall bear such counsel's fees and expenses unless the indemnifying party and the indemnified party mutually agree to the retention of such counsel.

ARTICLE 8
MISCELLANEOUS

8.1. Survival. The Parties' respective representations and warranties contained in this Agreement shall survive for a period of 12 (twelve) months following the Closing, and thereafter neither party may claim any damage for breach thereof. The covenants contained in this Agreement shall survive the Closing and not expire unless otherwise specifically provided in this Agreement.

8.2. Assignment. Neither this Agreement nor any of the rights, interests or obligations of either party hereunder may be assigned by either of the Parties without the prior written consent of the other party.

8.3. Binding Effect. This Agreement and all of the provisions hereof shall be binding upon and inure to the benefit of the Parties and their respective successors and permitted assigns. Except as expressly provided herein, the Parties intend that nothing in this Agreement, express or implied, is intended to or shall confer upon any other person, including, without limitation, any employee or former employee of Seller or any of the Subsidiaries, any legal or equitable right, benefit or remedy of any nature whatsoever, including without limitation, any rights of employment or benefits for any specified period, under or by reason of this Agreement.

8.4. Post-Closing Support. Upon request from Seller or the Sole Shareholder, the Parties agree to negotiate in good faith and reasonable commercial terms towards executing a contract for Purchasers or their Affiliates to provide services to Seller or the Sole Shareholder, on an actual cost basis, for the management of Assets or Liabilities not transferred to Purchasers hereunder.

8.5. Public Notices. Neither party shall directly or indirectly make, or cause to be made, any press release for general circulation, public announcement or disclosure or issue any notice or communication generally (except to the Parties' employees) with respect to any of the transactions contemplated hereby without the prior consent of the other party, which consent shall not be unreasonably withheld or delayed. Consent shall be deemed granted by the party from which it is sought unless such party objects within 2 (two) Business Days after receipt of the proposed press release or other announcement from the party requesting consent. The Parties shall cooperate reasonably to produce public announcements to be released simultaneously within 3 (two) Business Days after the date of this Agreement; *provided* that nothing herein shall limit the right of Purchasers or any Affiliate to refer to this transaction in any document required to be filed with the Securities and Exchange Commission or with any other competent regulatory body. Nothing in this Agreement shall limit the right of either party to make any disclosure required by law, subject to the provisions of Section 5.1.

8.6. Notices. All notices or other communications required or permitted to be given or made hereunder shall be in writing and delivered personally or sent by pre-paid, first class certified or registered mail, return receipt requested, or by facsimile transmission, to the intended recipient thereof at its address or facsimile number set out below. Any such notice or communication shall be deemed to have been duly given immediately (if given or made in person or by facsimile confirmed by mailing a copy thereof to the recipient in accordance with this Section on the date of such facsimile), or 5 (five) calendar days after mailing (if given or made by mail), and in proving same it shall be sufficient to show that the envelope containing the same was delivered to the delivery service and duly addressed, or that receipt of a facsimile was confirmed by the recipient.

If to Seller or Sole Shareholder:

22 Dorado Beach Estates
Dorado, Puerto Rico 00646

If to Purchaser:

777 Post Oak Blvd. #430
Houston, TX 77056

Attention: Peter D. Schiff
Email: bahdebing@yahoo.com

Attention: Legal & Compliance Department
Email: legalnotices@qenta.com

Either party may change the address to which notices or other communications to such party shall be delivered or mailed by giving notice thereof to the other party hereto in the manner provided herein.

8.7. Dispute Resolution and Governing Law. This Agreement shall be governed by and construed in accordance with the laws of the State of New York, without regard to the conflict of law principles thereof. All disputes arising out of or in connection with this Agreement shall be finally settled under the Rules of Arbitration of the International Chamber of Commerce by one or more arbitrators appointed in accordance with the said Rules. Any award granted shall be final, binding and enforceable against the parties thereto, but no award or procedural order made in the arbitration shall be published. The arbitration shall be held in the English language and in the City of New York, N.Y., and discovery shall only be admissible to the extent permitted under or not prohibited under Art. 20 of the ICC-Rules and agreed upon by the Parties, who shall cooperate with one another at the outset of the proceeding to define the extent of discovery reasonably needed to complete the proceeding. The procedural law of the State of New York shall otherwise be applied to any proceedings held in connection with said arbitration. Judgment upon an award rendered by the Arbitrator shall be binding and may be entered in any court with appropriate jurisdiction, and the Parties consent to jurisdiction therein for the purpose of such enforcement. Notwithstanding anything to the contrary contained in this Agreement or elsewhere, each of the Parties hereby acknowledges and expressly agrees that any breach by it of this Agreement, which does or may result in loss of confidentiality or improper use of Confidential Information, would cause irreparable harm to the other party for which money damages would not be an adequate remedy. Therefore, each of the Parties hereby agree, that in the event of any breach of this Agreement by it, the non-breaching party will have the right to seek injunctive relief in a court of competent jurisdiction against continuing or further breach by the breaching party, without the necessity of proof of actual damages, in addition to any other right which either party may have under this Agreement, or otherwise in law or in equity.

8.8. Entire Agreement. This Agreement contains the entire understanding of and all agreements between the Parties with respect to the subject matter hereof and supersedes any prior or contemporaneous agreement or understanding, oral or written, pertaining to any such matters which agreements or understandings shall be of no force or effect for any purpose.

8.9. Counterparts. This Agreement may be executed in any number of counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

8.10. Waiver and Amendment. The waiver of any breach of any provision under this Agreement by any party shall not be deemed to be a waiver of any preceding or subsequent breach under this Agreement. No such waiver shall be effective unless in writing. This Agreement may not be amended or supplemented in any manner except by mutual agreement of the Parties and as set forth in a writing signed by the Parties or their respective successors in interest.

8.11. Expenses. Except as specifically provided otherwise in this Agreement, each party shall bear and pay all costs and expenses, including without limitation brokerage and legal fees, which it incurs, or which may be incurred on its behalf in connection with the preparation of this Agreement and consummation of the transactions described herein, and the expenses, fees, and costs necessary for any approvals of the appropriate regulatory authorities.

8.12. Severability. If any provision of this Agreement or the application of any such provision to any person or circumstance shall be held invalid, illegal or unenforceable in any respect by a court of

competent jurisdiction, such invalidity, illegality or unenforceability shall not affect any other provision hereof.

8.13. Third Party Beneficiaries. Except as specifically provided herein with respect to indemnification, no provision of this Agreement shall be deemed to create any third party beneficiary right in anyone not a party to this Agreement. Nothing contained in this Agreement shall be construed to affect or limit any right Purchasers or their Affiliates over or with respect to any of the Assets or Liabilities.

[Rest of page intentionally left blank. Signature page(s) follow(s).]

IN WITNESS WHEREOF, the Parties have caused this Agreement to be executed by their duly authorized officers as of the date first above written.

SELLER
Euro Pacific Intl. Bank, Inc.

By: Peter schiff (Sep 30, 2022 14:17 EDT)
Name: Peter D. Schiff
Title: Chairman

SOLE SHAREHOLDER
Peter D. Schiff

Peter schiff (Sep 30, 2022 14:17 EDT)

PURCHASERS

Qenta Inc.

By:
Name: Brent de Jong
Title: Chairman and CEO

G-Commerce DMCC

By:
Name: Brent de Jong
Title: Director

Responsible Gold Trading DMCC

By:
Name: Brent de Jong
Title: Director

Exhibit 1

ASSETS

Closing date: September 30, 2022.

Cash and Cash Equivalents:

To be transferred to Purchasers or their designated Affiliate upon their release by Seller's correspondent banks including but not limited to Novo Banco, S.A.

Precious Metals:

All gold and silver reserves held in the name of Seller as of the Closing date by Silver Bullion Pte. Ltd.

Subsidiary Shares:

All outstanding shares of stock or membership interests issued by each of the Subsidiaries, along with its complete corporate records and the Seller and/or Sole Shareholder's resignation to any managerial position therein and designation of representatives of the Purchasers as the only controlling parties of any bank accounts indicated by Purchasers as necessary for the ongoing operation of the Subsidiaries.

Assumed Contracts:

Cloud Service Subscription Agreement number SAAS-CCA-WV-2015-138697, including addendums and supplemental terms, originally entered into by and between Seller and Temenos Headquarters SA on March 30, 2015.

Records

All Records related to Assets or Liabilities transferred on the relevant Closing.

IT Equipment

[List follows.]

Type	Brand	Model	SN	Specs
MICRO DESKTOP	DELL	OPTIPLEX 7060 MICRO	9F576Q2	RAM: 8GB / SSD: 256 / PROC: I7
MICRO DESKTOP	DELL	OPTIPLEX 7060 MICRO	9FC66Q2	RAM: 8GB / SSD: 256 / PROC: I7
DESKTOP	APPLE	IMAC 21.5 A1418	C02RF4PTGF1J	RAM: 8GB / HDD: 1TB / PROC: I5
MONITOR	DELL	P2419H	QDC00-86P-2L5B-A00	24.1
MONITOR	DELL	P2419H	TV200-9B7-726B	24.1
MONITOR	DELL	P2419H	TV200-987-80KB	24.1
MONITOR	DELL	P2419H	TV200-9B7-80MB	24.1
MONITOR	SAMSUNG	U28E850R	065EHCHM803871J	27
HEADSET	PLANTRONICS	A8	20307901	
HEADSET	PLANTRONICS	H8	2036TF042318	
HEADSET	PLANTRONICS	H8	1919TF028728	
KEYBOARD	APPLE	MAGIC KEYBOARD	FOT9485012SJKNCAQ	
KEYBOARD	Dell	KB216P	ONGR8G	
KEYBOARD	Dell	KB216P	0F9D93	
MOUSE	APPLE	MAGIC MOUSE	CC2945312UDJ2XEAD	
MOUSE	Dell	M116T	CN-ODVORH-LO300-855-0BK9	
MOUSE	Dell	M116T	CN-ODVORH-LO300-7BE-1ZEW	
BATTERY BACKUP	Cyber Power	550VA	CQYEN2002468	4 BATTERY + SURGE AND 2 SURGE
BATTERY BACKUP	APC	UPS-650	4B1930P08308	4 BATTERY + SURGE AND 2 SURGE
BATTERY BACKUP	APC	UPS-650	AB1803P32198	4 BATTERY + SURGE AND 2 SURGE
MICRO DESKTOP MOUNT CASE				
MICRO DESKTOP MOUNT CASE				
MONITOR DUAL MOUNT				
MONITOR DUAL MOUNT				
MONITOR DUAL MOUNT				

SELLER
Euro Pacific Intl. Bank, Inc.

By: _____ Peter schiff (Sep 30, 2022 14:17 EDT)
Name: Peter D. Schiff
Title: Chairman

SOLE SHAREHOLDER
Peter D. Schiff

_____ Peter schiff (Sep 30, 2022 14:17 EDT)

PURCHASERS
Qenta Inc.

By: _____
Name: Brent de Jong
Title: Chairman and CEO

G-Commerce DMCC

By: _____
Name: Brent de Jong
Title: Director

Responsible Gold Trading DMCC

By: _____
Name: Brent de Jong
Title: Director

Exhibit 7
Approved Voluntary Liquidation Plan

Euro Pacific Bank

Liquidation and Dissolution Plan for Euro Pacific Bank

I. Introduction

On June 30th, 2022, the Office of the Commissioner of Financial Institutions ("OCFI") issued a Complaint and Order to Cease and Desist and Order Appointing a Trustee against Euro Pacific Bank ("EPB") for lack of compliance with the renewal process; for lack of compliance with the minimum capital required under Article 2(g) of Act 273-2012 and lack of compliance with a Consent Order dated October 28, 2021. OCFI appointed Wigberto Lugo-Mender, Esq. as trustee ("Trustee").

On August 9, 2022, EPB and the OCFI entered a Consent Order for Liquidation and Dissolution of International Financial Entity ("Consent Order") (marked as Exhibit A) to dispose of the administrative proceedings initiated by OCFI against EPB. Section IV(2)(d) of the Order requires EPB to submit a Voluntary Liquidation Plan ("Plan") for OCFI's consideration within 15 days of the execution of the Order. In compliance with that provision of the Order, EPB hereby submits its Plan for an orderly liquidation of the bank. The following is EPB's plan to fully liquidate the bank, surrender its banking license and tax decree, and carry out the dissolution of the corporate entity that owns the bank in the most efficient and inexpensive way possible. All of this will be done in coordination with, and subject to the approval of, the Trustee and OCFI.

II. Preliminary Steps

Immediately upon execution of this Plan, the Trustee will reach out to Novo Bank and Mizuho Bank, to notify them of the liquidation process, and secure their cooperation with the same. EBP has already reached out to FirstBank and secured its agreement to continue offering banking services to EPB for the duration of the liquidation process. With the added cooperation of Novo Bank and Mizuho Bank, these steps will follow.

The Consent Order dated August 9th, 2022 (hereinafter, "Effective Date"), is hereby incorporated, and marked as **Exhibit A** to this Plan in its entirety. EPB shall be obligated to fully comply with its terms. Pursuant to Section IV (3), the closing of operations, transfers and withdrawal of funds is subject the following:

(i) This Voluntary Liquidation Plan shall become effective on the date of the approval of the Plan by the affirmative written consent of EPB, the Trustee, and OCFI.

(ii) The Liquidation Period shall not exceed ninety (90) days from the Effective Date.

(iii) EPB may only maintain its business operations for the sole purpose of completing the operating tasks geared to the effective and adequate implementation of this Liquidation Order, marshalling, winding up its business and affairs, and preserving the value of its assets.

(iv) At the date of the Effective Date, EPB shall provide the Trustee with a list of all accounts, including inactive accounts.

(v) Within five (5) business days of the Effective Date, EPB shall mail a notice to its Creditors, at their address shown on EPB's records, that EPB is undergoing Voluntary Liquidation and, thus, the deposits held at EPB will be transferred or paid accordingly.

(vi) This Voluntary Liquidation Plan shall provide that all deposit accounts held in EPB shall be transferred to an assuming institution that will make all monies available to clients immediately after the transfer, *provided, however*, that prior to a transfer of deposits to an assuming institution EPB shall provide adequate notice and a thirty-day window to Depositors that are Non-Related Parties to withdraw their deposits in cash.

(vii) EPB, as a corporate entity, shall be terminated within ten (10) business days after this Voluntary Liquidation Plan is terminated, by submitting all required documents to the Department of State.

(viii) The assuming institution to which EPB client accounts are transferred may resume banking operations in any foreign jurisdiction other than Puerto Rico, subject to strict compliance with all statutory and/or regulatory requirements governing their business operations in the corresponding jurisdiction.

(ix) At the execution of the last payment obligation, EPB business locations and international banking operations in Puerto Rico will be closed permanently and irrevocably.

Liabilities and Payment to Creditors

During the Liquidation Period, the Trustee shall cause EPB to pay, discharge, or otherwise provide for the payment or discharge of, all liabilities and obligations of EPB, pursuant to the steps listed in the Consent Order at Section IV(4)(A)-(B). EPB will provide written notice to all its Depositors and Creditors in accordance with Section IV(4)(A) and subsection (v) above. The notice shall state the procedure for withdrawing and/or transferring funds and the procedures after the allotted time for withdrawing and/or transferring funds has elapsed. The notice shall also include the Trustee's official email address to receive claims and inquiries.

III. Additional Steps Towards Liquidation

1) Creation and Funding of Cash Reserve Account

Immediately upon the execution of this Voluntary Liquidation Plan, EPB will establish and fund a Cash Reserve Account with sufficient funds in cash or readily available funds to pay all deposits and the Trustee's reasonable administrative expenses. EPB understands that the Trustee shall certify whether the Cash Reserve Account satisfies the requirements set forth herein.

EPB will fund the Cash Reserve Account using the following monies:

a) $500,000.00 that it will receive immediately upon the execution of this plan from Qenta, Inc. as described below;

b) $200,000.00 that it will receive from OCFI after payment of fine;

c) $400,000.00 that it will receive immediately from selling its proprietary position in the bank's mutual funds immediately upon the execution of this Voluntary Liquidation Plan; and

d) $2,153,831.30 (as of 08/23/22) that it will receive immediately in cash from the bank's selling of its proprietary gold and precious metals immediately upon the execution of this Voluntary Liquidation Plan.

In total, EPB's Cash Reserve Account will have $3,253,831.30 in available reserve funds to cover all deposits and the Trustee's reasonable administrative expenses. EPB will establish this Cash Reserve Account in the same operating account it currently has at FirstBank immediately upon the execution of this Voluntary Liquidation Plan and will not be required to open a separate account.

2) Sale of Assets (Section IV (5))

EPB notes that the steps that will follow from the sale of the assets as specified herein will follow only as to the Depositor accounts that do not notify EPB within thirty (30) days of receiving EPB's notice under Section IV (4)(A) of the Consent Order that they wish to transfer their deposits to a financial institution of their choosing or cash out. Once EPB has covered all the deposits that wish to either withdraw and/or transfer their funds to a financial institution of their choosing, it will then transfer the remaining funds (for which no such notice is received from Depositor) to the assuming institution, as follows.

a. __G-Commerce DMCC

G-Commerce DMCC, a wholly owned subsidiary of Qenta, Inc., has agreed to assume/buy all the bank's deposit obligations of both cash and precious metals. G-Commerce DMCC is incorporated under the laws of Dubai, UAE. It is licensed, regulated, and required to maintain global best practices for Know Your Customer ("KYC") and Anti Money Laundering ("AML") compliance. Once both cash and precious metals deposits are transferred to G-Commerce DMCC, EPB customers will have immediate access to their funds, and will be able to make and receive third-party payments in multiple currencies, including U.S. dollars, which they are not currently able to do at EBP. As such, the bank respectfully posits that this represents a big improvement for customers.[1]

b. Qenta, Inc.

Qenta, Inc. ("Qenta") incorporated under the laws of Delaware, has agreed to buy all issued and outstanding shares of the following wholly owned EPB subsidiaries that are all incorporated outside of Puerto Rico, including Euro Pacific Funds SCC Ltd., Euro Pacific Securities Inc., Euro Pacific Card Services Ltd., and Global Corporate Staffing, Ltd. Qenta has already received the required approvals from regulators in the British Virgin Islands for the transfer of control.[2] For the subsidiaries located in St. Vincent and the Grenadines, and the one located in the U.K., no government approval for the change of control is necessary.[3] Qenta has also agreed to assume the following contractional obligations of EPB: Neteller (e-money pay safe transfer service), HedgeGuard (portfolio management system), and Temenos (core banking system). In addition, Qenta will cover the $250,000.00 cost to renew the Temenos Contract at the end of September, if the transfer of accounts has not been completed by that date.

Once these agreements are executed, the money will be payable to EPB in two installments, $500,000.00 as soon as the plan is approved by OCIF and the Receiver, and $750,000.00 thirty (30) days following that approval. EPB has included this purchase offer as an Exhibit 3 to this liquidation plan for OCIF's review and consideration. The sale of EPB's assets to Qenta and G-Commerce DMCC assures that there will be enough funds available to pay off all the bank's

[1] As required by Section IV, Paragraph 4(A) and (B) of the liquidation order, before transferring any customer funds, EPB will send out emails to all its customers giving them all pertinent information about G-Commerce DMCC and informing them that if they do not want their accounts transferred to this buyer, they have thirty (30) days to provide wiring instructions to an alternate bank or financial account with the same beneficial owner as their EPB account, and their funds will be wired to those accounts. Deposits that are not in U.S. dollar, or deposits in currencies the bank cannot transact in, will have to be converted to a currency which the bank can wire out. Any accounts that remain after the thirty (30) day period expires will be transferred to G-Commerce DMCC, along with appropriate bank records relating to those customers, as specified in the liquidation order.

[2] See Exhibit 1.

[3] See Exhibit 2.

remaining obligations once bank operations are suspended. As of today, those obligations, not including the $300,000.00 fine owed to OCFI pursuant to Section IV (8) of the Order and the Deposits, amount to approximately $500,000.00.

3) Suspension of Banking Operations and Surrender of License and Tax Decree

EPB ceased operations on June 30th, 2022, and the Trustee took possession of the Corporation. The Corporation ceased conducting any business activity, except for the purposes of winding up its business and affairs, marshalling and preserving the value of its assets, and distributing the Corporation's assets in accordance with the provision of this Plan and through the appointed Trustee. Upon proper return or transfer of client funds in conformity with this Plan, and upon the successful transfer of EPB's subsidiaries, EPB shall deliver the original license to OCFI. Likewise, EPB shall coordinate with Department of Commercial Development to deliver its Tax Decree.

4) Assignment of Commercial Lease

Aside from Deposits and other Obligations, the sole remaining creditor will be EPB's landlord in San Juan, Puerto Rico. EPB has already advised the landlord to attempt to secure a new tenant to replace the bank and it is also engaged in efforts to secure a potential tenant. There are four months remaining on the lease. The total rent obligation is $115,000.00. If a replacement tenant cannot be found within the ninety (90) days allowed for liquidation, EPB will assign the lease to Mr. Peter Schiff's asset management company for its use, or sublease part or all the space to third parties. The office furniture, phones, computers, among other equipment will be sold, to whoever leases the office, or to retain it, if Mr. Schiff's company assumes the lease.

5) Preservation of Bank Records

After the customer records are transferred to G-Commerce and Qenta, G-Commerce and Qenta will become the custodians of the records as agreed upon in writing. Pursuant to Puerto Rico Corporate Law, EPB will keep and preserve accounting books and customer records (for those that are not transferred to G-Commerce and Qenta) at a secure location for at least three (3) years. Pursuant to Article 7.14 of Puerto Rico's General Corporations Act, EPB will maintain said records in or through any means of storage of information or method, so long as the files maintained can be converted into clearly legible paper within a reasonable time. EPB understands that it shall convert any record so maintained at the request of any person with the right to examine them, in accordance with the corresponding provisions of Puerto Rico law.

6) Remaining Assets

EPB understands and recognizes that, pursuant to Section IV(4)(B)(6) no distribution of assets of EPB shall be made to the Shareholder, Mr. Peter Schiff, until all Deposits are either paid in cash or transferred to the assuming depository institution. Once all Deposits are covered, and upon execution of steps 1 through 4 of this Voluntary Liquidation Plan, the remaining assets of the EPB will be distributed to Mr. Schiff.

7) Dissolution of Corporation

The Corporation shall be terminated as reasonably practicable after all Depositors and Liabilities have been paid (i.e., the "Termination Date").

[SPACE LEFT BLANK]

IV. Miscellaneous Provisions

Taxes. The Corporation shall file a request for an administrative determination or ruling with the Department of the Treasury of Puerto Rico confirming that the liquidation of the Corporation is not subject to Puerto Rico taxation pursuant to the Act and the Puerto Rico General Corporation Law of 2009 (the "PRGCL"), the Internal Revenue Code for the New Puerto Rico, as amended (the "Code"), and the Corporation's Articles of Incorporation and By-Laws.

Indemnification. The Corporation and the Shareholder, joint and severally, shall continue to indemnify its officers, directors, employees, agents and the Trustee in accordance with its certificate of incorporation, bylaws, and contractual arrangements as therein or elsewhere provided, the Corporation's existing directors' and officers' liability insurance policy and applicable law, and such indemnification shall apply to acts or omissions of such persons in connection with the implementation of this Plan and the winding up of the affairs of the Corporation. The Shareholder is authorized to obtain and maintain insurance as may be necessary to cover the Corporation's indemnification obligations.

Further Assurances. EPB's Board shall take such further action, prior to, at, and after the final Liquidation Distribution, as may be necessary or desirable and proper based on the advice of the Administrator to consummate the transactions contemplated by this Plan.

Governing Law. This Plan shall be governed and construed in accordance with the laws of the Commonwealth of Puerto Rico.

Severability. Any provision of this Plan that is declared invalid or unenforceable by a court of competent jurisdiction shall be ineffective to the extent of such invalidity or unenforceability without invalidating or rendering unenforceable the remaining provisions hereof. The headings or titles of the sections of this Plan are used for purposes of reference and they should not affect the construction, interpretation, validity and/or enforceability of this Plan.

Modifications and Headings. This Plan can only be modified with the express written consent of OCFI and the Corporation. The headings in this Plan are inserted for convenience only and are not intended to affect the meaning or interpretation of this Plan or its individual terms.

[SIGNATURE PAGE IN NEXT PAGE]

IN WITNESS WHEREOF, the Corporation and the Shareholder hereto have caused this Plan to be approved and executed by their duly authorized officers as September 1, 2022.

Euro Pacific Bank
The "Corporation"

By: _____
Name: Peter Schiff
Title: Director

Peter Schiff
The "Shareholder"

By: _____
Name: Peter Schiff
Title:

Accepted by:

TRUSTEE APPOINTED BY **THE OFFICE OF THE COMMISSIONER OF FINANCIAL INSTITUTIONS**

By: _____
Name: Wigberto Lugo Mender
Title: Trustee

Dated: 9/6/2022

OFFICE OF THE COMMISSIONER OF FINANCIAL INSTITUTIONS

By: _____
Name: Natalia I. Zequeira Días
Title: Commissioner

Dated: 9/6/2022

Exhibit A
Consent Order

Exhibit B
Related Parties

Exhibit 8
Letters and Emails

-----Original Message-----
From: bahdebing@yahoo.com <bahdebing@yahoo.com>
Sent: Monday, July 14, 2025 8:10 PM
To: Brent De Jong <brent.dejong@qenta.com>
Cc: Carlos Garduno <carlos.garduno@qenta.com>; Wigberto Lugo <wigberto@lugomender.com>; Javier Micheo <javier.micheo@dmralaw.com>
Subject: Your email to the receiver.

Brent,

The receiver send me a copy of what you sent him. No wonder you did not send it to me too.

I can't believe that you are tying to get away with keeping over $20 million in gains on the gold that was transferred to you in good faith by the bank. On top of that, you are asking for additional compensation for the extra work that you supposedly did.

This is a non-starter. I have no problem with the bank paying you for any extra work that you did, provided that you can document that work, and that it's offset by the interest that you earned on the $27 million that was transferred to you from IB over two years ago.

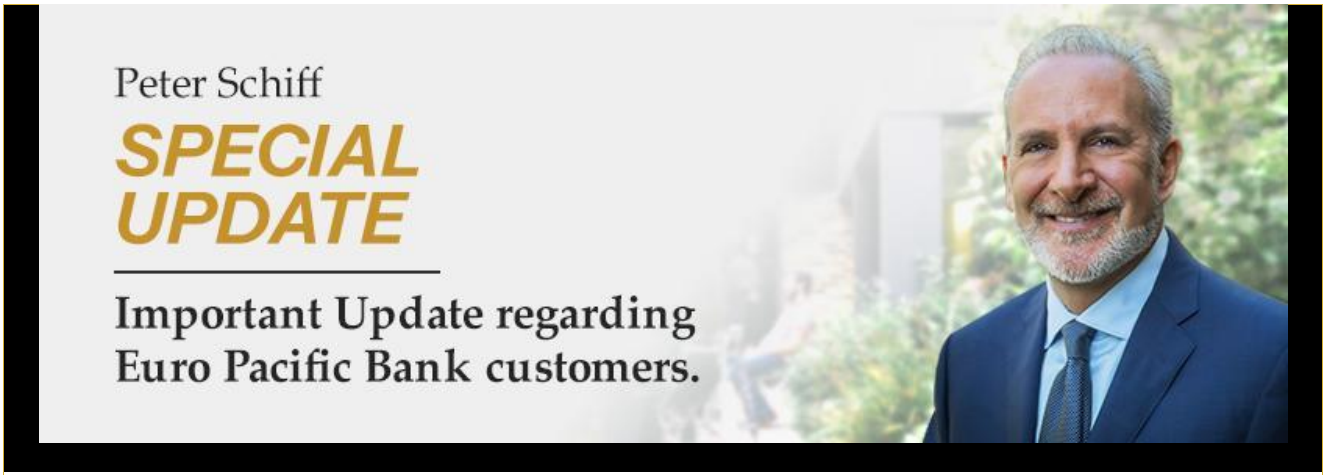
I have informed the receiver that signing your deal would constitute gross negligence on his part and provide an unjust enrichment to Qenta at the expense of the bank and its customers, especially the Opt-in customers who transferred their gold to you based on written assurances made by Qenta that their gold would be held for them and not sold.

Also, your most recent email to Opt-In customers, read that you would be returning assets "as they were originally received." That means if you receive 12,000 ounces of gold you must return 12,000 ounces of gold. You can not return the cash equivalent of what those 12,000 ounces of gold where worth when you received the gold three years ago.

So if you want to terminate the purchase and assumption agreement without arbitration in N.Y., we need to work something out ASAP, or we will have no choice but to initiate that arbitration proceeding ourselves.

I suggest that we all get on a call to do that.

Peter Schiff



Dear Euro Pacific Bank customers:

The following notice is only relevant to Opt-in customers. Opt-in customers authorized the bank to transfer their assets and corresponding liabilities to Qenta. If you didn't opt out of that transfer within 30 days of notification, you became an Opt-in customer by default.

On July 11, 2025, Qenta terminated the Purchase and Assumption Agreement under which they acquired the right to custody the bank's assets on behalf of Opt-in customers. Those assets consist of cash, gold, silver, and the bank's proprietary mutual funds (current market value totaling approximately $80 million.)

Though Qenta terminated the agreement, it did not offer to return all the assets it had received from the bank. Instead, Qenta offered to liquidate those assets and return to the bank only the cash proceeds it would have received had the assets been sold on Sept. 30, 2022 - retaining a windfall of over $25 million for itself, at the expense of Opt-in customers. That's mainly because gold and silver prices have doubled since that date. In addition, Qenta wanted to withhold over $5 million from the amount returned to the bank, citing costs it claimed resulted from its failed attempt to purchase the assets and liabilities of Opt-in customers. This would have imposed additional losses on Opt-in customers.

So, despite terminating the agreement, Qenta wanted to keep roughly half of the $80 million in customer assets it was holding for itself. The Receiver rightly rejected this offer and told Qenta that those assets belonged to customers and needed to be returned to them. I was informed today that Qenta has emailed Opt-in customers stating that it has a plan to sell their claims to a third party, who will settle them for some unspecified discounted amount.

I am writing to urge you to reject any such offer. Qenta has custody of 100% of your assets. As the owners of gold, silver, and mutual funds, you are entitled to all of the appreciation of those assets over the past three-plus years. There is no reason to allow Qenta to potentially unjustly enrich itself at your expense. Since Qenta has all of the assets, it can just as easily transfer all of those assets back to the bank, rather than transfer a portion to a third party.

Since I did not trust Qenta to fully honor the liabilities to Opt-in customers, on Friday last week I obtained a court order temporarily restraining Qenta from selling, transferring, encumbering, dissipating, or disposing of your assets. I believe it was that court order that prompted Qenta's recent attempt to potentially circumvent the order by getting Opt-in customers to accept a discounted sale of their claims.

The N.Y. Supreme Court Judge had scheduled a hearing for tomorrow morning for Qenta to show cause why it should not be ordered to return 100% of those assets to the bank now, without any offsets, so that they may be returned in full to Opt-in customers. However, I just learned that Qenta is delaying justice by having the case remanded to Federal Court in NYC instead.

I have no idea how much this will delay the process. At most it will succeed in running up my legal costs, as I am confident that I will prevail in either state or federal court. My belief is that Qenta just wants to delay the process long enough to dupe Opt-in customers into accepting huge discounts on what they are owed.

No action is required by you at this time. I am doing everything in my power to protect your interests. I just want to make sure you are fully informed of what Qenta is attempting to do and that you know you have a much better option.

If I am successful, Qenta will be legally ordered to return your assets to the bank, to be distributed to you in full by the Receiver. There is no need to accept Qenta's self-serving discounted offer.

I expect the liquidation process to proceed quickly after the bank recovers all of the assets currently in Qenta's custody.

This is not legal or financial advice; please consult your own professionals if needed.

Sincerely,

Peter Schiff

Sole Shareholder, Euro Pacific Bank

SchiffGOLD LLC | 222 Bloomingdale Rd Suite 107 | White Plains, NY 10605 US

Unsubscribe | Update Profile | Constant Contact Data Notice

Exhibit 9
Notice and List of Outgoing Wires

GOVERNMENT OF PUERTO RICO
OFFICE OF THE COMMISSIONER OF FINANCIAL INSTITUTIONS
Commissioner I Natalia I. Zequeira Díaz, Esq. I nataliaz@ocif.pr.gov

VIA ELECTRONIC DELIVERY

San Juan, Puerto Rico – September 29, 2022

Novo Banco, S.A.
Sílvia Vieira da Silva
Senior Relationship Manager

Av. da Liberdade, nº195, 13º piso
1250-142 Lisboa, Portugal

RE: EURO PACIFIC INTERNATIONAL BANK, INC.; TRANSACTION APPROVAL NOTICE

Dear Ms. Vieira da Silva,

The Office of the Commissioner of Financial Institutions (the "OCFI") makes reference to several communications (notices, letters and emails) through which Novo Banco, S.A. was informed that on June 30, 2022, the OCFI issued a Complaint and Order to Cease and Desist and an Order Appointing a Trustee ("Designation Order") against Euro Pacific Bank ("EPB"). In such Order, ***the OCFI appointed Mr. Wigberto Lugo-Mender, Esq. as the Trustee of EPB and was entrusted with the supervision and execution of EPB's liquidation process.***

On August 9, 2022, EPB and the OCFI entered into a Consent Order for Liquidation and Dissolution of EPB (Exhibit A). Pursuant to Section IV(6) of the Consent Order "*the Trustee shall be in charge of completing the liquidation of [EPB]... consistent with the parameters set forth in the Designation Order...*".

On September 1, 2022, EPB and its Shareholder signed and executed a Liquidation and Dissolution Plan ("Liquidation Plan") in compliance with Section IV(2)(d) of the Consent Order (Exhibit B). Furthermore, Section II of the Liquidation Plan, states that the Trustee "*will reach out to Novo Bank to notify them of the liquidation process and secure cooperation with the same*". Additionally, during the liquidation period, the Trustee "*shall cause EPB to pay, discharge, pr otherwise provide for the payment or discharge of, all liabilities and obligations pursuant to the Consent Order*".

On September 16, 2022, OCFI provided further assurances to Novo Banco regarding EPB's liquidation property and the authority delegated to Mr. Wigberto Lugo-Mender as Trustee of EP. In the

referred missive OCFI requested Novo Banco to take note that Mr. Wigberto Lugo-Mender is dully empowered to order and carry our all transfers of moneys from Novo Banco S.A. in compliance with a certain Consent Order and Liquidation Plan signed by EPB and its Shareholder.

Today, the OCFI came into knowledge that certain transfer instructions were sent directly to Novo Banco. The OCFI hereby confirms that those instructions are correct and authorized by this Office and are contemplated by the Liquidation Plan attached hereto.

Do not hesitate to contact us or the Trustee should you need further information on this matter.

Cordially,

Euro Pacific Bank

Sílvia Vieira da Silva
Senior Relationship Manager

NOVOBANCO
Av. da Liberdade, nº195, 13º piso
1250-142 Lisboa, Portugal

SUBJECT: Liquidation & Dissolution Plan

DATE: 28-Sep-2022

Dear Ms. Vieria da Silva:

Pursuant to the signed Liquidation & Dissolution Plan for Euro Pacific Bank and approved by OCIF on September 6, 2022, please proceeds with the wire transactions identified in the enclosed attachment. I understand that upon processing these transfers the clients won't be leaving any money nor negative balances left on these accounts. I also understand that the requested transactions are compliance with the operating and fiscal guidelines applicable to this account for NOVOBANCO to complete these transfers.

Upon your confirmation of executing these transfers we will then start approving them in T24 and sending them to NOVOBANCO.

Regards,

Peter Schiff

Sole Stockholder and Appointed Liquidating Officer for Euro Pacific International Bank, Inc.

Euro Pacific Bank

Receiver Attestation:

Please be informed that the request proposed by the liquidating entity has been reviewed and approved by the undersigned acting in his official capacity of Receiver/Trustee as being in accordance to the Voluntary Plan of Liquidation executed with the Office of the Commissioner of Financial Institutions of Puerto Rico.

The undersigned prays that NOVOBANCO provides all cooperation as may be required by EPB to fully discharge the provisions detailed in the Plan including the abovementioned transactions.

Mr. Wigberto Lugo Mender
Trustee appointed by
The Office of the Commissioner of Financial Institutions, Puerto Rico

Transaction Ref	Txn Type	Debit Account	Debit Ccy	Debit Amount	Debit Value Date	Credit Account	Credit Ccy	Credit Amount	Credit Value Date	Status	Inputter	Residence	Reside
FT22174HWHXG	OT03	1000695293	EUR	0	20220623	1000002727	EUR	49,500.00	20220623	INAU	E.BANKING	CY	Cyprus
FT221810KYJJ	OT03	1000506636	EUR	0	20220630	1000002727	EUR	18,000.00	20220630	INAU	E.BANKING	PH	Philipp
FT2218153NSP	OT03	1000541048	EUR	0	20220630	1000002727	EUR	20,000.00	20220630	INAU	E.BANKING	JP	Japan
FT22181KWVNM	OT03	1000703792	EUR	0	20220630	1000002727	EUR	31,300.00	20220630	INAU	E.BANKING	MX	Mexico
FT22181M77S0	OT03	1000737964	EUR	0	20220630	1000002727	EUR	20,000.00	20220630	INAU	E.BANKING	AT	Austria
FT22181N7QN0	OT03	1000576758	EUR	0	20220630	1000002727	EUR	9,940.00	20220630	INAU	E.BANKING	FR	France
FT22181PW88H	OT03	1000732628	EUR	0	20220630	1000002727	EUR	419.00	20220630	INAU	E.BANKING	HU	Hunga
FT22181YH2P8	OT03	1000529768	EUR	0	20220630	1000002727	EUR	2,400.00	20220630	INAU	E.BANKING	ES	Spain
FT221820W1VL	OT03	1000499222	EUR	0	20220701	1000002727	EUR	7,000.00	20220701	INAU	E.BANKING	NL	Nethe
FT221820W23N	OT03	1000416769	EUR	0	20220701	1000002727	EUR	3,950.00	20220701	INAU	E.BANKING	ES	Spain
FT2218241W1W	OT03	1000412364	EUR	0	20220701	1000002727	EUR	5,095.00	20220701	INAU	E.BANKING	AE	United
FT22182684XZ	OT03	1000444649	EUR	0	20220701	1000002727	EUR	40,000.00	20220701	INAU	E.BANKING	SK	Slovak
FT221826ZM6K	OT03	1000440937	USD	0	20220701	1000002727	EUR	8,010.00	20220701	INAU	E.BANKING	HK	Hong K
FT22182FNKY4	OT03	1000751576	CHF	0	20220701	1000002719	CHF	26,869.00	20220701	INAU	E.BANKING	FR	France
FT22182JJSZS	OT03	1000745468	EUR	0	20220701	1000002727	EUR	8,500.00	20220701	INAU	E.BANKING	GB	United
FT22182KH1C9	OT03	1000735783	EUR	0	20220701	1000002727	EUR	4,000.00	20220701	INAU	E.BANKING	AM	Armen
FT22182P2XZM	OT03	1000434813	EUR	0	20220701	1000002727	EUR	10,000.00	20220701	INAU	E.BANKING	PL	Poland
FT22182RXNGD	OT03	1000435577	EUR	0	20220701	1000002727	EUR	4,500.00	20220701	INAU	E.BANKING	SE	Swede
FT22182TV6JY	OT03	1000754044	EUR	0	20220701	1000002727	EUR	14,615.09	20220701	INAU	E.BANKING	SG	Singap
FT221850HW5Y	OT03	1000476648	EUR	0	20220704	1000002727	EUR	4,000.00	20220704	INAU	E.BANKING	PT	Portug
FT2218544MXK	OT03	1000404717	EUR	0	20220704	1000002727	EUR	90.00	20220704	INAU	E.BANKING	HK	Hong K
FT221880D889	OT03	1000742194	EUR	0	20220707	1000002727	EUR	6,300.00	20220707	INAU	E.BANKING	IE	Ireland
FT221920F2SF	OT03	1000379518	EUR	0	20220711	1000002727	EUR	654.50	20220711	INAU	E.BANKING	ES	Spain
FT221920H6CS	OT03	1000379518	EUR	0	20220711	1000002727	EUR	950.00	20220711	INAU	E.BANKING	ES	Spain
FT2219647QQN	OT03	1000748389	GBP	0	20220715	1000001108	GBP	1,650.00	20220715	INAU	E.BANKING	GB	United
FT221994KHT4	OT03	1000744758	EUR	0	20220718	1000002727	EUR	4,200.00	20220718	INAU	E.BANKING	CL	Chile
FT2221362MYZ	OT03	1000541048	EUR	0	20220801	1000002727	EUR	20,000.00	20220801	INAU	E.BANKING	JP	Japan
FT22213758G3	OT03	1000506636	EUR	0	20220801	1000002727	EUR	18,000.00	20220801	INAU	E.BANKING	PH	Philipp
FT2221444HHL	OT03	1000404717	EUR	0	20220802	1000002727	EUR	90.00	20220802	INAU	E.BANKING	HK	Hong K
FT2221650HD0	OT03	1000476648	EUR	0	20220804	1000002727	EUR	4,000.00	20220804	INAU	E.BANKING	PT	Portug
FT222203XSCZ	OT03	1000742194	EUR	0	20220808	1000002727	EUR	6,300.00	20220808	INAU	E.BANKING	IE	Ireland
FT2222243YMX	OT03	1000379518	EUR	0	20220810	1000002727	EUR	654.50	20220810	INAU	E.BANKING	ES	Spain
FT2222250749	OT03	1000379518	EUR	0	20220810	1000002727	EUR	950.00	20220810	INAU	E.BANKING	ES	Spain
FT222270F8RQ	OT03	1000748389	GBP	0	20220815	1000001108	GBP	1,650.00	20220815	INAU	E.BANKING	GB	United
FT222304KSX2	OT03	1000744758	EUR	0	20220818	1000002727	EUR	4,200.00	20220818	INAU	E.BANKING	CL	Chile
FT222410L98T	OT03	1000752807	EUR	0	20220829	1000002727	EUR	976.00	20220829	INAU	E.BANKING	ES	Spain
FT222410MXJT	OT03	1000742194	EUR	0	20220829	1000002727	EUR	10,000.00	20220829	INAU	E.BANKING	IE	Ireland
FT222410W9J5	OT03	1000476648	EUR	0	20220829	1000002727	EUR	1,500.00	20220829	INAU	E.BANKING	PT	Portug
FT22241110LN	OT03	1000405821	EUR	0	20220829	1000002727	EUR	1,192.00	20220829	INAU	E.BANKING	CY	Cyprus
FT22241131TM	OT03	1000635576	USD	0	20220829	1000002727	EUR	460.00	20220829	INAU	E.BANKING	AU	Austra
FT2224114M3N	OT03	1000744968	CHF	0	20220829	1000002719	CHF	2,850.00	20220829	INAU	E.BANKING	BR	Brazil
FT2224117QC5	OT03	1000496417	EUR	0	20220829	1000002727	EUR	3,000.00	20220829	INAU	E.BANKING	DE	Germa
FT2224120RBT	OT03	1000705426	EUR	0	20220829	1000002727	EUR	25,000.00	20220829	INAU	E.BANKING	DE	Germa
FT222412BS51	OT03	1000751452	EUR	0	20220829	1000002727	EUR	184,000.00	20220829	INAU	E.BANKING	VN	Vietna
FT22241386LY	OT03	1000456302	EUR	0	20220829	1000002727	EUR	2,500.00	20220829	INAU	E.BANKING	CA	Canad
FT222413B2G7	OT03	1000726954	EUR	0	20220829	1000002727	EUR	9,500.00	20220829	INAU	E.BANKING	HU	Hunga

Transaction Ref	Txn Type	Debit Account	Debit Ccy	Debit Amount	Debit Value Date	Credit Account	Credit Ccy	Credit Amount	Credit Value Date	Status	Inputter	Residence	Reside
FT222413ZRQJ	OT03	1000517336	USD	0	20220829	1000002727	EUR	8,000.00	20220829	INAU	E.BANKING	AT	Austria
FT2224144QVH	OT03	1000640747	EUR	0	20220829	1000002727	EUR	865.00	20220829	INAU	E.BANKING	TH	Thailar
FT222414KSDN	OT03	1000379518	EUR	0	20220829	1000002727	EUR	8,580.00	20220829	INAU	E.BANKING	ES	Spain
FT222414M4YJ	OT03	1000395044	EUR	0	20220829	1000002727	EUR	3,758.49	20220829	INAU	E.BANKING	TH	Thailar
FT222414RTNJ	OT03	1000735783	EUR	0	20220829	1000002727	EUR	10,600.00	20220829	INAU	E.BANKING	AM	Armen
FT222414W2CH	OT03	1000434813	EUR	0	20220829	1000002727	EUR	15,500.00	20220829	INAU	E.BANKING	PL	Poland
FT222416C5PX	OT03	1000576871	GBP	0	20220829	1000001108	GBP	2,897.00	20220829	INAU	E.BANKING	GB	United
FT222416HW1L	OT03	1000397527	EUR	0	20220829	1000002727	EUR	12,000.00	20220829	INAU	E.BANKING	VN	Vietna
FT222416M3VT	OT03	1000403543	EUR	0	20220829	1000002727	EUR	38,450.00	20220829	INAU	E.BANKING	ES	Spain
FT222416P6TF	OT03	1000533487	USD	0	20220829	1000002727	EUR	2,000.00	20220829	INAU	E.BANKING	BR	Brazil
FT222417K1BZ	OT03	1000562738	GBP	0	20220829	1000001108	GBP	34,000.00	20220829	INAU	E.BANKING	GB	United
FT222417ZYDN	OT03	1000588861	EUR	0	20220829	1000002727	EUR	51,000.00	20220829	INAU	E.BANKING	FR	France
FT2224185NV3	OT03	1000637471	EUR	0	20220829	1000002727	EUR	78,000.00	20220829	INAU	E.BANKING	CY	Cyprus
FT222418Z1P9	OT03	1000728876	USD	0	20220829	1000002727	EUR	840.00	20220829	INAU	E.BANKING	AT	Austria
FT22241B839Q	OT03	1000522089	EUR	0	20220829	1000002727	EUR	21,205.00	20220829	INAU	E.BANKING	BR	Brazil
FT22241CLK80	OT03	1000714557	GBP	0	20220829	1000001108	GBP	5,800.00	20220829	INAU	E.BANKING	GB	United
FT22241D42JH	OT03	1000643517	EUR	0	20220829	1000002727	EUR	18,263.38	20220829	INAU	E.BANKING	DE	Germa
FT22241GKYJ9	OT03	1000554436	USD	0	20220829	1000002727	EUR	1,000.00	20220829	INAU	E.BANKING	BR	Brazil
FT22241HMDWV	OT03	1000739843	EUR	0	20220829	1000002727	EUR	88,407.00	20220829	INAU	E.BANKING	MU	Mauriti
FT22241JR6DC	OT03	1000433825	EUR	0	20220829	1000002727	EUR	18,750.00	20220829	INAU	E.BANKING	FR	France
FT22241JX8Q1	OT03	1000653067	EUR	0	20220829	1000002727	EUR	10,000.00	20220829	INAU	E.BANKING	FR	France
FT22241K5W30	OT03	1000733047	USD	0	20220829	1000002727	EUR	45,499.81	20220829	INAU	E.BANKING	BR	Brazil
FT22241KY30G	OT03	1000732978	CHF	0	20220829	1000002719	CHF	4,827.13	20220829	INAU	E.BANKING	CH	Switze
FT22241LY81X	OT03	1000744758	EUR	0	20220829	1000002727	EUR	4,500.00	20220829	INAU	E.BANKING	CL	Chile
FT22241M4FY7	OT03	1000744715	EUR	0	20220829	1000002727	EUR	43,900.00	20220829	INAU	E.BANKING	CA	Canada
FT22241MNXKC	OT03	1000708387	EUR	0	20220829	1000002727	EUR	5,010.00	20220829	INAU	E.BANKING	FI	Finland
FT22241MQF48	OT03	1000745568	EUR	0	20220829	1000002727	EUR	53,200.00	20220829	INAU	E.BANKING	CA	Canada
FT22241MQV7L	OT03	1000683201	EUR	0	20220829	1000002727	EUR	44,863.95	20220829	INAU	E.BANKING	IN	India
FT22241N0H5Z	OT03	1000749156	GBP	0	20220829	1000001108	GBP	1,705.00	20220829	INAU	E.BANKING	NO	Norwa
FT22241N2GPM	OT03	1000403543	EUR	0	20220829	1000002727	EUR	12,000.00	20220829	INAU	E.BANKING	ES	Spain
FT22241N3563	OT03	1000548177	EUR	0	20220829	1000002727	EUR	1,939.00	20220829	INAU	E.BANKING	CY	Cyprus
FT22241P218D	OT03	1000407522	USD	0	20220829	1000002719	CHF	2,000.00	20220829	INAU	E.BANKING	CH	Switze
FT22241PKMJM	OT03	1000449691	EUR	0	20220829	1000002727	EUR	10,000.00	20220829	INAU	E.BANKING	BR	Brazil
FT22241PRH4Y	OT03	1000735341	EUR	0	20220829	1000002727	EUR	3,463.59	20220829	INAU	E.BANKING	TR	Turkey
FT22241RBBWR	OT03	1000527657	GBP	0	20220829	1000001108	GBP	229,194.00	20220829	INAU	E.BANKING	ES	Spain
FT22241S3CF4	OT03	1000525107	EUR	0	20220829	1000002727	EUR	13,225.00	20220829	INAU	E.BANKING	NL	Nether
FT22241SWDLH	OT03	1000456302	EUR	0	20220829	1000002727	EUR	3,500.00	20220829	INAU	E.BANKING	CA	Canada
FT22241TZ1VF	OT03	1000554436	USD	0	20220829	1000002727	EUR	1,000.00	20220829	INAU	E.BANKING	BR	Brazil
FT22241TZHJS	OT03	1000710136	EUR	0	20220829	1000002727	EUR	3,280.86	20220829	INAU	E.BANKING	CY	Cyprus
FT22241VKYPC	OT03	1000525347	EUR	0	20220829	1000002727	EUR	2,108.00	20220829	INAU	E.BANKING	TH	Thailar
FT22241W02TW	OT03	1000702516	EUR	0	20220829	1000002727	EUR	1,531.09	20220829	INAU	E.BANKING	AR	Argent
FT22241W41QR	OT03	1000683104	EUR	0	20220829	1000002727	EUR	278,000.00	20220829	INAU	E.BANKING	BG	Bulgar
FT22241W50WR	OT03	1000737964	EUR	0	20220829	1000002727	EUR	10,200.00	20220829	INAU	E.BANKING	AT	Austria
FT22241WDHB5	OT03	1000533595	GBP	0	20220829	1000001108	GBP	19,000.00	20220829	INAU	E.BANKING	MA	Moroc
FT22241WH0L5	OT03	1000680776	EUR	0	20220829	1000002727	EUR	13,000.00	20220829	INAU	E.BANKING	TW	Repub
FT22241WPB9Y	OT03	1000476648	EUR	0	20220829	1000002727	EUR	4,500.00	20220829	INAU	E.BANKING	PT	Portug

Transaction Ref	Txn Type	Debit Account	Debit Ccy	Debit Amount	Debit Value Date	Credit Account	Credit Ccy	Credit Amount	Credit Value Date	Status	Inputter	Residence	Reside
FT22241WS759	OT03	1000657901	EUR	0	20220829	1000002727	EUR	11,108.53	20220829	INAU	E.BANKING	BR	Brazil
FT22241ZQVXJ	OT03	1000433825	EUR	0	20220829	1000002727	EUR	15,502.00	20220829	INAU	E.BANKING	FR	France
FT22241ZVD2L	OT03	1000747657	EUR	0	20220829	1000002727	EUR	9,200.00	20220829	INAU	E.BANKING	DE	Germa
FT22241ZWPNB	OT03	1000720158	EUR	0	20220829	1000002727	EUR	6,000.00	20220829	INAU	E.BANKING	CY	Cyprus
FT22242086KM	OT03	1000400455	EUR	0	20220830	1000002727	EUR	780.00	20220830	INAU	E.BANKING	BG	Bulgar
FT222420Q77C	OT03	1000753218	CHF	0	20220830	1000002719	CHF	4,150.00	20220830	INAU	E.BANKING	NZ	New Z
FT222420SB13	OT03	1000471767	EUR	0	20220830	1000002727	EUR	163,336.00	20220830	INAU	E.BANKING	NL	Nether
FT222421PCCT	OT03	1000412607	EUR	0	20220830	1000002727	EUR	8,630.00	20220830	INAU	E.BANKING	FR	France
FT222421W3RC	OT03	1000714007	EUR	0	20220830	1000002727	EUR	3,740.87	20220830	INAU	E.BANKING	DE	Germa
FT22242228VV	OT03	1000751711	EUR	0	20220830	1000002727	EUR	900.00	20220830	INAU	E.BANKING	IT	Italy
FT22242245SB	OT03	1000653264	EUR	0	20220830	1000002727	EUR	800.00	20220830	INAU	E.BANKING	GR	Greece
FT222422M0P9	OT03	1000576758	EUR	0	20220830	1000002727	EUR	9,995.00	20220830	INAU	E.BANKING	FR	France
FT222423DBLT	OT03	1000716401	EUR	0	20220830	1000002727	EUR	4,780.00	20220830	INAU	E.BANKING	DE	Germa
FT222423R2SG	OT03	1000718846	EUR	0	20220830	1000002727	EUR	1,616.00	20220830	INAU	E.BANKING	NL	Nether
FT2224241747	OT03	1000405775	GBP	0	20220830	1000001108	GBP	6,000.00	20220830	INAU	E.BANKING	ES	Spain
FT222424662V	OT03	1000730943	CHF	0	20220830	1000002719	CHF	18,000.00	20220830	INAU	E.BANKING	GB	United
FT222424TW3Z	OT03	1000511327	EUR	0	20220830	1000002727	EUR	6,000.00	20220830	INAU	E.BANKING	GR	Greece
FT222425R79V	OT03	1000385731	EUR	0	20220830	1000002727	EUR	156,262.00	20220830	INAU	E.BANKING	NL	Nether
FT22242649JZ	OT03	1000493259	GBP	0	20220830	1000001108	GBP	36,271.14	20220830	INAU	E.BANKING	GB	United
FT2224267H70	OT03	1000590289	EUR	0	20220830	1000002727	EUR	5,258.00	20220830	INAU	E.BANKING	HR	Croatia
FT222426N0KG	OT03	1000746696	EUR	0	20220830	1000002727	EUR	3,400.00	20220830	INAU	E.BANKING	CZ	Czech
FT222427FS1B	OT03	1000736089	EUR	0	20220830	1000002727	EUR	8,696.00	20220830	INAU	E.BANKING	ES	Spain
FT222427HLHV	OT03	1000696958	EUR	0	20220830	1000002727	EUR	21,900.00	20220830	INAU	E.BANKING	MC	Monac
FT22242868MN	OT03	1000745088	EUR	0	20220830	1000002727	EUR	10,000.00	20220830	INAU	E.BANKING	FR	France
FT2224288SDM	OT03	1000735527	EUR	0	20220830	1000002727	EUR	747.48	20220830	INAU	E.BANKING	DE	Germa
FT222428F0JJ	OT03	1000746181	EUR	0	20220830	1000002727	EUR	298,000.00	20220830	INAU	E.BANKING	MT	Malta
FT222428GB45	OT03	1000664932	EUR	0	20220830	1000002727	EUR	4,500.00	20220830	INAU	E.BANKING	AT	Austria
FT222428SRT2	OT03	1000563974	EUR	0	20220830	1000002727	EUR	21,690.04	20220830	INAU	E.BANKING	NL	Nether
FT22242926WY	OT03	1000711787	EUR	0	20220830	1000002727	EUR	27,772.83	20220830	INAU	E.BANKING	ES	Spain
FT222429LV19	OT03	1000716223	EUR	0	20220830	1000002727	EUR	1,600.00	20220830	INAU	E.BANKING	DE	Germa
FT222429PK2T	OT03	1000494538	EUR	0	20220830	1000002727	EUR	500.00	20220830	INAU	E.BANKING	TH	Thailar
FT222429TMDW	OT03	1000691433	EUR	0	20220830	1000002727	EUR	5,350.45	20220830	INAU	E.BANKING	NL	Nether
FT22242B4NDP	OT03	1000744723	EUR	0	20220830	1000002727	EUR	14,100.00	20220830	INAU	E.BANKING	PH	Philipp
FT22242C7MRP	OT03	1000656859	EUR	0	20220830	1000002727	EUR	7,000.00	20220830	INAU	E.BANKING	GR	Greece
FT22242D8MP2	OT03	1000704535	CHF	0	20220830	1000002719	CHF	84.00	20220830	INAU	E.BANKING	CH	Switze
FT22242DF2DP	OT03	1000582887	EUR	0	20220830	1000002727	EUR	46,637.80	20220830	INAU	E.BANKING	IT	Italy
FT22242FCBYV	OT03	1000750278	EUR	0	20220830	1000002727	EUR	4,500.00	20220830	INAU	E.BANKING	GR	Greece
FT22242FLX2Q	OT03	1000745557	CHF	0	20220830	1000002719	CHF	230.00	20220830	INAU	E.BANKING	SE	Swede
FT22242FQZGG	OT03	1000405163	AUD	0	20220830	1000002727	EUR	277,000.00	20220830	INAU	E.BANKING	AU	Austra
FT22242FV22F	OT03	1000664673	GBP	0	20220830	1000001108	GBP	88,828.99	20220830	INAU	E.BANKING	GB	United
FT22242G32VQ	OT03	1000653833	EUR	0	20220830	1000002727	EUR	45,717.00	20220830	INAU	E.BANKING	SE	Swede
FT22242GHYJX	OT03	1000695455	GBP	0	20220830	1000001108	GBP	3,600.00	20220830	INAU	E.BANKING	GB	United
FT22242GMK9S	OT03	1000584165	EUR	0	20220830	1000002727	EUR	12,194.00	20220830	INAU	E.BANKING	LT	Lithua
FT22242GRF9Z	OT03	1000730943	CHF	0	20220830	1000002719	CHF	10,000.00	20220830	INAU	E.BANKING	GB	United
FT22242H5YZH	OT03	1000706228	EUR	0	20220830	1000002727	EUR	8,000.00	20220830	INAU	E.BANKING	DE	Germa
FT22242H62M8	OT03	1000730145	EUR	0	20220830	1000002727	EUR	267.94	20220830	INAU	E.BANKING	BR	Brazil

Transaction Ref	Txn Type	Debit Account	Debit Ccy	Debit Amount	Debit Value Date	Credit Account	Credit Ccy	Credit Amount	Credit Value Date	Status	Inputter	Residence	Reside
FT22242HKJ61	OT03	1000476648	EUR	0	20220830	1000002727	EUR	9,000.00	20220830	INAU	E.BANKING	PT	Portug
FT22242K03J5	OT03	1000511133	EUR	0	20220830	1000002727	EUR	9,500.00	20220830	INAU	E.BANKING	FR	France
FT22242K2GY2	OT03	1000649135	EUR	0	20220830	1000002727	EUR	6,369.78	20220830	INAU	E.BANKING	GR	Greece
FT22242L7KST	OT03	1000649135	EUR	0	20220830	1000002727	EUR	4,900.00	20220830	INAU	E.BANKING	GR	Greece
FT22242LSZPH	OT03	1000733039	USD	0	20220830	1000002727	EUR	120.00	20220830	INAU	E.BANKING	TH	Thailar
FT22242LTB0X	OT03	1000426338	EUR	0	20220830	1000002727	EUR	919.00	20220830	INAU	E.BANKING	NL	Nether
FT22242M4ZT6	OT03	1000744518	GBP	0	20220830	1000001108	GBP	33,430.00	20220830	INAU	E.BANKING	IL	Israel
FT22242MCDLS	OT03	1000517708	EUR	0	20220830	1000002727	EUR	62,285.09	20220830	INAU	E.BANKING	ES	Spain
FT22242N0WVL	OT03	1000751711	EUR	0	20220830	1000002727	EUR	2,400.00	20220830	INAU	E.BANKING	IT	Italy
FT22242N9ZCN	OT03	1000563974	EUR	0	20220830	1000002727	EUR	21,645.04	20220830	INAU	E.BANKING	NL	Nether
FT22242PNJJ6	OT03	1000576758	EUR	0	20220830	1000002727	EUR	300.00	20220830	INAU	E.BANKING	FR	France
FT22242PWBRG	OT03	1000656956	EUR	0	20220830	1000002727	EUR	17,196.00	20220830	INAU	E.BANKING	GB	United
FT22242PWNTM	OT03	1000730943	CHF	0	20220830	1000002719	CHF	7,000.00	20220830	INAU	E.BANKING	GB	United
FT22242Q4WST	OT03	1000696869	EUR	0	20220830	1000002727	EUR	1,947.46	20220830	INAU	E.BANKING	MT	Malta
FT22242QDKCK	OT03	1000749253	EUR	0	20220830	1000002727	EUR	188.78	20220830	INAU	E.BANKING	TR	Turkey
FT22242QJR0S	OT03	1000465131	USD	0	20220830	1000002727	EUR	38,000.00	20220830	INAU	E.BANKING	NL	Nether
FT22242QRQJZ	OT03	1000643692	USD	0	20220830	1000002727	EUR	341.00	20220830	INAU	E.BANKING	KR	Korea,
FT22242QYM12	OT03	1000730412	EUR	0	20220830	1000002727	EUR	120,000.00	20220830	INAU	E.BANKING	DZ	Algeria
FT22242SBJFF	OT03	1000745355	EUR	0	20220830	1000002727	EUR	3,195.89	20220830	INAU	E.BANKING	TR	Turkey
FT22242T0LTK	OT03	1000662646	EUR	0	20220830	1000002727	EUR	14,337.95	20220830	INAU	E.BANKING	DE	Germa
FT22242T1BHH	OT03	1000487728	EUR	0	20220830	1000002727	EUR	100,000.00	20220830	INAU	E.BANKING	VC	St. Vin
FT22242THYL5	OT03	1000455071	USD	0	20220830	1000002727	EUR	334,824.00	20220830	INAU	E.BANKING	MA	Moroc
FT22242V87QJ	OT03	1000441755	EUR	0	20220830	1000002727	EUR	119,000.00	20220830	INAU	E.BANKING	PL	Poland
FT22242VBHGS	OT03	1000749741	EUR	0	20220830	1000002727	EUR	300.00	20220830	INAU	E.BANKING	TH	Thailar
FT22242VSX34	OT03	1000722983	GBP	0	20220830	1000001108	GBP	7,600.00	20220830	INAU	E.BANKING	GB	United
FT22242W4LZR	OT03	1000542101	EUR	0	20220830	1000002727	EUR	75,000.00	20220830	INAU	E.BANKING	NL	Nether
FT22242W9754	OT03	1000481967	USD	0	20220830	1000002727	EUR	6,200.00	20220830	INAU	E.BANKING	BG	Bulgar
FT22242W99ZF	OT03	1000431644	EUR	0	20220830	1000002727	EUR	22,230.00	20220830	INAU	E.BANKING	IT	Italy
FT22242X6JLR	OT03	1000728906	GBP	0	20220830	1000001108	GBP	2,000.00	20220830	INAU	E.BANKING	GB	United
FT22242XB9JS	OT03	1000724088	EUR	0	20220830	1000002727	EUR	10,000.00	20220830	INAU	E.BANKING	TH	Thailar
FT22242XZXR7	OT03	1000585878	EUR	0	20220830	1000002727	EUR	194.00	20220830	INAU	E.BANKING	PT	Portug
FT22242Y40GX	OT03	1000724088	EUR	0	20220830	1000002727	EUR	10,000.00	20220830	INAU	E.BANKING	TH	Thailar
FT22242YRM19	OT03	1000750219	EUR	0	20220830	1000002727	EUR	10,107.66	20220830	INAU	E.BANKING	CN	People
FT22242YS47X	OT03	1000729104	GBP	0	20220830	1000001108	GBP	3,270.00	20220830	INAU	E.BANKING	KZ	Kazaks
FT22242Z2HYL	OT03	1000404717	EUR	0	20220830	1000002727	EUR	2,950.00	20220830	INAU	E.BANKING	HK	Hong K
FT22242ZMZBP	OT03	1000718846	EUR	0	20220830	1000002727	EUR	630.00	20220830	INAU	E.BANKING	NL	Nether
FT222430KJP1	OT03	1000580698	EUR	0	20220831	1000002727	EUR	1,270.00	20220831	INAU	E.BANKING	AT	Austria
FT222430Y59L	OT03	1000701781	EUR	0	20220831	1000002727	EUR	10,000.00	20220831	INAU	E.BANKING	PL	Poland
FT222432QYNW	OT03	1000699922	EUR	0	20220831	1000002727	EUR	110.00	20220831	INAU	E.BANKING	DE	Germa
FT222432SRYL	OT03	1000558431	EUR	0	20220831	1000002727	EUR	1,584.68	20220831	INAU	E.BANKING	MT	Malta
FT2224330ZMF	OT03	1000657968	EUR	0	20220831	1000002727	EUR	10,000.00	20220831	INAU	E.BANKING	GR	Greece
FT222436XV3Y	OT03	1000495596	GBP	0	20220831	1000001108	GBP	12,900.00	20220831	INAU	E.BANKING	ZA	South
FT2224386CVW	OT03	1000751673	EUR	0	20220831	1000002727	EUR	12,300.07	20220831	INAU	E.BANKING	BR	Brazil
FT22243B5Y0S	OT03	1000644777	EUR	0	20220831	1000002727	EUR	306.00	20220831	INAU	E.BANKING	ES	Spain
FT22243BB5MT	OT03	1000646567	EUR	0	20220831	1000002727	EUR	8,167.10	20220831	INAU	E.BANKING	ES	Spain
FT22243BG74M	OT03	1000716247	EUR	0	20220831	1000002727	EUR	40,450.00	20220831	INAU	E.BANKING	SE	Swede

Transaction Ref	Txn Type	Debit Account	Debit Ccy	Debit Amount	Debit Value Date	Credit Account	Credit Ccy	Credit Amount	Credit Value Date	Status	Inputter	Residence	Reside
FT22243C8XTM	OT03	1000414626	EUR	0	20220831	1000002727	EUR	3,764.91	20220831	INAU	E.BANKING	DE	Germa
FT22243F5PS9	OT03	1000731176	EUR	0	20220831	1000002727	EUR	832.00	20220831	INAU	E.BANKING	FR	France
FT22243G2LS0	OT03	1000397292	EUR	0	20220831	1000002727	EUR	5,000.00	20220831	INAU	E.BANKING	ES	Spain
FT22243G3ZM3	OT03	1000561491	USD	0	20220831	1000002727	EUR	19,000.00	20220831	INAU	E.BANKING	JP	Japan
FT22243GZYVJ	OT03	1000693258	GBP	0	20220831	1000001108	GBP	1,074.00	20220831	INAU	E.BANKING	BR	Brazil
FT22243HFBRV	OT03	1000751727	EUR	0	20220831	1000002727	EUR	19,500.00	20220831	INAU	E.BANKING	AT	Austria
FT22243KLX5Z	OT03	1000370017	EUR	0	20220831	1000002727	EUR	20,563.35	20220831	INAU	E.BANKING	DE	Germa
FT22243L8HM4	OT03	1000740949	GBP	0	20220831	1000001108	GBP	1,215.00	20220831	INAU	E.BANKING	GB	United
FT22243MWNR7	OT03	1000567325	EUR	0	20220831	1000002727	EUR	262,565.62	20220831	INAU	E.BANKING	GR	Greece
FT22243NHN4L	OT03	1000426365	USD	0	20220831	1000002727	EUR	110.00	20220831	INAU	E.BANKING	NL	Nether
FT22243NJL9K	OT03	1000714018	EUR	0	20220831	1000002727	EUR	37,314.57	20220831	INAU	E.BANKING	DE	Germa
FT22243P82ZM	OT03	1000656767	EUR	0	20220831	1000001108	GBP	19,500.00	20220831	INAU	E.BANKING	MT	Malta
FT22243PJ8GZ	OT03	1000426397	EUR	0	20220831	1000002727	EUR	200.00	20220831	INAU	E.BANKING	NL	Nether
FT22243QTHT1	OT03	1000701102	EUR	0	20220831	1000002727	EUR	100.00	20220831	INAU	E.BANKING	DE	Germa
FT22243RYTVV	OT03	1000591803	EUR	0	20220831	1000002727	EUR	14,254.33	20220831	INAU	E.BANKING	BE	Belgiu
FT22243TT02Z	OT03	1000733691	GBP	0	20220831	1000001108	GBP	2,955.43	20220831	INAU	E.BANKING	GB	United
FT22243X0HKK	OT03	1000397292	EUR	0	20220831	1000001108	GBP	140.00	20220831	INAU	E.BANKING	ES	Spain
FT22243XKSY5	OT03	1000744766	EUR	0	20220831	1000002727	EUR	250.00	20220831	INAU	E.BANKING	AR	Argent
FT22243XZLJ0	OT03	1000569654	EUR	0	20220831	1000002727	EUR	2,800.00	20220831	INAU	E.BANKING	BH	Bahrai
FT22243Z2X29	OT03	1000400404	EUR	0	20220831	1000002727	EUR	9,500.00	20220831	INAU	E.BANKING	TH	Thailar
FT222440DCWY	OT03	1000704918	EUR	0	20220901	1000002727	EUR	105,960.00	20220901	INAU	E.BANKING	DK	Denma
FT222444Z926	OT03	1000749024	EUR	0	20220901	1000002727	EUR	83,500.00	20220901	INAU	E.BANKING	ES	Spain
FT222445079J	OT03	1000506636	EUR	0	20220901	1000002727	EUR	18,000.00	20220901	INAU	E.BANKING	PH	Philipp
FT2224450PG9	OT03	1000525142	EUR	0	20220901	1000002727	EUR	5,000.00	20220901	INAU	E.BANKING	CY	Cyprus
FT2224462497	OT03	1000554401	GBP	0	20220901	1000001108	GBP	7,950.00	20220901	INAU	E.BANKING	GB	United
FT222446P83B	OT03	1000714336	EUR	0	20220901	1000002727	EUR	14,920.00	20220901	INAU	E.BANKING	PT	Portug
FT222446STTC	OT03	1000707925	USD	0	20220901	1000002727	EUR	2,525.00	20220901	INAU	E.BANKING	SE	Swede
FT222447MGZM	OT03	1000687827	EUR	0	20220901	1000002727	EUR	6,110.73	20220901	INAU	E.BANKING	DE	Germa
FT22244959NB	OT03	1000697601	GBP	0	20220901	1000001108	GBP	16,638.77	20220901	INAU	E.BANKING	MY	Malays
FT22244BXP6K	OT03	1000468025	GBP	0	20220901	1000001108	GBP	19,471.35	20220901	INAU	E.BANKING	GB	United
FT22244H6319	OT03	1000533706	USD	0	20220901	1000002727	EUR	7,649.00	20220901	INAU	E.BANKING	DE	Germa
FT22244JKTBS	OT03	1000646365	EUR	0	20220901	1000002727	EUR	6,400.00	20220901	INAU	E.BANKING	ES	Spain
FT22244KD3D0	OT03	1000721607	EUR	0	20220901	1000002727	EUR	60,002.64	20220901	INAU	E.BANKING	DE	Germa
FT22244LMW2Z	OT03	1000631384	EUR	0	20220901	1000002727	EUR	4,500.00	20220901	INAU	E.BANKING	SE	Swede
FT22244RQS7S	OT03	1000560134	EUR	0	20220901	1000002727	EUR	2,153.21	20220901	INAU	E.BANKING	LU	Luxem
FT22244RV74J	OT03	1000446013	USD	0	20220901	1000002719	CHF	312,200.00	20220901	INAU	E.BANKING	BR	Brazil
FT22244SN69T	OT03	1000496703	EUR	0	20220901	1000002727	EUR	49,999.00	20220901	INAU	E.BANKING	IT	Italy
FT22244VFXK8	OT03	1000543175	GBP	0	20220901	1000001108	GBP	1,470.30	20220901	INAU	E.BANKING	AE	United
FT22244VTSCL	OT03	1000708538	EUR	0	20220901	1000002727	EUR	6,540.00	20220901	INAU	E.BANKING	SE	Swede
FT222452MCPX	OT03	1000425792	EUR	0	20220902	1000002727	EUR	8,500.00	20220902	INAU	E.BANKING	PL	Poland
FT222452XGV4	OT03	1000457187	EUR	0	20220902	1000002727	EUR	53,865.99	20220902	INAU	E.BANKING	BE	Belgiu
FT22245619D8	OT03	1000657968	EUR	0	20220902	1000002727	EUR	9,900.00	20220902	INAU	E.BANKING	GR	Greece
FT222457H12P	OT03	1000697237	GBP	0	20220902	1000001108	GBP	100.00	20220902	INAU	E.BANKING	DE	Germa
FT22245BSXC4	OT03	1000711175	GBP	0	20220902	1000001108	GBP	700.00	20220902	INAU	E.BANKING	GB	United
FT22245CVRMG	OT03	1000507195	EUR	0	20220902	1000002727	EUR	8,555.96	20220902	INAU	E.BANKING	NL	Nether
FT22245F504X	OT03	1000432586	EUR	0	20220902	1000002727	EUR	60,000.00	20220902	INAU	E.BANKING	MT	Malta

Transaction Ref	Txn Type	Debit Account	Debit Ccy	Debit Amount	Debit Value Date	Credit Account	Credit Ccy	Credit Amount	Credit Value Date	Status	Inputter	Residence	Reside
FT22245H3QW2	OT03	1000714883	EUR	0	20220902	1000002727	EUR	1,506.03	20220902	INAU	E.BANKING	DE	Germa
FT22245JP53V	OT03	1000721577	EUR	0	20220902	1000002727	EUR	863.00	20220902	INAU	E.BANKING	SK	Slovak
FT22245KFX27	OT03	1000652942	GBP	0	20220902	1000001108	GBP	213,000.00	20220902	INAU	E.BANKING	ES	Spain
FT22245LG22W	OT03	1000663502	GBP	0	20220902	1000001108	GBP	193,000.00	20220902	INAU	E.BANKING	GB	United
FT22245M0JZ3	OT03	1000555467	USD	0	20220902	1000001108	GBP	2,790.46	20220902	INAU	E.BANKING	GB	United
FT22245PDC88	OT03	1000491768	EUR	0	20220902	1000002727	EUR	10,000.00	20220902	INAU	E.BANKING	NL	Nether
FT22245PGVJY	OT03	1000556994	EUR	0	20220902	1000002727	EUR	1,096.77	20220902	INAU	E.BANKING	DE	Germa
FT22245PTXJK	OT03	1000750669	EUR	0	20220902	1000002727	EUR	4,400.00	20220902	INAU	E.BANKING	ES	Spain
FT22245V4JF5	OT03	1000559683	EUR	0	20220902	1000002727	EUR	4,857.00	20220902	INAU	E.BANKING	SE	Swede
FT22245VN8KN	OT03	1000750267	GBP	0	20220902	1000001108	GBP	117.00	20220902	INAU	E.BANKING	CA	Canad
FT22245VZBNL	OT03	1000697237	GBP	0	20220902	1000001108	GBP	63,000.00	20220902	INAU	E.BANKING	DE	Germa
FT22245XVXR2	OT03	1000541598	EUR	0	20220902	1000002727	EUR	121.88	20220902	INAU	E.BANKING	SC	Seyche
FT22245YWC9Q	OT03	1000425318	EUR	0	20220902	1000002727	EUR	14,600.00	20220902	INAU	E.BANKING	DE	Germa
FT2224801D4P	OT03	1000476648	EUR	0	20220905	1000002727	EUR	4,000.00	20220905	INAU	E.BANKING	PT	Portug
FT222480N5SB	OT03	1000400568	EUR	0	20220905	1000002727	EUR	1,680.00	20220905	INAU	E.BANKING	MA	Moroc
FT222481VZYK	OT03	1000528176	USD	0	20220905	1000002727	EUR	250,000.00	20220905	INAU	E.BANKING	MU	Maurit
FT222484LXTX	OT03	1000522526	GBP	0	20220905	1000001108	GBP	19,470.00	20220905	INAU	E.BANKING	GB	United
FT2224859L7W	OT03	1000729031	USD	0	20220905	1000002727	EUR	440.00	20220905	INAU	E.BANKING	MU	Maurit
FT222486F16F	OT03	1000717588	EUR	0	20220905	1000002727	EUR	250.00	20220905	INAU	E.BANKING	BG	Bulgar
FT222486Z4PL	OT03	1000693126	EUR	0	20220905	1000002727	EUR	28,734.86	20220905	INAU	E.BANKING	DE	Germa
FT222487ZK9L	OT03	1000706201	EUR	0	20220905	1000002727	EUR	215.00	20220905	INAU	E.BANKING	NL	Nether
FT222489K8J9	OT03	1000693207	EUR	0	20220905	1000002727	EUR	9,109.09	20220905	INAU	E.BANKING	QA	Qatar
FT222489TZPD	OT03	1000574151	EUR	0	20220905	1000002727	EUR	655.00	20220905	INAU	E.BANKING	BG	Bulgar
FT22248BCQT0	OT03	1000746424	EUR	0	20220905	1000002727	EUR	7,000.00	20220905	INAU	E.BANKING	BR	Brazil
FT22248BDBWZ	OT03	1000563273	CHF	0	20220905	1000002719	CHF	10,000.00	20220905	INAU	E.BANKING	CH	Switze
FT22248BJ0ZG	OT03	1000517182	EUR	0	20220905	1000002727	EUR	100.00	20220905	INAU	E.BANKING	AT	Austria
FT22248BXNY2	OT03	1000751576	CHF	0	20220905	1000002719	CHF	85,500.00	20220905	INAU	E.BANKING	FR	France
FT22248C4Z20	OT03	1000552514	USD	0	20220905	1000002727	EUR	1,000.00	20220905	INAU	E.BANKING	SG	Singap
FT22248CPSM8	OT03	1000745029	GBP	0	20220905	1000001108	GBP	10,470.27	20220905	INAU	E.BANKING	GB	United
FT22248H3JX6	OT03	1000479108	GBP	0	20220905	1000001108	GBP	1,859.64	20220905	INAU	E.BANKING	GB	United
FT22248HDSY3	OT03	1000691131	EUR	0	20220905	1000002727	EUR	3,047.00	20220905	INAU	E.BANKING	GR	Greece
FT22248KWP1P	OT03	1000550929	GBP	0	20220905	1000001108	GBP	295.00	20220905	INAU	E.BANKING	ZA	South
FT22248L5H55	OT03	1000517182	EUR	0	20220905	1000002727	EUR	4,448.00	20220905	INAU	E.BANKING	AT	Austria
FT22248M6LZ7	OT03	1000693819	EUR	0	20220905	1000002727	EUR	900.00	20220905	INAU	E.BANKING	NL	Nether
FT22248MMRGD	OT03	1000677112	EUR	0	20220905	1000002727	EUR	5,969.00	20220905	INAU	E.BANKING	GR	Greece
FT22248N9CDW	OT03	1000462598	EUR	0	20220905	1000002727	EUR	9,448.49	20220905	INAU	E.BANKING	NL	Nether
FT22248P8BMV	OT03	1000683217	EUR	0	20220905	1000002727	EUR	47.00	20220905	INAU	E.BANKING	IT	Italy
FT22248PJ9YR	OT03	1000517336	USD	0	20220905	1000002727	EUR	4,650.00	20220905	INAU	E.BANKING	AT	Austria
FT22248QNK9Z	OT03	1000659106	EUR	0	20220905	1000002727	EUR	50,000.00	20220905	INAU	E.BANKING	ES	Spain
FT22248Y0GD3	OT03	1000517336	USD	0	20220905	1000002727	EUR	30.00	20220905	INAU	E.BANKING	AT	Austria
FT22248YHVLD	OT03	1000657642	EUR	0	20220905	1000002727	EUR	1,000.00	20220905	INAU	E.BANKING	IT	Italy
FT22248YQ8DF	OT03	1000472995	GBP	0	20220905	1000001108	GBP	3,500.00	20220905	INAU	E.BANKING	GR	Greece
FT22248ZZJKR	OT03	1000385022	EUR	0	20220905	1000002727	EUR	4,424.57	20220905	INAU	E.BANKING	PA	Panam
FT222491TZ6B	OT03	1000717084	EUR	0	20220906	1000002727	EUR	75,000.00	20220906	INAU	E.BANKING	DE	Germa
FT222494NRKC	OT03	1000647175	EUR	0	20220906	1000002727	EUR	4,384.00	20220906	INAU	E.BANKING	AT	Austria
FT222495TNQJ	OT03	1000708654	GBP	0	20220906	1000001108	GBP	3,000.00	20220906	INAU	E.BANKING	GB	United

Transaction Ref	Txn Type	Debit Account	Debit Ccy	Debit Amount	Debit Value Date	Credit Account	Credit Ccy	Credit Amount	Credit Value Date	Status	Inputter	Residence	Reside
FT222496BYC0	OT03	1000734795	EUR	0	20220906	1000002727	EUR	59,000.00	20220906	INAU	E.BANKING	MU	Maurit
FT222496LXKR	OT03	1000456493	USD	0	20220906	1000002727	EUR	19,849.00	20220906	INAU	E.BANKING	BR	Brazil
FT222499DM1Z	OT03	1000735635	EUR	0	20220906	1000002727	EUR	4,961.00	20220906	INAU	E.BANKING	CY	Cyprus
FT22249C1KLW	OT03	1000416769	EUR	0	20220906	1000002727	EUR	90,000.00	20220906	INAU	E.BANKING	ES	Spain
FT22249CX7FZ	OT03	1000542101	EUR	0	20220906	1000002727	EUR	75,000.00	20220906	INAU	E.BANKING	NL	Nether
FT22249D9N87	OT03	1000496258	EUR	0	20220906	1000002727	EUR	7,350.00	20220906	INAU	E.BANKING	NL	Nether
FT22249L224R	OT03	1000722126	EUR	0	20220906	1000002727	EUR	15,000.00	20220906	INAU	E.BANKING	DE	Germa
FT22249TSHMN	OT03	1000735732	EUR	0	20220906	1000002727	EUR	760.00	20220906	INAU	E.BANKING	SI	Sloven
FT22249V8GPQ	OT03	1000711973	AUD	0	20220906	1000002727	EUR	5,250.00	20220906	INAU	E.BANKING	NL	Nether
FT22249VY62T	OT03	1000505141	USD	0	20220906	1000002727	EUR	4,300.00	20220906	INAU	E.BANKING	BB	Barbad
FT22249X1CXX	OT03	1000706497	USD	0	20220906	1000002727	EUR	400.00	20220906	INAU	E.BANKING	TR	Turkey
FT22249ZLW9S	OT03	1000657968	EUR	0	20220906	1000002727	EUR	9,900.00	20220906	INAU	E.BANKING	GR	Greece
FT222500D3T1	OT03	1000742194	EUR	0	20220907	1000002727	EUR	6,300.00	20220907	INAU	E.BANKING	IE	Ireland
FT22250308VS	OT03	1000374648	EUR	0	20220907	1000002727	EUR	13,530.00	20220907	INAU	E.BANKING	NL	Nether
FT22250311F8	OT03	1000583479	EUR	0	20220907	1000001108	GBP	22,059.00	20220907	INAU	E.BANKING	GR	Greece
FT2225057RPN	OT03	1000732792	EUR	0	20220907	1000002727	EUR	22,285.00	20220907	INAU	E.BANKING	NL	Nether
FT222507B3GD	OT03	1000718331	EUR	0	20220907	1000002727	EUR	4,000.00	20220907	INAU	E.BANKING	MY	Malays
FT222509GP3H	OT03	1000542101	EUR	0	20220907	1000002727	EUR	75,000.00	20220907	INAU	E.BANKING	NL	Nether
FT22250FLKBS	OT03	1000742925	EUR	0	20220907	1000002727	EUR	4,000.00	20220907	INAU	E.BANKING	HR	Croatia
FT22250GB54L	OT03	1000430238	EUR	0	20220907	1000002727	EUR	300.00	20220907	INAU	E.BANKING	FR	France
FT22250GVB97	OT03	1000376988	EUR	0	20220907	1000002727	EUR	50,405.71	20220907	INAU	E.BANKING	FI	Finland
FT22250HG4CJ	OT03	1000696761	EUR	0	20220907	1000002727	EUR	560,000.00	20220907	INAU	E.BANKING	MC	Monac
FT22250J0198	OT03	1000646365	EUR	0	20220907	1000002727	EUR	452.00	20220907	INAU	E.BANKING	ES	Spain
FT22250J5FQX	OT03	1000741163	EUR	0	20220907	1000002727	EUR	265.72	20220907	INAU	E.BANKING	DE	Germa
FT22250JBR0J	OT03	1000484772	EUR	0	20220907	1000002727	EUR	9,840.00	20220907	INAU	E.BANKING	SK	Slovak
FT22250LRTR6	OT03	1000745557	CHF	0	20220907	1000002719	CHF	7,227.00	20220907	INAU	E.BANKING	SE	Swede
FT22250PDMNS	OT03	1000752491	EUR	0	20220907	1000002727	EUR	880.00	20220907	INAU	E.BANKING	NL	Nether
FT22250YWRB6	OT03	1000718347	GBP	0	20220907	1000001108	GBP	4,630.84	20220907	INAU	E.BANKING	MY	Malays
FT222511L5VV	OT03	1000705019	EUR	0	20220908	1000002727	EUR	1,500.00	20220908	INAU	E.BANKING	CY	Cyprus
FT222511N49N	OT03	1000539046	EUR	0	20220908	1000002727	EUR	6,900.00	20220908	INAU	E.BANKING	IT	Italy
FT222515DTTT	OT03	1000478446	CHF	0	20220908	1000002719	CHF	15,000.00	20220908	INAU	E.BANKING	DE	Germa
FT222515ZQNL	OT03	1000737964	EUR	0	20220908	1000002727	EUR	49,500.00	20220908	INAU	E.BANKING	AT	Austria
FT222517ML7L	OT03	1000542101	EUR	0	20220908	1000002727	EUR	75,000.00	20220908	INAU	E.BANKING	NL	Nether
FT222518SK9L	OT03	1000680849	USD	0	20220908	1000002727	EUR	125,000.00	20220908	INAU	E.BANKING	CA	Canada
FT22251FB9V7	OT03	1000742925	EUR	0	20220908	1000002727	EUR	5,000.00	20220908	INAU	E.BANKING	HR	Croatia
FT22251FHM31	OT03	1000753878	GBP	0	20220908	1000001108	GBP	700.00	20220908	INAU	E.BANKING	HK	Hong K
FT22251GXRN9	OT03	1000753617	GBP	0	20220908	1000001108	GBP	12,434.62	20220908	INAU	E.BANKING	BR	Brazil
FT22251GYMSB	OT03	1000750278	EUR	0	20220908	1000002727	EUR	13,500.00	20220908	INAU	E.BANKING	GR	Greece
FT22251R1GCC	OT03	1000526777	EUR	0	20220908	1000002727	EUR	330.00	20220908	INAU	E.BANKING	MY	Malays
FT22251X86R2	OT03	1000751215	EUR	0	20220908	1000002727	EUR	10,000.00	20220908	INAU	E.BANKING	IT	Italy
FT22251YKVBP	OT03	1000429119	EUR	0	20220908	1000002727	EUR	9,485.00	20220908	INAU	E.BANKING	NL	Nether
FT22251YZZDC	OT03	1000511613	EUR	0	20220908	1000002727	EUR	23,771.96	20220908	INAU	E.BANKING	SC	Seyche
FT2225256XR7	OT03	1000751328	EUR	0	20220909	1000002727	EUR	3,956.32	20220909	INAU	E.BANKING	AT	Austria
FT22252BQGFD	OT03	1000536519	EUR	0	20220909	1000002727	EUR	4,780.25	20220909	INAU	E.BANKING	BE	Belgiu
FT22252GS4FV	OT03	1000480599	EUR	0	20220909	1000002727	EUR	4,200.00	20220909	INAU	E.BANKING	DE	Germa
FT22252HWBXZ	OT03	1000713054	EUR	0	20220909	1000002727	EUR	1,400.00	20220909	INAU	E.BANKING	DE	Germa

Transaction Ref	Txn Type	Debit Account	Debit Ccy	Debit Amount	Debit Value Date	Credit Account	Credit Ccy	Credit Amount	Credit Value Date	Status	Inputter	Residence	Reside
FT22252N48PY	OT03	1000707208	GBP	0	20220909	1000001108	GBP	2,140.55	20220909	INAU	E.BANKING	CA	Canad
FT222552WSVM	OT03	1000747738	GBP	0	20220912	1000001108	GBP	210,000.00	20220912	INAU	E.BANKING	GB	United
FT222553HVSQ	OT03	1000542101	EUR	0	20220912	1000002727	EUR	36,750.00	20220912	INAU	E.BANKING	NL	Nethe
FT222554ZHYW	OT03	1000662476	EUR	0	20220912	1000002727	EUR	2,379.00	20220912	INAU	E.BANKING	DE	Germa
FT222557DQ1Q	OT03	1000646438	EUR	0	20220912	1000002727	EUR	10,000.00	20220912	INAU	E.BANKING	FR	France
FT22255BTQZW	OT03	1000639342	GBP	0	20220912	1000001108	GBP	471.89	20220912	INAU	E.BANKING	GR	Greece
FT22255H4716	OT03	1000391774	EUR	0	20220912	1000002727	EUR	19,119.74	20220912	INAU	E.BANKING	NL	Nethe
FT22255K4D2N	OT03	1000569018	EUR	0	20220912	1000002727	EUR	62,122.45	20220912	INAU	E.BANKING	TH	Thailar
FT22255K7L07	OT03	1000732857	EUR	0	20220912	1000002727	EUR	18,464.00	20220912	INAU	E.BANKING	ZA	South
FT22255KVM34	OT03	1000585797	EUR	0	20220912	1000002727	EUR	45,467.90	20220912	INAU	E.BANKING	FR	France
FT22255LCZ4P	OT03	1000679287	EUR	0	20220912	1000002727	EUR	14,451.93	20220912	INAU	E.BANKING	DE	Germa
FT22255LSTLM	OT03	1000511133	EUR	0	20220912	1000002727	EUR	3,535.00	20220912	INAU	E.BANKING	FR	France
FT22255P4PSX	OT03	1000550627	EUR	0	20220912	1000002727	EUR	55,000.00	20220912	INAU	E.BANKING	SI	Sloven
FT22255Q0BM3	OT03	1000713291	EUR	0	20220912	1000002727	EUR	9,500.00	20220912	INAU	E.BANKING	FR	France
FT22255VD800	OT03	1000551275	EUR	0	20220912	1000002727	EUR	1,579.78	20220912	INAU	E.BANKING	BE	Belgiu
FT22255VHNNW	OT03	1000747738	GBP	0	20220912	1000001108	GBP	210,000.00	20220912	INAU	E.BANKING	GB	United
FT22256279JF	OT03	1000754637	EUR	0	20220913	1000002727	EUR	7,856.28	20220913	INAU	E.BANKING	EE	Estoni
FT2225628GY1	OT03	1000717308	USD	0	20220913	1000002719	CHF	3,900.00	20220913	INAU	E.BANKING	NG	Nigeri
FT222562DR30	OT03	1000525258	EUR	0	20220913	1000002727	EUR	4,200.00	20220913	INAU	E.BANKING	ES	Spain
FT222562WHP9	OT03	1000564954	GBP	0	20220913	1000001108	GBP	19,487.50	20220913	INAU	E.BANKING	GB	United
FT222563QRMM	OT03	1000712268	SGD	0	20220913	1000002727	EUR	11,000.00	20220913	INAU	E.BANKING	DE	Germa
FT222565JL0K	OT03	1000402587	EUR	0	20220913	1000002727	EUR	2,185.00	20220913	INAU	E.BANKING	CA	Canad
FT222569736L	OT03	1000637177	EUR	0	20220913	1000002727	EUR	8,000.00	20220913	INAU	E.BANKING	MT	Malta
FT22256BY72D	OT03	1000472618	EUR	0	20220913	1000002727	EUR	51,250.00	20220913	INAU	E.BANKING	AE	United
FT22256GZS7Z	OT03	1000734795	EUR	0	20220913	1000002727	EUR	35,350.00	20220913	INAU	E.BANKING	MU	Maurit
FT22256MCZNY	OT03	1000720743	EUR	0	20220913	1000002727	EUR	12,500.00	20220913	INAU	E.BANKING	DE	Germa
FT22256QWFP2	OT03	1000543469	EUR	0	20220913	1000002727	EUR	72,093.00	20220913	INAU	E.BANKING	DE	Germa
FT22256V1W4M	OT03	1000737964	EUR	0	20220913	1000002727	EUR	450,000.00	20220913	INAU	E.BANKING	AT	Austria
FT22256V68K2	OT03	1000748028	EUR	0	20220913	1000002727	EUR	372.53	20220913	INAU	E.BANKING	ES	Spain
FT22256VFHGW	OT03	1000564903	GBP	0	20220913	1000001108	GBP	126,800.00	20220913	INAU	E.BANKING	AE	United
FT22256ZNFW7	OT03	1000571268	EUR	0	20220913	1000002727	EUR	70,394.56	20220913	INAU	E.BANKING	GB	United
FT222571JLLD	OT03	1000645048	EUR	0	20220914	1000002727	EUR	1,560.00	20220914	INAU	E.BANKING	PL	Poland
FT222572XBT4	OT03	1000540044	EUR	0	20220914	1000002727	EUR	5,000.00	20220914	INAU	E.BANKING	NL	Nethe
FT2225749Q8B	OT03	1000507772	EUR	0	20220914	1000002727	EUR	46,960.00	20220914	INAU	E.BANKING	LU	Luxem
FT222577XNF8	OT03	1000732415	EUR	0	20220914	1000002727	EUR	501.00	20220914	INAU	E.BANKING	AT	Austria
FT22257C9BY5	OT03	1000720816	EUR	0	20220914	1000002727	EUR	16,528.00	20220914	INAU	E.BANKING	DE	Germa
FT22257FQM1S	OT03	1000479191	EUR	0	20220914	1000002727	EUR	1,878.00	20220914	INAU	E.BANKING	SK	Slovak
FT22257HQDZ3	OT03	1000659106	EUR	0	20220914	1000002727	EUR	69,760.93	20220914	INAU	E.BANKING	ES	Spain
FT22257J9TJW	OT03	1000687231	CHF	0	20220914	1000002719	CHF	5,000.00	20220914	INAU	E.BANKING	MY	Malays
FT22257L01JD	OT03	1000512512	EUR	0	20220914	1000002727	EUR	4,200.00	20220914	INAU	E.BANKING	FR	France
FT22257LFVHK	OT03	1000705736	GBP	0	20220914	1000001108	GBP	57,000.00	20220914	INAU	E.BANKING	GB	United
FT22257Q4TJ9	OT03	1000449691	EUR	0	20220914	1000002727	EUR	90,000.00	20220914	INAU	E.BANKING	BR	Brazil
FT22257T7P9S	OT03	1000648244	EUR	0	20220914	1000002727	EUR	4,000.00	20220914	INAU	E.BANKING	PL	Poland
FT22257TKRJ7	OT03	1000525142	EUR	0	20220914	1000002727	EUR	20,000.00	20220914	INAU	E.BANKING	CY	Cyprus
FT22257TMCCK	OT03	1000738022	GBP	0	20220914	1000001108	GBP	2,200.00	20220914	INAU	E.BANKING	ES	Spain
FT22257VW157	OT03	1000730967	EUR	0	20220914	1000002727	EUR	5,000.00	20220914	INAU	E.BANKING	DE	Germa

Transaction Ref	Txn Type	Debit Account	Debit Ccy	Debit Amount	Debit Value Date	Credit Account	Credit Ccy	Credit Amount	Credit Value Date	Status	Inputter	Residence	Reside
FT22257ZNH6R	OT03	1000679964	EUR	0	20220914	1000002727	EUR	9,000.00	20220914	INAU	E.BANKING	PL	Poland
FT222580F4R3	OT03	1000748389	GBP	0	20220915	1000001108	GBP	1,650.00	20220915	INAU	E.BANKING	GB	United
FT222580LT1C	OT03	1000712268	SGD	0	20220915	1000002727	EUR	12,399.00	20220915	INAU	E.BANKING	DE	Germa
FT222584PD3T	OT03	1000525142	EUR	0	20220915	1000002727	EUR	1,600.00	20220915	INAU	E.BANKING	CY	Cyprus
FT222587QQCB	OT03	1000751347	EUR	0	20220915	1000002727	EUR	930.44	20220915	INAU	E.BANKING	ES	Spain
FT222588CK7X	OT03	1000634097	GBP	0	20220915	1000001108	GBP	8,000.00	20220915	INAU	E.BANKING	GB	United
FT2225899ZG1	OT03	1000496417	EUR	0	20220915	1000002727	EUR	3,252.00	20220915	INAU	E.BANKING	DE	Germa
FT22258FZ7C9	OT03	1000573759	USD	0	20220915	1000002727	EUR	4,818.00	20220915	INAU	E.BANKING	HK	Hong K
FT22258HCBH7	OT03	1000392819	EUR	0	20220915	1000002727	EUR	6,790.00	20220915	INAU	E.BANKING	CZ	Czech
FT22258LDWSB	OT03	1000742925	EUR	0	20220915	1000002727	EUR	21,404.00	20220915	INAU	E.BANKING	HR	Croati
FT22258LMK1K	OT03	1000414561	EUR	0	20220915	1000002727	EUR	16,835.00	20220915	INAU	E.BANKING	DK	Denma
FT22258NRP34	OT03	1000475471	EUR	0	20220915	1000002727	EUR	4,500.00	20220915	INAU	E.BANKING	DE	Germa
FT22258SR2V3	OT03	1000752807	EUR	0	20220915	1000002727	EUR	991.00	20220915	INAU	E.BANKING	ES	Spain
FT22258TKHYL	OT03	1000748028	EUR	0	20220915	1000002727	EUR	1,000.00	20220915	INAU	E.BANKING	ES	Spain
FT222591GYNC	OT03	1000653973	EUR	0	20220916	1000002727	EUR	2,500.00	20220916	INAU	E.BANKING	BE	Belgiu
FT222591L0WG	OT03	1000750968	EUR	0	20220916	1000002727	EUR	193.26	20220916	INAU	E.BANKING	PA	Panam
FT222593SJYV	OT03	1000443901	EUR	0	20220916	1000002727	EUR	30,000.00	20220916	INAU	E.BANKING	NL	Nethe
FT222594WXCD	OT03	1000513853	EUR	0	20220916	1000002727	EUR	10,000.00	20220916	INAU	E.BANKING	MU	Mauri
FT222596YYPN	OT03	1000679468	USD	0	20220916	1000002727	EUR	39,300.00	20220916	INAU	E.BANKING	EG	Egypt
FT222598DPQ3	OT03	1000443901	EUR	0	20220916	1000002727	EUR	26,128.79	20220916	INAU	E.BANKING	NL	Nethe
FT222598P3HC	OT03	1000752238	GBP	0	20220916	1000001108	GBP	570.00	20220916	INAU	E.BANKING	CZ	Czech
FT222599DDLT	OT03	1000458534	EUR	0	20220916	1000002727	EUR	5,330.68	20220916	INAU	E.BANKING	GB	United
FT22259DC8QP	OT03	1000735317	EUR	0	20220916	1000002727	EUR	466.42	20220916	INAU	E.BANKING	DE	Germa
FT22259DW97X	OT03	1000412526	EUR	0	20220916	1000002727	EUR	100.00	20220916	INAU	E.BANKING	ES	Spain
FT22259H2D2D	OT03	1000638737	EUR	0	20220916	1000002727	EUR	335.86	20220916	INAU	E.BANKING	GI	Gibralt
FT22259JYKG5	OT03	1000487728	EUR	0	20220916	1000002727	EUR	67,164.00	20220916	INAU	E.BANKING	VC	St. Vin
FT22259KD9R0	OT03	1000485008	GBP	0	20220916	1000001108	GBP	177,000.00	20220916	INAU	E.BANKING	GB	United
FT22259KTLVN	OT03	1000479191	EUR	0	20220916	1000002727	EUR	5,900.00	20220916	INAU	E.BANKING	SK	Slovak
FT22259RTLDC	OT03	1000701102	EUR	0	20220916	1000002727	EUR	4,093.00	20220916	INAU	E.BANKING	DE	Germa
FT22259RZ621	OT03	1000551089	GBP	0	20220916	1000001108	GBP	1,610.00	20220916	INAU	E.BANKING	GB	United
FT22259SK2PL	OT03	1000713348	EUR	0	20220916	1000002727	EUR	12,000.00	20220916	INAU	E.BANKING	DE	Germa
FT22259T3T26	OT03	1000721839	CHF	0	20220916	1000002719	CHF	325,000.00	20220916	INAU	E.BANKING	GT	Guate
FT22259W55DZ	OT03	1000491768	EUR	0	20220916	1000002727	EUR	24,500.00	20220916	INAU	E.BANKING	NL	Nethe
FT22259X4TWR	OT03	1000582553	EUR	0	20220916	1000002727	EUR	3,650.00	20220916	INAU	E.BANKING	HU	Hunga
FT22259XN8RS	OT03	1000734914	EUR	0	20220916	1000002727	EUR	37,712.00	20220916	INAU	E.BANKING	CY	Cyprus
FT222620L3KM	OT03	1000370645	EUR	0	20220919	1000002727	EUR	9,400.00	20220919	INAU	E.BANKING	MX	Mexic
FT222621S4CC	OT03	1000449691	EUR	0	20220919	1000002727	EUR	3,500.00	20220919	INAU	E.BANKING	BR	Brazil
FT222622B385	OT03	1000548444	EUR	0	20220919	1000002727	EUR	18,378.21	20220919	INAU	E.BANKING	FR	France
FT222622M3SL	OT03	1000752505	EUR	0	20220919	1000002727	EUR	789.22	20220919	INAU	E.BANKING	ES	Spain
FT2226233457	OT03	1000551739	CHF	0	20220919	1000002719	CHF	11,400.00	20220919	INAU	E.BANKING	ES	Spain
FT222623K39D	OT03	1000648538	EUR	0	20220919	1000002727	EUR	9,900.00	20220919	INAU	E.BANKING	FR	France
FT222623LNML	OT03	1000442913	EUR	0	20220919	1000002727	EUR	262,740.00	20220919	INAU	E.BANKING	PA	Panam
FT222624G9RL	OT03	1000744758	EUR	0	20220919	1000002727	EUR	4,200.00	20220919	INAU	E.BANKING	CL	Chile
FT2226260VFN	OT03	1000732768	EUR	0	20220919	1000002727	EUR	150.00	20220919	INAU	E.BANKING	GR	Greece
FT2226279B2J	OT03	1000416556	EUR	0	20220919	1000002727	EUR	3,040.00	20220919	INAU	E.BANKING	GR	Greece
FT222627ZQPN	OT03	1000536616	GBP	0	20220919	1000001108	GBP	3,000.00	20220919	INAU	E.BANKING	HK	Hong K

Transaction Ref	Txn Type	Debit Account	Debit Ccy	Debit Amount	Debit Value Date	Credit Account	Credit Ccy	Credit Amount	Credit Value Date	Status	Inputter	Residence	Reside
FT222629GY9Q	OT03	1000574027	EUR	0	20220919	1000002727	EUR	1,300.00	20220919	INAU	E.BANKING	HK	Hong K
FT22262BRH9D	OT03	1000420324	EUR	0	20220919	1000002727	EUR	2,586.06	20220919	INAU	E.BANKING	AT	Austria
FT22262FTWS1	OT03	1000425776	USD	0	20220919	1000002727	EUR	100.00	20220919	INAU	E.BANKING	DK	Denma
FT22262GX6MP	OT03	1000735988	EUR	0	20220919	1000002727	EUR	80,000.00	20220919	INAU	E.BANKING	LT	Lithua
FT22262HPHH0	OT03	1000702028	EUR	0	20220919	1000002727	EUR	9,403.00	20220919	INAU	E.BANKING	NL	Nether
FT22262JNQ68	OT03	1000706864	EUR	0	20220919	1000002727	EUR	90,000.00	20220919	INAU	E.BANKING	BE	Belgiu
FT22262MWN9L	OT03	1000751118	CHF	0	20220919	1000002719	CHF	49,041.20	20220919	INAU	E.BANKING	DE	Germa
FT22262N3F3F	OT03	1000713348	EUR	0	20220919	1000002727	EUR	12,100.00	20220919	INAU	E.BANKING	DE	Germa
FT22262NCVHM	OT03	1000750219	EUR	0	20220919	1000002727	EUR	991.00	20220919	INAU	E.BANKING	CN	People
FT22262NFYSH	OT03	1000406372	EUR	0	20220919	1000002727	EUR	5,530.00	20220919	INAU	E.BANKING	ES	Spain
FT22262NM8T1	OT03	1000501472	USD	0	20220919	1000002727	EUR	1,100.00	20220919	INAU	E.BANKING	ZA	South
FT22262PZBNQ	OT03	1000701366	USD	0	20220919	1000002727	EUR	5,320.00	20220919	INAU	E.BANKING	GB	United
FT22262QY96Y	OT03	1000751107	EUR	0	20220919	1000002727	EUR	1,943.00	20220919	INAU	E.BANKING	DE	Germa
FT22262RFXNS	OT03	1000574027	EUR	0	20220919	1000002727	EUR	1,300.00	20220919	INAU	E.BANKING	HK	Hong K
FT22262RTG11	OT03	1000653973	EUR	0	20220919	1000002727	EUR	3,184.69	20220919	INAU	E.BANKING	BE	Belgiu
FT22262YZ33H	OT03	1000472995	GBP	0	20220919	1000001108	GBP	1,840.00	20220919	INAU	E.BANKING	GR	Greece
FT22262Z3NPJ	OT03	1000713348	EUR	0	20220919	1000002727	EUR	12,200.00	20220919	INAU	E.BANKING	DE	Germa
FT22263127KN	OT03	1000655518	EUR	0	20220920	1000002727	EUR	2,900.00	20220920	INAU	E.BANKING	FR	France
FT222632J6FG	OT03	1000529768	EUR	0	20220920	1000002727	EUR	8,000.00	20220920	INAU	E.BANKING	ES	Spain
FT222634HCHW	OT03	1000547545	EUR	0	20220920	1000002727	EUR	660.00	20220920	INAU	E.BANKING	SK	Slovak
FT222636W42C	OT03	1000722126	EUR	0	20220920	1000002727	EUR	15,000.00	20220920	INAU	E.BANKING	DE	Germa
FT222637BHSV	OT03	1000708654	GBP	0	20220920	1000001108	GBP	11,173.84	20220920	INAU	E.BANKING	GB	United
FT222638BKRJ	OT03	1000687193	EUR	0	20220920	1000002727	EUR	29,600.00	20220920	INAU	E.BANKING	CN	People
FT222639HJ05	OT03	1000637072	EUR	0	20220920	1000002727	EUR	4,967.08	20220920	INAU	E.BANKING	BR	Brazil
FT22263FX6PS	OT03	1000492667	EUR	0	20220920	1000002727	EUR	975.00	20220920	INAU	E.BANKING	DE	Germa
FT22263LHCP3	OT03	1000435399	EUR	0	20220920	1000002727	EUR	25,500.00	20220920	INAU	E.BANKING	ES	Spain
FT22263N537M	OT03	1000748467	EUR	0	20220920	1000002727	EUR	900.00	20220920	INAU	E.BANKING	RO	Roman
FT22263PT394	OT03	1000744979	EUR	0	20220920	1000002727	EUR	830.00	20220920	INAU	E.BANKING	HU	Hunga
FT22263QZN0Q	OT03	1000720158	EUR	0	20220920	1000002727	EUR	997.98	20220920	INAU	E.BANKING	CY	Cyprus
FT22263RR52F	OT03	1000424408	GBP	0	20220920	1000001108	GBP	7,800.00	20220920	INAU	E.BANKING	GB	United
FT22263WGCFX	OT03	1000723297	CHF	0	20220920	1000002719	CHF	99,847.04	20220920	INAU	E.BANKING	DE	Germa
FT22263Y1NYD	OT03	1000653388	EUR	0	20220920	1000002727	EUR	82,050.00	20220920	INAU	E.BANKING	GB	United
FT22263YTF75	OT03	1000581743	EUR	0	20220920	1000002727	EUR	11,000.00	20220920	INAU	E.BANKING	BD	Bangla
FT222643M7GQ	OT03	1000647175	EUR	0	20220921	1000002727	EUR	900.00	20220921	INAU	E.BANKING	AT	Austria
FT222643SLXJ	OT03	1000706465	GBP	0	20220921	1000002727	EUR	750.00	20220921	INAU	E.BANKING	GB	United
FT2226442HR1	OT03	1000727845	EUR	0	20220921	1000002727	EUR	69,930.21	20220921	INAU	E.BANKING	DE	Germa
FT222645J5Z2	OT03	1000468173	EUR	0	20220921	1000002727	EUR	135.00	20220921	INAU	E.BANKING	FR	France
FT2226480F8Y	OT03	1000551666	EUR	0	20220921	1000002727	EUR	2,415.00	20220921	INAU	E.BANKING	DK	Denma
FT222648DJ7V	OT03	1000520938	EUR	0	20220921	1000002727	EUR	6,131.51	20220921	INAU	E.BANKING	NL	Nether
FT222648Y1G8	OT03	1000746076	GBP	0	20220921	1000001108	GBP	6,000.00	20220921	INAU	E.BANKING	DE	Germa
FT222649SHSZ	OT03	1000370645	EUR	0	20220921	1000002727	EUR	9,000.00	20220921	INAU	E.BANKING	MX	Mexico
FT22264B1026	OT03	1000447826	USD	0	20220921	1000001108	GBP	600.00	20220921	INAU	E.BANKING	CZ	Czech
FT22264CB3C7	OT03	1000746424	EUR	0	20220921	1000002727	EUR	11,345.60	20220921	INAU	E.BANKING	BR	Brazil
FT22264CKL5C	OT03	1000722495	EUR	0	20220921	1000002727	EUR	65,326.68	20220921	INAU	E.BANKING	AT	Austria
FT22264FLDJJ	OT03	1000744502	GBP	0	20220921	1000001108	GBP	200,928.50	20220921	INAU	E.BANKING	IL	Israel
FT22264HV1SD	OT03	1000544813	EUR	0	20220921	1000002727	EUR	6,000.00	20220921	INAU	E.BANKING	FR	France

Transaction Ref	Txn Type	Debit Account	Debit Ccy	Debit Amount	Debit Value Date	Credit Account	Credit Ccy	Credit Amount	Credit Value Date	Status	Inputter	Residence	Reside
FT22264HV7NZ	OT03	1000551666	EUR	0	20220921	1000002727	EUR	60,000.00	20220921	INAU	E.BANKING	DK	Denma
FT22264PN1BL	OT03	1000657642	EUR	0	20220921	1000002727	EUR	15,300.00	20220921	INAU	E.BANKING	IT	Italy
FT22264RV0Y9	OT03	1000430869	EUR	0	20220921	1000002727	EUR	3,590.00	20220921	INAU	E.BANKING	GB	United
FT22264RZW3H	OT03	1000738448	EUR	0	20220921	1000002727	EUR	20,512.86	20220921	INAU	E.BANKING	DE	Germa
FT22264S3JN5	OT03	1000434724	EUR	0	20220921	1000002727	EUR	5,076.52	20220921	INAU	E.BANKING	DE	Germa
FT22264S80GT	OT03	1000505826	EUR	0	20220921	1000002727	EUR	500.00	20220921	INAU	E.BANKING	NL	Nether
FT22264TTB6C	OT03	1000744596	EUR	0	20220921	1000002727	EUR	225,231.70	20220921	INAU	E.BANKING	CW	Curaca
FT22264V1KMM	OT03	1000452428	EUR	0	20220921	1000002727	EUR	319,618.00	20220921	INAU	E.BANKING	NL	Nether
FT22264W8VYF	OT03	1000561777	EUR	0	20220921	1000002727	EUR	2,587.71	20220921	INAU	E.BANKING	DE	Germa
FT22264X385Y	OT03	1000746262	EUR	0	20220921	1000002727	EUR	800.00	20220921	INAU	E.BANKING	GR	Greece
FT222652J39R	OT03	1000754672	EUR	0	20220922	1000002727	EUR	7,944.01	20220922	INAU	E.BANKING	CA	Canad
FT2226578SBX	OT03	1000397071	GBP	0	20220922	1000001108	GBP	18,848.41	20220922	INAU	E.BANKING	GB	United
FT222657923C	OT03	1000546751	EUR	0	20220922	1000002727	EUR	4,300.00	20220922	INAU	E.BANKING	PH	Philipp
FT222657C0SZ	OT03	1000448717	EUR	0	20220922	1000002727	EUR	36,400.00	20220922	INAU	E.BANKING	BE	Belgiu
FT22265DCWLW	OT03	1000732067	GBP	0	20220922	1000001108	GBP	250.00	20220922	INAU	E.BANKING	FR	France
FT22265J25T8	OT03	1000732059	EUR	0	20220922	1000002727	EUR	3,500.00	20220922	INAU	E.BANKING	FR	France
FT22265JYB8F	OT03	1000704012	EUR	0	20220922	1000001108	GBP	300.00	20220922	INAU	E.BANKING	BE	Belgiu
FT22265L4NLH	OT03	1000514299	EUR	0	20220922	1000002727	EUR	80.00	20220922	INAU	E.BANKING	SE	Swede
FT22265NTD5V	OT03	1000754688	EUR	0	20220922	1000002727	EUR	168,690.51	20220922	INAU	E.BANKING	CA	Canad
FT22265V318B	OT03	1000722808	CHF	0	20220922	1000002719	CHF	23,000.00	20220922	INAU	E.BANKING	CH	Switze
FT22265WK9R0	OT03	1000518607	EUR	0	20220922	1000002727	EUR	17,450.00	20220922	INAU	E.BANKING	FR	France
FT22265XHKCV	OT03	1000430109	USD	0	20220922	1000002727	EUR	1,930.00	20220922	INAU	E.BANKING	KY	Cayma
FT222661TV9B	OT03	1000717955	EUR	0	20220923	1000002727	EUR	45,498.59	20220923	INAU	E.BANKING	DE	Germa
FT222663M9K3	OT03	1000379987	GBP	0	20220923	1000001108	GBP	1,600.00	20220923	INAU	E.BANKING	GB	United
FT222667CM5R	OT03	1000679468	USD	0	20220923	1000002727	EUR	1.00	20220923	INAU	E.BANKING	EG	Egypt
FT222667SV46	OT03	1000732792	EUR	0	20220923	1000002727	EUR	2,700.00	20220923	INAU	E.BANKING	NL	Nether
FT2226689QZX	OT03	1000754761	EUR	0	20220923	1000002727	EUR	25,533.13	20220923	INAU	E.BANKING	QA	Qatar
FT22266C5NK0	OT03	1000389095	USD	0	20220923	1000001108	GBP	100.00	20220923	INAU	E.BANKING	AU	Austra
FT22266D7J22	OT03	1000754745	EUR	0	20220923	1000002727	EUR	77,812.79	20220923	INAU	E.BANKING	MY	Malays
FT22266F8WGS	OT03	1000679964	EUR	0	20220923	1000002727	EUR	1.00	20220923	INAU	E.BANKING	PL	Poland
FT22266FKV7L	OT03	1000738111	EUR	0	20220923	1000002727	EUR	60,000.00	20220923	INAU	E.BANKING	RO	Roman
FT22266YW8ZS	OT03	1000738111	EUR	0	20220923	1000002727	EUR	10,000.00	20220923	INAU	E.BANKING	RO	Roman
FT2226914KW4	OT03	1000668199	EUR	0	20220926	1000002727	EUR	4,748.00	20220926	INAU	E.BANKING	ES	Spain
FT222691LLK8	OT03	1000442198	EUR	0	20220926	1000002727	EUR	74,347.77	20220926	INAU	E.BANKING	DE	Germa
FT222692FHZT	OT03	1000701781	EUR	0	20220926	1000002727	EUR	10,000.00	20220926	INAU	E.BANKING	PL	Poland
FT222693V64Y	OT03	1000682469	EUR	0	20220926	1000002727	EUR	30,619.68	20220926	INAU	E.BANKING	AT	Austria
FT222693XRNF	OT03	1000531363	EUR	0	20220926	1000002727	EUR	103.00	20220926	INAU	E.BANKING	SE	Swede
FT222695HPHH	OT03	1000456493	USD	0	20220926	1000002727	EUR	1,515.00	20220926	INAU	E.BANKING	BR	Brazil
FT222695W9Q9	OT03	1000661569	EUR	0	20220926	1000002727	EUR	5,943.00	20220926	INAU	E.BANKING	ES	Spain
FT222696MS24	OT03	1000745096	EUR	0	20220926	1000002727	EUR	86,780.00	20220926	INAU	E.BANKING	BR	Brazil
FT222697Z52K	OT03	1000743549	EUR	0	20220926	1000002727	EUR	700.00	20220926	INAU	E.BANKING	DE	Germa
FT22269C86N7	OT03	1000741732	CHF	0	20220926	1000002719	CHF	17,375.37	20220926	INAU	E.BANKING	CN	People
FT22269CXKQQ	OT03	1000741236	EUR	0	20220926	1000002727	EUR	544,438.09	20220926	INAU	E.BANKING	IT	Italy
FT22269D703B	OT03	1000542397	USD	0	20220926	1000001108	GBP	249,800.00	20220926	INAU	E.BANKING	AU	Austra
FT22269G3XC7	OT03	1000493647	AUD	0	20220926	1000001108	GBP	675.00	20220926	INAU	E.BANKING	AU	Austra
FT22269GTR4S	OT03	1000590742	CHF	0	20220926	1000002719	CHF	6,000.00	20220926	INAU	E.BANKING	DE	Germa

Transaction Ref	Txn Type	Debit Account	Debit Ccy	Debit Amount	Debit Value Date	Credit Account	Credit Ccy	Credit Amount	Credit Value Date	Status	Inputter	Residence	Reside
FT22269GVJ67	OT03	1000525417	EUR	0	20220926	1000002727	EUR	7,500.00	20220926	INAU	E.BANKING	DE	Germa
FT22269J7YW5	OT03	1000537531	EUR	0	20220926	1000002727	EUR	172,048.68	20220926	INAU	E.BANKING	FR	France
FT22269KS58P	OT03	1000476648	EUR	0	20220926	1000002727	EUR	6,300.00	20220926	INAU	E.BANKING	PT	Portug
FT22269KTLZ6	OT03	1000726954	EUR	0	20220926	1000002727	EUR	175,000.00	20220926	INAU	E.BANKING	HU	Hunga
FT22269NV0WD	OT03	1000395745	CAD	0	20220926	1000002727	EUR	10,980.00	20220926	INAU	E.BANKING	DE	Germa
FT22269PFVPM	OT03	1000428694	EUR	0	20220926	1000002727	EUR	29,819.59	20220926	INAU	E.BANKING	CY	Cyprus
FT22269Q4ZLV	OT03	1000736348	CAD	0	20220926	1000001108	GBP	750.00	20220926	INAU	E.BANKING	GB	United
FT22269Q57QN	OT03	1000723149	CHF	0	20220926	1000002719	CHF	5,000.00	20220926	INAU	E.BANKING	AT	Austria
FT22269QFJLH	OT03	1000408413	GBP	0	20220926	1000001108	GBP	2,744.61	20220926	INAU	E.BANKING	ES	Spain
FT22269R4V0R	OT03	1000694858	EUR	0	20220926	1000002727	EUR	103,000.00	20220926	INAU	E.BANKING	ES	Spain
FT22269TTVMM	OT03	1000729708	GBP	0	20220926	1000001108	GBP	3,000.00	20220926	INAU	E.BANKING	GB	United
FT22269W3B9Y	OT03	1000752491	EUR	0	20220926	1000002727	EUR	1,000.00	20220926	INAU	E.BANKING	NL	Nether
FT22269W588H	OT03	1000657968	EUR	0	20220926	1000002727	EUR	9,900.00	20220926	INAU	E.BANKING	GR	Greece
FT22269YBTQ4	OT03	1000690925	EUR	0	20220926	1000002727	EUR	2,000.00	20220926	INAU	E.BANKING	FR	France
FT22269Z8386	OT03	1000754621	EUR	0	20220926	1000002727	EUR	760,119.90	20220926	INAU	E.BANKING	ES	Spain
FT2227017DRJ	OT03	1000739045	CHF	0	20220927	1000002719	CHF	4,795.19	20220927	INAU	E.BANKING	DE	Germa
FT222702PQBV	OT03	1000491922	EUR	0	20220927	1000002727	EUR	8,095.00	20220927	INAU	E.BANKING	PY	Paragu
FT2227091FMS	OT03	1000583479	EUR	0	20220927	1000002727	EUR	1,900.00	20220927	INAU	E.BANKING	GR	Greece
FT222709TSVL	OT03	1000496258	EUR	0	20220927	1000002727	EUR	158,500.00	20220927	INAU	E.BANKING	NL	Nether
FT22270BHZ4J	OT03	1000464216	EUR	0	20220927	1000002727	EUR	9,200.00	20220927	INAU	E.BANKING	CL	Chile
FT22270CB5TM	OT03	1000409975	EUR	0	20220927	1000002727	EUR	900.00	20220927	INAU	E.BANKING	PT	Portug
FT22270MS57K	OT03	1000735619	EUR	0	20220927	1000002727	EUR	300.00	20220927	INAU	E.BANKING	GB	United
FT22270P5WK4	OT03	1000515527	EUR	0	20220927	1000002727	EUR	700,000.00	20220927	INAU	E.BANKING	GB	United
FT22270PCFPS	OT03	1000743255	EUR	0	20220927	1000002727	EUR	8,901.37	20220927	INAU	E.BANKING	DE	Germa
FT22270Q7GH1	OT03	1000722126	EUR	0	20220927	1000002727	EUR	15,000.00	20220927	INAU	E.BANKING	DE	Germa
FT22270SFX34	OT03	1000657968	EUR	0	20220927	1000002727	EUR	9,900.00	20220927	INAU	E.BANKING	GR	Greece
FT22270T67WY	OT03	1000590742	CHF	0	20220927	1000002719	CHF	16,000.00	20220927	INAU	E.BANKING	DE	Germa
FT22270XFF68	OT03	1000751126	CHF	0	20220927	1000002719	CHF	7,726.07	20220927	INAU	E.BANKING	CA	Canad
FT22270XZ7XY	OT03	1000508628	EUR	0	20220927	1000002727	EUR	16,736.51	20220927	INAU	E.BANKING	NL	Nether
FT22270YLMF6	OT03	1000439203	EUR	0	20220927	1000002727	EUR	28,408.00	20220927	INAU	E.BANKING	NL	Nether
FT22270Z7SYR	OT03	1000729708	GBP	0	20220927	1000001108	GBP	250.00	20220927	INAU	E.BANKING	GB	United
FT222710GRX6	OT03	1000744677	EUR	0	20220928	1000002727	EUR	2,300.00	20220928	INAU	E.BANKING	ZA	South
FT2227116YXM	OT03	1000740841	EUR	0	20220928	1000002727	EUR	3,400.00	20220928	INAU	E.BANKING	DE	Germa
FT222712RBHR	OT03	1000657968	EUR	0	20220928	1000002727	EUR	9,500.00	20220928	INAU	E.BANKING	GR	Greece
FT222713P5DX	OT03	1000405538	EUR	0	20220928	1000002727	EUR	150,000.00	20220928	INAU	E.BANKING	PT	Portug
FT222714ZXC7	OT03	1000712268	SGD	0	20220928	1000002727	EUR	10,160.00	20220928	INAU	E.BANKING	DE	Germa
FT222715DF5N	OT03	1000393308	EUR	0	20220928	1000002727	EUR	12,000.00	20220928	INAU	E.BANKING	HU	Hunga
FT22271730JF	OT03	1000721324	EUR	0	20220928	1000002727	EUR	131,000.00	20220928	INAU	E.BANKING	FR	France
FT22271DZPDW	OT03	1000703792	EUR	0	20220928	1000002727	EUR	67.39	20220928	INAU	E.BANKING	MX	Mexic
FT22271GCL9G	OT03	1000657968	EUR	0	20220928	1000002727	EUR	9,900.00	20220928	INAU	E.BANKING	GR	Greece
FT22271LKGKX	OT03	1000679468	USD	0	20220928	1000002727	EUR	10.00	20220928	INAU	E.BANKING	EG	Egypt
FT22271LY0SH	OT03	1000498145	EUR	0	20220928	1000002727	EUR	4,540.80	20220928	INAU	E.BANKING	PA	Panam
FT22271M6MXW	OT03	1000479558	EUR	0	20220928	1000002727	EUR	30,578.39	20220928	INAU	E.BANKING	AT	Austria
FT22271RRD9T	OT03	1000717858	EUR	0	20220928	1000002727	EUR	100.00	20220928	INAU	E.BANKING	AT	Austria
FT22271SPJQF	OT03	1000513853	EUR	0	20220928	1000002727	EUR	680.00	20220928	INAU	E.BANKING	MU	Maurit
FT22271T5DWT	OT03	1000745371	CHF	0	20220928	1000002719	CHF	165,500.00	20220928	INAU	E.BANKING	GB	United

Transaction Ref	Txn Type	Debit Account	Debit Ccy	Debit Amount	Debit Value Date	Credit Account	Credit Ccy	Credit Amount	Credit Value Date	Status	Inputter	Residence	Reside
FT22271V5490	OT03	1000702788	EUR	0	20220928	1000002727	EUR	19,740.63	20220928	INAU	E.BANKING	CY	Cyprus

Exhibit 10
Authorizations and Requests
Transfer of Funds

Outlook

Re: Liquidation Questions

From Peter Schiff <bahdebing@yahoo.com>
Date Tue 8/30/2022 8:32 AM
To Wigberto Lugo <wigberto@lugomender.com>; Wigberto Lugo <trustee@europacbank.com>; Joanna Leslie <jleslie@Europacbank.com>
Cc Yassiris Latorre <hr@europacbank.com>; Adabel Hernandez <ahernandez@europacbank.com>; Jonella Hanson <jhanson@europacbank.com>; Elvis Samuel <esamuel@europacbank.com>; Amanda Dioum <adioum@Europacbank.com>

No, we don't need confirmation from OCIF on the liquidation plan. Just process everything. The only thing that we need confirmation for is the asset sale to Qenta. OCIF wants the customers to get their money. If the sale to Qenta is turned down, all customers will have to withdraw their money.

On Tuesday, August 30, 2022 at 08:27:55 AM EDT, Joanna Leslie <jleslie@europacbank.com> wrote:

Hello All,

In that case Operations will not process anything until we have confirmation via Wigberto that OCIF has approved the liquidation plan.

Best regards,

Joanna Leslie-Ollivierre / Head of Operations
+1-888-527-4041 x 103 / jleslie@europacbank.com

Euro Pacific Bank
53 Palmeras St, 10th Floor, San Juan 00901, Puerto Rico
www.europacbank.com / tel: +1-787-305-3663 / fax: +1784-453-2085

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From: Peter Schiff <bahdebing@yahoo.com>
Sent: Tuesday, August 30, 2022 8:24 AM
To: Wigberto Lugo <wigberto@lugomender.com>; Wigberto Lugo <trustee@europacbank.com>; Joanna Leslie <jleslie@Europacbank.com>
Cc: Yassiris Latorre <hr@europacbank.com>; Adabel Hernandez <ahernandez@europacbank.com>; Jonella Hanson <jhanson@europacbank.com>; Elvis Samuel <esamuel@europacbank.com>; Amanda Dioum <adioum@Europacbank.com>
Subject: Re: Liquidation Questions

We are charging normal transaction fees for all services.

As long as OCIF gives final approval to the liquidation plan, Qenta is buying the card program. So customers don't have to do anything with their cards. They can use when they want to. If OCIF turns down the plan, we will email customers that they must quickly spend all the money on their cards, as the program will shut down, and they will lose unspent funds.

I would try to allow any incoming wires already in the system to be processed. Outgoing wires should be 1st party. We are not providing normal banking services, just allowing customers to withdraw they accounts. If it's a corporate account we should consider a wire to the beneficial owner as being first party.

We should process all sell orders form the mutual funds. That's the only way we can return customer funds.

We can close all accounts with zero balances. No need to have customers close. The bank is closing, so all accounts are closing.

On Tuesday, August 30, 2022 at 08:16:38 AM EDT, Joanna Leslie <jleslie@europacbank.com> wrote:

Good morning Wigberto,

We need clarification on how to proceed with the following transactions:

1. Brokerage transfers Interactive Brokers / EPT (moving funds between the EPB cash and brokerage

cash account) – can they be processed?

2. Internal transfers between different customers – is it safe to assume we should only process first party (same name) and pseudo first party transfers (for instance between a company and the shareholder)?

3. Outgoing wires – should we cancel all outgoing wires that are not first party? Will pseudo first party be allowed for outgoing?

4. Incoming Wires - Peter has already expressed his wish to credit these where possible. Please advise if we can proceed with this or have to return the wires? Can we charge our fees?

5. Mutual Fund - can we proceed to approve mutual fund share sell orders?

6. MT4 accounts – can we proceed to approve MT4 transfers?

7. EP Card Services – what action do we need to take regarding the cards?

8. Accounts that are zero or negative – can they be closed, or should we just leave them? Do we need to wait for an account closure request from the customer?

9. Fees in general - can we charge our usual fees for services (account statements, wire transfer copy etc)?

Please provide these answers as soon as possible so Operations can start processing.

Best regards,

Joanna Leslie-Ollivierre / Head of Operations
+1-888-527-4041 x 103 / jleslie@europacbank.com

Euro Pacific Bank
53 Palmeras St, 10th Floor, San Juan 00901, Puerto Rico
www.europacbank.com / tel: +1-787-305-3663 / fax: +1784-453-2085

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Exhibit 11
EPB Website Publications

LAST UPDATED: JULY 12, 2025

July 12, 2025: Qenta Status Update. (https://europacbank.com/support/status-update-july-2025/)

October 31, 2024: Receiver's Report. (https://europacbank.com/support/receivers-reports-20241031/)

October 16, 2024: Receiver's Notice. (https://europacbank.com/support/receivers-notice-20241016/)

October 04, 2024: Migration Update. (https://europacbank.com/support/migration-update-20241004/)

April 16, 2024: Receiver's Reports. (https://europacbank.com/support/receivers-reports-20240416/)

April 13, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240413/)

March 11, 2024: Receiver's Reports. (https://europacbank.com/support/receiver-reports-20240311/)

March 03, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240303/)

February 19, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240219/)

February 02, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240202/)

November 21, 2023: Migration Update (Opt-in Only). (https://europacbank.com/support/migration-update-202311/)

November 20, 2023: Progress Report (Opt-out Only). (https://europacbank.com/support/progress-report-20231120/)

September 22, 2023: Report & Communication Portal. (https://europacbank.com/support/migration-update-20230922/)

September 01, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20230901/)

July 20, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230720/)

June 23, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230623/)

June 17, 2023: Receiver's report. (https://europacbank.com/support/progress-report-20230617/)

May 31, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230531/)

May 05, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230505/)

April 20, 2023: Liquidation update- Action required. (https://europacbank.com/support/migration-liquidation-update_20230421/)

March 31, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230331/)

March 8, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230308/)

January 27, 2023: Correspondent bank update. (https://europacbank.com/support/migration-liquidation-update-20230127/)

December 16, 2022: Comprehensive FAQ is published. (https://europacbank.com/support/migration-liquidation-faq-20221216/)

December 05, 2022: Migration & liquidation update. (https://europacbank.com/support/migration-liquidation-update_20221205/)

November 01, 2022: Mutual funds & outgoing wire requests update. (https://europacbank.com/support/migration-update-20221101/)

October 21, 2022: Update on Opt-out deadline - Extended. (https://europacbank.com/support/bank-liquidation-update-20221021/)

October 14, 2022: Customer Update & Townhall. (https://europacbank.com/support/bank-liquidation-update-20221017/)

October 8, 2022: Update on opt-out deadline for EPB clients who do not wish to migrate their account to Qenta Inc. (https://europacbank.com/support/bank-liquidation-update-20221008/)

September 30, 2022: Update on bank liquidation, pending transactions, and migration of assets to Qenta Inc. (https://europacbank.com/support/bank-liquidation-update-20220930/)

September 28, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration. (https://europacbank.com/support/bank-liquidation-update-20220928/)

September 16, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration. (https://europacbank.com/support/bank-liquidation-update-20220916/)

September 8, 2022: Qenta has emailed a welcome letter to all EPB clients. You can read a copy of it here

September 8, 2022: Qenta has emailed welcome letter to all EPB clients. You can read a copy of it here: (https://europacbank.com/support/qenta-welcome-letter/)

September 2, 2022: Update on pending transactions, brokerage, and account migration. (https://europacbank.com/support/bank-liquidation-update-20220902/)

August 29, 2022: Euro Pacific Bank liquidation has commenced. Please read our formal instructions here as it is time-sensitive. (https://europacbank.com/support/commencement-of-liquidation-20220829/)

Euro Pacific Bank

Commencement of Bank Liquidation

Published: August 29, 2022



Dear Euro Pacific Bank customer,

We write to inform you that, although Euro Pacific Bank is now in liquidation pursuant to a Consent Order for Liquidation and Dissolution of International Financial Entity entered into with the Puerto Rico Office of the Commissioner of Financial Institutions ("OCIF"), we can now provide you with a positive update on an easy path forward.

Account Migration

Since Euro Pacific Bank will be closing its business operations in Puerto Rico permanently and irrevocably, we are in advanced conversations to arrange for the transfer of all customer deposits, cash and physical precious metals, as well as ownership of the bank's four wholly owned subsidiaries, which includes the broker dealer where many customers maintain linked brokerage accounts, to a global financial services technology company headquartered in the United States with an experienced management team and solid track record.

The four subsidiaries of the bank will be owned directly by that company. The bank's currency and precious metals deposits will be held by its wholly owned subsidiary operating in Dubai. From your account there you will be able to send and receive third party payments in multiple currencies, including U.S. dollars and utilize a debit card to access your deposits.

Once your funds are transferred, they will be immediately available to spend or withdraw. If the acquiring financial institution does not meet your needs, you can transfer your balance to an alternative financial institution.

Migration Opt Out

If you prefer, you may have your deposits wired to an alternative financial institution of your choosing. To initiate this process, you must log into eBanking and request an outgoing wire transfer to an account with the same beneficial ownership as your Euro Pacific account.

You have thirty (30) days from the date of this notice to complete the outgoing wire request for processing.

Reminders:

- U.S. dollars must be converted to another currency the bank supports to be wired out.
- If you do not want your gold and silver holdings to be under new ownership, you must sell them, as the bank cannot deliver out metal.
- If you do not want your brokerage account to be under new ownership, you must liquidate your holdings, including in the bank's proprietary mutual funds, and transfer any proceeds to your bank account so those amounts can be included in the wire.

We appreciate the confidence you have placed in us over the years and your continued support of our bank throughout this process. Our customers have always been our priority and you continue to be our priority throughout this liquidation process.

Sincerely,

Euro Pacific Bank Management

Bank Liquidation Update: September 2, 2022

Published: September 2, 2022



As stated in the official Notice of Liquidation on Monday, August 29th, Euro Pacific Bank was required to proceed with its liquidation and allow clients to request withdrawals inside their eBanking. We also disclosed the existence of a financial services company interested in continuing to serve any clients that remain.

Today, we would like to provide an update on both topics.

Operational Delays

Euro Pacific Bank began allowing clients to submit transfer requests in their eBanking on Monday, August 29th. Unfortunately, those transfer requests are currently being held by our correspondent bank, who has requested written confirmation from the bank's government-appointed receiver that we are authorized to proceed with your wire transfer(s).

However, the receiver will not provide our correspondent bank with that written confirmation until the Puerto Rico financial regulator (OCIF) authorizes him to. In other words, our correspondent bank will not process any of our wire transfer requests until OCIF provides authorization.

We understand this situation may be frustrating for some of you, especially after patiently waiting. However, the bank is in receivership and has been under the control of OCIF, so transactions can take much longer to process than it did before.

As stated in our Monday notice, clients can still request transactions and they will be processed as soon as we're allowed to. Thanks for your continued patience through this process and we will continue to update you on this step.

Brokerage Accounts

Similarly, if you currently have a Euro Pacific Trader brokerage account and are awaiting the transfer of your positions to your new Interactive Brokers account, we have also been asked to get written authorization from our receiver before any of our transfer requests can be processed.

Account Migration

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As you may recall in our Notice of Liquidation, a financial services company has made an offer to continue serving our customers, which includes bank deposits, precious metals, mutual funds, and brokerage accounts. Understandably, an important part of your consideration to be migrated to this new institution is who they are and what they do.

We have received authorization to disclose the company's details, so you can expect to receive a welcome letter from this company within a few days. A copy of their welcome letter will be published here on our website. They also plan to conduct a "Virtual Customer Townhall" within the next two weeks to introduce their senior leadership team and answer your questions.

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Qenta Welcome Letter

Published: September 8, 2022



Dear valued customer,

On behalf of Qenta Inc., welcome to our family. We know this has been a difficult time and look forward to a brighter future together. In this letter, we want to share who we are, why we are excited for you to join us, and invite you to our Virtual Customer Townhall on Wednesday September 14, 2022, at 8am Eastern Standard Time to directly answer any questions you may have.

After September 29, 2022, remaining customer assets will be held by Qenta subsidiaries but you will have full and ongoing access to your deposits, precious metals holdings, mutual funds and brokerage accounts. Qenta is not a bank; however, it has subsidiaries that are licensed by the Dubai Multi Commodities Centre, which allows Qenta to trade precious metals for its clients. Qenta will facilitate payments in multiple currencies, and over the next year upgrade its card offering.

To ease the transition, a number of your former bank's staff will also be joining our team.

About Qenta

Qenta is a global financial technology firm headquartered in Houston, Texas, with a vision to lead the world to a frictionless and democratized ecosystem. Towards this end, we offer to our customers savings products such as Responsible Gold, wallets, payment solutions for merchants, and commodities hedging and financing products. We operate in 17 countries around the world with a team of over ~200 people.

Our group Chairman and CEO, Brent de Jong, started working with banks in 1997 to provide financing and restructuring advice globally while at J.P. Morgan. He has since achieved a solid track record of building teams and transforming businesses with the core principle of customer satisfaction.

Our Managing Director, Mariame McIntosh, has worked in the financial services industry for two decades and, prior to joining Qenta, was the CEO of a commercial bank for over 6 years. Her success at the bank was driven by a relentless focus on customer experience.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

Our Mission

Qenta is a purpose-driven business with a committed, experienced team and it is our hope that you can get to know more of our team members in the coming months.
We also hope that you will give us the chance to serve you as we believe the benefits of joining the Qenta family are:

1. Safe and secure custody of your assets;
2. Access to innovative digital products to meet your needs;
3. Our commitment to the highest environmental, social and governance (ESG) standards.

For more information about the company, please visit our website at www.qenta.com.

Qenta 1st Virtual Customer Townhall

We look forward to meeting you during our first global Virtual Customer Townhall where you will be able to share thoughts and feedback, as well as ask any clarifying questions directly to the senior leadership team at Qenta.

Time: Sep 14, 2022 08:00 AM Eastern Time (US and Canada)
Hosted by: Brent de Jong, Chairman and CEO; and Mariame McIntosh, Managing Director of Qenta Inc.
Join Zoom Meeting: https://zoom.us/j/92905617682?pwd=a0FNY1dHaGZUM1VOK1o5VkdwOHR1dz09
Meeting ID: 929 0561 7682
Passcode: UXs9jh

Click here to add the event to your calendar:

- Google
- Outlook
- Yahoo

If Qenta is not meeting your needs, you can transfer your funds to another organization at any time and through the usual means.

Sincerely,

Brent De Jong
Chairman & CEO, Qenta Inc.

Mariame McIntosh
Managing Director, Qenta Inc.

Security and Stability
Foreign Currency Exchange
Privacy Policy
User Guide
Careers
Precious Metals Storage Account
Website Terms & Conditions
Contact
Brokerage
Client Warnings
Mutual Funds

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Migration Opt Out Update: September 16, 2022

Published: September 16, 2022



As promised, we are providing a long-awaited update on the bank's operations, aimed at clients wishing to opt out of the migration to Qenta Inc.

We are fully aware that many of you have waited very patiently over the last few months for OCIF and our appointed receiver to approve our liquidation plan. We notified clients on August 29th that they can begin entering their transaction requests inside their eBanking, per OCIF's orders to liquidate the bank.

Summary

✅ OCIF suspended Euro Pacific Bank and appointed a receiver (or "trustee") to manage all bank operations and assets on June 30, 2022

✅ Currency conversions, outgoing wire transfer form, precious metals trading, and mutual fund trading re-enabled in eBanking on August 29th

✅ OCIF and trustee fully approved Liquidation Plan for Euro Pacific Bank on September 6, 2022

⌛ Correspondent bank awaiting further information from OCIF to process our client transactions

⌛ Interactive Brokers awaiting further information from OCIF to transfer client positions to new brokerage accounts

⌛ Mutual fund sell orders awaiting approval from Interactive Brokers, its custodian

⌛ Accounts with debit blocks to be unblocked by Compliance so wire transfer requests can be entered

Operational Delays

Outgoing Wire Transfers

Euro Pacific Bank began allowing clients to submit transfer requests in their eBanking on Monday, August 29th. Unfortunately, those transfer requests are currently still being held by our correspondent bank, who has requested written confirmation from the bank's government-appointed receiver that we are authorized to proceed with your wire transfer(s).

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

Although the receiver, with permission from OCIF, has provided our correspondent bank with written authorization and the government-approved Liquidation Plan, our correspondent bank has requested additional authorization from the receiver, which he is currently attempting to fulfill.

We understand this situation may be frustrating for many of you, as it is for us. We have been waiting eagerly for your transactions be processed, however our correspondent bank will only accept our transaction requests after fulfilling their internal requirements. Simply put, we can only process your transactions as soon as our correspondent bank processes them.

In the meantime, here are some actions you can take:

- Simply enter your outgoing wire transfer request and get in the queue so the bank can process them as soon as our correspondent bank is ready.
- If you have a blocked bank account and cannot enter a wire transfer, our compliance team is in the process of unblocking them so that you can enter your wire transfer request. We expect this to be completed over the next 1-2 business days.
- Ensure that your outgoing wire transfer requests are first party. In other words, they should go to an account under the same name. If you have a corporate account with us, transfers can be made to your personal name if preferred.
- Consolidate your cash balances into one of your bank accounts before entering your final wire transfer request, if you hold multiple currencies. Remember, wire transfers can only be requested in EUR, GBP, CHF, JPY, and PLN.

Thanks for your continued patience through this process and we will continue to update you on this step.

Brokerage Accounts

Similarly, if you currently have a Euro Pacific Trader brokerage account and are awaiting the transfer of your positions to your new Interactive Brokers account, Interactive Brokers has also asked to get written authorization from our receiver before any of our transfer requests can be processed, for legal reasons.

To date, written authorization has been provided by the receiver with approval from OCIF, and Interactive Brokers is currently reviewing the documentation. We hope they can complete this task as soon as possible so that we can regain the ability to transfer your cash and stock positions to your new brokerage accounts.

Precious Metals

Precious metals sell orders are being fulfilled in real-time with no delay or issues.

Mutual Funds

Mutual fund sell orders are currently delayed for the same reason as the brokerage account delay—Interactive Brokers is the custodian of the mutual fund accounts, and currently we are prevented from processing mutual fund sell requests until they have approved the bank trustee's requests.

Frequently Asked Questions

We will be posting your requested Q&As here shortly.

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Migration Opt Out Update: September 28, 2022

Published: September 28, 2022



Dear Customers,

This is a follow up to our last update on September 16, 2022. We continue to work with our custodians and stakeholders, including the OCIF-appointed receiver to ensure the liquidation process is completed according to plan.

We acknowledge that outgoing wire transfers are still delayed since our last update on September 16, 2022. The delay continues to result from the OCIF-appointed receiver's ongoing discussions with our custodians, i.e. our correspondent bank for outgoing wire transfers and Interactive Brokers for brokerage asset transfers.

Specifically, our custodians requested from the receiver several documents—personal and regulatory—which are in the final stages of being fulfilled. Unfortunately, we have limited involvement in this process, as our custodians are required to deal exclusively with the receiver.

Despite the delays, Euro Pacific Bank has maintained 100% of customer cash on-demand and ready to withdraw through the entirety of this receivership.

Latest Update

1. As a reminder, Euro Pacific Bank customers will be migrated to Qenta on the transfer date unless a customer elects to opt-out of the transfer. The planned transfer date is September 29, 2022, however the actual transfer date will be dependent on when the receiver and the correspondent bank processes all wires. As mentioned before, we do not have control over these delays, but we continue to stay abreast and will keep you informed.
2. We anticipate all precious metal holdings will be transferred by September 30, 2022, however we are still waiting on the receiver and the correspondent bank to complete their process for cash transfers to take place.
3. Pursuant to the OCIF-approved Liquidation and Dissolution Plan, Euro Pacific Bank will be liquidated shortly after all funds have been transferred to customers who have opted out as well as those who are being migrated to Qenta. Regardless, our team continues to be here to serve you and will also be joining Qenta.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

4. Even after the transfer date, customers who have been migrated to Qenta can request funds at any time by entering the wire request in eBanking with details of a destination account in their name (first party).

5. Current Euro Pacific Bank customers whose accounts are currently blocked will have access to their accounts during the period between September 29 and October 7, 2022 only for the purpose of providing missing information for such account to remain active with Qenta or to request the wire of the available funds to a destination account in their name and the subsequent closing of the account. Such wires shall be processed, and the corresponding funds will be transferred, when the correspondent bank and receiver complete their process (even if that were to happen after October 7, 2022). After such date, such accounts will once again be placed under review by Qenta, with limited functionality.

Further FAQs will be shared this week, and the Qenta team will have another Customer Townhall meeting on Monday October 10, 2022. In the meantime, please continue to direct all queries to info@europacbank.com.

Summary of Recent Events

- OCIF suspended Euro Pacific Bank and appointed a receiver (or “trustee”) to manage all bank operations and assets on June 30, 2022
- Currency conversions, outgoing wire transfer form, precious metals trading, and mutual fund trading re-enabled in eBanking on August 29th
- OCIF and trustee fully approved Liquidation Plan for Euro Pacific Bank on September 6, 2022
- Euro Pacific Bank’s correspondent bank awaiting further information from receiver to process our client transactions
- Interactive Brokers awaiting further information from receiver to transfer client positions to new brokerage accounts
- Mutual fund sell orders awaiting approval from Interactive Brokers, its custodian
- Blocked accounts to be temporarily unblocked by Euro Pacific Bank so customers may provide missing information for accounts to remain active with Qenta or to wire available funds to a destination account in their name and the subsequent closing of the account. Otherwise accounts will remain blocked.

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Migration Update: September 30, 2022

Published: September 30, 2022



Dear Customers,

Below please find an update on the liquidation status as well as some actions required by you, our customer.

If you opted in to migrate to Qenta

1. Precious Metals Account holdings will be transferred to Qenta's management on September 30, 2022.
2. Qenta is also in the process of acquiring Euro Pacific Securities' role as the Fully-Disclosed Broker on all brokerage accounts currently at Interactive Brokers, in order to service all of your brokerage needs.
3. Finally, bank account cash holdings will begin transferring to Qenta's banking network in October 2022, once the receiver and correspondent bank has completed their review and approval process.
4. As this migration period occurs from today September 30, 2022 through October, there will be more frequent communication via email, this website, and Customer Townhalls to keep you informed.

As a reminder, Qenta is not a bank. Qenta is a financial technology firm whose vision is to lead the world to a frictionless and democratized financial ecosystem, operating three divisions focused on payments, pay-outs, and commodities hedging. As such, Qenta can facilitate first-party wires, as well as to other Qenta clients. While third party wire transfers are not possible today, we are working to bring this service to you in the future.

In addition, one of Qenta's key retail products is a Responsible Gold savings product that gives customers a title of ownership to gold that can be accessed through a digital wallet for convenience, liquidity and flexibility. Qenta also works with businesses to simplify their complex payment needs via smart contracts.

Feel free to reach out to Qenta at anytime at info@europacbank.com. The Qenta team looks forward to welcoming you to their family.

If you opted out

SEARCH ARTICLES

Search

- Account Opening
- Affiliates
- Bank Accounts
- Bank Cards
- Brokerage Accounts
  - Euro Pacific Trader
- Client Warnings
- Managed Investments
  - Manager Commentary
  - Mutual Funds
  - Separately Managed Accounts
- News & Blog
- Precious Metals
- Security and Regulation
- Top Articles
- Wire Transfers

1. To follow up our previous Migration Opt Out updates, we are happy to announce that some progress has been made on the processing of your pending outgoing wire transfers. Our correspondent bank and the bank's receiver have come to an agreement to start releasing funds, albeit manually. We appreciate your continued patience as funds are periodically released.
2. The Migration Opt Out deadline has now been postponed to October 7, 2022. What this means to you is that if you do not want your funds migrated to Qenta Inc., all outgoing wire transfer requests should be made no later than October 7th inside eBanking, to another account in the same name (first party), or beneficial owner's name if you hold a corporate account.
3. If you are considering opting in, please note that even after the metals and cash are migrated to Qenta, customers can request at any time for funds to be sent to an account in his or her name at another institution via eBanking.

Summary of Recent Events

- OCIF suspended Euro Pacific Bank and appointed a receiver (or "trustee") to manage all bank operations and assets on June 30, 2022
- Currency conversions, outgoing wire transfer form, precious metals trading, and mutual fund trading re-enabled in eBanking on August 29th
- OCIF and trustee fully approved Liquidation Plan for Euro Pacific Bank on September 6, 2022
- Interactive Brokers awaiting further information from receiver to transfer client positions to new brokerage accounts
- Mutual fund sell orders awaiting approval from Interactive Brokers, its custodian
- Euro Pacific Bank's correspondent bank will begin processing transactions in collaboration with the receiver
- Blocked accounts to be temporarily unblocked by Euro Pacific Bank so customers may provide missing information for accounts to remain active with Qenta or to wire available funds to a destination account in their name and the subsequent closing of the account. Otherwise accounts will remain blocked.

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Migration Update: Oct 8, 2022

Published: October 8, 2022



Dear Customers,

The following details are applied to those of you who wish to **opt-out** of Qenta migration:

Due to a technical issue, some of the recently unblocked accounts did not have the full functionality to request outgoing wires as expected. As such, the opt-out deadline has been extended to **Friday, October 14, 2022** for all cash deposit clients.

This means that, should you not want your account to migrate to Qenta, you should request an outgoing wire by no later than October 14th, through eBanking, to another account in the same name (first party wire) or that of the same beneficial owners if you have a corporate account.

If you are encountering any difficulties, please feel free as always to contact our Client Services team through the Support Center or through info@europacbank.com.

Summary of Recent Events

- OCIF suspended Euro Pacific Bank and appointed a receiver (or “trustee”) to manage all bank operations and assets on June 30, 2022
- Currency conversions, outgoing wire transfer form, precious metals trading, and mutual fund trading re-enabled in eBanking on August 29th
- OCIF and trustee fully approved Liquidation Plan for Euro Pacific Bank on September 6, 2022
- Interactive Brokers awaiting further information from receiver to transfer client positions to new brokerage accounts
- Mutual fund sell orders awaiting approval from Interactive Brokers, its custodian
- Euro Pacific Bank’s correspondent bank will begin processing transactions in collaboration with the receiver

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

- Blocked accounts to be temporarily unblocked by Euro Pacific Bank so customers may provide missing information for accounts to remain active with Qenta or to wire available funds to a destination account in their name and the subsequent closing of the account. Otherwise accounts will remain blocked.
- Unblocked accounts have full functionality. Opt-out deadline to be extended to Oct 14, 2022 for clients to request outgoing wires.

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Migration Update: Oct 14, 2022

Published: October 14, 2022



Dear Customers,

Thank you for attending our Townhall on October 12th and for your engagement. As promised, we will have a follow-up Townhall on **Monday, October 17, from 9-10am EST (US & Canada)** given that we ran out of time on October 12. See meeting details below.

- Meeting ID: 984 2068 7642
- Passcode: 054496
- Zoom Meeting: Link

Other key reminders:

1. For opt-out clients: The deadline to opt-out has been extended from today until **October 22, 2022**. For emphasis, this means that customers who do not wish their accounts to be transferred to Qenta, must request an outgoing wire through eBanking to another account in the same name (first party wire) or that of the same beneficial owners in the case of corporate accounts, by no later than October 22, 2022.
2. As mentioned before, the delay in the processing of outgoing wires continues until the Receiver and correspondent banking institutions complete their process. This situation is out of our control, but we will continue to monitor the situation and keep you updated.
3. Please feel free to reach out to our Client Services team through the Support Center in eBanking or through info@europacbank.com, and they will continue to provide all assistance for any issues you may have.

Thank you very much, and we look forward to hearing from you on Monday.

Best Regards,

Qenta Team.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Migration Update: Oct 21, 2022

Published: October 21, 2022



Dear Customers,

Thank you for your continued patience. We wanted to let you know that the Receiver continues to work with the correspondent financial institution to process all outgoing wires for opt-out clients and the remaining wires for opt-in clients, however, we have not been given an indication that their process will end today.

As such, the Opt-out period will be extended from October 22 to **Monday, October 31, 2022.**

Meanwhile, we continue to follow up, and will keep you updated on any developments. As always, please feel free to reach out to us directly at info@europacbank.com, or if you need to escalate, you can email hphan@europacbank.com.

Sincerely,

Qenta Team.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Migration Update: Nov 1, 2022

Published: November 1, 2022



Dear Customers,

Please find an update for all mutual fund account holders as well as clients who have entered partial liquidation requests in eBanking.

Mutual funds

As the existing mutual fund products will be discontinued after the migration, all holders of mutual fund shares should enter a sell order within eBanking for the entirety of their current positions. Any shares still being held at the migration date would be liquidated by the bank, at which point the exact dollar value would then be credited to your cash account accordingly in order for these funds to be included in the migration.

Outgoing wire requests

The bank's OCIF-appointed receiver has stipulated that all outgoing wires for opt-out clients must be for the entirety of the remaining account balance, as such partial outgoing wires would not be accepted before the migration to Qenta. Please keep in mind however that once the migration to Qenta has been completed you will be able to liquidate any portion of your account that you wish at any time to a first-party account of your choosing.

To cancel an existing partial outgoing wire, please send the request to the bank using the eBanking Support center, or by writing to info@europacbank.com.

Deadline Extended

To give you more time to make adjustments accordingly, the opt-out deadline for all customers has been extended to **Wednesday, November 9, 2022.**

As a reminder, the OCIF-appointed receiver continues to work with the correspondent financial institutions to review and process all wires for opt-out and opt-in clients, and we continue to wait for completion of their process.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

And as always, please feel free to reach out to us directly anytime at info@europacbank.com or if you need to escalate you can email hphan@europacbank.com.

Sincerely,

Euro Pacific Bank.

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Migration & Liquidation Update: Dec 5, 2022

Published: December 5, 2022



Dear Customers,

Thank you for your continued patience. We wanted to let you know that the Receiver appointed by the Puerto Rican government to oversee the liquidation process continues to work with the correspondent bank to process all outgoing wires for opt-out clients as well as the wires for opt-in clients, however, we still do not have a clear indication as to when their process will end. Your frustration is shared and understood.

Until these parties have completed the liquidation process, no one will have access to funds held at the correspondent financial institution – neither the opt-out clients, nor Qenta for the opt-in clients. Unfortunately, the team at Euro Pacific Bank/Qenta do not have any control over the speed of this process between the Receiver and the correspondent bank.

Please rest assured that the moment we receive approval to proceed with the transfers the operations team is standing by ready to complete these actions immediately.

In the meantime, we will also continue to follow up and provide further updates to all customers as soon as they become available.

As always, if any questions please feel free to reach out to us directly at info@europacbank.com or if you need to escalate, you can email hphan@europacbank.com.

Sincerely,

Euro Pacific Bank.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

Overview
Security and Stability
Careers

Bank Accounts
Foreign Currency Exchange
Precious Metals Storage Account
Brokerage
Mutual Funds

Legal
Privacy Policy
Website Terms & Conditions
Client Warnings

Help
User Guide
Contact

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Migration & Liquidation FAQ

Published: December 16, 2022

In an effort to continually update you about the liquidation & migration process, we have created the following comprehensive Frequently Asked Questions list that is composed of the most essential questions & answers regarding the liquidation of Euro Pacific Bank & migration to Qenta for your reviews.

Sincerely,

Euro Pacific Bank.

Liquidation Process | Opt-out | Opt-in | Contact EPB

1. **Are my funds and investment account holdings safe?**

   Yes. Euro Pacific Bank (“EPB”) was a full reserve bank, all assets previously held by the bank are there and to be honoured whether you choose to migrate to Qenta or opt out of the migration post completion of the liquidation process.

2. **Why is the liquidation process still not done?**

   EPB’s OCIF-appointed receiver and custodian institution must work through their process before any funds can be released. This includes opt-out clients as well as those transferring to Qenta.

3. **When will the liquidation process be completed?**

   The opt-out deadline ended November 30th, 2022, however the liquidation process will be completed when all requirements in the Liquidation plan have been met. This includes transfer of client funds back to clients which will occur when the OCIF-appointed receiver and correspondent bank has completed their process. All wires will be sent out as soon as their process is complete, however an exact time or date is currently not available.

Last updated: 12/20/2022.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Migration & Liquidation FAQ

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Sincerely,

Euro Pacific Bank.

Liquidation Process | Opt-out | Opt-in | Contact EPB

For cash deposits, how do I opt-out?

The deadline for opt-out requests was November 30th, 2022. Please note however that EPB can continue to accept opt out requests for clients who missed the deadline. Please go into eBanking and enter the outgoing wire transfer request.

2. **How do I opt-out if I own mutual funds?**
   Qenta will not be maintaining EPB's Mutual Funds offerings. As of November 30th, all Mutual Fund holdings are in the process of being liquidated and the exact value of your shares credited accordingly to your account in cash. The liquidation will be done in accordance with the mutual fund agreements.

3. **How do I opt-out if I have precious metals account holdings?**
   Precious metals account holders can liquidate their positions in eBanking and credit the funds to their cash account. The deadline for opting out of the migration was November 30th, 2022, however EPB can continue to accept opt-out requests for clients who missed the deadline.

4. **How do I opt-out if I have brokerage account holdings?**
   The brokerage accounts have now become fully disclosed accounts with Interactive Brokers (IB). All funding and withdrawals from these accounts should be handled directly with IB.

5. **Can I do a partial opt-out from the migration as well as transfer some funds to Qenta?**
   EPB's OCIF-appointed receiver will not be allowing partial opt-out requests. This means that all opt-out first-party outgoing wire requests must be for the full balance of your account. If you currently still maintain a partial outgoing wire this request will need to be cancelled by the bank's Operations department and the amount for the full wire entered into eBanking.

Last updated: 12/20/2022.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Migration & Liquidation FAQ

Published: December 16, 2022

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Sincerely,

Euro Pacific Bank.

Liquidation Process | Opt-out | Opt-in | Contact EPB

How do I opt-in to Qenta?

If you did not request an outgoing first party wire by November 30th for the entirety of your account balance, at the end of the liquidation process your account and assets (deposits, precious metals, brokerage, mutual funds) should be automatically transferred to Qenta.. If you have missed the November 30th deadline, EPB can still accept outgoing wire requests. Kindly note that once the migration is complete and you become Qenta clients, you can still opt-out (i.e. liquidate all existing assets) to a first party account at any time.

2. **Are you converting my funds to gold with the migration to Qenta?**
   All new funds sent to your account after the migration would indeed need to be received for the purpose of purchasing gold, however for existing funds coming over with the migration, Qenta will honour your current portfolio as it stands. Qenta will convert migrated funds to gold as our license requires us to do, however we will assume all the risk on this conversion and your current exposure on migrated funds will remain the same as before and these funds can be liquidated at any time post migration.

3. **What about my precious metals account holdings with the migration to Qenta?**
   The Precious Metals Accounts will move into the Responsible Gold Ecosystem which is backed by physical metal in Switzerland. You will continue to have access to your deposits through a very similar user interface. The process has already started to upgrade all gold holding clients into high quality Responsible Gold which should command a premium over standard LBMA gold which is currently the basis for the gold holdings. A similar solution is being worked on for silver clients. No action will be required from your part to complete the opt-in process.

4. **Is Qenta a bank?**
   Qenta is **not** a bank. Client accounts migrating from EPB will be held by the wholly owned Qenta subsidiary located in Dubai, Responsible Gold Trading Division (RGTD) and the department that will continue to serve you is Responsible Gold Trading Services (RGTS) team.

5. **If Qenta is not a bank, how are you licensed to receive former EPB client deposits?**
   Qenta's subsidiary RGTD is a fully licensed precious metals trading company. Please note that as RGTD is not a bank it will not be providing banking services, such as cash deposit accounts and third party transfers. Former EPB clients who migrate to Qenta will have a gold trading account and not a bank account. As mentioned before,

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

all EPB client liabilities coming over as currency and precious metals will be fixed and obligations (ie liquidation requests) will be honoured at any time.

6. **If I opt-in, can I still opt-out at a later date?**

   Yes. Anytime after the completion of the migration, you will be able to liquidate your holdings to a first party account of your choosing at any time.

7. **What currencies will be available with the transfer to Qenta?**

   All currencies previously available to EPB clients for first-party incoming and outgoing wire transfers will be available to Qenta clients, including USD.

8. **What about my existing EPB bank card?**

   EPB's existing relationship with their card provider has been closed and as such EPB nor Qenta maintain any access or visibility to systems related to the previously issued cards. For all inquiries related to existing cards issued by EPB, clients should contact the card provider's customer service line directly. These details can be found on the back of your card.

9. **Does Qenta serve all jurisdictions?**

   The new accounts will be available to all jurisdictions previously served by EPB. Qenta will be maintaining a restricted country list which is very similar to the one already used by EPB.

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Migration & Liquidation FAQ

Published: December 16, 2022

In an effort to continually update you about the liquidation & migration process, we have created the following comprehensive Frequently Asked Questions list that is composed of the most essential questions & answers regarding the liquidation of Euro Pacific Bank & migration to Qenta for your reviews.

Sincerely,

Euro Pacific Bank.

Liquidation Process | Opt-out | Opt-in | Contact EPB

How do I get in touch with EPB if I am having a problem?

For the time being, please continue to use the Client Services channels established by EPB, e.g. info@europacbank.com, or the internal messaging system within eBanking. If your existing client services ticket has not been responded to, please escalate to hphan@europacbank.com, and we will ensure that it is handled urgently. Once the migration is complete, EPB will release new support and escalation channels for clients, however the previously existing email addresses will continue to be forwarded on to us.

Last updated: 12/20/2022.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Migration & Liquidation Update: Jan 27, 2023

Published: Jan 27, 2023



Dear Customers,

We would like to provide an update regarding the EPB Liquidation and release of customer deposits. As reported by the Receiver on Jan 23, 2023, the correspondent bank has indicated that their process to allow liquidation of EPB assets to conclude would be delayed further until March 2023.

We understand that this news may cause concern, and we want to assure you that we are closely monitoring the situation and staying in touch with the Receiver. We will also continue to provide updates as things change and/or reminders to keep you informed accordingly.

Please note that until the correspondent bank concludes their internal process, Qenta is not able to conduct the migration of opt-in accounts, and outgoing wire requests can not be processed for opt-out clients. We apologize for any inconvenience this may cause and thank you for your continued patience and understanding.

If you have any questions, please do not hesitate to reach out to us at info@europacbank.com or if you need to escalate, you can email hphan@europacbank.com.

Sincerely,
Euro Pacific Bank.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Migration & Liquidation Update: March 08, 2023

Published: March 08, 2023



Dear Customers,

We would like to take this opportunity to express our appreciation for your continued support and patience as we are awaiting news from the correspondent bank and the receiver. We also acknowledge that many clients have sent in their inquiries lately, so we would like to provide you with some clarity regarding the status of the liquidation and migration, as well as Qenta and its services.

To address the frequently asked questions we have received, we have compiled the following information:

1. **Has the bank liquidation for opt-out clients already begun?**
   No. The liquidation of the bank is an ongoing process. We are expecting the process to continue to run in parallel to the situation with the correspondent bank. Further updates in this regard will be provided as soon as available.
2. **Can I open an account at Qenta before the migration takes place?**
   No. EPB clients who have chosen to opt-in to the migration to Qenta will need to wait until the receiver and correspondent have finished the liquidation process before being onboarded into Qenta.
3. **I am an opt-out customer, how will I receive my funds?**
   EPB customers who have queued an outgoing wire for the entire balance of their account are considered to be opting out of the migration to Qenta and will stay with the receiver who will facilitate the liquidation for these customers and oversee the process of completing all outgoing wires to their respective destinations.
4. **What services will Qenta be providing upon completion of the migration?**
   It is important to note that Qenta is not a bank, as such third-party payments as an example will not be allowed. Upon migration, clients transferring to Qenta will have the ability to hold gold, and cash out their holdings at any time in USD to a first-party account of their choosing. The ability to buy additional gold will also be added shortly after. In the future, Qenta will be rolling out other exciting services such as gold-backed debit cards, access to other commodities, and much more.
5. **I am currently an opt-in customer, can I still opt-out after the migration has been completed?**
   Yes. Once the migration to Qenta has been completed, you can choose at any time to cash out to a first-party

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

account of your choosing at any time.

6. **How will I receive notice of the liquidation and migration when they take place?**
   All customers will receive email notification as soon as the official timeline for the liquidation and migration is ready to be released. Updates will also continue to be added to the EPB website. In addition, instructions for migrating customers will be received by email before the process is set to begin.

If you have further questions about Qenta & its services, please send your inquiries to hoang.phan@qenta.com. For inquiries about the liquidation, please email info@europacbank.com as always. Thank you for your continued trust and partnership.

Sincerely,

Euro Pacific Bank.

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Migration & Liquidation Update: March 31, 2023

Published: March 31, 2023



Dear Customers,

Firstly, we would like to express our gratitude for your patience and understanding as we continue to wait for the receiver and correspondent bank to complete their process and for the bank liquidation to finally commence. Here are the updates about the migration & liquidation process that we have collected in the last few weeks.

Liquidation

According to the receiver's latest update, the correspondent bank still cannot provide us with a final date as to when the bank liquidation will officially begin. Please rest assured that we are continually following up and closely monitoring the situation, and that we will keep you informed of any developments as soon as they are available.

Migration

The migration to Qenta will take place at the same time as the bank liquidation, and as such we are still waiting for confirmation on the final date for when this will officially commence. In the meantime, we are preparing exciting news and developments on the registration, onboarding, and product offerings to come, so please stay tuned!

E-statement

We would like to remind **all clients** to download your historical statements. Here is a short guide on how to generate statements from your eBanking.

It is important to do so as soon as possible to ensure that you have access to all the financial information that you need. If you require assistance with generating your statements, please do not hesitate to create a case in the Support Center for assistance.

Once again, we would like to thank you for your patience and understanding during this time. And as always, if there's any question, please feel free to reach out to our Client Services team at info@europacbank.com.

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Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

Sincerely,

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Liquidation Update: Action Required

Published: April 20, 2023



Dear Customers,

After many months of waiting, we are happy to announce that the liquidation of Euro Pacific Bank will officially commence before the end of April as the correspondent bank has been ordered to unfreeze queued wires. Over the next few days, you will be receiving specific information to better guide you through this process.

What this means for you:

Opt-out clients

If you are an opt-out client, meaning you have queued up an outgoing wire for the full balance of your account and are therefore not migrating to Qenta, EPB's receiver will begin processing your outgoing first-party transfers before the end of April with the assistance of EPB's correspondent bank. The EPB Client Services team will assist the receiver as needed, and you can reach this team at anytime at info@europacbank.com.

Opt-in clients

If you are an opt-in client, meaning that you will be participating in the migration to Qenta, your assets will be safely brought into the Qenta ecosystem, and you will receive detailed onboarding and registration instructions in the coming days. The Qenta Client Services team will also be available to provide you with assistance throughout this process.

Your record-keeping

Please note that EPB's current banking systems will continue to function as usual until the end of April 2023. As such, kindly take the time to download your statements from within your account for your own recordkeeping purposes. You will also receive confirmation from Qenta and/or the receiver once the migration and/or liquidation has concluded.

Please also be aware that if there has been no movement in your account for a given month, the system does not generate a statement; to resolve this you would just need to generate an older statement from when the last movement in

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

the account occurred.

We would like to thank you for your patience and understanding throughout this process, and will be in further touch.

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Migration & Liquidation Update: May 05, 2023

Published: May 5, 2023



Dear Customers,

Following up on our most recent post from April 20, we would like to provide an update on the status of the liquidation and migration process.

As mentioned in our last update, EPB's correspondent bank has been ordered to unfreeze the queued wires. This was the primary item preventing the process and the lifting of this order represents a major step forward. We expected that EPB's correspondent bank would be able to move the funds soon after the lifting of the freeze order, and for the liquidation process to begin before the end of April. Unfortunately, however, the execution of this process by our partners has not been as quickly as we expected.

Please rest assured we are working diligently with EPB's receiver to find a solution, and as soon as a firm date can be set for the commencement of the liquidation, we will follow up regarding next steps.

For those of you who will be migrating to Qenta, an easy migration process has been prepared for you which will begin around the same time as the liquidation. You will receive further updates on this and other exciting product offerings very soon!

As always, should you have any comments or questions, please feel free to reach out to our Client Services team at info@europacbank.com and we will be very happy to provide all needed assistance.

We would like to thank you deeply for your patience and understanding throughout this process.

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SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
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Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Migration & Liquidation Update: May 31, 2023

Published: May 31, 2023



Dear Customers,

Following up on our most recent post from May 5, 2023, we are reaching out again with a status update on the liquidation of Euro Pacific Intl. Bank, Inc. (the “Bank”) and the migration process.

Unfortunately, the Receiver has still not provided a date for the commencement of the liquidation of the Bank. The seller, purchaser and other stakeholders continue to follow up conscientiously with the Receiver and, as soon as we have a meaningful update, we will share it with you via the usual communication channels (website, direct email). It was our strong hope and desire that this liquidation process would have started and been completed by now, particularly because of the court order for the Bank’s correspondent bank to unfreeze queued outgoing wires, a key blocker earlier in this process.

For customers migrating to Qenta, that process will commence as soon as there is visibility from the Receiver on when liquidation will occur. The Qenta team has prepared an easy migration process and will provide further updates closer to the migration date.

As always, should you have any comments or questions, please feel free to reach out to our Client Services team at info@europacbank.com and we will be very happy to provide all needed assistance.

Sincerely,
Euro Pacific Bank.

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Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Progress Report: June 17, 2023

Published: June 17, 2023



Dear Customers,

We are pleased to inform you that the Receiver, who is appointed by OCIF (Office of the Commissioner of Financial Institutions of Puerto Rico), has diligently prepared an official progress report detailing the liquidation process up to this point.

To access the comprehensive report, click on the following link.

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Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Migration & Liquidation Update: June 23, 2023

Published: June 23, 2023



Dear Customers,

Following up on the most recent post from June 17, containing the statement from the OCIF-appointed Receiver, we are reaching out again with a status update on the liquidation of Euro Pacific Intl. Bank, Inc. (the “Bank”) and the migration process.

Liquidation

The Receiver in conjunction with key stakeholders is preparing for the imminent liquidation of the Bank. The Receiver will be in contact with the opt-out liquidation clients in short order with additional details on the process, and the ongoing communication plan.

Migration

Qenta is pleased with the recent news from OCIF and the Receiver, and is actively making arrangements to start the migration of clients by next month. The two gating items will be:

- Qenta awaits the updated liquidation order from the Receiver and OCIF (expected by end of June); and
- Qenta requires access to the assets that will be used to honor the opt-in client obligations that are being transferred over to the Company. Qenta has received access to some but will receive assistance from the Receiver as relevant for the remaining assets.

Further details on the final migration timeline and seamless transition process will be shared by the Qenta Client Services team closer to the migration date, once confirmed.

Statements

The core banking system will cease after June 30, 2023. So, if you have not, please download your bank statements accordingly.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

For mutual fund holders, kindly note that the latest statements (as of June 2023) will be sent to you in July.

Lastly, Qenta's team is excited to have the opportunity soon to welcome you to the family and will be sharing more about its services and offerings, including its Qenta app that puts you in control of your assets in a safe and secure manner.

As always, should you have any comments or questions, please feel free to reach out to our Client Services team at info@europacbank.com and we will be very happy to provide all needed assistance.

We sincerely thank all EPB customers for your patience throughout this period and we look forward to a pleasant and long awaited close for everyone involved.

Sincerely,

Euro Pacific Bank.

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Migration & Liquidation Update: July 20, 2023

Published: July 20, 2023



Dear Customers,

We are pleased to inform you that the Receiver, who is appointed by OCIF (Office of the Commissioner of Financial Institutions of Puerto Rico), has prepared an additional official progress report detailing the liquidation process up to this point.

To access the comprehensive report, click on the following link.

If you have any comments or questions, please feel free to reach out to our Client Services team at info@europacbank.com and we will be very happy to provide all needed assistance.

And lastly, we sincerely thank all EPB customers for your immense patience throughout this period.

Sincerely,
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Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
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Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Migration Update: September, 2023



Dear Customers,

We provide an update on the liquidation of Euro Pacific Intl. Bank, Inc. (the “Bank”) and Qenta’s migration process.

We have been advised that the Receiver has submitted a final version of the liquidation plan to Puerto Rico Office of the Commissioner of Financial Institutions (OCIF) and awaits formal feedback in order to initiate the process. The Receiver continues to work with all stakeholders to prepare for the liquidation of the Bank and for the eventual distribution of funds to opt-out clients.

Additionally, as stated in the Receiver’s update posted via the Bank’s website on July 17, 2023, we understand the Receiver has set up a separate communication website and customers portal. This portal should assist in providing accurate information on the process as well as allow for the exchange of documents and information related to the liquidation. Details of this portal should be available from the Receiver’s Office.

In parallel, Qenta continues with its own preparation for the migration of opt-in clients pending formal confirmation from the Receiver and OCIF that the liquidation and migration can commence. Further details on the final migration timeline and process will be shared by the Qenta Client Services team once confirmed.

The Bank’s core banking system and e-banking channel ceased to operate on August 23, 2023. As required by OCIF and applicable law, data extracts of all client records have been taken and securely stored. All information required by the Receiver’s Office to facilitate the liquidation and meet his legal obligations has been shared in a secure and structured manner. This comprised a large set of carefully structured data.

Qenta’s team remains excited to have the opportunity to welcome opt-in clients to its eco system and will share more about its services and offerings once we receive the go ahead to commence the migration.

Should you have any comments or questions, please feel free to reach out to our Client Services team at info@europacbank.com and we will be very happy to provide assistance. We also recommend you reach out directly to the Receiver’s Office to utilise the customer communication portal established by that Office for the Bank liquidation.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Receiver's Report & Communication Portal



Dear Customers,

We would like to inform you that Qenta continues working with the OCIF-appointed Receiver of EPB to facilitate the bank's liquidation and the migration of opt-in customers to the Qenta platform. The original liquidation plan has been revised in response to evolving circumstances, but Qenta continues to cooperate in full and to swiftly facilitate all necessary information to the Receiver's staff.

The Receiver has issued an updated progress report that can be consulted in the following link.

Please also note that the Receiver has set up of a separate communication website and customer portal for the EPB liquidation. The URL link to access this website is: https://epbprliquidation.com. This portal is meant to assist in providing accurate information on the process and to allow the exchange of documents and information related to the liquidation, and constitutes the best way to contact the Receiver's Office.

Despite the launch of this additional portal, key updates regarding the liquidation and the migration will continue to be posted on this website as soon as they become available. We thank you very much for your continued patience throughout this process.

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SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Progress Report: November, 2023

Published: November 20, 2023



Dear Opt-out Customers,

We wish to inform you that the Receiver, appointed by OCIF (Office of the Commissioner of Financial Institutions of Puerto Rico), has published a new progress report that outlines the latest status of the liquidation process.

To access the comprehensive report, click on the following link.

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Search

Account Opening
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Bank Cards
Brokerage Accounts
Euro Pacific Trader
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Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Migration Update: November, 2023



Dear Opt-in Customers,

We would like to provide an update on the progress of the EPB liquidation and the migration of **opt-in** customers to the Qenta platform.

Since our last update, we have continued to support and work alongside the Receiver to facilitate the commencement of the migration and liquidation processes, in connection with data migration and support, and account consolidation and reconciliation efforts. At this time, however, the migration of opt-in clients into the Qenta platform remains dependent on the Receiver finalizing, and obtaining OCIF's approval with, his final liquidation plan.

We will continue to work diligently with the Receiver to ensure the smooth migration of opt-in customers at the earliest possible date. We will also continue to publish update notices for opt-in customers on the EPB homepage, as well as via email in some cases.

If you are an opt-out customer, please remember to visit the dedicated website setup by the Receiver for updates at https://epbprliquidation.com/.

Should you require special assistance, please feel free to contact the EPB Client Services team at any time at info@europacbank.com. We appreciate your patience and understanding.

Sincerely,
Euro Pacific Bank.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

Careers
Precious Metals Storage Account
Website Terms & Conditions
Contact
Brokerage
Client Warnings
Mutual Funds

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Migration Update: February 02, 2024



Dear Customers,

We trust this message finds you in good health and high spirits. Euro Pacific Bank and Qenta are unwavering in our commitment to expediting the liquidation and migration processes with the utmost efficiency.

Opt-in Process

Our dedicated team continues to work alongside the Receiver, appointed by OCIF (Office of the Commissioner of Financial Institutions of Puerto Rico), to get this migration completed seamlessly. The successful migration of our opt-in clients to the Qenta platform hinges upon the Receiver's finalization of his liquidation plan and subsequent approval with OCIF. At this time, we have unfortunately still not received confirmation from the Receiver's office as to when this process will be completed. We continue to push for the migration date to be set at the soonest possible time and will provide notice to all opt-in clients as soon as this date can be confirmed.

Opt-out Process

The Receiver and his team have initiated communication to collect the necessary documentation via the Receiver's portal at https://epbprliquidation.com/. If you are an opt-out customer and have inquiries regarding this process, please remember that the website provides direct access to the Receiver's office for your convenience.

In Conclusion

We want to emphasize that our commitment to completing this process as early as possible remains unwavering. We fully comprehend the significance of this transition to you and share your eagerness to witness its completion. For forthcoming updates, we will continue to provide notifications on the EPB homepage and, where appropriate, communicate via email to ensure you receive timely information. Once again, we extend our heartfelt gratitude for your continued trust and patience. Our dedication to keeping you informed remains resolute, and we will promptly provide further updates as they become available.

Sincerely,
Euro Pacific Bank.

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Migration Update: February 19, 2024



Dear Opt-in Customers,

We hope this message finds you well. For your peace of mind, we would like to increase the frequency of these updates on the migration and liquidation process.

Since our last update at the beginning of the month, we have continued to push for the migration and liquidation processes to begin at the soonest possible date, and we have continued to work alongside the Receiver in connection with his data migration, support, account consolidation, and reconciliation efforts. At this time, however, the migration of opt-in clients to Qenta continues to remain dependent on the Receiver finalizing his liquidation plan and upon him receiving approval on this plan from OCIF.

Please rest assured that we will continue to work diligently to ensure the smooth migration of opt-in customers at the earliest possible date. As mentioned, we will also increase the frequency of the update notices for opt-in customers on the EPB homepage, as well as via email in some cases.

Should you require special assistance, please feel free to contact the EPB Client Services team at any time at info@europacbank.com. We appreciate your ongoing patience and understanding.

If you are an opt-out customer, please remember to visit the dedicated website setup by the Receiver for updates at **https://epbprliquidation.com/**.

Sincerely,
Euro Pacific Bank.
info@europacbank.com

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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Migration Update: March 03, 2024



Dear Opt-in Customers,

We hope this message finds you well.

Since our last update posted on February 19th, we would like to inform you that the Receiver continues to work on the approval of his final liquidation plan by OCIF and the receipt of certain funds from EPB's correspondent bank, which is necessary for the migration of opt-in customers to Qenta to commence. Even though neither of these processes are under the control of Qenta, we continue in communication with the Receiver's office and providing as much support as is possible for the migration and liquidation processes to begin at the soonest possible date.

For customers who have opted in, we will keep providing updates here on the EPB homepage and, in certain instances, through email as well.

If you require special assistance, please do not hesitate to contact the EPB Client Services team at any time at info@europacbank.com. We appreciate your ongoing patience and understanding.

If you are an opt-out customer, please visit the dedicated website set up by the Receiver for updates at **https://epbprliquidation.com/**.

Sincerely,
Euro Pacific Bank.
info@europacbank.com

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

Careers
Precious Metals Storage Account
Brokerage
Mutual Funds
Website Terms & Conditions
Client Warnings
Contact

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Receiver's Reports: March 11, 2024

Published: March 11, 2024



Dear Opt-in Customers,

The Receiver/Trustee, designated by the Office of the Commissioner of Financial Institutions of Puerto Rico (OCIF), has released a series of five reports. These documents provide detailed insights into the work and transactions undertaken for the liquidation of Euro Pacific Bank and its assets throughout 2022 and 2023.

To view the reports, please use the following links:

Legal Document	Link
Liquidation Receiver Report Q3 2022	View
Liquidation Receiver Report Q4 2022	View
Liquidation Receiver Report Q1 2023	View
Liquidation Receiver Report Q2 2023	View
Liquidation Receiver Report Q3 2023	View

As always, we'll keep you updated on the EPB homepage and, in certain instances, through email.

Sincerely,

Euro Pacific Bank.

info@europacbank.com

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

Careers
Precious Metals Storage Account
Brokerage
Mutual Funds
Website Terms & Conditions
Client Warnings
Contact

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Migration Update: April 13, 2024



Dear Opt-in Customers,

We hope this message finds you well.

Since our last update posted on March 11, we would like to notify you that we continue to await the finalization of the liquidation plan between the Receiver, OCIF, and EPB's correspondent bank. The Receiver continues to work on the approval of his final liquidation plan with OCIF and for the receipt of certain funds from EPB's correspondent bank, which is necessary to commence the migration of opt-in customers to Qenta. Even though neither of these processes are under the control of Qenta, please note that we continue to be in communication with the Receiver's office and are providing as much support as is possible for the migration and liquidation processes to begin at the soonest possible date.

For customers who have opted in, we will keep providing updates here on the EPB homepage and, in certain instances, through email as well.

If you require special assistance, please do not hesitate to contact the EPB Client Services team at any time at info@europacbank.com. We appreciate your ongoing patience and understanding. If you are an opt-out customer, please visit the dedicated website set up by the Receiver for updates at **https://epbprliquidation.com/**.

Sincerely,
Euro Pacific Bank.
info@europacbank.com

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

Careers
Brokerage
Client Warnings
Contact
Mutual Funds

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Receiver's Reports: April 16, 2024

Published: April 16, 2024



Dear Opt-in Customers,

The Receiver/Trustee, designated by the Office of the Commissioner of Financial Institutions of Puerto Rico (OCIF), has issued a comprehensive report for the fourth quarter of 2023. This report outlines the activities involved in the dissolution of Euro Pacific Bank and its assets. To view the report, please use the following link.

As always, we'll keep you updated on the EPB homepage and, in instances, through email.

Sincerely,

Euro Pacific Bank.

info@europacbank.com

SEARCH ARTICLES

Search

Account Opening
Affiliates
Bank Accounts
Bank Cards
Brokerage Accounts
Euro Pacific Trader
Client Warnings
Managed Investments
Manager Commentary
Mutual Funds
Separately Managed Accounts
News & Blog
Precious Metals
Security and Regulation
Top Articles
Wire Transfers

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LAST UPDATED: OCTOBER 04, 2024

August 29, 2022: Euro Pacific Bank liquidation has commenced. Please read our formal instructions here as it is time-sensitive. (https://europacbank.com/support/commencement-of-liquidation-20220829/)

September 2, 2022: Update on pending transactions, brokerage, and account migration. (https://europacbank.com/support/bank-liquidation-update-20220902/)

September 8, 2022: Qenta has emailed a welcome letter to all EPB clients. You can read a copy of it here. (https://europacbank.com/support/qenta-welcome-letter/)

September 16, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration. (https://europacbank.com/support/bank-liquidation-update-20220916/)

September 28, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration. (https://europacbank.com/support/bank-liquidation-update-20220928/)

September 30, 2022: Update on bank liquidation, pending transactions, and migration of assets to Qenta Inc. (https://europacbank.com/support/bank-liquidation-update-20220930/)

October 8, 2022: Update on opt-out deadline for EPB clients who do not wish to migrate their account to Qenta Inc.. (https://europacbank.com/support/bank-liquidation-update-20221008/)

October 14, 2022: Customer Update & Townhall. (https://europacbank.com/support/bank-liquidation-update-20221017/)

October 21, 2022: Update on Opt-out deadline - Extended. (https://europacbank.com/support/bank-liquidation-update-20221021/)

November 01, 2022: Mutual funds & outgoing wire requests update. (https://europacbank.com/support/migration-update-20221101/)

December 05, 2022: Migration & liquidation update. (https://europacbank.com/support/migration-liquidation-update_20221205/)

December 16, 2022: Comprehensive FAQ is published. (https://europacbank.com/support/migration-liquidation-faq-20221216/)

January 27, 2023: Correspondent bank update. (https://europacbank.com/support/migration-liquidation-update-20230127/)

March 8, 2023: Migration & liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230308/)

March 31, 2023: Migration & liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230331/)

April 20, 2023: Liquidation update- Action required. (https://europacbank.com/support/migration-liquidation-update_20230421/)

May 05, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230505/)

May 31, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230531/)

June 17, 2023: Receiver's report. (https://europacbank.com/support/progress-report-20230617/)

June 23, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230623/)

July 20, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230720/)

September 01, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20230901/)

September 22, 2023: Report & Communication Portal. (https://europacbank.com/support/migration-update-20230922/)

September 22, 2023: Report & Communication Portal. (https://europacbank.com/support/migration-update-20230922/)

November 20, 2023: Progress Report (Opt-out Only). (https://europacbank.com/support/progress-report-20231120/)

November 21, 2023: Migration Update (Opt-in Only). (https://europacbank.com/support/migration-update-202311/)

February 02, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240202/)

February 19, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240219/)

March 03, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240303/)

March 11, 2024: Receiver's Reports. (https://europacbank.com/support/receiver-reports-20240311/)

April 13, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240413/)

April 16, 2024: Receiver's Reports. (https://europacbank.com/support/receivers-reports-20240416/)

October 04, 2024: Migration Update. (https://europacbank.com/support/migration-update-20241004/)

Euro Pacific Bank

Migration Update: October, 2024

Published: October 04, 2024



Dear Opt-in Customers,

We hope this message finds you well.

Since our last update, we have continued to follow up with the Receiver's office in an effort to move this process forward. We are able to announce that all customer funds that were previously stuck at EPB's former intermediary bank have been released and are now under the control of the Receiver.

This will allow us to work with the Receiver to complete the final reconciliation of funds, and it will allow the Receiver to submit his liquidation plan to OCIF for final approval. Our expectation is that once these two steps have been completed, we will be able to set an official migration date.

We cannot provide a firm timeline at the moment, however, for customers who have opted in, we will continue to post updates here on the EPB homepage and, in certain instances, through email as soon as new information becomes available.

As we approach the final stages of the Receiver's liquidation process, we would also like to advise all opt-in customers who may have changed their email address since the time the bank went into liquidation, or who did not receive the email notification that accompanied this website post, to please contact the EPB Customer Services team at info@europacbank.com (mailto:info@europacbank.com) to ensure that the email address we have on file is the correct one. This will help to ensure a smooth process for you once the migration does begin.

If you require any other special assistance, please do not hesitate to contact us at any time.

If you are an opt-out customer, please visit the dedicated website set up by the Receiver for updates at https://epbprliquidation.com/ (https://epbprliquidation.com/).

We would like to thank all of you very much for your ongoing patience throughout this difficult time and we will continue to work diligently to bring this process to a close as soon as possible.

Sincerely,

Euro Pacific Bank.

info@europacbank.com (mailto:info@europacbank.com)

Euro Pacific Bank is no longer licensed to do business. As such, we are not accepting new customer accounts.

This website is being maintained by Peter Schiff personally as a memorial to the bank and to update customers on the status of their deposits that have been tied up in receivership since June 30, 2022, and on his personal efforts to recover those customer deposits—including gold and mutual funds—that were transferred to Qenta's custody and which Qenta is now attempting to keep for itself rather than return to their lawful owners.

The legacy pages and links on this site are preserved solely for historical and educational purposes, to demonstrate how the bank operated while it was in business. They do not represent current offerings.

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If you are interested in buying gold, silver, or other precious metals, please visit http://www.schiffgold.com (http://www.schiffgold.com)

For official updates and notifications from Euro Pacific Bank's OCIF-appointed Receiver, who holds exclusive authority to communicate with customers on behalf of the Bank, visit: https://epbprliquidation.com (https://epbprliquidation.com/)

LAST UPDATED: SEPTEMBER 5, 2025

September 5, 2025: Clarification on Receiver's Misrepresentations (https://europacbank.com/support/clarification-on-receivers-misrepresentations/)
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August 20, 2025: Update on Your Silver Held at Euro Pacific Bank (https://europacbank.com/support/update-on-your-silver-held-at-euro-pacific-bank-august-20-2025/)
August 18, 2025: Euro Pacific Bank WARNING from Peter Schiff (https://europacbank.com/support/important-warning-to-former-euro-pacific-bank-customers-august-18-2025/)
August 14, 2025: Euro Pacific Bank Update from Peter Schiff - ACTION REQUIRED! (https://europacbank.com/support/update-from-peter-schiff-august-14-2025/)
August 6, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-6-2025/)
August 5, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-5-2025/)
August 2, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-2-2025/)
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June 23, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230623/)
June 17, 2023: Receiver's report. (https://europacbank.com/support/progress-report-20230617/)
May 31, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230531/)
May 05, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230505/)
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September 28, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration. (https://europacbank.com/support/bank-liquidation-update-20220928/)
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August 29, 2022: Euro Pacific Bank liquidation has commenced. Please read our formal instructions here as it is time-sensitive. (https://europacbank.com/support/commencement-of-liquidation-20220829/)

Euro Pacific Bank
Receiver's Notice: October 16, 2024

Published: October 16, 2024



Dear Opt-in Customers,

The Receiver/Trustee appointed by the Office of the Commissioner of Financial Institutions of Puerto Rico (OCIF) has published a new notice to update you on the progress of the liquidation process. To view the notice, please select the following link (https://qenta-rgts-public.s3.us-west-2.amazonaws.com/10-11-2024+EPIB+Trustee+Liquidation+Process+Update.pdf).

As always, we will continue to keep you informed about the liquidation progress through updates on the EPB homepage and, when necessary, via email communications.

Sincerely,
Euro Pacific Bank.
info@europacbank.com (mailto:info@europacbank.com)

Euro Pacific Bank is no longer licensed to do business. As such, we are not accepting new customer accounts.

This website is being maintained by Peter Schiff personally as a memorial to the bank and to update customers on the status of their deposits that have been tied up in receivership since June 30, 2022, and on his personal efforts to recover those customer deposits—including gold and mutual funds—that were transferred to Qenta's custody and which Qenta is now attempting to keep for itself rather than return to their lawful owners.

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For official updates and notifications from Euro Pacific Bank's OCIF-appointed Receiver, who holds exclusive authority to communicate with customers on behalf of the Bank, visit: https://epbprliquidation.com (https://epbprliquidation.com/)

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Published: October 31, 2024



Dear Opt-in Customers,

The Receiver/Trustee appointed by the Office of the Commissioner of Financial Institutions of Puerto Rico (OCIF) has released a new liquidation report for the third quarter of 2024. To access the report, please click on the following link (https://epbprliquidation.com/wp-content/uploads/Liquidation-Receiver-Report-on-Work-Performed-Q3-2024.pdf).

As always, we will continue to keep you informed about the liquidation progress through updates on the EPB homepage and, when necessary, via email communications.

Sincerely,
Euro Pacific Bank.
info@europacbank.com (mailto:info@europacbank.com)

LAST UPDATED: JULY 12, 2025

July 12, 2025: Qenta Status Update. (https://europacbank.com/support/status-update-july-2025/)

October 31, 2024: Receiver's Report. (https://europacbank.com/support/receivers-reports-20241031/)

October 16, 2024: Receiver's Notice. (https://europacbank.com/support/receivers-notice-20241016/)

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March 11, 2024: Receiver's Reports. (https://europacbank.com/support/receiver-reports-20240311/)

March 03, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240303/)

February 19, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240219/)

February 02, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240202/)

November 21, 2023: Migration Update (Opt-in Only). (https://europacbank.com/support/migration-update-202311/)

November 20, 2023: Progress Report (Opt-out Only). (https://europacbank.com/support/progress-report-20231120/)

September 22, 2023: Report & Communication Portal. (https://europacbank.com/support/migration-update-20230922/)

September 01, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20230901/)

July 20, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230720/)

June 23, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230623/)

June 17, 2023: Receiver's report. (https://europacbank.com/support/progress-report-20230617/)

May 31, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230531/)

May 05, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230505/)

April 20, 2023: Liquidation update- Action required. (https://europacbank.com/support/migration-liquidation-update_20230421/)

March 31, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230331/)

March 8, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230308/)

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December 05, 2022: Migration & liquidation update. (https://europacbank.com/support/migration-liquidation-update_20221205/)

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October 14, 2022: Customer Update & Townhall. (https://europacbank.com/support/bank-liquidation-update-20221017/)

October 8, 2022: Update on opt-out deadline for EPB clients who do not wish to migrate their account to Qenta Inc. (https://europacbank.com/support/bank-liquidation-update-20221008/)

September 30, 2022: Update on bank liquidation, pending transactions, and migration of assets to Qenta Inc. (https://europacbank.com/support/bank-liquidation-update-20220930/)

September 28, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration. (https://europacbank.com/support/bank-liquidation-update-20220928/)

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September 8, 2022: Qenta has emailed a welcome letter to all EPB clients. You can read a copy of it here

September 8, 2022: Qenta has released welcome letter to all EPI clients. You can read/reply at here: (https://europacbank.com/support/qenta-welcome-letter/)

September 2, 2022: Update on pending transactions, brokerage, and account migration. (https://europacbank.com/support/bank-liquidation-update-20220902/)

August 29, 2022: Euro Pacific Bank liquidation has commenced. Please read our formal instructions here as it is time-sensitive. (https://europacbank.com/support/commencement-of-liquidation-20220829/)

Euro Pacific Bank

Status Update: July, 2025

Published: July 12, 2025



Dear Opt-in Customers,

We would like to update you on recent developments concerning the purchase agreement related to Euro Pacific Intl. Bank Inc.

Over the past three years, our team has worked diligently to finalize the agreement and ensure a smooth transition for all opt-in customers. Unfortunately, despite our best efforts, we have not received all the necessary assets or approvals required to complete the reconciliation and migration process. We have also been unable to engage constructively with the Receiver to resolve outstanding issues or secure reimbursement for excess expenses incurred due to the delay in achieving the final closing of the transaction.

Therefore, we have made the difficult decision to terminate the purchase agreement and return all liquidated assets to the Receiver as they were originally received. We have notified this to the Receiver and stand ready to work constructively with him and his team to make this happen.

Thank you for your understanding and continued trust.

Sincerely,
Qenta Team.

LAST UPDATED: JULY 30, 2025

July 30, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-july-30-2025/)

July 12, 2025: Qenta Status Update. (https://europacbank.com/support/status-update-july-2025/)

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June 23, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230623/)

June 17, 2023: Receiver's report. (https://europacbank.com/support/progress-report-20230617/)

May 31, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230531/)

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September 28, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration. (https://europacbank.com/support/bank-liquidation-update-20220928/)

September 16, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration

September 16, 2022: Update on pending transactions for clients during our Qenta migration.
(https://europacbank.com/support/bank-liquidation-update-20220916/)

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(https://europacbank.com/support/commencement-of-liquidation-20220829/)

Euro Pacific Bank

Euro Pacific Bank Update from Peter Schiff: July 30, 2025

Published: July 30, 2025



Update from Peter Schiff

Dear Opt-in Customers.

On July 12th Qenta informed you of its decided to terminated the purchase Agreement, which I subsequently consented to make mutual. However, when Qenta wrote on this website that it intended to return the “asset to the Receiver as they were originally received,” it actually meant liquidating those assets, but returning only the proceeds it would have received had it liquidated those assets when originally received on Sept. 30th 2022, depriving Opt-in customers of over $25 million in appreciated value.

But that is not all. Qenta also alleged about $5.5 million is unsubstantiated costs, mainly the result of delays that it blamed on OCIF, the Receiver, and other third parties, that it wanted to withhold from the amount returned to the Receiver. This would have exacerbated the losses it sought to impose on Opt-in customers.

Lastly, Qenta wanted to return the liquidated proceeds of the mutual funds directly to Opt-in customers, but only at their 2022 liquidation values, not their substantially appreciated current market values.

In total, Qenta listed having custody of approximately $80 million of the bank’s assets, but only offered to return about $38 million to the Receiver, 60 days following his written acceptance of their terms, retaining the balance for itself.

Qenta's self-serving offer was completely unacceptable and rightly rejected by the Receiver, who reminded Qenta of its obligations to hold those assets as received for the benefit of Opt-in customers, and to coordinate the return of those assets directly with Opt-in customers. His subsequent reply to Opt-in customers themselves was to individually engage legal counsel to recover their assets directly from Qenta.

However, given the difficultly Opt-in customers would encounter pursuing such an approach, as a party to the terminated Asset Purchase and Assumption Agreement, yesterday I filed an action in New York court to compel Qenta to return the assets to the bank, under the administration of the Receiver, or at a minimum to freeze them in place until I can obtain a judgement in favor of the bank through arbitration, as mandated by the terminated Purchase and Assumption Agreement. This would allow the Receiver, with my help, to return all assets to Opt-in customers.

I am confident Qenta has no legal basis to unjustly enrich itself at Opt-in customer's expense, and will pursue all legal means to prevent this injustice.

Unfortunately, this may further delay the return of customer funds, but Opt-in customers did not wait this long only to surrender half their assets to Qenta. To the extent that damages can be recovered from Qenta on behalf of all customers, they will be sought as well.

In the meantime, I expect the silver, which is currently still stored with Silver Bullion in Singapore, to soon be back under the Receiver's control. I am working on a plan to quickly allocate that silver to its beneficial owners. I will post an update on this website with the next step as soon as I can confirm the silver is available for distribution.

Sincerely,

Peter Schiff
Sole shareholder, Euro Pacific Bank

LAST UPDATED: AUGUST 2, 2025

August 2, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-2-2025/)

July 30, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-july-30-2025/)

July 12, 2025: Qenta Status Update. (https://europacbank.com/support/status-update-july-2025/)

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September 28, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration

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(https://europacbank.com/support/bank-liquidation-update-20220928/)

September 16, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration.
(https://europacbank.com/support/bank-liquidation-update-20220916/)

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August 29, 2022: Euro Pacific Bank liquidation has commenced. Please read our formal instructions here as it is time-sensitive.
(https://europacbank.com/support/commencement-of-liquidation-20220829/)

Euro Pacific Bank

Euro Pacific Bank Update from Peter Schiff: August 2, 2025

Published: August 2, 2025



Update from Peter Schiff

Dear Opt-in customers,

On Friday August 1, the Supreme Court of the State of N.Y., County of Westchester, granted my TRO request. Qenta is now restrained from selling, transferring, encumbering, dissipating, or disposing of any Euro Pacific Bank assets, including approximately $50 million in precious metals, $19 million in cash, and about $8 million in mutual funds.

On Wednesday, August 6th we have a hearing where Qenta will have to show cause why it should not be ordered to immediately return all transferred assets to the bank, under the administration of the Receiver, without any setoffs for alleged costs.

I will provide an update as soon as I know the results of the hearing.

Sincerely,

Peter Schiff

Sole shareholder, Euro Pacific Bank

LAST UPDATED: AUGUST 5, 2025

August 5, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-5-2025/)

August 2, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-2-2025/)

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February 02, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240202/)

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November 20, 2023: Progress Report (Opt-out Only). (https://europacbank.com/support/progress-report-20231120/)

September 22, 2023: Report & Communication Portal. (https://europacbank.com/support/migration-update-20230922/)

September 01, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20230901/)

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June 23, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230623/)

June 17, 2023: Receiver's report. (https://europacbank.com/support/progress-report-20230617/)

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October 8, 2022: Update on opt-out deadline for EPB clients who do not wish to migrate their account to Qenta Inc. (https://europacbank.com/support/bank-liquidation-update-20221008/)

September 30, 2022: Update on bank liquidation, pending transactions, and migration of assets to Qenta Inc.

September 30, 2022: Update on pending transactions, dividend liquidation, derivative transactions, and withdrawal of assets to Qenta Inc.
(https://europacbank.com/support/bank-liquidation-update-20220930/)

September 28, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration.
(https://europacbank.com/support/bank-liquidation-update-20220928/)

September 16, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration.
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Euro Pacific Bank

Euro Pacific Bank Update from Peter Schiff: August 5, 2025

Published: August 5, 2025



Update from Peter Schiff

Dear Opt-in Customers,

Qenta is now attempting to leverage their temporary custody of your assets—and the fact that you've been waiting three years to receive them—by getting you to accept a huge discount on what you are owed. Qenta wants you to agree to the sale of your claim to a third party, who will repay you only a fraction of what you're owed.

But there is no need for you to agree to accept a discount on your claim. Qenta is in possession of 100% of what Opt-in customers are owed. Any discount you accept will simply and unfairly line Qenta's pockets.

Not only is what Qenta is attempting to do unethical and in violation of the terms of its purchase and assumption agreement with the bank, but it also violates an existing court order that enjoins Qenta from selling any of your assets.

Tomorrow, a court will likely order Qenta to return the assets to the bank so that Opt-in customers can receive 100% of what they are owed—not a substantial discount that merely enriches Qenta at your expense.

Sincerely,

Peter Schiff

Sole shareholder, Euro Pacific Bank

LAST UPDATED: AUGUST 6, 2025

August 6, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-6-2025/)

August 5, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-5-2025/)

August 2, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-2-2025/)

July 30, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-july-30-2025/)

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February 19, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240219/)

February 02, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240202/)

November 21, 2023: Migration Update (Opt-in Only). (https://europacbank.com/support/migration-update-202311/)

November 20, 2023: Progress Report (Opt-out Only). (https://europacbank.com/support/progress-report-20231120/)

September 22, 2023: Report & Communication Portal. (https://europacbank.com/support/migration-update-20230922/)

September 01, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20230901/)

July 20, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230720/)

June 23, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230623/)

June 17, 2023: Receiver's report. (https://europacbank.com/support/progress-report-20230617/)

May 31, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230531/)

May 05, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230505/)

April 20, 2023: Liquidation update- Action required. (https://europacbank.com/support/migration-liquidation-update_20230421/)

March 31, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230331/)

March 8, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230308/)

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October 8, 2022: Update on opt-out deadline for EPB clients who do not wish to migrate their account to Qenta Inc.

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September 30, 2022: Update on bank liquidation, pending transactions, and migration of assets to Qenta Inc. (https://europacbank.com/support/bank-liquidation-update-20220930/)

September 28, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration. (https://europacbank.com/support/bank-liquidation-update-20220928/)

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Euro Pacific Bank

Euro Pacific Bank Update from Peter Schiff: August 6, 2025

Published: August 6, 2025



Update from Peter Schiff on my legal action against Qenta,

Qenta has filed a motion to vacate the TRO currently in place that prevents them from selling the bank's assets in their custody. Qenta does not even legally own these assets and should have no legal right to sell them—even in the absence of a TRO. The assets belong to the bank and its customers, who are the beneficial owners.

Most shockingly, Qenta claims that Opt-in customers should only be entitled to recover the value of the assets as of Sept. 30, 2022, and that Qenta should be allowed to retain for itself the approximately $30 million in appreciated value. Even more outrageous, Qenta misrepresented to the court that the Receiver agrees Qenta should be allowed to keep this windfall — and that the bank's customers are not entitled to any part of it. Yet despite this, Qenta actually had the nerve to tell the court that it is trying to "marshal assets for the benefit of customers" and that my TRO is getting in their way.

Of course, I am doing everything I can to prevent Qenta from stealing what rightfully belongs to customers. It would be much easier if I had the active support of the Receiver, as Qenta's main argument is that I lack standing, since the Receiver is the only one who can act on behalf of the bank. While the Receiver does not oppose my action, he has not yet joined in my effort. Qenta is trying to exploit this technicality, as it's the only chance it has of getting away with this theft.

Sincerely,

Peter Schiff

Sole shareholder, Euro Pacific Bank

LAST UPDATED: AUGUST 14, 2025

August 14, 2025: Euro Pacific Bank Update from Peter Schiff - ACTION REQUIRED! (https://europacbank.com/support/update-from-peter-schiff-august-14-2025/)

August 6, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-6-2025/)

August 5, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-5-2025/)

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Euro Pacific Bank

Euro Pacific Bank Update from Peter Schiff — ACTION REQUIRED: August 14, 2025

Published: August 14, 2025



Subject: Urgent Action Needed to Protect Your Assets from Qenta

Dear Opt-In Customers,

Despite my best efforts, I could not convince the OCIF-appointed Receiver to take legal action against Qenta to protect your assets.

Under the Purchase and Assumption Agreement — which Qenta terminated prior to an initial closing, before securing regulatory approvals, and without onboarding a single customer — Qenta was obligated to return all cash, gold, silver, mutual funds transferred into its custody back to the bank.

Instead, Qenta proposed to liquidate the assets and return only their values as of September 2022, keeping all appreciation — roughly $30 million — for itself. On top of that, it sought to deduct over $5 million in unsubstantiated "losses" it claimed to have incurred. Out of approximately $80 million in customer assets, Qenta offered to return just $38 million, keeping the rest.

The Receiver rightly rejected this obvious breach of contract and unjust enrichment. However, he failed to demand that Qenta return the assets *in kind*, without offsets. Instead, he instructed Qenta to return the assets directly to customers — without selling them — and to follow customer's instructions.

Qenta has ignored this. From what I can tell, Qenta is offering customers essentially the same self-serving deal it offered the Receiver: keep all the appreciation for itself and force customers to accept September 2022 valuations. Brent De Jong even falsely claimed in his affidavit that the Receiver agreed to such an arrangement. The Receiver not only never agreed, but "categorically reject" that assertion. Qenta only paid $500,000 of the $1.25 million it had agreed to pay for the right to "custody" these assets for customers. Why would the Receiver agree that Qenta should pocket a $30 million windfall at their expense?

I tried to stop Qenta in court myself, even offering to personally cover all of the bank's legal costs if the Receiver joined in. But the judge ruled that I had no standing to act for the bank without the Receiver on board. Had the Receiver been included, we would have won, and Qenta would have ultimately been forced to return all assets to the bank — with customers keeping every dollar of appreciation.

My advice now: **Do not make any deal with Qenta to accept less than the full amount that you are owed.** Instead, I believe customers should join together and file a class action lawsuit. Qenta has no valid defense. **These assets belong to you** — Qenta had custody, not title — and **a federal court can order their full return, plus damages.**

We must act quickly so we can seek another TRO to freeze the assets before Qenta can sell, move, or otherwise encumber them.

In the meantime, I strongly suggest that each customer email Qenta demanding the return of their assets. This is necessary for the lawsuit, as we must show that customers requested the return of their assets and that Qenta refused to comply. **Qenta was instructed by the Receiver that you own the assets and that Qenta must follow your instructions with respect to those assets.**

For cash, demand a wire transfer. For mutual funds, demand that Qenta sell the shares at their current market price and wire the proceeds. For the gold, either demand that Qenta sell it now at the current market price and wire the full proceeds, or have your gold transferred to Schiff Gold. I will be able to set up custodial accounts for each of

you, so you can continue to hold your gold and benefit from any future appreciation. You can then liquidate later at your sole discretion and receive the full value from your sale. I recommend the latter. That way you retain your rights to all future appreciation of your gold, as I doubt Qenta will comply with your demands.

On your silver, the good news is that your silver is now under the control of the Receiver. I was able to prevent Qenta from accessing it. Send an email to the Receiver that you want your silver transferred to Schiff Gold. Schiff Gold will create an omnibus account with Silver Bullion in Singapore which currently has custody of your silver. Once your Schiff Gold account is set up, you can either sell your silver or continue to hold it and sell at your discretion in the future.

For the Receiver send emails to wigberto@lugomender.com.

For Qenta, send emails to legalnotices@qenta.com. Include your bank's wiring instructions. Remember Qenta holds U.S. dollars, so you need to include instructions to an account that accepts dollars. Also, include that you reserve your rights to file a lawsuit if your funds or assets are not returned immediately.

If you are an Opt-in customer and wish to participate in the class action lawsuit, or have a custodial account with Schiff Gold set up, for either silver or gold, please send an email to me at peter@schiffradio.com with your contact details.

I am covering these legal costs myself, though any contributions from participating customers are appreciated. If you are in a position to help let me know.

Sincerely,

Peter Schiff
Sole shareholder, Euro Pacific Bank

LAST UPDATED: AUGUST 18, 2025

August 18, 2025: Euro Pacific Bank WARNING from Peter Schiff (https://europacbank.com/support/important-warning-to-former-euro-pacific-bank-customers-august-18-2025/)

August 14, 2025: Euro Pacific Bank Update from Peter Schiff - ACTION REQUIRED! (https://europacbank.com/support/update-from-peter-schiff-august-14-2025/)

August 6, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-6-2025/)

August 5, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-5-2025/)

August 2, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-2-2025/)

July 30, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-july-30-2025/)

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October 31, 2024: Receiver's Report. (https://europacbank.com/support/receivers-reports-20241031/)

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April 13, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240413/)

March 11, 2024: Receiver's Reports. (https://europacbank.com/support/receiver-reports-20240311/)

March 03, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240303/)

February 19, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240219/)

February 02, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240202/)

November 21, 2023: Migration Update (Opt-in Only). (https://europacbank.com/support/migration-update-202311/)

November 20, 2023: Progress Report (Opt-out Only). (https://europacbank.com/support/progress-report-20231120/)

September 22, 2023: Report & Communication Portal. (https://europacbank.com/support/migration-update-20230922/)

September 01, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20230901/)

July 20, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230720/)

June 23, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230623/)

June 17, 2023: Receiver's report. (https://europacbank.com/support/progress-report-20230617/)

May 31, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230531/)

May 05, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230505/)

April 20, 2023: Liquidation update- Action required. (https://europacbank.com/support/migration-liquidation-update_20230421/)

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March 8, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230308/)

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October 8, 2022: Update on opt-out deadline for EPB clients who do not wish to migrate their account to Qenta Inc. (https://europacbank.com/support/bank-liquidation-update-20221008/)

September 30, 2022: Update on bank liquidation, pending transactions, and migration of assets to Qenta Inc. (https://europacbank.com/support/bank-liquidation-update-20220930/)

September 28, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration. (https://europacbank.com/support/bank-liquidation-update-20220928/)

September 16, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration. (https://europacbank.com/support/bank-liquidation-update-20220916/)

September 8, 2022: Qenta has emailed a welcome letter to all EPB clients. You can read a copy of it here. (https://europacbank.com/support/qenta-welcome-letter/)

September 2, 2022: Update on pending transactions, brokerage, and account migration. (https://europacbank.com/support/bank-liquidation-update-20220902/)

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Euro Pacific Bank

Important Warning to Former Euro Pacific Bank Customers: August 18, 2025

Published: August 18, 2025



Important Warning to Former Euro Pacific Bank Customers

It has come to my attention that Qenta Inc. is sending emails to former Euro Pacific Bank customers, presenting what it describes as an “opportunity” to resolve claims. These emails are misleading and deceptive.

Qenta no longer has any agreement to acquire the Bank’s customers, and its transaction with the Bank was terminated before it ever closed. Despite this, Qenta continues to hold approximately $70 million in customer assets—gold, silver, mutual funds, and cash—that were transferred to it in anticipation of a closing that never took place. These assets belong to the Bank’s customers.

Rather than returning those assets to the Bank, Qenta is now soliciting customers to sign Non-Disclosure Agreements (NDAs) in order to consider a so-called “offer” from an unidentified third party to purchase their claims at a discount. This is not a legitimate recovery option. Customers do not need to allow Qetna to sell discounted claims or sign NDAs to access what is rightfully theirs.

Let us be clear:

Your claim is against Qenta, not against Euro Pacific Bank. Your assets are not tied up in litigation and neither is the bank. They are only tied up at Qetna, as Qenta has unilatertally refused to return your assets to you, depsite the Receiver’s explicit instructions to do so.

Qenta has no authority to force you to settle for less than what you are owed.

Any attempt to induce customers to sign away rights or accept discounted settlements is a self-serving strategy designed to allow Qenta to profit from assets it is unlawfully withholding.

I recommend that customers demand the following in writing from Qenta:

Immediate sale of your mutual funds at current market value, with all proceeds remitted directly to you along with your full cash balances.

Delivery of your gold in the same form it was received, shipped directly to Schiff Gold for safe custody in your name.

Written acknowledgment from Qenta that you reserve all legal rights if they fail to comply.

If you wish to join the customer lawsuit against Qenta to enforce your claims, and to open custodial accounts at Schiff Gold to accept delivery of your precious metals, (incuding your silver which I recoved from Qenta and is now controled by the bank) please email me at peter@schiffradio.com. There is no cost to you to participate.

I remain committed to ensuring that customers are informed and protected. I will continue to update you as developments occur.

Sincerely,

Peter Schiff
Sole shareholder, Euro Pacific Bank

LAST UPDATED: AUGUST 20, 2025

August 20, 2025: Update on Your Silver Held at Euro Pacific Bank (https://europacbank.com/support/update-on-your-silver-held-at-euro-pacific-bank-august-20-2025/)

August 18, 2025: Euro Pacific Bank WARNING from Peter Schiff (https://europacbank.com/support/important-warning-to-former-euro-pacific-bank-customers-august-18-2025/)

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August 5, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-5-2025/)

August 2, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-2-2025/)

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February 02, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240202/)

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November 20, 2023: Progress Report (Opt-out Only). (https://europacbank.com/support/progress-report-20231120/)

September 22, 2023: Report & Communication Portal. (https://europacbank.com/support/migration-update-20230922/)

September 01, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20230901/)

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June 23, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230623/)

June 17, 2023: Receiver's report. (https://europacbank.com/support/progress-report-20230617/)

May 31, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230531/)

May 05, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230505/)

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March 8, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230308/)

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September 16, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration. (https://europacbank.com/support/bank-liquidation-update-20220916/)

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August 29, 2022: Euro Pacific Bank liquidation has commenced. Please read our formal instructions here as it is time-sensitive. (https://europacbank.com/support/commencement-of-liquidation20220829/)

Euro Pacific Bank

Update on Your Silver Held at Euro Pacific Bank: August 20, 2025

Dear Customer,

I want to update you on the latest development regarding your silver that was held by Euro Pacific Bank.

Over 100 of you have already followed the Receiver's earlier instructions and emailed him written directions to have your silver transferred to Schiff Gold. Unfortunately, the Receiver has now changed his position and is treating your silver as if it is part of the bank's liquidation estate, despite previously assuring both you, Qenta, and me that the precious metals were your separate property and outside of the estate.

This is inconsistent and hypocritical. The Receiver continues to insist that the gold still in Qenta's custody is not part of the bank's estate (and therefore refuses to take any legal action to recover it), yet he is suddenly classifying the silver—which remained under Qenta's control until I personally recovered it back to the bank—as if it is part of the estate.

Because of this reversal, the Receiver is now requiring all silver owners to complete a full set of compliance documents before he will even consider transferring your silver. These documents are available here: https://epbprliquidation.com/legal-documents/ (https://epbprliquidation.com/legal-documents/). They include:

- **KYC Form (Personal or Non-Personal Account)** – Requires identity verification, proof of address, etc.
- **Proof of Claim Form** – Form A, already filed by most customers months ago.

- **EDD / PEP Form** – Enhanced Due Diligence questionnaire (only applies if you are a politically exposed person).
- **Compliance Documentation Checklist** – Requires supporting documents such as government-issued ID, proof of address, and in many cases, documents with an **apostille**.

These forms are burdensome and will create long delays, especially due to the apostille requirement on certain documents, which is time-consuming and expensive, especially considering that all customers reside outside the United States.

This means the transfer of silver will almost certainly be delayed by many months, and given the Receiver's track record—he has not returned a single penny to any bank customer in over three years—the process could drag on for a year or longer. The only silver lining is that your silver is safe, and in my opinion it will likely be worth significantly more when you finally gain access to it.

The Receiver has also announced that he will no longer accept instructions sent to his personal email (the one I originally provided). He has stated that any emails sent there will be deleted. If you sent an email to him and did not receive a reply asking for additional compliance documents, you should resend your instructions to his preferred address: **trustee@epbprliquidation.com**.

In the meantime, Schiff Gold will begin setting up accounts for all silver owners based on the personal information we already have on file, combined with what many of you recently supplied by email. A Schiff Gold representative will be in touch to confirm details and collect any missing information. All accounts will be ready to use, so if you wish to buy any additional silver or gold while waiting for the Receiver to act, you will be able to do so.

There is no urgency, as it is clear the Receiver is not prepared to initiate silver transfers anytime soon. But we want to be ready the moment he does.

Thank you for your patience. I will continue to update you on developments and press the Receiver to follow through on his earlier assurances.

If you own silver and have not yet emailed me to open a Schiff Gold account, send an email to me at peter@schiffradio.com (mailto:peter@schiffradio.com) with your contact details and we will set it up. If you already sent me those instruction there is no need to send me anything else.

Sincerely,

Peter Schiff

Sole Shareholder, Euro Pacific Bank

LAST UPDATED: AUGUST 20, 2025

August 20, 2025: Rebuttal to the Receiver's Denial of Responsibility for Assets Held by Qenta: August 26, 2025 (https://europacbank.com/support/rebuttal-to-the-receivers-denial-of-responsibility-for-assets-held-by-qenta-august-26-2025/)

August 20, 2025: Update on Your Silver Held at Euro Pacific Bank (https://europacbank.com/support/update-on-your-silver-held-at-euro-pacific-bank-august-20-2025/)

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Euro Pacific Bank

Rebuttal to the Receiver's Denial of Responsibility for Assets Held by Qenta: August 26, 2025

Dear Customers,

You recently received a letter from the OCIF-appointed Receiver, Wigberto Lugo Mender, regarding the assets transferred to Qenta. Unfortunately, his letter misrepresents the facts and shifts responsibility away from where it truly lies. I want to set the record straight.

1. **Customer Consent Was Based on Assurances Never Honored**

When the “opt-in” process was conducted, both the bank and Qenta promised that:

- Your assets would be placed in accounts you controlled with immediate access.
- You could sell your assets at your discretion and withdraw the proceeds.

This never happened. In three years, Qenta:

- Never onboarded a single customer.
- Never credited gold, cash, or mutual funds into your accounts.

- Has instead tried to keep the assets for itself — offering no customer more than 35 cents on the dollar, and most customers nothing at all.

Since the conditions you agreed to were never met, no valid consent was ever given. Importantly, when these promises were made, the bank was already under the Receiver's control. He therefore oversaw and bears responsibility for the representations made to you.

2. **The Purchase & Assumption Agreement Was Never Completed**

The Agreement required Qenta to obtain regulatory approval and assume customer liabilities before a closing could occur. That never happened. Instead:

- Qenta only took custody of assets — it never became the legal owner.
- Qenta failed to pay the $750,000 balance of the purchase price.
- Qenta terminated the Agreement without returning the assets.
- As the three subsidiaries were never paid for, they must also be returned.

By law, the bank has remained the owner of your assets throughout.

3. **The Receiver, Not Peter Schiff, Has Responsibility**

The Receiver claims I am to blame because I signed the Agreement. What he leaves out is:

- He became Receiver on June 30, 2022, three months before the Agreement was executed. By the time it was signed on September 30, 2022, the bank was fully under his control, and he signed off on every subsequent asset transfer.
- Even if the Agreement had been signed before receivership, once a Receiver is appointed, he steps into the shoes of prior management. That means enforcing all contracts — including the Purchase and Assumption Agreement — becomes his duty.
- The federal court has ruled that I have no standing to sue Qenta. Only the Receiver can act for the bank.
- Therefore, it is the Receiver's obligation — not mine — to pursue litigation against Qenta and recover customer assets.

4. **The Truth About the Silver**

The Receiver's letter downplays the situation with silver, but here are the facts:

- Like the gold, the silver was also transferred to Qenta under the Agreement.
- However, when Qenta failed to complete the transaction, I personally reached out to the custodian.
- Using the cancelled Agreement as leverage, I succeeded in having the custodian transfer control of the silver back to the bank, removing it from Qenta's control.

That is very different from the way the Receiver described it. The silver is not "frozen" by chance — it is back under the bank's control only because of my direct intervention, not because of anything the Receiver did.

5. **The Receiver's Own Words Undermine His Position**

- He admits he has no verifiable information about the gold — an astonishing admission given it is his duty to locate and recover customer assets.
- He claims that the subsidiaries and their mutual funds were "sold" and therefore outside his scope. But those companies were wholly owned by the bank at the time of receivership, making them part of the estate he is supposed to administer. Worse, the Agreement to sell them was signed while he was already Receiver, and Qenta never paid for them. By definition, they still belong to the bank.
- He insists it is "unwarranted" to suggest he must resolve Qenta's breach, yet the federal court has ruled the opposite: only the Receiver has standing and authority to litigate a breach of the Purchase and Assumption Agreement or to act on the bank's behalf.

Conclusion

The Receiver is wrong to claim he has no responsibility or to shift that responsibility to me — especially since I asked him to delegate his authority to me so that I could enforce the Purchase and Assumption Agreement that he insists in my responsibility, but he refused.

The facts are clear:

- Customer consent was conditional and never satisfied.
- The Purchase & Assumption Agreement was never closed.
- Qenta breached by keeping assets without payment.
- The subsidiaries were bank assets when he became Receiver, and since Qenta never paid, they remain part of the bank's estate.
- The silver was restored to the bank only because of my actions — not his.

I even tried to assume his responsibility myself. I brought an action against Qenta, and both a state court judge and later a federal judge agreed I had provided sufficient evidence to show the bank would likely prevail. They granted a temporary restraining order freezing Qenta's assets. But that TRO was later vacated — not because the case lacked merit, but because the federal judge ruled that I had no authority to act. The ruling was clear: only the Receiver can bring that action.

That is the strongest possible proof that the duty to act lies with him. Though I lacked the authority, I still acted. The Receiver has both the authority and responsibility to act — yet refuses to do so.

All of the assets transferred to Qenta —precious metals, cash, mutual funds, and subsidiaries — belong to the bank and must be recovered. The Receiver has both the power and the obligation to take legal action against Qenta to get them back.

The Receiver's refusal to act, and OCIF's indifference, are the reasons I am now organizing a group action for customers to recover their assets directly. This path is far more difficult and costly than an action brought by the Receiver on behalf of the bank, because it requires coordinating a large number of individual claimants. But the outcome will ultimately be the same, since Qenta has no case. Qenta is simply exploiting the Receiver's refusal to act in order to unjustly enrich itself at your expense, hoping that customers lack the resources or resolve to pursue justice. Unlike the Receiver, I will not sit back and allow this travesty to continue. While he refused to pursue cost-effective litigation with the bank's funds — even after I offered to personally cover those costs — I am stepping up to fund far more expensive litigation with my own money.

Sincerely,

Peter Schiff
Sole shareholder Euro Pacific Bank

https://europacbank.com

Euro Pacific Bank

BANKING TRADING INVESTING COMPANY SUPPORT Login Open Account

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Euro Pacific Bank
Update on Qenta Email and Legal Action

Dear Customers,

Qenta has once again circulated the same misleading email. Please ignore it. Their intention is to exploit the Receiver's refusal to act on behalf of the bank and my lack of authority to do so as a third party. Qenta's offer amounts to less than 35 cents on the dollar. Qenta has no legal right to hold your assets hostage and force you to accept a steep discount just to recover a portion of what is rightfully yours.

I have not yet taken any action with respect to the customer lawsuit, as I waited this past week to see if the Receiver would follow through on his indication to my lawyer that he planned to pursue an action on behalf of the bank. Despite repeated requests for an update, we have received no response.

The easiest and least costly path forward is a bank-led action, like the one I already won, but which Qenta had vacated solely because the Receiver did not bring the action himself. However, based on the email he recently sent to customers dated Aug. 26, I am losing hope that he will actually follow through. I will address his latest misrepresentations in a follow-up email.

Based on his latest email, I will likely have to move forward with the **Litigation Recovery Trust** for customers to collectively pursue their claims against Qenta and Brent De Jong, as well as any Qenta employees who knowingly helped or received proceeds derived from the misappropriation of customer-owned assets, or who were unjustly enriched at your expense — including clawing back any assets that may be transferred to Brent De Jong's soon-to-be ex-wife, as they are now going through a divorce.

Our claims are strong, and two judges have already ruled that we would prevail in a lawsuit if the right party filed it. There are only two parties that can file an action against Qenta: the Receiver and the customers. So if the Receiver refuses to do the job he was appointed to do, then I am committed to doing it for him by creating the Litigation Recovery Trust, to pursue all customer claims, including potential claims against the Receiver personally.

The good news is that customer claims are not limited by the arbitration agreement in the Purchase and Assumption Agreement, so we can bring our case directly in federal court.

I will continue pressing for accountability and will update you promptly on the next steps.

Sincerely,
Peter Schiff, Sole Shareholder Euro Pacific Bank

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Euro Pacific Bank

Clarification on Receiver's Misrepresentations

Dear Customers,

Today, the Receiver, Wigberto Lugo Mender, sent you an email that was dated August 26th, but that I only went out today. While the date discrepancy is not the main issue, the substance of his letter contains serious misrepresentations that must be corrected with the actual facts.

1. Qenta Never Owned the Assets

Contrary to his claim, the assets transferred to Qenta under the Purchase & Assumption Agreement (PAA) always remained property of Euro Pacific Bank. The PAA was terminated before any closing took place. Both the **New York State judge** who granted the TRO and the **Federal judge** who later reviewed it agreed that if the bank brought an action to recover these assets, it would prevail. That is why the TRO was granted and then upheld. The only reason the TRO was later vacated is because the Federal judge ruled that **only the Receiver** has the authority to act on behalf of the bank. The Receiver's statement that these assets "never belonged to the bank" is a total fabrication. Once he was appointed Receiver, all of these assets were frozen, and customers lost access to them.

2. Qenta Paid the Bank — Not Me

Qenta acquired custody of the bank's assets and was required to assume its liabilities. It even made the first installment of the purchase price — $500,000 — which was paid to the bank, not to me personally. Any suggestion otherwise is dishonest and misleading.

3. Silver Holdings Are Not Frozen

The Receiver claims that the custodian froze customer silver. That is false. The custodian, **Silver Bullion Pte Ltd in Singapore**, has confirmed directly to me that they are prepared to release all silver to customers immediately — but they are just waiting for written confirmation from the Receiver, which he has refused to provide. The receiver is the only obstacle preventing customers from recovering their silver.

4. Subsidiaries Were Bank Assets

The Receiver admits in his own letter that Euro Pacific Securities, Euro Pacific Funds, and Euro Pacific Advisors "were wholly owned subsidiaries of Euro Pacific International Bank." If they were wholly owned subsidiaries, then by definition their value and assets were part of the bank's estate. Yet he now claims these subsidiaries — and the mutual funds and brokerage accounts they managed — "never belonged to the bank" and were outside the liquidation process. That position is absurd. The clearest example is the **$19 million in cash** held at Interactive Brokers. Those funds came directly from customer deposits at Euro Pacific Bank, which the bank chose to place in an IB account through its subsidiary, Euro Pacific Securities. Under the terminated PAA, Qenta was not given the cash directly but was transferred ownership of Euro Pacific Securities, which held the account. Since the PAA never closed, Qenta never legally acquired Euro Pacific Securities or the IB account. To now claim this $19 million of customer deposits was never part of the bank's estate is indefensible.

5. The Receiver's Contradiction on Responsibility

In his letter, the Receiver blames me for having signed the agreement with Qenta. What he leaves out is that the agreement was signed **three months after he was appointed Receiver**. By that time, he was already in charge of the bank, including approving the PAA, overseeing the migration of customers to Qenta and reconciling the cash balances — the latter two tasks he failed to complete.

More importantly, once the bank was in receivership, **any rights or responsibilities I once had under the agreement automatically transferred to him**. That is exactly why the Federal judge vacated the TRO: he ruled that even though I signed the agreement, I no longer had any authority to enforce it because the bank was in receivership. Therefore only the Receiver could legally enforce it.

Two judges have already made clear that the bank would prevail in an action to recover these assets. The Federal judge made equally clear that **only the Receiver** has the authority to bring that action. Yet instead of fulfilling his duty, he seeks to shift blame to me while refusing to exercise the very authority the courts have confirmed belongs exclusively to him.

6. A New Ask: Assignment of Rights

Up to now, I have only asked the Receiver to delegate me authority to act on behalf of the bank. So far he has refused. However, if he truly believes that the assets now in Qenta's possession never belonged to the bank, then he should have no objection to assigning all of the bank's rights to those assets directly to the **Litigation Recovery Trust**. If that assignment were made, the Trust could pursue Qenta in its own right, without further obstruction.

If he refuses, the Trust can still act based on the **collective rights of customers** who assign their claims directly to it. But an assignment from the bank would allow the action to commence much sooner, at a much lower cost, and with far less work. If he refuses even this, then his position is exposed as a deliberate cover-up of his unwillingness to act.

7. Clawbacks Against Insiders

As part of this effort, the Litigation Recovery Trust will also pursue claims not only against Qenta and its executives, but against any insiders or employees who knowingly participated in or benefitted from the misappropriation of customer assets. That includes unjust enrichment claims, and if necessary, clawing back assets transferred to **Brent De Jong's soon-to-be ex-wife** as part of their divorce proceedings.

Next Steps

If the Receiver continues refusing to fulfill his duty, customers will not be left without recourse. I am prepared to do the Receiver's job for him by moving forward with the formation of the Litigation Recovery Trust so that customers can collectively pursue all claims necessary to recover what is rightfully theirs.

I will continue pressing for accountability, correcting misinformation, and updating you on the actions we will take to recover what is rightfully yours.

Please note: this message is my personal update and perspective, and not an official communication from the Receiver or OCIF. You should continue to monitor their notices for formal instructions about the liquidation process.

Sincerely,

Peter Schiff, sole shareholder Euro Pacific Bank.

Exhibit 12
Qenta Revised Plan

Dear Receiver,

Kindly find below the latest and final proposal to close-out EPB for your review and consent.
We will go through this in our scheduled call with you on 09 May 23. Please note that all the values are calculated based on precious metal and foreign currency exchange rates as of 14 April 2023.
Note - This analysis along with the supporting excel file which will be sent to you replace the previous prelim versions provided you earlier.

Analysis of Total Customers As of April 14th, 2023

Analysis of Total Customers	Balances (USD Million)
Deposit Customers	$85.26
Mutual Fund Customers	$5.28
Brokerage Customers	$0.17
Precious Metal Customers	$21.24
Total Customers	**$111.95**
Deposit customers Opt-out	36.02
Mutual Funds Opt-out	$0.11
Brokerage customers Opt-out	$0.00
Precious Metals Opt-out	$0.84
Total Opt-Out Customers	**$36.98**
Customer Opt-In balances	**$74.97**
Asset balances available	$74.95
Excess / (Shortfall)	**($0.02)**

1. Restricted cash balance of $550K have not been included.
2. Cash balance of $511K available with Receiver has not been included.
3. EPB licensing fee and other expenses have been paid out of this $511K.
4. There is only $ 30K shortfall after considering the balance payment of deal towards payment of customers.
5. No haircut has been applied to the depositor balances.

Bank, PM, MF and Securities Balances Analysis and Allocation Plan as of April 14, 2023

Correspondent Entity	Fund type	Amount in USD (Millions)	Amount in USD – Allocated to proposed Op-out customers	Potential Un-recoverable Bank Balances	Potential Outstanding Liabilities / (Assets)	Amount in USD – Balance for Opt-In customers	% of US balance converted from other currencies
First Bank	Client funds	$4.42				$4.42	0.0%
Interactive Brokers	Startup cash	$0.54				$0.54	20.5%
Interactive Brokers	Brokerage	$27.69				$27.69	78.4%
Interactive Brokers	NAV (non-cash)	$0.17				$0.17	
Interactive Brokers	Mutual Funds (Cash)	$2.40				$2.40	
Interactive Brokers	Mutual Funds (Non-cash)	$3.25	$0.11			$3.13	
Saxo	Brokerage/ settlement for FX	$18.49	$11.82			$6.66	100.0%
Novo Bank	Client wires	$24.19	$24.19				100.0%
Stone X	Client funds/ hedge	$7.16				$7.16	0.0%
Stone X*	Gold holdings (non-cash)	$15.40	$0.75			$14.65	
Silver Bullion*	Silver holdings (non-cash)	$6.64	$0.10		*$0.13	$6.41	
Intercash	Client Card	$0.50		$0.50			99.9%
Currency Matters	Client wires	$0.62		$0.62			72.6%
Sensus	GBE Wallet	$0.96				$0.96	53.1%
Qenta Balance Payment		$0.00			**($0.75)	$0.75	
		$112.43	$36.99	$1.12	($0.62)	$74.94	

* $133K has been included in Potential liabilities for mobilization of Silver Bullion to StoneX.
** Total consideration was $1.25M from which $0.5M already paid and balance of $0.75M considered here.
***Balances in restricted account for $550K and Corporate account for $511k have not been included. However, Corporate account balance for $ 511K have fully used for payment of licensing fees and other operating expenses.

We would request you to confirm whether unrecoverable bank balances of $ 1.12 million (Intercash for $ 0.5 million & CM for $ 0.62 million) can be recovered or not. As per our assessment and information available, these balances are not recoverable.

Below is further information on the overall customers for your record with commentary on the Opt Out vs Opt In customer sets.

Under separate email, we will forward the final Customer file that contains the full detail behind this summary.

1. **Total number of former EPB customers:**
    a. Total EPB Group Customers are 3,595 (Value: $111.9M)
2. **Total number and volume of opt-out customers:**
    a. ***Outgoing Wires***
        i. 536 clients with 566 outgoing wires
        ii. Total balance of outgoing wires are $30.68M as of FX rates of 14 April 2023
    b. ***Opt-Out***
        i. The overall total of clients marked as opt-out are 1893 which includes below. However, the count of below may not be same due to some overlapping, as some customers are under opt-out but still have PM or MF balances:
            1. UAE/China/BIOT/USMO Nationals/Residents (Count 59 & Value $3.2M)
            2. Deceased clients (Count: 19 & Value: $1.69M)
            3. KYC Fail Opt-Out (Count: 46 & Value $1.32M)
            4. Freeze order (Count: 1 & value $15k)
            5. Clients with cumulative balance below $50 (Count: 1582 & Value $-126K)
            6. Outgoing wires that are in Opt-Out are Count: 536 & Value: $30.68M
        ii. Total balance of opt-out clients is $36.96M as of 14 April 2023
        iii. The opt-out balances due to KYC Fail under MF (Count: 4 & value $ 63K) and PM (Count: 5 & Value $ 769K) will be liquidated and settled.
3. **Total approximate number of RGTS opt-in customers and balances:**
    a. Number of RGTS opt-in customers are 1702.

b. Total balance in $74.98M consisting of following;
    i. Deposit of $49.2M (Both Current & IB)
    ii. Precious Metals of $20.39M
    iii. Securities of $0.174M
    iv. Mutual Funds of $5.17M

Kindly review the above information for final close-out of EPB and provide us with formal confirmation to proceed.

Exhibit 13
Qenta Summary of Opt-Out Plan

EPB - Assets and Liabilities analysis as of 31 Aug, 2024

1) Below are the key assumptions for full & final distribution based on available cashflows after receipt of Novo Funds;

* Customer balances below $ 50 including negative, net negative ($547K) have been eliminated from below analysis.
* Receiver's accrued fees\expenses have not been provided for, however, fees\expenses paid till 31 August 2024 have been accounted for.
* Qenta have incurred staff costs to maintain customer relationship, compliance, legal and finance related matters. These costs have been accounted for in this file.
* The valuation of assets and liabilities are subject to change on the actual date of settlement. The shortfall could reduce or increase due to fluctuation in Fcy balances.
* The immediate cash out requests received from 72 customers have been included in opt-out list. These clients will be responsibility of the Trustee under final distribution/liquidation.
* The additional window for opt-out option not considered, as Novo funds have been received.
*Incoming wires in Novo Bank to the tune of $886K have been excluded from the reconciliation and reduced from the Axos bank balance. Trustee will handle\settle separately.

Overall Position of EPB Assets & Depositor Balances							
Classification	Assets	Depositor Balances	Allocation of shortfall/Haircut	Net Depositor Balances	Excess\(Shrtfall)	% of the liabilities	Notes
Precious Metal	26,335,813	26,101,831	(777,580)	25,324,251	1,011,562	4%	
NAV of MF units held by EPB as Investment	439,829	-	-	-	439,829	0%	
Curr Deposit	82,546,636	86,577,184	(2,579,157)	83,998,027	(1,451,391)	-2%	
Receiver fees\expenses							
Total Clients	**109,322,278**	**112,679,015**	**(3,356,737)**	**109,322,278**	**0**	**0%**	

EPB Assets under Qenta Control and Opt-in Depositor Balances							
Classification	Assets	Depositor Balances	Allocation of shortfall/Haircut	Net Depositor Balances	Excess\(Shrtfall)	% of the liabilities	Notes
Precious Metal	26,335,813	24,979,883	(744,157)	24,235,726	2,100,087	8%	
NAV of MF units held by EPB as Investment	439,829	-	-	-	439,829	0%	
Curr Deposit	36,127,382	44,052,039	(1,312,322)	42,739,717	(6,612,334)	-15%	
Receiver fees\expenses							
Total Clients	**62,903,024**	**69,031,922**	**(2,056,479)**	**66,975,443**	**(4,072,419)**	**-6%**	

EPB Assets under Receiver Control and Opt-out Depositor balances							
Classification	Assets	Depositor Balances	Allocation of shortfall/Haircut	Net Depositor Balances	Excess\(Shrtfall)	% of the liabilities	Notes
Precious Metal	-	1,121,948	(33,423)	1,088,525	(1,088,525)	-97%	
NAV of MF units held by EPB as Investment	-	-	-	-	-	0%	
Curr Deposit	46,419,254	42,525,145	(1,266,835)	41,258,310	5,160,944	12%	
Receiver fees\expenses							
Total Clients	**46,419,254**	**43,647,093**	**(1,300,258)**	**42,346,835**	**4,072,419**	**9%**	
Check	-	(0)	0	(0)	0		

Exhibit 14
Commercial Register
Responsible Gold Trading DMCC

REPUBLIQUE ET CANTON DE GENEVE
POST TENEBRAS LUX

Consult the Geneva trade register

~~G-Mint Sàrl, in liquidation~~

CHE-406.674.883

No.
02841/2018

registered on
09 février 201

cancelled on
28 juin 2

Legal form
Société à responsabilité limitée

REF. ↑	COMPANY NAME
10	G-Mint Sàrl, in liquidation

REF. ↑	HEAD OFFICE
1	Geneva

REF. ↑	ADDRESS
8	Rue de la Cité 1, c/o G-Commerce Suisse Sàrl, 1204 Geneva

REF. ↑	GOAL, OBSERVATIONS
1	Purpose: to issue and cancel digital tokens that represent gold and to administer the code that manages the related blockchain registry; the company conducts its business in accordance with the objectives of the group to the extent possible (see articles of association for full purpose).
1	Opting-out: According to the declaration of 22.01.2018, limited monitoring is waived.
1	The terms of transfer of shares deviate from the law according to the statutes.
10	By decision of the judge of the Court of First Instance of 29.02.2024, the company was dissolved in accordance with Art. 731b CO; its liquidation was ordered in accordance with the provisions applicable to bankruptcy.
11	The bankruptcy proceedings were suspended due to lack of assets by judgment of the Court of First Instance dated 13.05.2024.
12	The bankruptcy proceedings having been closed by judgment of 20.06.2024, the company is automatically deregistered.

REF.	PUBLICATION BOARD
1	Communication to partners: in writing, by mail, by email or by fax
1	Swiss Official Journal of Commerce

^	NEWSPAPER		PAGE/ID	
REF.	NUMBER	DATE	DATE	PAGE/ID
1	2841	09.02.2018	14.02.2018	4056553
3	16381	11.09.2018	14.09.2018	1004456182

	NEWSPAPER		PAGE/ID	
REF. ↑	NUMBER	DATE	DATE	PAGE/ID
12	12916	28.06.2024	03.07.2024	10060749

REF. ↑	NAME AND FIRST NAMES, ORIGIN, RESIDENCE, PARTNERSHIP SHARE	FUNCTIONS	SIGNATURE FASHION
1	Responsible Gold Operations Ltd (MC-319413), in George Town, CYM, for 20 shares of CHF 1,000	associated	
6	de Jong Brent, from USA, in Houston, USA	managing president	individual signature

The information above is given with no commitment and is in no way legally binding.

on 27 January 2025 State of [27.01.2025]

Exhibit 15
Qenta Final Liquidation Proposal

EPB - Assets vs Liabilities analysis as of 31 Dec, 2024

1) Below are the key assumptions for full & final distribution based on available cashflows after receipt of Novo Funds;

* Customer balances below $ 50 including negative, net negative ($531K) have been eliminated from below analysis.
* Receiver's accrued fees\expenses have not been provided for, however, fees\expenses paid till 31 August 2024 have been accounted for.
* Qenta has charged Asset Management and Risk Management fee of 1% to the tune of $4.95M.
* The valuation of assets and liabilities may change on the actual date of settlement.
* The immediate cash out requests received from 72 customers have been included in opt-out list. These clients will be responsibility of the Trustee under final distribution/liquidation.
* Incoming wires in Novo Bank to the tune of $816K have been excluded from the reconciliation and Trustee will handle\settle separately.

Overall Position							
Classification	Assets	Liabilities	Allocation of shortfall	Net Liabilities	Excess\(Shrtfall)	% of the liabilities	Notes
Precious Metal	27,996,385	27,746,249	(1,798,265)	25,947,984	2,048,402	7%	
EPB - MF Investment	442,635	-	-	-	442,635	0%	
Curr Deposit	79,596,372	82,487,484	(5,346,106)	77,141,378	2,454,994	3%	
Fees / Expenses	-	4,946,031	-	4,946,031	(4,946,031)		
Total Clients	**108,035,392**	**115,179,764**	**(7,144,371)**	**108,035,392**	**0**	**0%**	
			-6.48%				

Qenta							
Classification	Assets	Liabilities	Allocation of shortfall	Net Liabilities	Excess\(Shrtfall)	% of the liabilities	Notes
Precious Metal	27,996,385	26,511,678	(1,718,252)	24,793,427	3,202,958	12%	
EPB - MF Investment	442,635	-	-	-	442,635	0%	
Curr Deposit	32,696,444	42,325,305	(2,743,150)	39,582,155	(6,885,711)	-16%	
Qenta Fees	-	4,946,031	-	4,946,031	(4,946,031)		
Total Clients	**61,135,464**	**73,783,014**	**(4,461,402)**	**69,321,612**	**(8,186,148)**	**-11%**	

Receiver							
Classification	Assets	Liabilities	Allocation of shortfall	Net Liabilities	Excess\(Shrtfall)	% of the liabilities	Notes
Precious Metal	-	1,234,570	(80,014)	1,154,557	(1,154,557)	-94%	
MF	-	-	-	-	-	0%	
Curr Deposit	46,899,928	40,162,179	(2,602,956)	37,559,223	9,340,705	23%	
Receiver Fees	-	-	-	-	-		
Total Clients	**46,899,928**	**41,396,750**	**(2,682,970)**	**38,713,780**	**8,186,148**	**20%**	

0

Exhibit 16
Metal Holdings Site Desciprion

LAST UPDATED: AUGUST 20, 2025

August 20, 2025: Update on Your Silver Held at Euro Pacific Bank (https://europacbank.com/support/update-on-your-silver-held-at-euro-pacific-bank-august-20-2025/)

August 18, 2025: Euro Pacific Bank WARNING from Peter Schiff (https://europacbank.com/support/important-warning-to-former-euro-pacific-bank-customers-august-18-2025/)

August 14, 2025: Euro Pacific Bank Update from Peter Schiff - ACTION REQUIRED! (https://europacbank.com/support/update-from-peter-schiff-august-14-2025/)

August 6, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-6-2025/)

August 5, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-5-2025/)

August 2, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-august-2-2025/)

July 30, 2025: Euro Pacific Bank Update from Peter Schiff (https://europacbank.com/support/update-from-peter-schiff-july-30-2025/)

July 12, 2025: Qenta Status Update. (https://europacbank.com/support/status-update-july-2025/)

October 31, 2024: Receiver's Report. (https://europacbank.com/support/receivers-reports-20241031/)

October 16, 2024: Receiver's Notice. (https://europacbank.com/support/receivers-notice-20241016/)

October 04, 2024: Migration Update. (https://europacbank.com/support/migration-update-20241004/)

April 16, 2024: Receiver's Reports. (https://europacbank.com/support/receivers-reports-20240416/)

April 13, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240413/)

March 11, 2024: Receiver's Reports. (https://europacbank.com/support/receiver-reports-20240311/)

March 03, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240303/)

February 19, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240219/)

February 02, 2024: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20240202/)

November 21, 2023: Migration Update (Opt-in Only). (https://europacbank.com/support/migration-update-202311/)

November 20, 2023: Progress Report (Opt-out Only). (https://europacbank.com/support/progress-report-20231120/)

September 22, 2023: Report & Communication Portal. (https://europacbank.com/support/migration-update-20230922/)

September 01, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-update-20230901/)

July 20, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230720/)

June 23, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230623/)

June 17, 2023: Receiver's report. (https://europacbank.com/support/progress-report-20230617/)

May 31, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230531/)

May 05, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230505/)

April 20, 2023: Liquidation update- Action required. (https://europacbank.com/support/migration-liquidation-update_20230421/)

March 31, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update-20230331/)

March 8, 2023: Migration & Liquidation update. (https://europacbank.com/support/migration-liquidation-update_20230308/)

January 27, 2023: Correspondent bank update. (https://europacbank.com/support/migration-liquidation-update-20230127/)

December 16, 2022: Comprehensive FAQ is published. (https://europacbank.com/support/migration-liquidation-faq-20221216/)

December 05, 2022: Migration & liquidation update. (https://europacbank.com/support/migration-liquidation-update_20221205/)

November 01, 2022: Mutual funds & outgoing wire requests update. (https://europacbank.com/support/migration-update-20221101/)

October 21, 2022: Update on Opt-out deadline - Extended. (https://europacbank.com/support/bank-liquidation-update-20221021/)

October 14, 2022: Customer Update & Townhall. (https://europacbank.com/support/bank-liquidation-update-20221017/)

October 8, 2022: Update on opt-out deadline for EPB clients who do not wish to migrate their account to Qenta Inc. (https://europacbank.com/support/bank-liquidation-update-20221008/)

September 30, 2022: Update on bank liquidation, pending transactions, and migration of assets to Qenta Inc. (https://europacbank.com/support/bank-liquidation-update-20220930/)

September 28, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration. (https://europacbank.com/support/bank-liquidation-update-20220928/)

September 16, 2022: Update on pending transactions for clients opting out of Qenta Inc. migration. (https://europacbank.com/support/bank-liquidation-update-20220916/)

September 8, 2022: Qenta has emailed a welcome letter to all EPB clients. You can read a copy of it here. (https://europacbank.com/support/qenta-welcome-letter/)

September 2, 2022: Update on pending transactions, brokerage, and account migration. (https://europacbank.com/support/bank-liquidation-update-20220902/)

August 29, 2022: Euro Pacific Bank liquidation has commenced. Please read our formal instructions here as it is time-sensitive. (https://europacbank.com/support/commencement-of-liquidation20220829/)

Euro Pacific Bank

Update on Your Silver Held at Euro Pacific Bank: August 20, 2025

Dear Customer,

I want to update you on the latest development regarding your silver that was held by Euro Pacific Bank.

Over 100 of you have already followed the Receiver's earlier instructions and emailed him written directions to have your silver transferred to Schiff Gold. Unfortunately, the Receiver has now changed his position and is treating your silver as if it is part of the bank's liquidation estate, despite previously assuring both you, Qenta, and me that the precious metals were your separate property and outside of the estate.

This is inconsistent and hypocritical. The Receiver continues to insist that the gold still in Qenta's custody is not part of the bank's estate (and therefore refuses to take any legal action to recover it), yet he is suddenly classifying the silver—which remained under Qenta's control until I personally recovered it back to the bank—as if it is part of the estate.

Because of this reversal, the Receiver is now requiring all silver owners to complete a full set of compliance documents before he will even consider transferring your silver. These documents are available here: https://epbprliquidation.com/legal-documents/ (https://epbprliquidation.com/legal-documents/). They include:

- **KYC Form (Personal or Non-Personal Account)** – Requires identity verification, proof of address, etc.
- **Proof of Claim Form** – Form A, already filed by most customers months ago.

- **EDD / PEP Form** – Enhanced Due Diligence questionnaire (only applies if you are a politically exposed person).
- **Compliance Documentation Checklist** – Requires supporting documents such as government-issued ID, proof of address, and in many cases, documents with an **apostille**.

These forms are burdensome and will create long delays, especially due to the apostille requirement on certain documents, which is time-consuming and expensive, especially considering that all customers reside outside the United States.

This means the transfer of silver will almost certainly be delayed by many months, and given the Receiver's track record—he has not returned a single penny to any bank customer in over three years—the process could drag on for a year or longer. The only silver lining is that your silver is safe, and in my opinion it will likely be worth significantly more when you finally gain access to it.

The Receiver has also announced that he will no longer accept instructions sent to his personal email (the one I originally provided). He has stated that any emails sent there will be deleted. If you sent an email to him and did not receive a reply asking for additional compliance documents, you should resend your instructions to his preferred address: **trustee@epbprliquidation.com**.

In the meantime, Schiff Gold will begin setting up accounts for all silver owners based on the personal information we already have on file, combined with what many of you recently supplied by email. A Schiff Gold representative will be in touch to confirm details and collect any missing information. All accounts will be ready to use, so if you wish to buy any additional silver or gold while waiting for the Receiver to act, you will be able to do so.

There is no urgency, as it is clear the Receiver is not prepared to initiate silver transfers anytime soon. But we want to be ready the moment he does.

Thank you for your patience. I will continue to update you on developments and press the Receiver to follow through on his earlier assurances.

If you own silver and have not yet emailed me to open a Schiff Gold account, send an email to me at peter@schiffradio.com (mailto:peter@schiffradio.com) with your contact details and we will set it up. If you already sent me those instruction there is no need to send me anything else.

Sincerely,

Peter Schiff

Sole Shareholder, Euro Pacific Bank

Exhibit 17
Invesment Cancellation Record

EURO PACIFIC BANK

19 May 2023
14:8:8

Account Statement
Account: **1000591919**
Currency: **GBP**
Customer: **Ewan Forsyth Incorporated**
Field House Main St
Lincoln
GB

Booking Date	Value Date	Reference	Description	Debit	Credit	Closing Balance
		Starting Balance				0.00
28 SEP 18	28 AUG 17	LCLG1-09-28-2018128436696	Credit		5,000.00	5,000.00
			Incoming Wire Transfer - -			
			KARLHUNT			
28 SEP 18	28 AUG 17	LCLG1-09-28-2018128436697	Debit	10.00		4,990.00
			Transfer Fee: Incoming Wire			
			Transfers Less Than €12500 10.00			
			GBP			
28 SEP 18	28 AUG 17	LCLG1-09-28-2018128436697	Debit	95.00		4,895.00
			Request Card (Card Cost)			
28 SEP 18	28 AUG 17	LCLG1-09-28-2018128436697	Debit	60.00		4,835.00
			Request Card (Shipping Cost)			
28 SEP 18	18 SEP 17	LCLG1-09-28-2018158245882	Debit	15.00		4,820.00
			Additional Transfer Fee: GBP 15.00			
28 SEP 18	18 SEP 17	LCLG1-09-28-2018128436697	Debit	4,000.00		820.00
			Outgoing Wire Transfer -			
			INTERACTIVE BROKERS LLC - U2214180			
			EWAN FORSYTH			
28 SEP 18	18 SEP 17	LCLG1-09-28-2018128436697	Debit	18.00		802.00
			Transfer Fee: Outgoing Wire			
			Transfers Less Than €12500 GBP			
			18.00			
28 SEP 18	20 SEP 17	LCLG1-09-28-2018158245882	Credit		110,000.00	110,802.00
			Incoming Wire Transfer - -			
			KARLHUNT			
28 SEP 18	20 SEP 17	LCLG1-09-28-2018158245882	Debit	65.00		110,737.00
			Transfer Fee: Incoming Wire			
			Transfers Greater Than €50000 65.0			
			GBP			
28 SEP 18	01 OCT 17	LCLG1-09-28-2018158245882	Debit	19.50		110,717.50
			Monthly Maintenance Fee			
28 SEP 18	10 OCT 17	LCLG1-09-28-2018077626468	Credit		200,000.00	310,717.50
			Incoming Wire Transfer - KARL HUNT			
			-			
28 SEP 18	10 OCT 17	LCLG1-09-28-2018077626468	Debit	65.00		310,652.50

			Transfer Fee: Incoming Wire Transfers Greater Than €50000 65.0 GBP			
28 SEP 18	18 OCT 17	LCLG1-09-28-2018077626468	Debit	300,000.00		10,652.50
			Outgoing Wire Transfer - INTERACTIVE BROKERS LLC - U2214180 EWAN FORSYTH			
28 SEP 18	18 OCT 17	LCLG1-09-28-2018077626468	Debit	68.00		10,584.50
			Transfer Fee: Outgoing Wire Transfers Greater Than €50000 GBP 68.00			
28 SEP 18	18 OCT 17	LCLG1-09-28-2018077626468	Debit	15.00		10,569.50
			Additional Transfer Fee: GBP 15.00			
28 SEP 18	01 NOV 17	LCLG1-09-28-2018077626469	Debit	19.50		10,550.00
			Monthly Maintenance Fee			
28 SEP 18	01 DEC 17	LCLG1-09-28-2018077626469	Debit	19.50		10,530.50
			Monthly Maintenance Fee			
28 SEP 18	01 JAN 18	LCLG1-09-28-2018077626469	Debit	19.50		10,511.00
			Monthly Maintenance Fee			
28 SEP 18	23 JAN 18	LCLG1-09-28-2018077626469	Credit		310,000.00	320,511.00
			Incoming Wire Transfer - - KARLHUNT			
28 SEP 18	23 JAN 18	LCLG1-09-28-2018077626469	Debit	65.00		320,446.00
			Transfer Fee: Incoming Wire Transfers Greater Than €50000 65.0 GBP			
28 SEP 18	30 JAN 18	LCLG1-09-28-2018077626469	Debit	310,000.00		10,446.00
			Outgoing Wire Transfer - INTERACTIVE BROKERS LLC - U2214180 EWAN FORSYTH			
28 SEP 18	30 JAN 18	LCLG1-09-28-2018077626469	Debit	68.00		10,378.00
			Transfer Fee: Outgoing Wire Transfers Greater Than €50000 GBP 68.00			
28 SEP 18	30 JAN 18	LCLG1-09-28-2018077626469	Debit	15.00		10,363.00
			Additional Transfer Fee: GBP 15.00			
28 SEP 18	01 FEB 18	LCLG1-09-28-2018077626469	Debit	19.50		10,343.50
			Monthly Maintenance Fee			
28 SEP 18	26 FEB 18	LCLG1-09-28-2018077626469	Credit		300,000.00	310,343.50

EURO PACIFIC BANK

19 May 2023
14:8:8

			Incoming Wire Transfer - - KARLHUNT			
28 SEP 18	26 FEB 18	LCLG1-09-28-201807 7626469	Debit	65.00		310,278.50
			Transfer Fee: Incoming Wire Transfers Greater Than €50000 65.0 GBP			
28 SEP 18	01 MAR 18	LCLG1-09-28-201807 7626469	Debit	19.50		310,259.00
			Monthly Maintenance Fee			
28 SEP 18	06 MAR 18	LCLG1-09-28-201807 7626469	Debit	300,000.00		10,259.00
			Transfer to Brokerage			
28 SEP 18	01 APR 18	LCLG1-09-28-201807 7626469	Debit	19.50		10,239.50
			Monthly Maintenance Fee			
28 SEP 18	01 MAY 18	LCLG1-09-28-201807 7626469	Debit	19.50		10,220.00
			Monthly Maintenance Fee			
28 SEP 18	01 JUN 18	LCLG1-09-28-201807 7626469	Debit	19.50		10,200.50
			Monthly Maintenance Fee			
28 SEP 18	01 JUL 18	LCLG1-09-28-201807 7626470	Debit	19.50		10,181.00
			Monthly Maintenance Fee			
28 SEP 18	01 AUG 18	LCLG1-09-28-201807 7626470	Debit	19.50		10,161.50
			Monthly Maintenance Fee			
28 SEP 18	01 SEP 18	LCLG1-09-28-201807 7626470	Debit	19.50		10,142.00
			Monthly Maintenance Fee			
28 SEP 18	05 SEP 18	LCLG1-09-28-201807 7626470	Credit		140,000.00	150,142.00
			Incoming Wire Transfer - -			
28 SEP 18	05 SEP 18	LCLG1-09-28-201807 7626470	Debit	65.00		150,077.00
			Transfer Fee: Incoming Wire Transfers Greater Than €50000 65.0 GBP			
01 OCT 18	01 OCT 18	AAACT18274951RNK07	Charge - Capitalise	19.50		150,057.50
			Account Charge Capitalise Schedule			
01 NOV 18	01 NOV 18	AAACT183055CM1Y042	Charge - Capitalise	19.50		150,038.00
			Account Charge Capitalise Schedule			
03 DEC 18	01 DEC 18	AAACT183376B588K7N	Charge - Capitalise	19.50		150,018.50
			Account Charge Capitalise Schedule			
02 JAN 19	01 JAN 19	AAACT190020ZW4JYDD	Charge - Capitalise	19.50		149,999.00
			Account Charge Capitalise Schedule			
01 FEB 19	01 FEB 19	AAACT190325GTXW3JF	Charge - Capitalise	19.50		149,979.50

			Account Charge			
			Capitalise Schedule			
01 MAR 19	01 MAR 19	AAACT190601FGBHGDQ	Charge - Capitalise	19.50		149,960.00
			Account Charge			
			Capitalise Schedule			
01 APR 19	01 APR 19	AAACT1909188PNPT18	Charge - Capitalise	19.50		149,940.50
			Account Charge			
			Capitalise Schedule			
01 MAY 19	01 MAY 19	AAACT1912112PRCWFR	Charge - Capitalise	19.50		149,921.00
			Account Charge			
			Capitalise Schedule			
03 JUN 19	01 JUN 19	AAACT191541WNSY70F	Charge - Capitalise	19.50		149,901.50
			Account Charge			
			Capitalise Schedule			
01 JUL 19	01 JUL 19	AAACT1918281PS50TW	Charge - Capitalise	19.50		149,882.00
			Account Charge			
			Capitalise Schedule			
24 JUL 19	24 JUL 19	FT19205C5JN1	Transfer In		177,803.00	327,685.00
			Return GTS cash			
			From Acc.No. - 10006 05138			
01 AUG 19	01 AUG 19	AAACT192132SQX13S7	Charge - Capitalise	19.50		327,665.50
			Account Charge			
			Capitalise Schedule			
08 AUG 19	08 AUG 19	FT1922031J91	Transfer In		254.93	327,920.43
			Return GTS cash			
			From Acc.No. - 10006 05138			
02 SEP 19	01 SEP 19	AAACT192458FMF7P6H	Charge - Capitalise	19.50		327,900.93
			Account Charge			
			Capitalise Schedule			
04 SEP 19	03 SEP 19	FT19246F0722	Transfer In		567.82	328,468.75
			Return GTS cash			
			From Acc.No. - 10006 05138			
01 OCT 19	01 OCT 19	AAACT192740ZXH17V3	Charge - Capitalise	19.50		328,449.25
			Account Charge			
			Capitalise Schedule			
15 OCT 19	15 OCT 19	FT192881YFWQ	Transfer Out	100,000.00		228,449.25
			To Brokerage A/C			
			To Acc.No.- 1000668 369			
01 NOV 19	01 NOV 19	AAACT1930529M4VNQY	Charge - Capitalise	19.50		228,429.75
			Account Charge			
			Capitalise Schedule			
02 DEC 19	01 DEC 19	AAACT193364CPYDHHG	Charge - Capitalise	19.50		228,410.25
			Account Charge			
			Capitalise Schedule			
19 DEC 19	19 DEC 19	FT19353369F9	Outward SWIFT Payment	150,084.00		78,326.25
			EWANFORSYTH			
02 JAN 20	01 JAN 20	AAACT20002CMBT8M0M	Charge - Capitalise	19.50		78,306.75
			Account Charge			
			Capitalise Schedule			

EURO PACIFIC BANK

19 May 2023
14:8:8

03 FEB 20	01 FEB 20	AAACT20034B6K388ZY	Charge - Capitalise	19.50		78,287.25
			Account Charge			
			Capitalise Schedule			
02 MAR 20	01 MAR 20	AAACT200623PG75Y2N	Charge - Capitalise	19.50		78,267.75
			Account Charge			
			Capitalise Schedule			
30 MAR 20	17 MAR 20	FT20077YMVFB	Outward SWIFT Payment	50,084.00		28,183.75
			KHUNTTRFR			
01 APR 20	01 APR 20	AAACT20092CX4BH1H7	Charge - Capitalise	19.50		28,164.25
			Account Charge			
			Capitalise Schedule			
01 MAY 20	01 MAY 20	AAACT201229GQRQ588	Charge - Capitalise	19.50		28,144.75
			Account Charge			
			Capitalise Schedule			
01 JUN 20	01 JUN 20	AAACT20153CC0C78BR	Charge - Capitalise	19.50		28,125.25
			Account Charge			
			Capitalise Schedule			
01 JUL 20	01 JUL 20	AAACT201832RKKB417	Charge - Capitalise	19.50		28,105.75
			Account Charge			
			Capitalise Schedule			
03 AUG 20	01 AUG 20	AAACT202163NHTGJQW	Charge - Capitalise	19.50		28,086.25
			Account Charge			
			Capitalise Schedule			
01 SEP 20	01 SEP 20	AAACT202459VSJ0TMQ	Charge - Capitalise	19.50		28,066.75
			Account Charge			
			Capitalise Schedule			
01 SEP 20	01 SEP 20	FT20245C7W8Y	Transfer Out	25,000.00		3,066.75
			To Acc.No.- 1000668369			
02 SEP 20	01 SEP 20	FT202455MQC3	Inward SWIFT Payment		168,822.19	171,888.94
03 SEP 20	03 SEP 20	FT2024790WM0	Transfer Out	168,000.00		3,888.94
			To Acc.No.- 1000668369			
11 SEP 20	10 SEP 20	FT20254470H0	Inward SWIFT Payment		199,822.16	203,711.10
15 SEP 20	14 SEP 20	FT20258M2QP6	Transfer Out	200,000.00		3,711.10
			Transfer frm C/A			
			To Acc.No.- 1000668369			
01 OCT 20	01 OCT 20	AAACT202753S6QSHGR	Charge - Capitalise	19.50		3,691.60
			Account Charge			
			Capitalise Schedule			
14 OCT 20	13 OCT 20	FT202872KY90	Inward SWIFT Payment		331,591.66	335,283.26
28 OCT 20	19 OCT 20	FT2029348D76	Outward SWIFT Payment	200,084.00		135,199.26
			KARL HUNT			
02 NOV 20	01 NOV 20	AAACT2030798HLY5SS	Charge - Capitalise	19.50		135,179.76
			Account Charge			
			Capitalise Schedule			
10 NOV 20	05 NOV 20	FT20310T9WK8	Outward SWIFT Payment	130,084.00		5,095.76
			U4552240 / KARL			
12 NOV 20	05 NOV 20	FT20310T9WK8	Outward SWIFT Payment		130,084.00	135,179.76

			U4552240 / KARL			
19 NOV 20	18 NOV 20	FT20323MDT00	Outward SWIFT Payment	130,084.00		5,095.76
			KARL HUNT			
01 DEC 20	01 DEC 20	AAACT203364XH0KWK3	Charge - Capitalise	19.50		5,076.26
			Account Charge			
			Capitalise Schedule			
04 JAN 21	01 JAN 21	AAACT2100419K3WKZ7	Charge - Capitalise	19.50		5,056.76
			Account Charge			
			Capitalise Schedule			
01 FEB 21	01 FEB 21	AAACT21032124MQQ2M	Charge - Capitalise	19.50		5,037.26
			Account Charge			
			Capitalise Schedule			
01 MAR 21	01 MAR 21	AAACT210609VD8Y5SX	Charge - Capitalise	19.50		5,017.76
			Account Charge			
			Capitalise Schedule			
01 APR 21	01 APR 21	AAACT210912PYLRNJD	Charge - Capitalise	19.50		4,998.26
			Account Charge			
			Capitalise Schedule			
03 MAY 21	01 MAY 21	AAACT2112301C8S952	Charge - Capitalise	19.50		4,978.76
			Account Charge			
			Capitalise Schedule			
01 JUN 21	01 JUN 21	AAACT211524KL7TRG3	Charge - Capitalise	19.50		4,959.26
			Account Charge			
			Capitalise Schedule			
01 JUL 21	01 JUL 21	AAACT211820SGBJ74T	Charge - Capitalise	26.00		4,933.26
			Account Charge			
			Capitalise Schedule			
21 JUL 21	21 JUL 21	FT21202X2Q8W	Transfer In		34,000.00	38,933.26
			From Acc.No. - 1000668369			
23 JUL 21	23 JUL 21	FT212047YPYW	Outward SWIFT Payment	34,044.00		4,889.26
			KARL HUNT NEW A			
02 AUG 21	01 AUG 21	AAACT212144LD5F6NF	Charge - Capitalise	26.00		4,863.26
			Account Charge			
			Capitalise Schedule			
01 SEP 21	01 SEP 21	AAACT212446YZ96Y4X	Charge - Capitalise	26.00		4,837.26
			Account Charge			
			Capitalise Schedule			
01 OCT 21	01 OCT 21	AAACT21274B9MSKVZV	Charge - Capitalise	26.00		4,811.26
			Account Charge			
			Capitalise Schedule			
01 NOV 21	01 NOV 21	AAACT213055Z4MF5JY	Charge - Capitalise	26.00		4,785.26
			Account Charge			
			Capitalise Schedule			
01 DEC 21	01 DEC 21	AAACT21335B1TF8Z9V	Charge - Capitalise	26.00		4,759.26
			Account Charge			
			Capitalise Schedule			
03 JAN 22	01 JAN 22	AAACT22003BBN9J1KX	Charge - Capitalise	26.00		4,733.26
			Account Charge			
			Capitalise Schedule			

EURO PACIFIC BANK

19 May 2023
14:8:8

20 JAN 22	18 JAN 22	FT22018T8H59	Transfer Out	7.00		4,726.26
			22011800001IN			
01 FEB 22	01 FEB 22	AAACT220325C2M6FFD	Charge - Capitalise	26.00		4,700.26
			Account Charge			
			Capitalise Schedule			
16 FEB 22	16 FEB 22	FT2204713GF3	Transfer In		30,000.00	34,700.26
			From Acc.No. - 10006 68369			
17 FEB 22	17 FEB 22	FT22048RLRCK	Outward SWIFT Payment	30,044.00		4,656.26
			KARL HUNT TRFR			
01 MAR 22	01 MAR 22	AAACT22060BY8YVZNB	Charge - Capitalise	26.00		4,630.26
			Account Charge			
			Capitalise Schedule			
01 APR 22	01 APR 22	AAACT220918X9DL6K3	Charge - Capitalise	26.00		4,604.26
			Account Charge			
			Capitalise Schedule			
12 APR 22	12 APR 22	FT22102G2VDY	Transfer In		53,000.00	57,604.26
			From Acc.No. - 10006 68369			
14 APR 22	13 APR 22	FT22103XY3NS	Outward SWIFT Payment	55,140.00		2,464.26
			Trfr to UK			
02 MAY 22	01 MAY 22	AAACT22122CKVP77D0	Charge - Capitalise	26.00		2,438.26
			Account Charge			
			Capitalise Schedule			
01 JUN 22	01 JUN 22	AAACT2215211P9NTMH	Charge - Capitalise	26.00		2,412.26
			Account Charge			
			Capitalise Schedule			
01 JUL 22	01 JUL 22	AAACT221825M2YZ1TZ	Charge - Capitalise	26.00		2,386.26
			Account Charge			
			Capitalise Schedule			
01 AUG 22	01 AUG 22	AAACT2221354PXB2VT	Charge - Capitalise	26.00		2,360.26
			Account Charge			
			Capitalise Schedule			
01 SEP 22	01 SEP 22	AAACT2224431V0SF5Y	Charge - Capitalise	26.00		2,334.26
			Account Charge			
			Capitalise Schedule			
03 OCT 22	01 OCT 22	AAACT2227693S8B0SG	Charge - Capitalise	26.00		2,308.26
			Account Charge			
			Capitalise Schedule			
14 OCT 22	14 OCT 22	FT22287329Z7	Transfer In		629,927.82	632,236.08
			From Acc.No. - 10006 68369			
01 NOV 22	01 NOV 22	AAACT22305BVCW2XPJ	Charge - Capitalise	26.00		632,210.08
			Account Charge			
			Capitalise Schedule			
01 DEC 22	01 DEC 22	AAACT223357H3VCC7P	Charge - Capitalise	26.00		632,184.08
			Account Charge			
			Capitalise Schedule			
02 JAN 23	01 JAN 23	AAACT23002390K916K	Charge - Capitalise	26.00		632,158.08
			Account Charge			
			Capitalise Schedule			

01 FEB 23	01 FEB 23	AAACT230323R0DF16S	Charge - Capitalise	26.00	632,132.08
			Account Charge		
			Capitalise Schedule		
01 MAR 23	01 MAR 23	AAACT230603NSLGM3N	Charge - Capitalise	26.00	632,106.08
			Account Charge		
			Capitalise Schedule		
03 APR 23	01 APR 23	AAACT23093CKPVSY13	Charge - Capitalise	26.00	632,080.08
			Account Charge		
			Capitalise Schedule		
01 MAY 23	01 MAY 23	AAACT231212QBWY4W0	Charge - Capitalise	26.00	632,054.08
			Account Charge		
			Capitalise Schedule		
		Ending Balance			632,054.08

Exhibit 18
Silver Transfer Request
and Spreadsheet

The Safe House

6 August 2025

Mr. Wigberto Lugo-Mender
Trustee and Receiver of Euro Pacific Intl. Bank Inc.
PMB 464 Suite 110 1353 Road 19
Guaynabo, Puerto Rico 00966

RE: Precious Metals Holdings under Euro Pacific International Bank, Inc., (EPB) Account

Dear Mr. Lugo-Mender,

We acknowledge receipt of your email and letter. Enclosed please find the following documents as requested:

1. A copy of the original storage agreement entered into between Euro Pacific International Bank Inc. (EPB) and **The Safe House SG Pte Ltd (TSH)**;

2. A full account statement reflecting all charges and payments to the latest billing date;

3. Copy of invoices issued to EPB;

4. Bank wire instructions for the remittance of unpaid storage fees; and

5. An additional account statement from **Silver Bullion Pte Ltd**, our trading entity, showing where EPB had liquidated some of their gold and silver holdings, with proceeds either wired back to EPB's bank account or used to pay for storage with The Safe House.

To clarify roles, **Silver Bullion Pte Ltd** is our trading entity that facilitates bullion purchases and liquidations, while its subsidiary, **The Safe House SG Pte Ltd**, provides secure storage services to EPB.

We appreciate your acknowledgment that you were previously unaware the silver holdings remained with TSH and had not been transferred to Qenta. For your awareness, we have found our when reviewing communications with Qenta that in **August 2023**, Qenta confirmed in writing that, following internal discussions, they had decided **not to change the account entity** to Responsible Gold Trading DMCC and would **keep Euro Pacific Bank Inc. (EPB) listed as the account holder**. This decision explains why the account has remained under EPB's name in our records and why the onboarding process to transfer it into Qenta's name was never completed.

We also wish to highlight certain discrepancies that may require clarification. Qenta's termination notice refers to "Silver Bullion," which we believe refers to **The Safe House SG Pte Ltd** as part of the Silver Bullion Group shows a **USD value that does not align with the actual quantity and current market value** of the silver stored at our facility. We are unsure how these figures were derived, particularly given past liquidations and withdrawals of cash and bullion, and we respectfully request clarification from your office on how these amounts were determined and whether they represent an actual sale, an internal valuation by Qenta, or another basis.

The Safe House

For completeness:

a) There were **sales of precious metals** in the past under instructions issued after EPB entered receivership, with proceeds used partly to pay storage fees and partly wired back to EPB's bank account.

b) In **October 2022, Qenta withdrew 31 LBMA Good Delivery gold bars (approximately 400 troy ounces each)** from our facility. This withdrawal was approved through a signed letter by EPB and your office.

The EPB account at TSH remains frozen and will not be acted upon until we receive confirmed legal instructions from you.

We will wait for your confirmation whether the Receivership has now formally assumed custody and authority over the EPB account, and whether all future instructions should be directed exclusively at your office.

Yours sincerely,

Gregor Gregesen
CEO and Director
The Safe House SG Pte. Ltd.

Exhibit 19
Qenta Customer Outreach

Oggetto: Confidential - Opportunity for Claim Resolution – Action Required

Raffy Baltazar <raffy.baltazar@qecosystem.com> 00:47 (8 ore fa)
a l.paccagnini@gmail.com, G-Coin Support, GCoin - Support

Dear Puva Tech Limited,

We are writing regarding your claims against Euro Pacific Bank, which remains subject to liquidation.

As you are aware, Qenta Inc. previously sought to acquire the bank's assets; however, due to ongoing and unresolved issues, that transaction is likely to be discontinued. The liquidation process remains unsettled, hindered by a lack of essential conditions to finalize and limited support from the trustee, resulting in prolonged and continuing delays.

We wish to inform you, however, that a potential offer to purchase claims has been identified which may allow you to gain liquidity. Pursuing this pathway would significantly reduce the time, costs, and continued uncertainty associated with the ongoing liquidation process. A swift resolution can help with financial planning.

At this stage, we are unable to provide specific details of the offer until a confidentiality agreement is in place as the interested buyer is not intending to put out a general solicitation or public offer. If you are interested in learning more, please reply affirmatively to this email.

We will then send you a Non-Disclosure Agreement (NDA) for your review and signature. After you have signed it, we will provide you with full details of the offer and connect you with the potential buyer.

If you have any questions, please feel free to contact our team directly.

Sincerely,
The Qenta Team

Exhibit 20
Filed Claims

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
Eligible Customers						
00001	Filed Claim	USD Deposited Funds as per Proof of Claim		20,000.00		
00002	Filed Claim	CHF Deposited Funds as per Proof of Claim		7,513.22		
00003	Filed Claim	USD Deposited Funds as per Proof of Claim		68,000.00		
00004	Filed Claim	EUR USD 56,284.53 Deposited Funds as per Proof of Claim		50,405.71		
00005	Filed Claim	USD Deposited Funds as per Proof of Claim		34,530.00		
00006	Filed Claim	EUR Deposited funds as per Proof of Claim		11,590.15		
00007	Filed Claim	EUR Account Statement 01 Mar 2023 as per Proof of Claim		19,097.24		
00008	Filed Claim	USD EUR6,790 Deposited Funds as per Proof of Claim		7,735.00		
00009	Filed Claim	No Amount Claimed Deposited Funds as per Proof of Claim				
00010	Filed Claim	USD Deposited Funds as per Proof of Claim		12,700.00		
00011	Filed Claim	USD EUR 925 Deposited Funds as per Proof of Claim		1,050.00		
00012	Filed Claim	USD EUR65,679.78 GBP45,276.68 USD829,100 - Total Claim GOLD 150oz @3340		829,100.00		
00013	Filed Claim	EUR		200,000.00		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		Deposited Funds as per Proof of Claim				
00014	Filed Claim	EUR Deposited Funds as per Proof of Claim		2,271.21		
00015	Filed Claim	GBP Deposited Funds Proof of Claim		36,381.14		
00016	Filed Claim	USD Deposited Funds in Silver and Small Amount of Cash as per Proof of Claim		365,000.00		
00017	Filed Claim	EUR Deposited Funds / Personal Savings as per Proof of Claim		26,770.15		
00018	Filed Claim	USD EUR160,625.16 EUR1 = USD1.17371 Deposited Funds as per Proof of Claim		188,527.22		
00019	Filed Claim	EUR Deposited Funds as per Proof of Claim		96,724.05		
00020	Filed Claim	USD Deposited Funds as per Proof of Claim		65,214.67		
00021	Filed Claim	EUR Deposited Funds as per Proof of Claim		53,883.99		
00022	Filed Claim	USD Deposited Funds as per Proof of Claim - 8/5/2025		263,585.38		
00023	Filed Claim	EUR Deposited Funds as per Proof of Claim		114,085.19		
00024	Filed Claim	USD Funds Proof of Claims		7,554.90		
00025	Filed Claim	USD Deposited Funds as per Proof of Claim		41,440.20		
00026	Filed Claim	USD EPB Liquidation		24,354.66		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		as per Proof of Claim				
00027	Filed Claim	EUR Deposit as per Proof of Claim		11,229.98		
00028	Filed Claim	EUR Deposited Funds as per Proof of Claim		17,220.96		
00029	Filed Claim	USD Deposited Funds as per Proof of Claim		6,874.96		
00030	Filed Claim	USD Deposited Funds Approximate Amount as per Proof of Claim		16,000.00		
00031	Filed Claims	EUR DEPOSITED FUNDS Proof of Claim		3,669.87		
00032	Filed Claim	GBP Bank Liquidation as per Proof of Claim		286,146.89		
00033	Filed Claim	EUR Deposited Funds as per Proof of Claims		330,333.21		
00034	Filed Claim	GBP Deposited Funds as per Proof of Claim		81,117.00		
00035	Filed Claim	USD EUR38,061 Deposited Funds as per Proof of Claim		41,106.00		
00036	Filed Claim	EUR Deposited Funds as per Proof of Claim		163,366.00		
00037	Filed Claim	EUR Deposited Funds as per Proof of Claim		156,262.00		
00038	Filed Claim	EUR Deposited Funds as per Proof of Claim		50,349.97		
00039	Filed Claim	EUR Share Capital as per Proof of Claim		30,495.70		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00040	Filed Claim	GBP Deposited Funds as per Proof of Claims		240,067.02		
00041	Filed Claim	EUR Deposited Funds as per Proof of Claim		4,337.00		
00042	Filed Claim	EUR Deposited Funds as per Proof of Claim		62,458.89		
00043	Filed Claim	USD EUR7,125 Balance Account Proof of Claim		8,391.00		
00044	Filed Claim	GBP Deposited Funds as per Proof of Claim		19,536.50		
00045	Filed Claim	USD PLN565,116.62 Rate 3.61 as of 07.27.2025 EUR1,990.70 Rate 0.85 as of 07.27.2025 Deposited Funds as per Proof of Claim		158,884.00		
00046	Filed Claim	USD EUR88,791.93 Deposit as per Proof of Claim		102,714.50		
00047	Filed Claim	EUR Deposited Funds as per Proof of Claims		16,893.61		
00048	Filed Claim	EUR as per Proof of Claim		31,592.49		
	Filed Claim	EUR 121 Pending Wires Novo Banco as per Proof of Claim		14,857.74		
00049	Filed Claim	USD as per Proof of Claim		236,449.99		
00050	Filed Claim	EUR Deposited Funds as per Proof of Claim		11,031.74		
00051	Filed Claim	No Amount Claim Deposited Funds as per Proof of Claim				

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00052	Filed Claim	EUR Deposited funds as per Proof of Claim		43,299.60		
00053	Filed Claim	USD Deposited Funds Proof of Claim		17,000.00		
00054	Filed Claim	USD Deposited Funds as per Proof of Claim		7,000.00		
00055	Filed Claim	GBP Deposited Funds as per Proof of Claim		19,540.00		
00056	Filed Claim	EUR Deposited Funds as per Proof of Claim		261,669.70		
00057	Filed Claim	USD Gold - 8.494 oz Silver - 181.641 oz as per Proof of Claim		32,878.56		
00058	Filed Claim	USD Investment Account Holdings as per Proof of Claim		68,788.11		
00059	Filed Claim	USD Deposited Funds and Invested Funds as per Proof of Claim		272,377.28		
00060	Filed Claim	EUR Deposited Funds as per Proof of Claim		168,400.62		
00061	Filed Claim	USD Silver, Euros, Dollars as per Proof of Claim		84,050.84		
00062	Filed Claim	CHF (Gold 36oz, Silver 1400oz) Deposited Funds as per Proof of Claim		31,808.74		
00063	Filed Claim	USD Deposited Funds, Gold, Silver Precious Metals as per Proof of Claim		362,820.00		
00064	Filed Claim	EUR E-Commerce Operation as per Proof of Claim		119,685.14		
00065	Filed Claim	USD		32,064.68		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		EUR 28,358.51 Deposited Funds as per Proof of Claim				
00066	Filed Claim	EUR Deposited Funds as per Proof of Claim		7,944.01		
00067	Filed Claim	USD Deposited Funds / Precious Metals Account as per Proof of Claim		13,020.00		
00068	Filed Claim	AUD Jun 26, 203 Before 1 March 2023 - AUD411,448.49 GBP-2.00 Services Performed as per Proof of Claim		411,417.94		
00069	Filed Claim	EUR Deposited Funds as per Proof of Claim		263,111.14		
00070	Filed Claim	EUR Deposited Funds as per Proof of Claim		5,573.87		
00071	Filed Claim	EUR Frozen Account as per Proof of Claim		16,736.51		
00072	Filed Claim	USD EUR 167,787.24 Bank Account as per Proof of Claim		187,921.70		
00073	Filed Claim	USD EUR47,106.92 Rate 1.1524 Deposited Funds Proof of Claim		54,262.80		
00074	Filed Claim	GBP Deposited Funds as per Proof of Claim		259,126.35		
00076	Filed Claim	USD Deposited Funds Amount Necessary to Cure - 2,500 Annual Interest Rate - 5% as per Proof of Claim		15,500.00		
00075	Filed Claim	EUR Account with EPB in Liquidation as per Proof of Claim		318,560.21		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00077	Filed Claim	USD GBP19,596.26 as per Proof of Claim Deposited Funds		26,254.00		
00078	Filed Claim	CHF Deposited Funds Proof of Claim		10,419.67		
00079	Filed Claim	USD EUR723,281.85 as per Proof of Claim Deposited Funds		838,300.00		
00080	Filed Claim	GBP Deposited Funds Proof of Claim		7,847.88		
00081	Filed Claim	EUR Deposited Funds as per Proof of Claim		184,978.00		
00082	Filed Claim	CHF Physical Gold - 35.000oz Physical Silver - 2700oz Deposited Funds as per Proof of Claim		22,228.51		
00083	Filed Claim	USD Deposited Funds as per Proof of Claim		44,757.78		
00084	Filed Claim	USD Deposited Funds as per Proof of Claim		12,000.00		
00085	Filed Claim	USD Salary Received as per Proof of Claim		10,000.00		
00086	Filed Claim	EUR Deposited Funds as per Proof of Claim		21,227.84		
00087	Filed Claim	EUR Available in the Bank Account as per Proof of Claim		8,000.00		
00088	Filed Claim	CHF Deposited Funds Proof of Claim		325,633.04		
00089	Filed Claim	USD EUR51,320.36		59,736.90		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		Deposited Funds as per Proof of Claim				
00090	Filed Claim	EUR Last Know Bank Statement: 02 Jan 2023 Proof of Claim		9,515.99		
00091	Filed Claim	USD Mutual Funds EUR 274,041.27 USD 159,778.90 Eligible Customer		468,000.00		
00092	Filed Claim	USD Deposited Funds as per Proof of Claim		15,372.54		
00093	Filed Claim	EUR Generated Funds as per Proof of Claim		142,000.00		
00094	Filed Claim	EUR Deposited Funds as per Proof of Claims		74,507.32		
00095	Filed Claim	USD EUR2,586.06 - Cash USD15,341.49 - Mutual Fund USD 3,992.46 - Gold and Precious Metals Deposited Funds and Mutual Funds as per Proof of Claim		21,920.01		
00096	Filed Claim	USD Deposited Funds as per Proof of Claim		46,550.00		
00097	Filed Claim	USD Deposited Funds As per Proof of Claims		11,076.77		
00098	Filed Claim	USD Bank Account as per Proof of Claim		800.00		
00099	Filed Claim	EUR Deposited Funds Proof of Claim		6,972.02		
00100	Filed Claim	USD Deposited Funds, Purchased PM, Balances of my EPB Account as per Proof of Claim		360,357.00		
00101	Filed Claim	EUR as per Proof of Claim		4,435.73		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00102	Filed Claim	Proof of Claim Incomplete Pages				
00103	Filed Claim	EUR Deposit In Account as per Proof of Claim		18,304.63		
00104	Filed Claim	EUR Deposited Funds as per Proof of Claim		14,633.69		
00105	Filed Claim	EUR Services Proof of Claim		3,521.85		
00106	Filed Claim	Amount Claim Unknown Serviced Performed Proof of Claim				
00107	Filed Claim	EUR Deposited Funds as per Proof of Claim		1,210.77		
00108	Filed Claim	USD Estimated Amount for 3 Accounts Deposited Funds		211,000.00		
00109	Filed Claim	GBP Deposited Funds as per Proof of Claim		241,876.96		
00110	Filed Claim	USD Proof of Claim		5,163.64		
00111	Filed Claim	No Amount Claimed Deposited Funds - No Access as per Proof of Claim				
00112	Filed Claim	Missing Page 2 of POC				
00113	Filed Claim	EUR Deposit Funds as per Proof of Claims		4,995.31		
00114	Filed Claim	USD Deposited Funds as per Proof of Claim		4,753.25		
00115	Filed Claim	EUR Deposited Funds as per Proof of Claim		50,326.39		
00116	Filed Claim	USD GBP 426,721 Reuters Rate 10 Jul 25 1.358		579,421.00		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		Deposited Funds				
00117	Filed Claim	USD See Attachments Proof of Claim		25,987.43		
00118	Filed Claim	USD Investment Fund and Cash as per Proof of Claim		28,000.00		
00119	Filed Claim	USD Gold 7.141oz Silver 393.14 oz as per Proof of Claim		33,721.92		
00120	Filed Claim	USD EUR172,048.68 Deposited Funds Proof of Claim		199,446.71		
00121	Filed Claim Filed Claim	EUR USD Deposited Funds as per Proof of Claim		9,500.00 1,144.00		
00122	Filed Claim	USD Consulting and Development Services as per Proof of Claim		339,490.38		
00123	Filed Claim	USD Deposited Funds Proof of Claim		79,313.29		
00124	Filed Claim	USD Services Performed as per Proof of Claim		10,146.28		
00125	Filed Claim	GBP Deposited Funds as per Proof of Claims		33,536.42		
00126	Filed Claim	EUR Deposited Funds as per Proof of Claims		80,654.00		
00127	Filed Claim	EUR Deposited Funds Proof of Claim		760,236.50		
00128	Filed Claim	EUR Limited Company Income as per Proof of Claim		143,926.25		
00129	Filed Claim	EUR Deposited Funds		69,882.49		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		as per Proof of Claim				
00130	Filed Claim	USD Deposited Funds as per Proof of Claim		20,500.00		
00131	Filed Claim	USD EUR 123,753.200 Deposited Funds as per Proof of Claim		138,134.22		
00132	Filed Claim	USD Deposited Funds From Labor as per Proof of Claim		10,600.00		
00133	Filed Claim	USD Deposited Funds Proof of Claim		6,852.46		
00134	Filed Claim	USD Balance of Personal Deposit Converted to USD at Official ECB Rate as per Proof of Claim		10,629.10		
00135	Filed Claim	EUR Deposited Funds as per Proof of Claim		81,453.37		
00136	Filed Claim	USD My Client Regulations as per Proof of Claim		13,000.00		
00137	Filed Claim	USD Deposited Funds as per Proof of Customer		26,926.00		
00138	Filed Claim	EUR Personal Deposit as per Proof of Claim		45,824.60		
00139	Filed Claim	USD EUR 11,140.03 Deposited Funds as per Proof of Claim		12,099.19		
00140	Filed Claim	EUR Deposited Funds as per Proof of Claim		17,200.00		
00141	Filed Claim	EUR Deposited Funds as per Proof of Claim		120,000.00		
00142	Filed Claim	EUR Bank Account		17,860.74		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
	Filed Claim	EUR Credit Card as per Proof of Claim		2,210.84		
00143		No Proof of Claim Submitted Documents				
00144	Filed Claim	GBP Deposited Funds as per Proof of Claim		202,208.50		
00145	Filed Claim	USD EUR 88,882.49 Deposited Funds as per Proof of Claim		110,214.25		
00146	Filed Claim	EUR Deposited Funds as per Proof of Claim		5,000.00		
00147	Filed Claim	No Amount Claim Deposited Funds Incomplete Proof of Claim				
00148	Filed Claim	EUR Deposited Funds as per Proof of Claim		140,000.00		
00149	Filed Claim	USD Account with EPB as per Proof of Claim Cancelled Brokerage Account After Closing Order		1,975,000.00		
00150	Filed Claim	EUR Services Performed		15,471.58		
00151	Filed Claim	EUR Deposited Funds as per Proof of Claim		224,941.74		
00152	Filed Claim	USD Deposited Funds as per Proof of Claim		30,619.28		
00153	Filed Claim	GBP Deposited Funds as per Proof of Claim		16,708.77		
00154	Filed Claim	GBP Deposited Funds as per Proof of Claim		201,262.12		
00155	Filed Claim	EUR		31,013.01		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		Deposited Funds as per Proof of Claim				
00156	Filed Claim	USD Deposited Funds Proof of Claims		6,088.76		
00157	Filed Claim	EUR Deposited Funds Proof of Claims		103,329.00		
00158	Filed Claim	USD Deposited Funds Proof of Claim		5,500.00		
00159	Filed Claim	USD Deposited Funds as per Proof of Claim		23,922.79		
00160	Filed Claim	USD Deposited Funds Proof of Claim		570,311.91		
00161	Filed Claim	USD Deposited Fund (USD and CHF) Proof of Claim		2,995.00		
00162	Filed Claim	USD Deposited Funds as per Proof of Claim		17,395.75		
00163	Filed Claim	USD Deposited Funds as per Proof of Claim		1,987.96		
00164	Filed Claim	USD Deposited Personal Funds as per Proof of Claim		32,000.00		
00165	Filed Claim	EUR Deposit Balance as per Proof of Claim		4,254.00		
00166	Filed Claim Filed Claim	EUR USD Deposited Funds as per Proof of Claim		55,696.28 320.00		
00167	Filed Claim	EUR Deposited Funds as per Proof of Claim		25,533.13		
00168	Filed Claim	USD Deposited Funds as per Proof of Claim		5,000.00		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00169	Filed Claim	EUR Deposited Funds Proof of Claim		1,622.57		
00170	Filed Claim	GBP Funds as per Proof of Claim		58,559.03		
00171	Filed Claim	USD Deposited Funds, Precious Metals sold as per Proof of Claim		35,423.54		
00172	Filed Claim	No Amount Claimed 4 Accounts - Service Performed as per Proof of Claim				
00173	Filed Claim	USD Deposited Funds as per Proof of Claim		949.16		
00174	Filed Claim	EUR From Payoneer Company Limit Disclosing information that is entitled to privacy as per Proof of Claim		28,741.44		
00175	Filed Claim	USD EUR19,755.63 Deposited Funds as per Proof of Claim		22,767.81		
00176	Filed Claim	USD Deposited Funds (Precious metals and shares were sold as instructed and converted into deposits) Proof of Claim		18,261.54		
00177	Filed Claim	USD USD1,400,000 plus 5 years 10% Interest Gold Assets as per Proof of Claim		2,254.00		
00178	Filed Claim	USD EUR 105,636.19 Deposited Funds as per Proof of Claim		118,850.00		
00179	Filed Claim	USD EUR 94,235.12 Deposited Funds as per Proof of Claim		106,956.86		
00180	Filed Claim	USD Deposited / Personal Funds as per Proof of Claim		15,000.00		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00181	Filed Claim	USD Deposited Funds / Salaries as per Proof of Claim		9,719.00		
00182	Filed Claim	EUR Deposited Funds as per Proof of Claim		27,813.33		
00183	Filed Claim	EUR Deposited Funds as per Proof of Claim		79,528.66		
00184	Filed Claim	USD Bank Balance Proof of Claim		66,384.08		
00185	Filed Claim	USD Deposited Funds as per Proof of Claim - 09.08.2025		43,638.77		
00186	Filed Claim	USD EUR38,165.42 Deposited Funds as per Proof of Claim		44,380.66		
00187	Filed Claim	GBP Deposited Funds as per Proof of Claim		130,311.53		
00188	Filed Claim	EUR Deposited Funds as per Proof of Claim		38,000.00		
00189	Filed Claim	USD Deposited Funds - Annex 1 as per Proof of Claim		7,062.48		
00190	Filed Claim	EUR Personal Savings - Professional as per Proof of Claim		50,578.85		
00191	Filed Claim	USD Deposited Funds Proof of Claim		45,487.43		
00192	Filed Claim	EUR Deposited Funds as per Proof of Claim		1,764.62		
00193	Filed Claim	USD Account Deposits as per Proof of Claim		72,258.73		
00194	Filed Claim	CHF		99,842.29		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		Deposited Funds Proof of Claim				
00195	Filed Claim	CHF Deposited Funds as per Proof of Claim		99,133.85		
00196	Filed Claim	USD Bank closed down and 3years wasted messing about-final liquidation as per Proof of Claim		57,114.00		
00197	Filed Claim	USD Deposited Funds as per Proof of Claim		14,522.49		
00198	Filed Claim	USD Deposited Funds as per Proof of Claim		6,243.91		
00199	Filed Claim	EUR Deposited Funds as per Proof of Claim		191,689.11		
00200	Filed Claim	USD Deposited Funds Proof of Claim		78,840.27		
00201	Filed Claim	EUR Account Credit Proof of Claim		48,434.31		
00202	Filed Claim	CHF Deposited Funds Proof of Claim		9,957.29		
00203	Filed Claim	EUR Deposited Funds as per Proof of Claim		263,802.98		
00204	Filed Claim	USD Business Profit as per Proof of Claims		130,000.00		
00205	Filed Claim	EUR Deposited Funds as per Proof of Claim		60,070.14		
00206	Filed Claim	USD Deposited Funds as per Proof of Claim		297,742.29		
00207	Filed Claim	USD Deposited Funds as per Proof of Claim		12,000.00		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00208	Filed Claim	USD Owned Business Account balance Proof of Claim		47,972.00		
00209	Filed Claim	EUR Deposited Funds as per Proof of Claims		12,300.07		
00210	Filed Claim	USD Deposited Funds as per Proof of Claim		21,305.66		
00211	Filed Claim	USD EUR69,930.21 Saving Deposit as per Proof of Claim		81,073.79		
00212	Filed Claim	Proof of Claim Incomplete Pages				
00213	Filed Claim	USD Deposited Funds as per Proof of Claim		75,000.00		
00214	Filed Claim	USD Deposited Funds as per Proof of Claim		48,882.25		
00215	Filed Claim	USD Deposited Funds as per Proof of Claim		8,000.00		
00216	Filed Claim	USD EUR18,424.07 Deposited Funds Proof of Claim		21,213.47		
00217	Filed Claim	USD EUR 14,704.61 Deposited Funds as per Proof of Claim		16,861.77		
00218	Filed Claim	EUR Deposited Funds as per Proof of Claim		543,351.70		
00219	Filed Claim	USD Bank Account Balance Proof of Claim		8,878.00		
	Filed Claim	USD Bank Account Balance Proof of Claim		20,490.00		
00220	Filed Claim	EUR		534,676.70		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		Deposited Funds as per Proof of Claim				
00221	Filed Claim	EUR Deposited funds Services Performed as per Proof of Claim Received 08/05/2025		88,362.30		
00222	Filed Claim	USD Deposited Funds as per Proof of Claim		3,800.00		
00223	Filed Claim	CHF Balance on 28 Nov 2022 Proof of Claim		17,529.18		
00224	Filed Claim	CHF CAD271.20 - Notary Fees CAD600 - Apostille Fees Deposited Funds as per Proof of Claim		7,772.07		
00225	Filed Claim	USD EUR 31,533.73 Deposited Funds, Services Performed		35,871.03		
00226	Filed Claim	USD Account Balance before freezing as per Proof of Claim		4,951.00		
00227	Filed Claim	EUR Deposited Funds Two Accounts as per Proof of Claim		53,217.03		
00228	Filed Claim	GBP Business Consulting Performed as per Proof of Claim		18,824.05		
00229	Filed Claim	USD Deposited Funds Savings as per the Proof of Claim		60,760.76		
00230	Filed Claim	EUR Deposited Funds as per Proof of Claim		11,116.66		
00231	Filed Claim	USD Deposited Funds as per Proof of Claims		84,620.18		
00232	Filed Claim	USD Cash Deposit - 5,000 Gold Deposit - 1,000 as per the Proof of Claim		6,500.00		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00233	Filed Claim	EUR Deposited Funds as per Proof of Claim		19,454.22		
00234	Filed Claim	EUR Deposited Accounts as per Proof of Claim		121,893.47		
00235	Filed Claim	GBP Services performed Offshore Worldwide as per Proof of Claim		13,215.12		
00236	Filed Claim	USD Deposited Funds Proof of Claim		167,460.00		
00237	Filed Claim	EUR Deposited Funds as per Proof of Claim		4,993.82		
Not Part of the Eligible Customers						
00001	Filed Claim	GBP Deposited Funds Proof of Claim		112,731.20		
00002	Filed Claim	CAD Shares/Holding/Securities as per Proof of Claim Deceased Customer / Sister		36,416.68		
00003	Filed Claim	USD Mutual Fund - EPF Proof of Claim		120,461.71		
00004	Filed Claim	USD EUR4,532.81 Deposited Funds as per Proof of Claim		5,269.98		
00005	Filed Claim	USD Deposited Funds as per Proof of Claim		105,953.78		
00006	Filed Claim	USD		61,211.44		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		Deposited Funds Converted to PM Mutual Funds as per Proof of Claim				
00007	Filed Claim	EUR Deposited Funds as per Proof of Claim		17,794.66		
00008	Filed Claim	EUR Deposited Funds as per Proof of Claim		25,444.24		
00009	Filed Claim	USD EUR125,602.95 Account is in EUR Deposited Funds as per Proof of Claim - 8/15/2025		146,700.00		
00010	Filed Claim	USD Deposited Funds as per Proof of Claim		21,945.00		
00011	Filed Claim	USD Unpaid Balance as per Proof of Claim		26,188.62		
00012	Filed Claim	EUR Deposited Funds Proof of Claim		164,315.18		
00013	Filed Claim	USD USD10,167.26 EUR321.83 Silver Deposit - 1,426.391 oz as per Proof of Claim - 8/21/2025		56,906.00		
00014	Filed Claim	USD Deposited Funds plus Interests Proof of Claim - 8.5.2025		222,581.44		
00015	Filed Claim	EUR Deposited Funds as per Proof of Claim		32,943.12		
00016	Filed Claim	The exact amount is not known to me Deposited Funds as per Proof of Claim				
	Filed Claim	USD Deposited Funds as per Proof of Claim		1,166,965.94		
00017	Filed Claim	USD Deposited Funds as per Proof of Claim		30,699.45		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00018	Filed Claim	GBP Deposited Funds as per Proof of Claim		191,000.00		
00019	Filed Claim	EUR Services Performed as per Proof of Claim		155,824.00		
00020	Filed Claim	USD EUR 1,730.426.12 Rate:1.0447 as per Proof of Claim Deposited Funds		1,807,776.17		
00021	Filed Claim	USD Around USD380,000 to USD500,000 Deposited Funds and Capital Gains as per Proof of Claim		500,000.00		
00022	Filed Claim	USD DEPOSITED FUNDS as per Proof of Claim		87,269.90		
00023	Filed Claim	Physical Gold - 2.0 troy oz Physical Silver - 225 troy oz USD400 Precious Metal and USD Account as per Proof of Claim				
00024	Filed Claim	Full Account Value Beneficial Ownership as per Proof of Claim				
00025	Filed Claim	USD Values not updated (Appreciation of PM) Deposited Funds Physical Gold - 9.453 oz Physical Silver - 626.536 oz as per Proof of Claim 8/5/2025		42,034.82		
00026	Filed Claim	GOLD 98.742.03 oz Gold Held by EPB as per Proof of Claim				
00027	Filed Claim	USD Gold 7.141oz Silver 393.14oz Share of Precious Metals as per Proof of Claim - 8.7.2025		33,721.92		
00028	Filed Claim	USD Deposited funds as per Proof of Claim - 8.12.2025		506,100.15		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00029	Filed Claim	USD Physical Gold 12.424 oz Physical Silver 823.151 oz All Funds (Currencies, Precious Metals) Proof of Claim		119,034.54		
00030	Filed Claim	EUR Deposited funds as per Proof of Claim		8,596.00		
00031	Filed Claim	GBP Deposited Funds as per Proof of Claim		79,095.04		
00032	Filed Claim	USD Deposited Funds as per Proof of Claim		1,853,866.49		
00033	Filed Claim	USD Deposited Funds Proof of Claim		185,081.00		
00034	Filed Claim	EUR Deposited Funds as per Proof of Claim		406,625.44		
00035	Filed Claim	USD Deposited Funds as per Proof of Claim		29,400.00		
00036	Filed Claim	USD Deposited Funds as per Proof of Claim		214.00		
00037	Filed Claim	USD Current Account as per Proof of Claim		380,146.00		
00038	Filed Claim	USD Deposited Funds in three Accounts as per Proof of Claim		70,119.16		
00039	Filed Claim	EUR 2015 Deposited Funds as per Proof of Claim		10,863.00		
00040	Filed Claim	USD Funds Reimbursement as per Proof of Claim - 8/20/2025		33,541.87		
00041	Filed Claim Filed Claim	USD EUR Deposited Funds as per Proof of Claim		586,721.00 466,991.00		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00042	Filed Claim	USD Deposited Funds And Mutual Funds as per Proof of Claim		162,379.96		
00043	Filed Claim	USD Deposited Funds as per Proof of Claim		93,386.07		
00044	Filed Claim	USD EUR5,558,38 Physical Gold - 20oz cost USD1,653.60 MF Gold and PM - 17,482.733 Units cost USD5.73 Deposited Funds, Precious Metals (Gold) and Mutual Funds (Gold and Precious Metals Fund) as per Proof of Claim		106,463.48		
00045	Filed Claim Filed Claim	USD CHF Gold 635.29 oz Deposited Funds and Commodities Non-Eligible Customer		354,405.30 66,924.53		
00046	Filed Claim	USD Deposited Funds as per Proof of Claim		36,796.20		
00047	Filed Claim	USD Deposited Funds as per Proof of Claim		456,306.00		
00048	Filed Claim	GBP Deposited Funds as per Proof of Claim		694,866.26		
00049	Filed Claim	USD DEposited Funds Cash & Precious Metals		96,806.18		
00050	Filed Claim	EUR Deposited Funds as per Proof of Claim		26,451.00		
00051	Filed Claim	EUR Deposited Funds Proof of Claim		459.87		
00052	Filed Claim	EUR Deposited Funds as per Proof of Claim		8,176.72		
	Filed Claim	EUR Deposited Funds as per Proof of Claim		339.78		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
	Filed Claim	USD Deposited Funds as per Proof of Claim		1,756.66		
00053	Filed Claim	EUR Saved Money as per Proof of Claim - 9.2.2025		4,838.49		
00054	Filed Claim	USD Gold - 26.09402 oz Silver - 60 oz Price as of Jul 27, 2025 Deposited Funds Precious Metals as per Proof of Claim - 8.5.25		89,363.23		
00055	Filed Claim	USD Physical Gold - 48.714oz Physical Silver - 242.52602 as per Proof of Claim		4,495.00		
00056	Filed Claim	USD EUR 1,077,000 Deposited Funds Dividend and Share Sale as per Proof of Claim		1,198,733.00		
00057	Filed Claim	USD CAD Physical Silver - 2,650 oz Physical Gold - 9.460 oz Deposited Funds and Purchase of Physical Precious Metals as per Proof of Claim - 8.25.2025		270.06 148.54		
00058	Filed Claim	USD Gold Price Jul 22, 2025 USD3,395.80 = 78,935.371 Personal Account $534.74 Deposited Bank Account Funds & Gold 23.245oz as per Proof of Claim Non-Eligible Customer		79,470.11		
00059	Filed Claim	USD Approximate 10,000 to 20,000 Deposited Funds as per Proof of Claim - 8.13.2025		20,000.00		
00060	Filed Claim Filed Claim Filed Claim Filed Claim	USD GBP USD USD (US$1,526.46 @ £1 = 1.2091063168 XE.com 08/09/2022) Gold: US$33,923.04 (18.896 oz @ US$1,795.25 LBMA PM fix 08/09/2022) Silver: US$42,407.61 (2,058.622 oz @ US$20.600 LBMA fix 08/09/2022) (I reserve right to file a supplemental claim for actual sale proceeds or to seek in-kind redemption or other access to my 18.896 oz as per Proof of Claim		1,616.76 1,262.47 33,923.04 42,407.61		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00061	Filed Claim	USD Silver Bullion 5,000oz Deposited Funds + Silver Bullion as per Proof of Claim		25,000.00		
00062	Filed Claim	USD Silver Gold Deposits as per Proof of Claim		119,725.00		
00063	Filed Claim	EUR GBP DEPOSIT FUNDS as per Proof of Claim - 8/13/2025		19,756.55 6,966.00		
00064	Filed Claim Filed Claim	GBP USD Deposited Funds as per Proof of Claim		3,740.51 82.98		
00065	Filed Claim	USD Deposited Funds as per Proof of Claims		13,251.00		
	Filed Claim Filed Claim Filed Claim	SGD AUD EUR Physical Gold - 35.000oz Physical Silver - 2700oz Deposited Funds as per Proof of Claim		973.25 868.08 555.78		
00066	Filed Claim	USD Current Account and Mutual Funds as per Proof of Claim		259,800.00		
00067	Filed Claim	EUR Deposits of Funds as per Proof of Claim		341,406.20		
00068	Filed Claim	USD EUR23,619.83 Deposited Funds as per Proof of Claim		27,458.05		
00069	Filed Claim	GBP Deposited Funds		632,054.08		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		as per Proof of Claim - Wife - 8.13.2025 Deceased				
00070	Filed Claim Filed Claim	AUD EUR Gold XAU - 4.379 oz as per Proof of Claim		7,799.79 76.22		
00071	Filed Claim	USD Deposited Funds as per Proof of Claim - 8/7/2025		92,842.13		
00072	Filed Claim	USD Deposited Funds as per Proof of Claim		5,303.03		
	Filed Claim	GBP Deposited Funds as per Proof of Claim		371,440.81		
00073	Filed Claim	EUR Deposited Funds as per Proof of Claim		105,293.79		
00074	Filed Claim	EUR Deposited Funds as per Proof of Claim		5,097.00		
00075	Filed Claim	No Amount Stated Deposited Funds. Mutual Funds as per Proof of Claim				
00076	Filed Claim	EUR Deposited Funds as per Proof of Claim		49,972.20		
00077	Filed Claim	EUR Deposited Funds as per Proof of Claim		18,228.00		
00078	Filed Claim	USD Deposited Funds as per Proof of Claim		433.87		
	Filed Claim	EUR Deposited Funds as per Proof of Claim		91,523.15		
00079	Filed Claim	USD EUR300,104.88 Rate 1.169 Aug 7, 2025 as per Proof of Claim - 8.8.25		350,822.00		
00080	Filed Claim	EUR Services performed and sale		19,747.14		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		as per Proof of Claim				
	Filed Claim	USD Services performed and sale as per Proof of Claim		230,858.11		
00081	Filed Claim	EUR Deposited Funds (Savings) as per Proof of Claim		84,188.00		
00082	Filed Claim	EUR Deposited Funds as per Proof of Claim		732.43		
00083	Filed Claim	USD Deposited Funds as per Proof of Claim		232,317.43		
00084	Filed Claim	No Proof of Claim Submitted Supporting Document as per Proof of Claim - 8.13.2025				
00085	Filed Claim	USD Deposited Funds as per Proof of Claim		117,200.05		
00086	Filed Claim	USD Deposited Funds / Savings as per Proof of Claim		500,000.00		
00087	Filed Claim	USD Deposited Funds as per Proof of Claim		1,350,000.00		
00088	Filed Claim	Claim Amount Not Provided DEPOSITED FUNDS as per Proof of Claim - 8.18.25				
00089	Filed Claim	USD EUR 303,646.12 Deposited Funds as per Proof of Claim		118,913.96		
00090	Filed Claim	USD Deposits as per Proof of Claim - 9.3.2025		75,314.06		
00091	Filed Claim	USD GBP86,538.14 Deposited Funds (Kept In GBP Cash) as per Proof of Claim - 9.4.2025		115,687.22		
00092	Filed Claim	USD Deposited Funds as per Proof of Claim		1,033,525.73		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00093	Filed Claim	GBP All Money in Bank Account as per Proof of Claim		282,906.87		
	Filed Claim	USD All Money in Bank Account as per Proof of Claim		344.00		
00094	Filed Claim	EUR Deposited Funds as per Proof of Claim 8.5.2025		45,785.59		
00095	Filed Claim	EUR Deposited Funds as per Proof of Claim		658,427.23		
00096	Filed Claim	USD Euro Pacific Liquidation as per Proof of Claim		263,768.67		
00097	Filed Claim	USD Funds Earned from Consulting Services as per Proof of Claim		65,984.62		
00098	Filed Claim	USD as per Proof of Claim Non-Eligible		60,000.00		
00099	Filed Claim	USD Current Acct 960.02 MF 1,933.62 Physical Silver 3,500oz Rate 37.41 = 130,935 as per Proof of Claim		133,827.64		
00100	Filed Claim	USD Ownership of Accounts Physical Gold - 26.765 oz Physical Silver - 649.633 oz as per Proof of Claim		115,634.77		
00101	Filed Claim	USD EUR99,123.00 Deposited Proceeds from Sale of Real Estate as per Proof of Claim		112,465.88		
00102	Filed Claim	USD Current Account+Precious Metal as per Proof of Claim		22,603.97		
00103	Filed Claim	EUR Deposited Funds as per Proof of Claim		76,435.10		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
00104	Filed Claim	USD Deposited Funds as per Proof of Claim		560,370.05		
00105	Filed Claim	USD Deposited Funds as per Proof of Claim		70,000.00		
00106	Filed Claim	EUR Deposited Funds as per Proof of Claim		288,625.06		
00107	Filed Claim	USD Deposited Funds as per Proof of Claim		134,270.18		
00108	Filed Claim	USD Bank Account as per Proof of Claim		238,040.90		
00110	Filed Claim	GBP Deposit Funds as per Proof of Claim - 8.13.2025		4,615.00		
00109	Filed Claim	Claim Amount Not Provided Bank Statement Physical Gold - 18oz @1,800.42 = USD33,749.67 Physical Silver - 3,000oz @ 19.42 = USD82,074.01 as per Proof of Claim - 8/15/2025				
	Filed Claim	EUR Deposit Funds as per Proof of Claim		92,500.00		
00111	Filed Claim	No Amount Specified Gold Holdings Custodial as per Proof of Claim				
00112	Filed Claim	USD Deposited Funds as per Proof of Claim		17,660.63		
00113	Filed Claim	EUR Deposited Funds as per Proof of Claim		61,650.00		
00114	Filed Claim	EUR Bank Balance as per Proof of Claim		298,705.58		
00115	Filed Claim	USD Savings Cash and Precious Metals as per Proof of Claim		1,000,000.00		
00116	Filed Claim	USD		18,874.56		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		Deposited Funds 2020 as per Proof of Claim				
00117	Filed Claim	USD Physical Gold - 7.020 oz Physical Silver - 486.188 oz Deposited Funds as per Proof of Claim		26,600.00		
00118	Filed Claim	EUR Private Account (Personal) as per Proof of Claim		60,539.84		
00119	Filed Claim	USD Bank Account as per Proof of Claim - 8/6/2025		14,470.00		
00120	Filed Claim	USD Gold 17.861 OZ Silver 6736.499 OZ, Cash 5.420 Trading Account est. 15.000 as per Proof of Claim		340,280.00		
00121	Filed Claim	USD silver metal and monetary claim as per Proof of Claim - 8/21/2025		50,000.00		
00122	Filed Claim	USD Deposited Funds as per Proof of Claim		22,795.23		
00123	Filed Claim	EUR Deposited Funds as per Proof of Claim		9,840.00		
00124	Filed Claim	USD Deposited Funds/Savings as per Proof of Claim		1,620,483.60		
00125	Filed Claim	USD Deposited Funds Gold 38oz Silver 2200oz as per Proof of Claim		150,000.00		
00126	Filed Claim	USD Deposited Funds as per Proof of Claim		50,358.45		
00126	Filed Claim	USD Deposited Funds		238,201.00		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		as per Proof of Claim				
00127	Filed Claim	EUR Gold 80oz Deposited Funds and Precious Metals as per Proof of Claim - 8/8/2025		77,243.00		
	Filed Claim	EUR Deposited Funds Proof of Claim		361.17		
00128	Filed Claim	USD Deposited Funds as per Proof of Claim		11,772.40		
00129	Filed Claim	USD Deposited Funds as per Proof of Claim		33,880.10		
00130	Filed Claim	EUR Proceeds from the Sale of Gold as per Proof of Claim - 8/18/2025		108,000.00		
00131	Filed Claim	USD Deposited Funds as per Proof of Claim		111,426.21		
00132	Filed Claim	EUR Deposited Fund as per Proof of Claim		49,946.76		
00133	Filed Claim	CAD Investment in Gold and Silver, Credit on Accounts as per Proof of Claim		34,000.00		
00134	Filed Claim	USD Managed Fund as per Proof of Claim		27,172.46		
00135	Filed Claim	USD US dollar amount calculated on USD value of Swiss Franc balance of SFr. 19,992.64 (Acc 1000731486) on 30 June 2022, 9.883oz Gold and 761.234 Silver in USD value on 30 June 2022, and $1,138.68 USD (Acc 1000731478) on 30 June 2022. Deposited lump sum of $61,617.84 on 6 November 2020 (proceeds from Sale of Property in South Africa) as per Proof of Claim		55,864.35		
00136	Filed Claim	EUR Software Development Services as per Proof of Claim		30,923.79		
00137	Filed Claim	USD		167,649.42		

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved
		Deposited Funds as per Proof of Claim				
00138	Filed Claim	USD USD46,945.19 EUR23,978.63 USD26,642.92 Deposited Funds Mutual Funds as per Proof of Claim - 8.29.2025		95,000.00		
00139	Filed Claim	USD Deposited funds as per Proof of Claim - 9.2.2025		2,600.00		
00140	Filed Claim	USD Euro Account Balance - 06/06/2023 Swift GBP Transfers sent Dec-22, Jan-23 and Feb-23 as per Proof of Claim		112,785.00		
00141	Filed Claim	USD Funds Metals and Financial Assets as per Proof of Claim		250,000.00		
00142	Filed Claim	GBP Deposit of Cash as per Proof of Claim		99,781.45		
00143	Filed Claim	GBP Deposited Funds as per Proof of Claim		99,781.45		
00144	Filed Claim	USD Deposited Funds as per Proof of Claim Account Name Not Found in the List of Client		5,500.00		

00237	**Case Totals per Currency**	**AUD**	**411,418**
		CAD	**-**
		CHF	**631,838**
		EUR	**7,363,937**
		GBP	**1,866,265**
		SGD	**-**
		USD	**12,019,203**

00144	**Case Totals per Currency**	**AUD**	**8,668**
		CAD	**70,565**
		CHF	**66,925**
		EUR	**3,925,222**
		GBP	**2,580,241**
		SGD	**973**
		USD	**21,847,708**

Exhibit A

CLAIMS REGISTER

Case Number: C22-D-006 **Date: Sep 11, 2025**

Debtor Name: EURO PACIFIC INTL BANK INC

Claim No	Claim Class	Notes	Scheduled	Claimed	Allowed	Reserved

Classification Level	Aggregated Amount in USD	
Eligible Customers		20,795,000
Not Part of the Eligible Customers		27,262,194
Total in USD	12,222,701	48,057,194

Disclaimer:

All data provided in this report reflects information as written and attested to by each claimant in the Proof of Claim submissions.

No determinations of claim validity, approval, or denial are made at this stage; evaluation is ongoing.

All claims are currently undergoing further evaluation

Currency conversions and related financial figures are presented for reporting purposes only and reflect values as of Sep 15, 2025 outcomes

These figures are provisional and subject to change without notice. No representation is made regarding future exchange rates or claim outcomes

This report is presented strictly for reporting purposes and should not be construed as a final assessment or regulatory confirmation

Claims submitted with a single total across multiple asset types (cash, gold, silver, mutual funds) and no itemized breakdown have been excluded from cash account balances. T

https://www.oanda.com/currency-converter/en/?from=USD&to=USD&amount=1

JS 44 (Rev. 09/19)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

Wigberto Lugo-Mender

(b) County of Residence of First Listed Plaintiff Puerto Rico
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys *(Firm Name, Address, and Telephone Number)*

Eyck O. Lugo; 252 Ponce de Leon Ave, 12th Floor; San Juan, PR 00918
787-522-2000

DEFENDANTS

Qenta, Inc.; Peter D. Schiff; Brent De Jong.

County of Residence of First Listed Defendant Texas
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question *(U.S. Government Not a Party)*
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☒ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☒ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☒ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

Click here for: Nature of Suit Code Descriptions.

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☐ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 835 Patent - Abbreviated New Drug Application
- ☐ 840 Trademark

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729(a))
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☒ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit (15 USC 1681 or 1692)
- ☐ 485 Telephone Consumer Protection Act
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

V. ORIGIN *(Place an "X" in One Box Only)*

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District *(specify)* ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing ***(Do not cite jurisdictional statutes unless diversity)***:
7 USC Sec. 1; 18 USC Sec. 1962

Brief description of cause:
Violation of Commodity Exchange Act and Corrupt Organizations Act.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A **CLASS ACTION** UNDER RULE 23, F.R.Cv.P.

DEMAND $ 150,000,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE
09/16/2025

SIGNATURE OF ATTORNEY OF RECORD
s/Eyck O. Lugo

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

CATEGORY SHEET

You must accompany your complaint with this Category Sheet, and the Civil Cover Sheet (JS-44).

Attorney Name (Last, First, MI): Lugo, Eyck O.

USDC-PR Bar Number: 216708

Email Address: elugo@edgelegal.com

1. Title (caption) of the Case (provide only the names of the first party on each side):

   Plaintiff: Wigberto Lugo-Mender

   Defendant: Qenta, Inc.

2. Indicate the category to which this case belongs:

   - [x] Ordinary Civil Case
   - [ ] Social Security
   - [ ] Banking
   - [x] Injunction

3. Indicate the title and number of related cases (if any).

   N/A.

4. Has a prior action between the same parties and based on the same claim ever been filed before this Court?

   - [ ] Yes
   - [x] No

5. Is this case required to be heard and determined by a district court of three judges pursuant to 28 U.S.C. § 2284?

   - [ ] Yes
   - [x] No

6. Does this case question the constitutionality of a state statute? (See, Fed.R.Civ. P. 24)

   - [ ] Yes
   - [x] No

Date Submitted: 9/16/2025

rev. Dec. 2009

Print Form Reset Form