

----- Forwarded Message -----  
**Subject:** Please Make Sure Lucy Receives This  
**Date:** Tue, 21 Aug 2018 22:13:03 +0000  
**From:** Tom Gober <tomgober@live.com>  
**To:** editors@thekomisarscoop.com <editors@thekomisarscoop.com>

Lucy,

We have spoken just a couple of times in years past. I am so proud of you and your diligence.

We should speak again. It is important and relates to a growing hornets' nest of international funds flows disguised as "reinsurance."

While I have access to loads of United States sworn annual statements of insurance companies via SNL Financial, I have had zero access to the other ends of transactions in places like Yemen, Moscow, Panama, etc.

But my recent forays into the Paradise Papers has enabled me to link U.S. insurers with nasty dealings globally.

Please let me know when we can chat. I have spent 33 years focused on complex insurance/reinsurance accounting fraud schemes for the protection of policyholders. My work with the US DOJ/FBI came to an abrupt halt thanks to the McNulty Memo:

Gober Attachment A6



U.S. Department of Justice

Office of the Deputy Attorney General

The Deputy Attorney General

Washington, D.C. 20530

MEMORANDUM

TO: Heads of Department Components  
United States Attorneys

The Deputy Attorney General

Washington, D.C. 20530

MEMORANDUM

TO: Heads of Department Components  
United States Attorneys

FROM: Paul J. McNulty  
Deputy Attorney General

SUBJECT: Principles of Federal Prosecution of Business Organizations

The Department experienced unprecedented success in prosecuting corporate fraud during the last four years. We have aggressively rooted out corruption in financial markets and corporate board rooms across the country. Federal prosecutors should be justifiably proud that the information used by our nation's financial markets is more reliable, our retirement plans are more secure, and the investing public is better protected as a result of our efforts. The most significant result of this enforcement initiative is that corporations increasingly recognize the need for self-policing, self-reporting, and cooperation with law enforcement. Through their self-regulation efforts, fraud undoubtedly is being prevented, sparing shareholders from the financial harm accompanying corporate corruption. The Department must continue to encourage these efforts.

