



## FOR IMMEDIATE RELEASE

Washington, D.C. – Friday, August 30, 2024

### MSR MEDIA Press Release

In recent weeks, Caribbean Galaxy has extensively publicized their defamation lawsuit against MSR MEDIA and Philippe Martinez.

As an update on this defamation lawsuit, on August 29, 2024, Damian Kelsick, attorney for MSR MEDIA and Philippe Martinez, filed the bank transactions in U.S. Dollars from Bank of America, which were obtained by MSR MEDIA's American lawyers through Section 1782 in the United States.

For months, Caribbean Galaxy, Ying Jin, and Timothy Harris have engaged in a protracted legal battle in the United States against MSR MEDIA and Philippe Martinez to prevent us from obtaining the U.S. Dollar transactions from Bank of America. MSR MEDIA and Philippe Martinez won this battle and are now in possession of the Bank of America records.

On August 29, the Bank of America statements concerning Les Khan, Caribbean Galaxy, and Ying Jin were filed in the Saint Kitts and Nevis court in reference to the defamation case. See *attached copy of the official filing*.

These records of Bank of America transactions reveal incoming wires to Mr. Khan's US company, LKCS, LLC **in the total amount of \$USD13,403,989.16**. The majority of the income was received by Mr. Khan for the Jail Project.

These Bank of America transactions raise several questions:

1. **Les Khan received \$USD320,752.92 from Caribbean Galaxy. Why did Caribbean Galaxy pay Mr. Khan's company while he was the Head of the Citizenship by Investment Unit of St. Kitts and Nevis?**
2. **HONGKONG BAI SHENG AN LIMITED paid Les Khan \$770,000. Why, after Mr. Khan's departure from the CIU of St. Kitts and Nevis and his subsequent position as CEO of Caribbean Galaxy in St. Lucia, did the due diligence company, HONGKONG BAI SHENG AN LIMITED, set up and owned by Mr. LI, MUSHENG, Vice President of Caribbean Galaxy, Mr. Khan shortly after his departure from the CIU? See corporate filing documents attached.**
3. **SKIPA INVESTMENT MACAU LIMITED paid Les Khan \$USD1,359,200.00. Why was Mr. Khan paid by SKIPA INVESTMENT MACAU LIMITED after his departure from the CIU?**
4. **Who controls SKIPA INVESTMENT MACAU LIMITED?**
5. **Accountant General CIU paid Les Khan's company \$USD10,518,188.00 for Les Khan's compensation as the CEO of the CIU Mr. Khan's compensation contract**

was based largely on a bonus structure on successful applications. Who are the officials that signed this very lucrative contract?

6. In addition to the transactions summarized above, Khan transferred \$435,848.24 to himself (LKCS LLC) on May 5, 2020, using a Singapore bank account with United Overseas Bank Ltd. The note says “CLOSING OF ACCOUNT.”

MSR MEDIA will provide the responses to these questions during the court case in St. Kitts and Nevis.

The minimum wage for the citizens is EC \$430/week. In the CBI industry, certain officials, like Mr. Khan, and other entities such as processing agents and lawyers negotiated compensation **by the number of successful CBI applications**. Looking at the extraordinary amount of money received by Mr. Khan, it is now clear *why* Caribbean Galaxy was given the unprecedented amount of 5500 shares for the jail project.

MSR MEDIA looks forward to providing a similar legal response, in due course, to the defamation case filed by Dr. Timothy Harris against MSR MEDIA. MSR MEDIA will file to the court the relevant bank transactions for him, other officials, and entities to the St. Kitts and Nevis court.

The filing of the Bank of America transactions on August 29, 2024, and in the Court of St. Kitts and Nevis will be remembered as a pivotal day where undeniable evidence of the abuse of the Citizenship by Investment industry was exposed in the fight against corruption.

MSR MEDIA

[www.msrmidiaskn.com](http://www.msrmidiaskn.com)

[info@msrmidiaskn.com](mailto:info@msrmidiaskn.com)

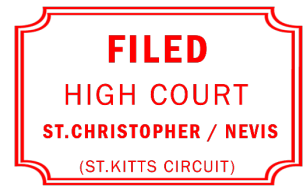
MSR MEDIA SKN LTD

3 Wigley Avenue, Basseterre, Saint Kitts and Nevis

✉ [info@msrmidiaskn.com](mailto:info@msrmidiaskn.com)

🌐 [www.msrmidiaskn.com](http://www.msrmidiaskn.com)

**Case Number :SKBHCV2023/0228**



THE EASTERN CARIBBEAN SUPREME COURT  
IN THE HIGH COURT OF JUSTICE  
SAINT CHRISTOPHER AND NEVIS  
SAINT CHRISTOPHER CIRCUIT

**Submitted Date:29/08/2024 15:55**

**Filed Date:29/08/2024 15:55**

**Fees Paid:27.00**

CLAIM NO. SKBHCV2023/0228

BETWEEN: [1] CARIBBEAN GALAXY REAL ESTATE CORPORATION

[2] YING JIN

*Claimants*

And

[1] MSR MEDIA SKN LTD.

[2] PHILIPPE MARTINEZ

*Defendants*

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**SECOND SUPPLEMENTAL LIST OF DOCUMENTS FOR THE DEFENDANTS**

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This list is completed in accordance with an order for:

(a) Standard disclosure **YES**

(b) Specific disclosure **NO**

dated March 19, 2024, and is served on behalf of the Claimant.

I, **PHILIPPE MARTINEZ**, the Director of the 1<sup>st</sup> Defendant, and the Second Defendant, certify that I have had explained to me –

(a) the duty of standard disclosure, and

(b) the terms of the order dated March 19, 2024, for standard disclosure and my duty to disclose documents in accordance with that order and that I have complied with that duty.

Part 1 of Schedule 1 contains a list of ALL the documents, received since 30<sup>th</sup> April 2024, which –

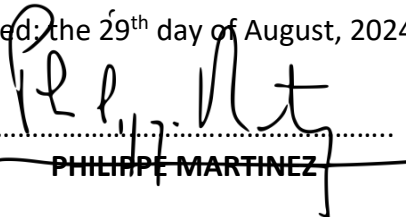
- a) are or were in the physical possession of the Defendants; or
- b) the Defendants have or have had a right to possession of; or
- c) the Defendants have or have had a right to inspect or take copies of, and on which the Defendants rely or intend to rely in these proceedings.

The Defendants claim a right to withhold disclosure and inspection of the documents listed in Part 2 of Schedule 1 on the basis stated in the Schedule.

The Defendants are not in physical possession of the documents listed in Schedule 2 and the Schedule states what has happened to those documents.

Neither the Defendants nor the Defendants' legal practitioners nor anyone else on behalf of the Defendants now has or has ever had physical possession of, nor have the Defendants now or ever had the right to possession or the right to take copies of any document which should be disclosed and inspected under the terms of the court's order other than those listed in this List of Documents.

Dated: the 29<sup>th</sup> day of August, 2024

  
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**PHILIPPE MARTINEZ**

The Court Office/Registry of the High Court is situate at the Sir Lee L. Moore Judicial and Legal Services Complex, East Independence Square, Basseterre, St. Kitts. Its email address is [registryskn@gov.kn](mailto:registryskn@gov.kn) and its telephone numbers are (869) 467-1335 and (869) 467-1337. The Office/Registry is open between 8:30 a.m. and 3:30 p.m. Mondays to Fridays, except public holidays.

## **SCHEDULE 1**

### **PART 1**

NO.	DOCUMENT
26.	Bank of America Cheques from <b>Facilitaire Associates</b> to: <b>Frank Mira</b> dd February 8, 2024 <b>David Mitchell</b> dd June 8, 2020 <b>Surfside Pool &amp; Spa</b> dd June 8, 2020 <b>Next Level Turf Mgmt</b> dd June 8, 2020
27.	Bank of America Cheques from <b>Leslie Khan</b> to: <b>David Mitchell</b> dd Sept 11, 2020, Oct 4, 2019, July 10, 2020, May 6, 2019, Feb 4, 2022, Jan 5, 2018, Aug 7, 2018, Jan 8, 2019, Jul 6, 2018, Apr 9, 2024, Dec 8, 2023, Feb 8, 2024, Nov 9, 2023, Mar 6, 2024, Sept 6, 2023, Nov 8, 2022, Nov 8, 2022, Jul 10, 2023, Sept 9, 2022, Aug 10, 2023  <b>Next Level Turf Mgmt</b> dd July 10, 2024, July 10, 2020, May 6, 2019, Feb 4, 2022, Sept 11, 2020, Aug 7, 2018, Jan 5, 2018, June 4, 2018, July 6, 2018, Sept 9, 2022, Jan 8, 2019, Jan 8, 2019, Dec 8, 2023, Feb 8, 2024, Mar 6, 2024, Apr 9, 2024, Nov 9, 2023, Nov 8, 2022, Jul 10, 2023, Aug 10, 2023, Sept 6, 2023  <b>Surfside Pool &amp; Spa</b> dd Oct 4, 2019, July 10, 2020, Sept 11, 2020, Feb 4, 2022, Jan 5, 2018, Sept 9, 2022, June 4, 2018, Oct 7, 2019, July 6, 2018, Aug 7, 2018, Jan 8, 2019, May 6, 2019, Nov 8, 2022
28.	Bank of America Account no. 229029317364 of Leslie Khan Debit record dd: June 28, 2024 June 12, 2023
29.	Bank of American Account no. 229029317364 of Kiera Cunin-Khan Debit record dd Jan 22, 2024
30.	Bank of America Cheques from Account no. 229029317364 of Leslie and Kiera Cunin-Khan to: <b>Michael Bisirri</b> dd September 5, 2024 chq no. 1271 <b>Michael Bisirri</b> Undated chq no. 1272 <b>Orlando Heath</b> dd June 8, 2024 chq no. 1276 <b>Michael Bisirri</b> dd June 6, 2024 chq no.1277 <b>Acadamie Alliance</b> dd June 8, 2024 chq no. 1275 <b>Alexandra</b> dd June 8, 2024 chq no. 1274
31.	Bank Statements of Bank of America Account no. 2290 0027 2033 – Leslie Khan and Kiera Cunin-Khan dd December 9, 2017 to February 7, 2022
32.	Bank Statements of Bank of America Account nos. 8981 2999 3378 and 8981 2999 3381 – Brandon Khan, Kiera Cunin-Khan and Leslie Khan dd Jan 13, 2022 to Jul 22, 2024

33.	Bank Statements of Bank of America Account no. 2290 3360 6689 – Brandon Khan, Kiera Cunin-Khan and Leslie Khan dd Dec 22, 2017 to Feb 28, 2022
34.	Bank Statements of Bank of America Account no. 3251 1985 8899 – Ying Jin dd July 29, 2019 to April 25, 2024
35.	Bank Statements of Bank of America Account no. 2290 3749 4897 – Facilitaire Associates dd January 1, 2018 to June 30, 2024
36.	Bank Statements of Bank of America Account no. 2290 3749 4897 – Facilitaire Associates dd July 1, 2024 to July 31, 2024
37.	Bank Statements of Bank of America Account no. 3251 2933 6767 – Ying Jin dd July 29, 2019 to July 19, 2024
38.	Bank Statements of Bank of America Account no. 3251 2933 6767 – Ying Jin dd July 20, 2024 to August 20, 2024
39.	Bank Statements of Bank of America Account no. 2290 2931 7364 – Leslie Khan and Kiera Cunin-Khan dd December 19, 2017 to July 19, 2024
40.	Bank Statements of Bank of America Account no. 2290 2931 7364 – Leslie Khan and Kiera Cunin- Khan dd July 20, 2024 to August 20, 2024
41.	Bank Statements of Bank of America Account no. 3251 1985 8899 – Ying Jin dd July 29, 2019 to June 25, 2024
42.	Bank Statements of Bank of America Account no. 3251 1985 8899 – Ying Jin dd June 26, 2024 to July 26, 2024
43.	Wire Report for the period January 1, 2018 to July 24, 2024 of Bank of America Accounts: 898129993381 898129993378 229000272033 229029317364
44.	Wire Report for the period January 1, 2018 to July 24, 2024 of Bank of America Accounts: 229037494897 229033606689 325129336767 325119858899
45.	Wire Report for the period January 1, 2018 to July 24, 2024 of Bank of America Accounts: 898129993378 229000272033 229033606689 325129336767 325119858899

**PART 2**

- NIL -

**SCHEDULE 2**

- NIL-

**NOTICE TO INSPECT**

The Documents listed in Part 1 of Schedule 1 may be inspected at Kelsick, Wilkin & Ferdinand Law Firm on any normal working day between the hours of 8:30 a.m. and 4:30 p.m.

Dated: the 29<sup>th</sup> day of August, 2024



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**HADYA K. L. DOLPHIN**

**ASSOCIATE**

**KELSICK, WILKIN & FERDINAND LAW FIRM**

*ATTORNEYS-AT-LAW ON BEHALF OF THE DEFENDANTS*

The Court Office/Registry of the High Court is situate at the Sir Lee L. Moore Judicial and Legal Services Complex, East Independence Square, Basseterre, St. Kitts. Its email address is registrykn@gov.kn and its telephone numbers are (869) 467-1335 and (869) 467-1337. The Office/Registry is open between 8:30 a.m. and 3:30 p.m. Mondays to Fridays, except public holidays.

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FEDERATION OF SAINT CHRISTOPHER AND NEVIS

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[2] YING JIN *-Claimants*

AND

[1] MSR MEDIA SKN LTD.

[2] PHILIPPE MARTINEZ *-Defendants*

Defendants' Supplemental List of Documents

Damian E. S. Kelsick, KC Partner  
KELSICK, WILKIN & FERDINAND  
Attorneys-at-Law for the Defendants



## Company Particulars

### Company Particulars Search

**System Clock:** 28-AUG-2024 13:01:06 GMT +0800

**Your Search:** BRN = 73176252

<b>BRN</b>	73176252
<b>Company Name</b>	HONGKONG BAI SHENG AN LIMITED 香港佰盛安有限公司
<b>Company Type</b>	Private company limited by shares
<b>Date of Incorporation</b>	13-Jul-2021
<b>Company Active Status</b>	Live
<b>Remarks</b>	-
<b>Winding Up Mode</b>	-
<b>Date of Dissolution / Ceasing to Exist</b>	-
<b>Register of Charges</b>	Unavailable
<b>Important Note</b>	-

### Name History

Effective Date	Name Used
13-Jul-2021	HONGKONG BAI SHENG AN LIMITED 香港佰盛安有限公司

### Registered Office

**Registered Office:** ROOM 407B, 4/F., MIRROR TOWER, 61 MODY ROAD, TSIM SHA TSUI EAST HONG KONG

**Effective Date:** 14-Feb-2022

### Share Capital

**Issued:** HKD 10,000

**Paid-Up:** HKD 10,000

## Person(s) Holding Shares

### Note:

1. The information of the company provided herein is taken from its Incorporation Form (Form NNC1), its Annual Return (Form NAR1) and its Return of Allotment (Form NSC1) filed with the Companies Registry, as the case may be. Other information relating to shareholding such as share transfer, reduction of share capital, repurchase of shares, share consolidation, listing, delisting, etc. is not included.




## Shareholder(s)

**Displaying: Record 1 to 1 of 1 records.**

No.	English Name	Chinese Name	Address	Class of Share	No. of Shares Held	Position as at (Note 1)
1	LI, MUSHENG	李木生	中國, 北京市朝陽區天樂園 5號樓1-101室	普通股	10,000	13-Jul-2023

## List of Directors

### Director

No.	Name in English	Name in Chinese	HKID No. / BRN	Passport No.	Passport Issuing Country / Region	Director Type	Director Particulars		All Directorships
							Online View	Certified Copy	
1	JIN, TAO	金濤	-	-	-	Natural Person			

## Particulars of Company Secretary

### Particulars of Company Secretary (Body Corporate)

<b>No.</b>	1
<b>English Name</b>	MERCURY SECRETARIAL LIMITED
<b>Chinese Name</b>	雅信秘書有限公司
<b>BRN</b>	71079230
<b>Registered / Principal Office</b>	UNIT 720, 7/F., STAR HOUSE., 3 SALISBURY ROAD., TSIM SHA TSUI, KOWLOON., HONG KONG
<b>Date of Appointment</b>	21-Jun-2024
<b>Important Note</b>	-