CIR CENTRE for INFORMATION RESILIENCE

THE ONEGATE

TGR s International Digital Payments Network

September 2026

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1. EXECUTIVE SUMMARY

CIR has identified strong evidence connecting an international money transfer service known as The OneGate to TGR, a transnational organisation which has been the subject of money laundering investigations, arrests and seizures by officials in the UK, the United States and other law enforcement partners.

The OneGate presents itself as *the control room behind a company's money*." It offers a variety of financial services to transfer money internationally as both digital fiat and cryptocurrency. It does this via an integrated network of companies that have spread across at least seven jurisdictions. These companies include:

- The OneGate Ltd (UK)
- The OneGate Inc (US - Delaware with Florida branch, registered to the same Vancouver address as Maple Digital Financial Solutions)
- Maple Digital Financial Solutions Ltd (Canada)
- Canneret s.r.o. (Czech Republic)
- The OneGate Sp.z.o.o. (Poland)
- The OneGate Capital AG (Switzerland)
- Leadtone Asia Limited (Hong Kong)

The ability to move money easily across borders while obscuring its origins and limiting the oversight of traditional financial institutions, regulators or law enforcement is a key component of TGR s service offering, according to U.K. and U.S. law enforcement officials.

Open source evidence identified by CIR suggests that The OneGate evolved from previous or perhaps replaced previous TGR projects, including the defunct Onecard and One Remit. CIR identified other strong connections between TGR and The OneGate including through archived websites; job advertisements from TGR for positions with The OneGate s companies; digital forensic traces including metadata including PDF authorship; and multiple overlapping personnel between OneGate and TGR.

Jānis Zvīgulis is a Latvian financial professional who served from January 2015 to November 2017 as a director for one of TGR's UK-registered companies, TGR Wealth Solutions Ltd (later renamed to TGR Corporate Concierge Ltd). Zvīgulis is listed on corporate records as shareholder and/or director for at least five of The OneGate s companies. He identifies himself in his LinkedIn profile as one of the founders of The OneGate. It has not been possible to identify shareholders or directors for all companies due to limitations on public access to information in some jurisdictions.

CIR has not identified and does not impute any evidence of criminal wrongdoing by individuals, companies or entities identified in this report. This report simply documents open-source evidence indicating connections between these entities and the TGR network. Further investigation, including of closed sources such as financial records, would be needed to uncover the nature of these connections.

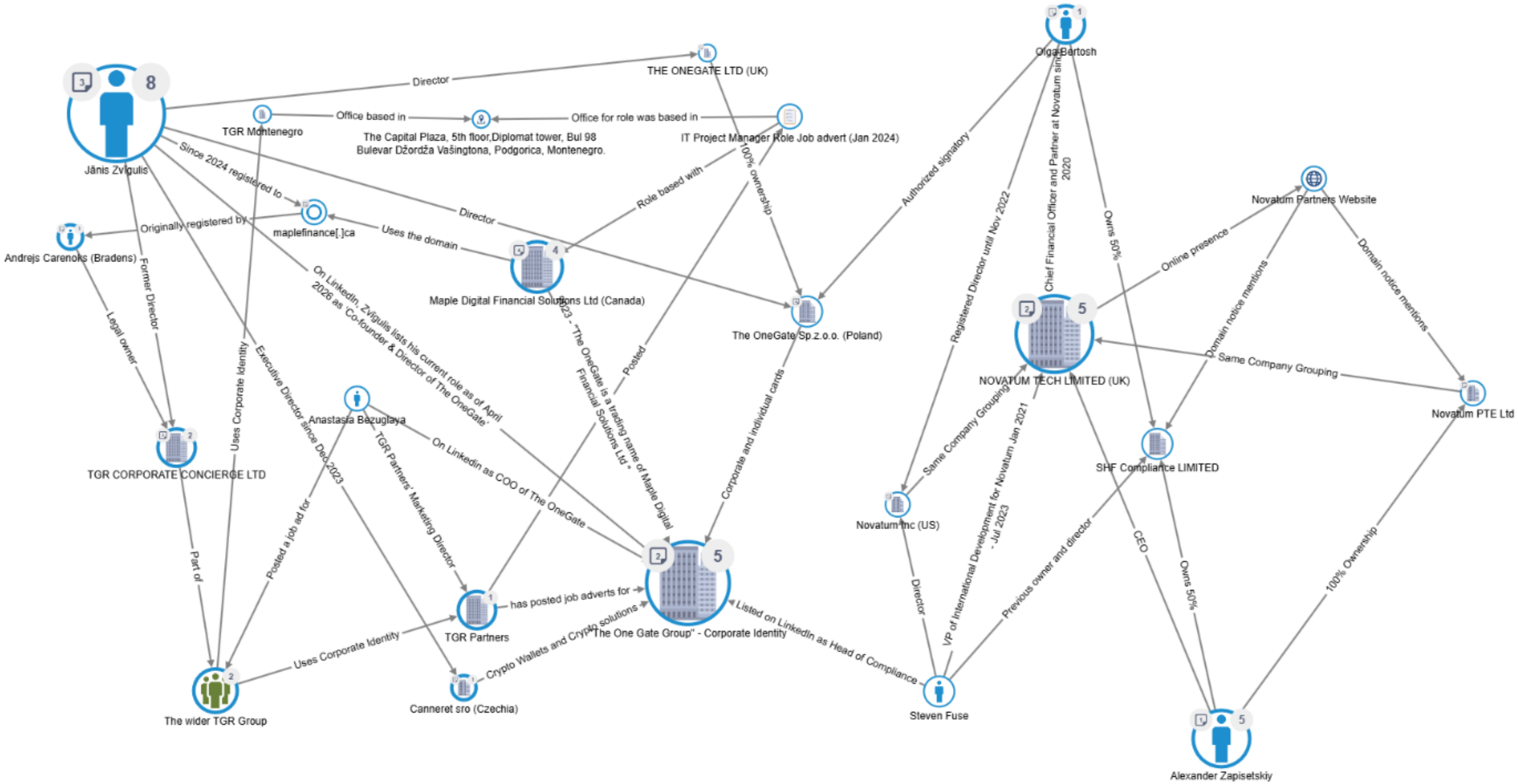
The OneGate appears to be active as of August 2026 based on recently filed corporate documents for its UK company; recent bug fixes for its iPhone app; a re-design of The OneGate s main website in July 2026 and recent activity on its Telegram support account.

It has not been possible based on open sources to establish how much or whose money may have moved through The OneGate s platform in the five years it or its companies have been operating. Further investigation, including by law enforcement with access to financial records, could shed light on this.

Further investigation could also uncover precisely how The OneGate may fit into TGR s broader operations, and identify its clients.

Late in the course of this investigation, CIR identified leads pointing towards a link between The OneGate and another multi-country payments network, Novatum. This evidence includes multiple instances of overlapping personnel between Novatum and The OneGate companies. Novatum's Singaporean company, Novatum PTE, is part-owner of one of OneGate's companies, Leadtone Asia Limited.

In addition, the Novatum network includes a UK-registered fintech company Novatum Tech and a Belarusian-registered company named Novatum Vit, which appears to be advertising capabilities to ship goods between Europe, Russia and Belarus in the face of international sanctions. It states on its website that it can deliver cargo that was previously *impossible to deliver into the country*" by working in *a new way*." The site advertises a full suite of services to achieve that end, including supplying documentation and even falsely posing as the importer.



Simplified network graph of the OneGate network

2. TGR

The TGR Group has been identified by UK and U.S. authorities as a transnational organised crime group. It offers money laundering internationally on a large scale to criminal groups involved in cybercrime, drugs and firearms smuggling, as well as wealthy Russian clients and state-linked actors looking to move money illicitly and in violation of sanctions. It is led by Russian-born Yuri Maksakov, who also goes by George Rossi. TGR's clients included the Kinahan cartel, one of Europe's largest organised crime groups, as well as Russian oligarchs and the sanctioned Russian state broadcaster RT.

CIR s research suggests Maksakov s operation likely originated in Russia and Latvia in or around the mid-2000s, and has many years' history of operating in Europe, Dubai, the US, the UK, Singapore and Hong Kong, among other countries.

The network was the target of a coordinated action in December 2024 led by the UK s National Crime Agency (NCA) and the US s Office of Foreign Assets Control (OFAC), among other law enforcement partners. Codenamed Operation Destabilise, this operation targeted both TGR and a related criminal network for which it was laundering money, referred to as the Smart Group. The Smart Group is another money laundering ring led by Ekaterina Zhdanova and others which specialized in helping wealthy Russians move money abroad.

The NCA has estimated that together, these networks have a combined footprint of about 30 countries, with the level of activity in each country varying significantly. Their major hubs have historically been in Latvia, the UK, Montenegro and the UAE, although it is likely that Operation Destabilise may have forced them to shift their operations.

UK law enforcement action linked to Destabilise has resulted in the arrests of more than 128 individuals and seized more than £25 million by November 2025. The NCA's investigation into these networks is ongoing. Other jurisdictions have seized $24 million and over EUR 2.6 million in connection with the action, according to the NCA. Many of those arrested were low-level cash couriers in the UK; a major part of TGR s UK based operations involve swapping cash from drugs sales in the UK for cryptocurrency, often originating from Russian and Eastern European cybercrime groups.

The NCA and the U.S. Department of Justice have also accused TGR of facilitating sanctions evasion, including for Russian state media organisation RT and for wealthy Russians looking to illegally purchase property in the UK. TGR have also allegedly been involved in the export of sanctioned electronic components from Asia to Russia.

The U.S. Office of Foreign Assets Control has imposed sanctions against Maksakov along with two of his deputies, Andrejs Carenoks (a Latvian national who also goes by Andrejs Bradens) and Elena Chirkinyan, none of whom have yet been arrested or charged. OFAC also sanctioned multiple companies linked to the TGR network.

Maksakov and Carenoks' whereabouts are not publicly known. Based on her Instagram activity as of August 2026, Chirkinyan is in her native Armenia, where she appears to have remained since the exposure of TGR in December 2024. Despite the disruption caused by law enforcement actions, there is significant evidence that TGR is continuing to operate.

3. TGR AND JĀNIS ZVĪGULIS

3.1. ZVĪGULIS' LINKS TO TGR

One of the key companies which TGR registered in the UK was TGR Wealth Solutions Ltd, later renamed to TGR Corporate Concierge Ltd. Companies House records show it was registered on 6 January 2015 to an address in London.

On the very first day, directorship of TGR Wealth Solutions was transferred to Jānis Zvīgulis. Zvīgulis, born November 1982, is listed as a Latvian citizen resident in Latvia according to Companies House records.

Zvīgulis remained director of TGR Wealth Solutions until 18 April 2017, when he was replaced by Andrejs Carenoks, a Latvian national identified by the NCA as a key member of the TGR network. Shortly after on 24 April, the company s name was changed to TGR Corporate Concierge and Carenoks became its sole shareholder as well as its director. TGR Corporate Concierge was sanctioned in 2024 for its role in the TGR network.

3.2. ZVĪGULIS BACKGROUND

Zvīgulis is a financial services professional who has previously worked for the Latvian government, KPMG Latvia and the private sector, according to his LinkedIn profile.

On LinkedIn, Zvīgulis lists his current role as of April 2026 as *Co-founder & Director of The OneGate*. He does not name the other co-founders. A recent post celebrates his acquisition of a specialist certification in Anti-Money Laundering (Figure 1).

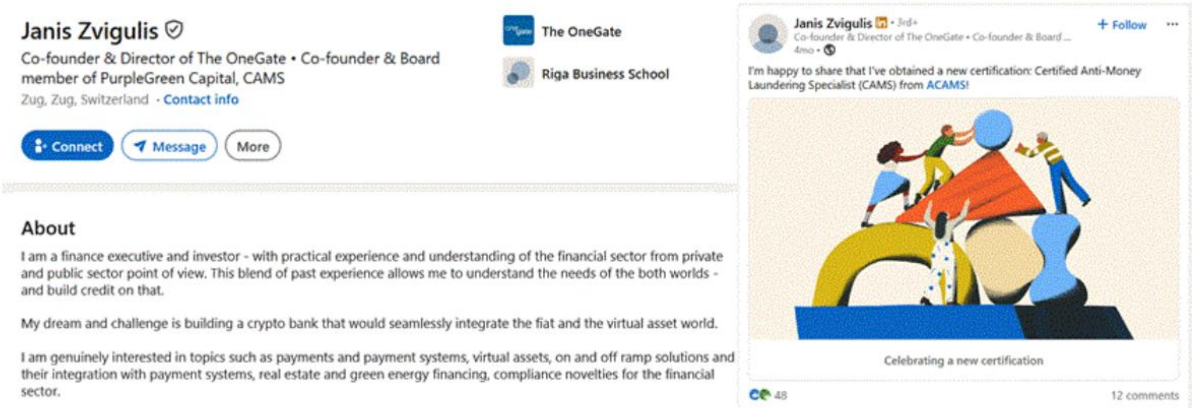


Fig 1: Screenshots from Jānis Zvīgulis LinkedIn profile, captured 23 April 2026.

3.3. LINKS BETWEEN THE ONEGATE AND TGR

There are multiple indications that OneGate's constellation of companies has extremely close connections to the TGR network.

3.3.1. ONECARD TO THE ONEGATE

The concept for The OneGate appears to have at least partially evolved out of OneCard, a now-defunct prepaid Mastercard payment card service offered by the company SIA Eastern European Payment System, which was at the time partially owned by TGR.[1]

OneCard had promoted itself on its site as *an improved alternative for traditional banking, created to serve both business and private clients*." It offered options for both personal and business payment cards. According to The OneCard s FAQ page the actual cards were supplied via Prepaid Financial Services Ltd (PFS) which appears unrelated to TGR and was likely an unwitting third-party service provider.[2]

Maple Financial Digital Solutions (dba Maple Finance) is the first of network of companies that eventually became The OneGate to be acquired by TGR (more detail on this company is included in a section below).

When The OneGate s main domain theonegate[.]com was created, a 2023 archive shows that it initially stated that "*The OneGate is a trading name of Maple Digital Financial Solutions Ltd*."

[1] During this time period SIA Eastern European Payment System was 30% owned by Asia Global Communications PTE, a Singaporean company operated by TGR. Between November 2016 and April 2024 it was also registered as a foreign company active in the UK, with TGR members Elena Chirkinyan and Olegs Kravcenko listed as directors.

[2] PFS card services entered liquidation in 2024.

Maple Financial's website, maplefinance[.]ca, was registered on 22 February 2021. Whois history shows that it was originally registered to Andrejs Carenoks, discussed above as a key member of TGR's leadership group.

On 6 December 2024, two days after the NCA and OFAC went public with their investigations into TGR and Carenoks was sanctioned in the US, Carenoks was removed from the website registration. Jānis Zvīgulis name and contact details were listed instead.

The site's content itself also establishes a connection to TGR, disclosing that its Maple Finance card was provided by OneCard. An archive of Maple Finance s site from June 2021 stated:

Your unique personalised Maple Finance card will be issued by OneCard for simplified payments, control of your spending and easing of cashflow. OneCard personal and business programs are designed to help you manage your financial needs better, while benefiting from an IBAN account features.*

**The Onecard Prepaid Mastercard is issued by PFS Card Services (Ireland) Limited pursuant to a license from Mastercard International Incorporated. PFS Card Services (Ireland) Limited, trading as PCSIL, is regulated by the Central Bank of Ireland*."

Maple Finance and the other OneGate companies will be discussed individually in more detail in later sections.

Andrejs Carenoks also previously owned another now-defunct company whose name and similarity of services to The OneGate's are notable. According to its website, One Remit offered an international money transfer service including payment cards and "*Direct transfer to bank accounts in more than 50 countries. Cash pick-up from over 250 000 locations*."

3.3.2. SHARED RECRUITING AND PERSONNEL

TGR has posted job ads for positions with The OneGate network. One ad published by TGR Partners for a Cards Product Manager role[3] begins "*We are seeking a highly skilled Cards Product Manager to join our dynamic team at The OneGate Group. As a key member of our cards department, you will play a crucial role in bridging the gap between technical implementation and business requirements for our card products and services.*"

[3] TGR Partners is sanctioned by the US for its role in the TGR network. This site appears to falsely date job ads to make them appear more recent. The date 7 August 2025 in this archive reflects the day CIR made the archive, not the true date the job ad was posted.

Another ad posted by TGR Partner's account on Layboard calls for an IT Project Manager for Maple Digital Financial Solutions, which as described in the previous section is a Canadian company within The OneGate s network. It opens by stating "*At Maple Digital Financial Solutions we contribute to the global financial inclusion initiative through our modern digital payments solution, which provides users with a convenient and secure alternative to the traditional banking marketplace.*"

The position required three days of in-office work at *The Capital Plaza, 5th floor, Diplomat tower, Bul 98 Bulevar Džordža Vašingtona, Podgorica, Montenegro.*" TGR Montenegro s registered address is in the same office building, although the floor level is not specified. The contact details provided for the Maple Finance job were for TGR s HR manager Anna Lekomceva, using the Telegram handle @TGR_HRAnna, which is no longer active.

Beyond the job advertisements, there is the obvious crossover of Jānis Zvīgulis. Additionally, Anastasia Bezuglaya has listed herself on LinkedIn as the COO of The OneGate. In November 2020 Bezuglaya posted an ad on Facebook for a position with TGR. The Wiza database lists Bezuglaya as TGR Partners Marketing Director, although it is unclear where this information is sourced from.

In documenting these connections based on publicly available evidence, CIR is not imputing that any of the above individuals are involved in illicit activity.

3.3.3. SHARED PHONE NUMBER

An archive of the tgr[.]partners domain from September 2021 lists TGR s Canadian phone number as +1 647 499 0788. This is the same number as listed in the contact details on Maple Finance s archived site from September 2021.

3.3.4. ADDITIONAL DIGITAL TRACES

As mentioned above, historic Whois records show that Maple Finance s domain maplefinance[.]ca was originally registered in the name of Andrejs Carenoks, a key member of TGR according to the NCA and OFAC (the company name Fexcool Payments appears to have been the original name of Maple Finance according to corporate records). This was changed on 6 December 2024 to Jānis Zvīgulis (Figure 2). The NCA went public with their investigation into TGR on 4 December 2024.

Who owned maplefinance.ca in the past? (4 records)

30 APR 2021

Name: Andrejs Carenoks
Company: FEXCOOL PAYMENTS LTD
Email: info@maplefinance.ca
Country: United Kingdom (28.2 million domains from **United Kingdom** for **$1,000**)
Nameservers: desi.ns.cloudflare.com, kip.ns.cloudflare.com
Status: clientDeleteProhibited, clientTransferProhibited, clientUpdateProhibited

26 FEB 2024

Name: Andrejs Carenoks
Company: FEXCOOL PAYMENTS LTD
Email: info@maplefinance.ca
Country: United Kingdom (28.2 million domains from **United Kingdom** for **$1,000**)
Nameservers: desi.ns.cloudflare.com, kip.ns.cloudflare.com
Status: autoRenewPeriod, clientDeleteProhibited, clientTransferProhibited, clientUpdateProhibited UPDATED

6 DEC 2024

Name: Janis Zvigulis (7 domains) UPDATED
Company: Maple Digital Financial Solutions Ltd UPDATED
Email: janis@maplefinance.ca UPDATED
Country: Latvia (157,827 domains from **Latvia** for **$250**)
Nameservers: adele.ns.cloudflare.com, jason.ns.cloudflare.com UPDATED
Status: clientDeleteProhibited, clientTransferProhibited, clientUpdateProhibited UPDATED

6 MAR 2025

Name: Janis Zvigulis (7 domains)
Company: Maple Digital Financial Solutions Ltd
Email: janis@maplefinance.ca
Country: Latvia (157,827 domains from **Latvia** for **$250**)
Nameservers: adele.ns.cloudflare.com, jason.ns.cloudflare.com
Status: autoRenewPeriod, clientDeleteProhibited, clientTransferProhibited, clientUpdateProhibited UPDATED

Fig 2: Whois history for maplefinance[.]ca. Source.

Another interesting detail from metadata (Figure 3) from The OneGate s Privacy Policy from 2023 is that it lists the author as Max Travel (it also references Maple Finance). The Onecard s 2020 Privacy Policy and One Remit s 2020 Privacy Policy and Terms and Conditions PDFs were also authored by Max Travel , according to metadata.[4] Yuri Maksakov, the leader of TGR, appears to have used the pseudonym Max Traveller’ on Facebook.

[4] The metadata also indicates that the author s PDF editor was likely configured in Russian, based on "Microsoft® Word для Microsoft 365".

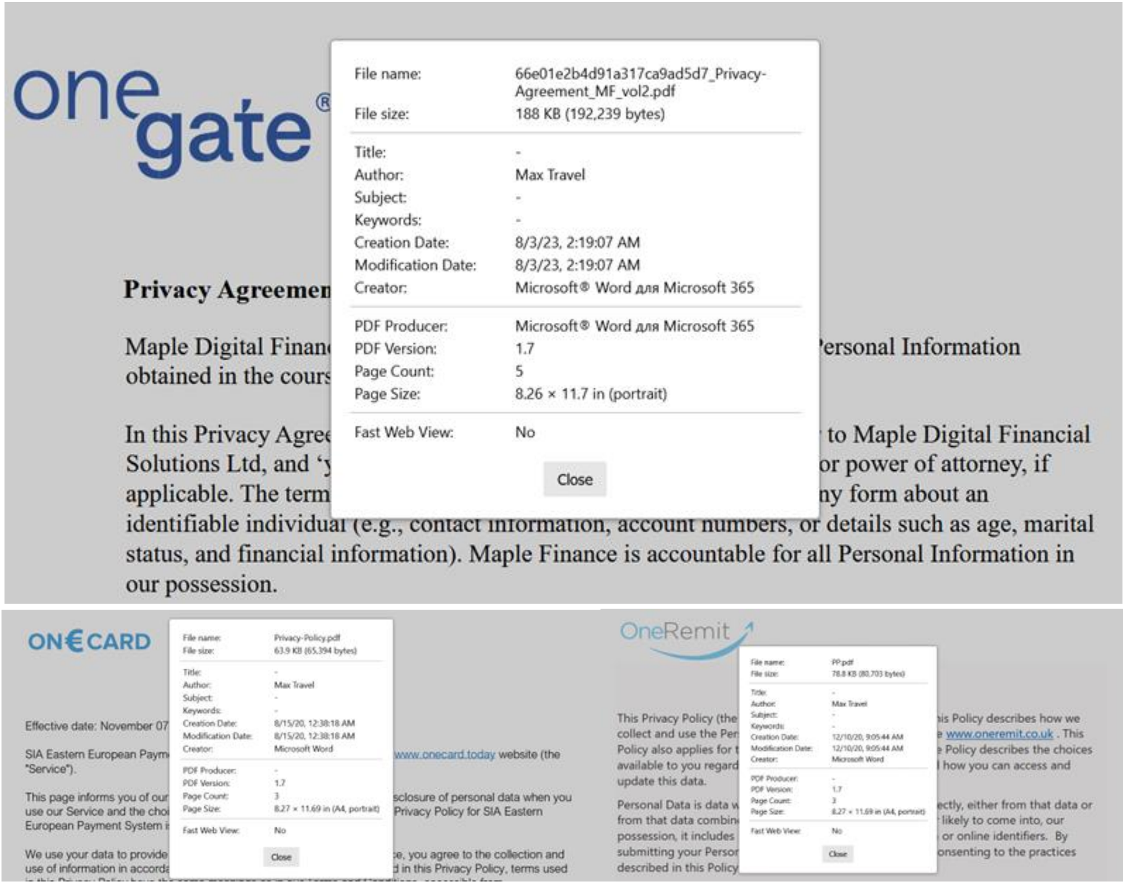


Fig 3: Top: PDF metadata for The OneGate s 2023 Privacy Policy. [Source](). Bottom left: PDF metadata for The Onecard s 2020 Privacy Policy. [Source](). Bottom right: PDF metadata for One Remit s 2020 Privacy Policy. [Source]().

Maple Finance s [2021 Terms and Conditions]() PDF metadata lists the author simply as ’Юрий‘(Yuri). There is no further evidence to indicate whether this is Yuri Maksakov or someone else, however.

4. THE ONEGATE NETWORK

The OneGate describes itself on its [website]() as an *the control room behind a company's money.*” As of August 2026, it offers multi-currency payments, international payments, digital assets and virtual and physical corporate cards (Figure 4). It has previously offered additional services including cryptocurrency and forex trading; it is unclear whether these services continue to be offered or have been eliminated.

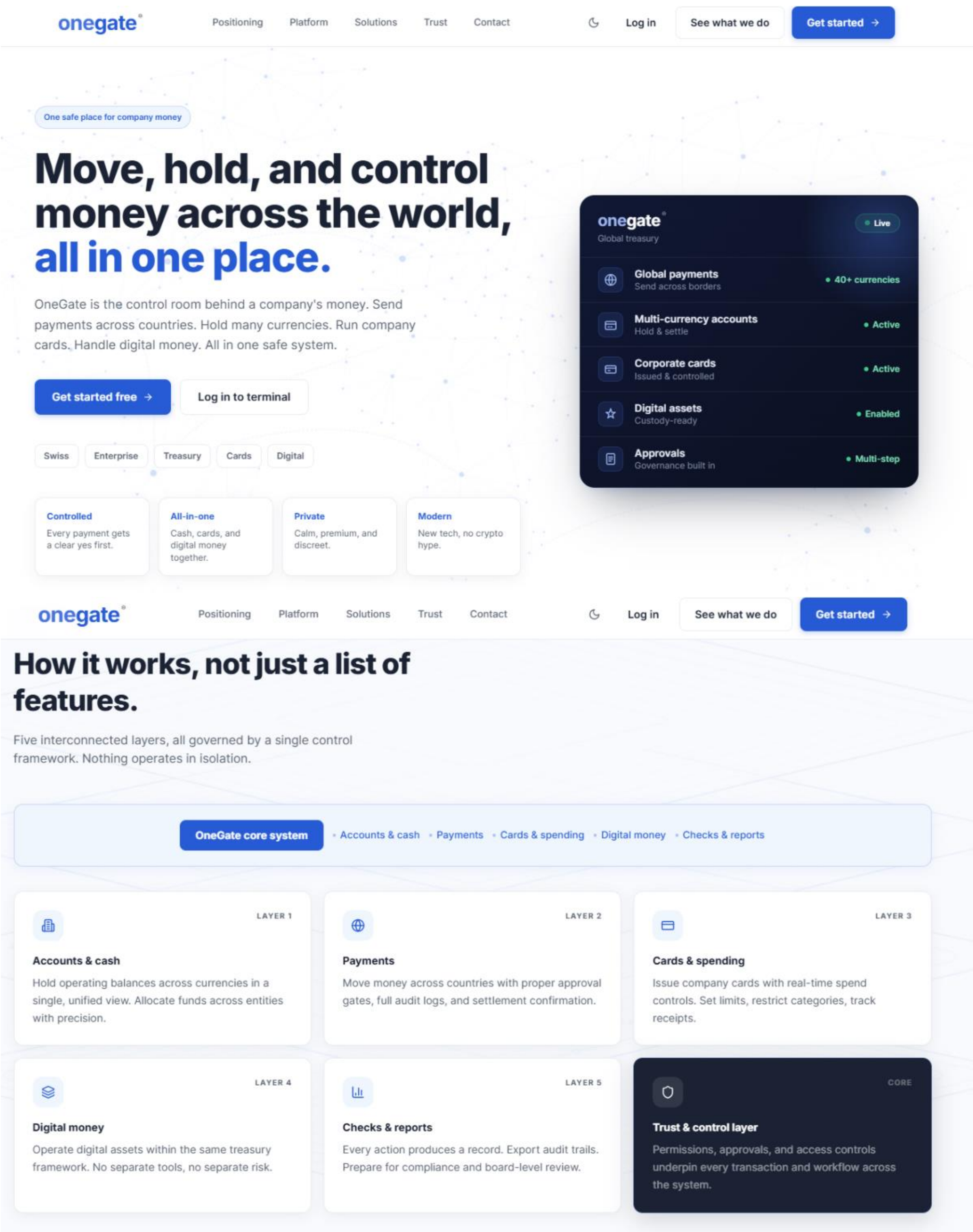


Fig 4: Screenshots of theonegate[.]com illustrating The OneGate s services, captured 20 August 2026. Source.

This network appears to have begun operating under The OneGate brand in or around April 2024.

What The OneGate characterises as a platform" is an integrated service offering built on a corporate network which has, at various points in its evolution, spanned at least seven different jurisdictions. These are:

- The OneGate Ltd (UK)
- The OneGate Inc (US - Delaware with Florida branch)
- Maple Digital Financial Solutions Ltd (Canada)
- Canneret s.r.o. (Czech Republic)
- The OneGate Sp.z.o.o. (Poland)
- The OneGate Capital AG (Switzerland)
- Leadtone Asia Limited (Hong Kong)

Each of these companies appears to play or have previously played a different role in The OneGate s operation, based on their respective licenses and jurisdictional regulations for offering financial services. For example, Canneret s.r.o. offered crypocurrency services while Leadtone Asia offers payment cards.

Splitting corporate structures across many jurisdictions has been a consistent strategy of the TGR network. This is a standard practice for many transnational criminal organisations, because crossing jurisdictional lines creates significant challenges for law enforcement agencies to investigate and take action against potential criminal activity.

Zvīgulis is or has been the registered director or equivalent officer for at least five of the seven companies linked to The OneGate s operations. These companies will be discussed in further detail in individual sections below.

4.1. EVOLUTION OF THE ONEGATE NETWORK

The domain theonegate[.]com was registered on 14 December 2022 using Whois privacy protection. This was after the creation of Maple Digital Financial Solutions (Maple Finance) as a company in 2019 in Canada and the maplefinance[.]ca domain in 2021, but before the acquisition or creation of the other companies in the network.

An archive from 13 March 2023 shows that at that time maplefinance[.]ca stated that The OneGate was a trading name of Maple Digital Financial Solutions Ltd. It offered the same services as Maple Finance was offering during the same period: cross-border money transfers, currency exchange, access to cash and IBAN accounts without needing to work through the banking system.

By the time of the next archive in April 2024 the site - and The OneGate s operations as a network - appear to have undergone major changes. The services remained largely the same, but the underlying corporate structure had expanded and diversified. The site at that time stated that:

The OneGate" is a trading name representing a consortium of companies. The financial products and services discussed or mentioned on this website are managed and offered by individual entities within this group. Each product or service mentioned herein is associated with a specific company within the group, responsible for its management, provision, and all related processes.

[...]

The OneGate platform allows you to access to the following financial services:

1) Multi-currency payment accounts and foreign exchange solutions provided by Maple Digital Financial Solutions Ltd, authorized and regulated by the Financial Transactions and Reports Analysis Centre of Canada (Ref No M19504222) and registered and operating under the Jurisdiction of incorporation within Provincial or Territorial (Canada): British Columbia with company registration number BC1220615.

2) Crypto wallets and cryptocurrency solution are provided by two companies Canneret s.r.o. a company registered in Czech Republic with a company registration number 09753087 and regulated by the Financial Analytical Unit (FAU) of the Czech Republic and The OneGate Capital AG, registered in Switzerland with a company registration number CHE-249.412.669.

3) Corporate and individual cards are provided by The OneGate Sp.z.o.o., a company registered in Poland with a company registration number 0000959787, authorized and regulated by the KNF.

Note: Canneret SRO doesn t promote products or services in the UK specifically. Canneret SRO s products or services are not available for UK resident individuals."

Maple Finance s registration with FINTRAC appears to have expired in August 2024 (this will be discussed further in the Maple Finance section). In January 2025, OneGate removed Maple Finance from the list of companies supplying products and services. The timing is one month after Operation Destabilise exposed TGR in December 2024. Maple Finance s FINTRAC registration appears to have since been reinstated and is current until 15 January 2027.

In February 2025 The OneGate s site ceased explicitly offering cryptocurrency services, and removed mentions of all individual companies other than The OneGate Capital AG from the site s footer and Terms and Conditions. This does not necessarily indicate that The OneGate is no longer making use of these companies; they may simply have decided not to continue publicly listing them.

According to its website, as of August 2026 The OneGate continues to offer multi-currency accounts, digital asset services and both physical and virtual payment cards which can be topped up via cryptocurrency. The site's Terms and Conditions as of April 2026 stated that the wallets are offered via the Swiss company The

OneGate Capital AG and the Visa payment cards are offered via the Hong Kong-registered Leadtone Asia Limited (both discussed in detail below).

The OneGate also has apps in the Apple and Android app stores. The Apple and Android app stores indicate bug fixes made to the app in July 2026, suggesting it is actively being maintained (Figure 5).

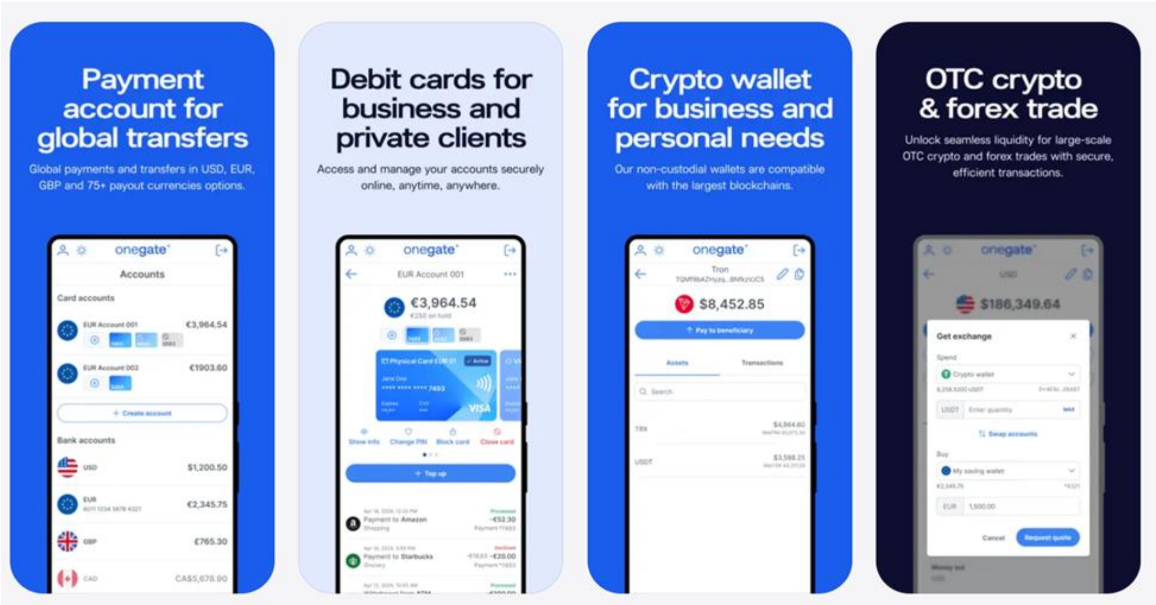


Fig 5: App screenshots from Apple app store. Source.

The OneGate does not list any pricing for its services. It does not appear to have any public facing social media presence beyond a LinkedIn profile, although it does have a Telegram account for technical support. As of 20 August 2026, the account appeared to have been recently in use (Figure 6). CIR was unable to find evidence of any efforts to advertise The OneGate or to build a widespread customer base.

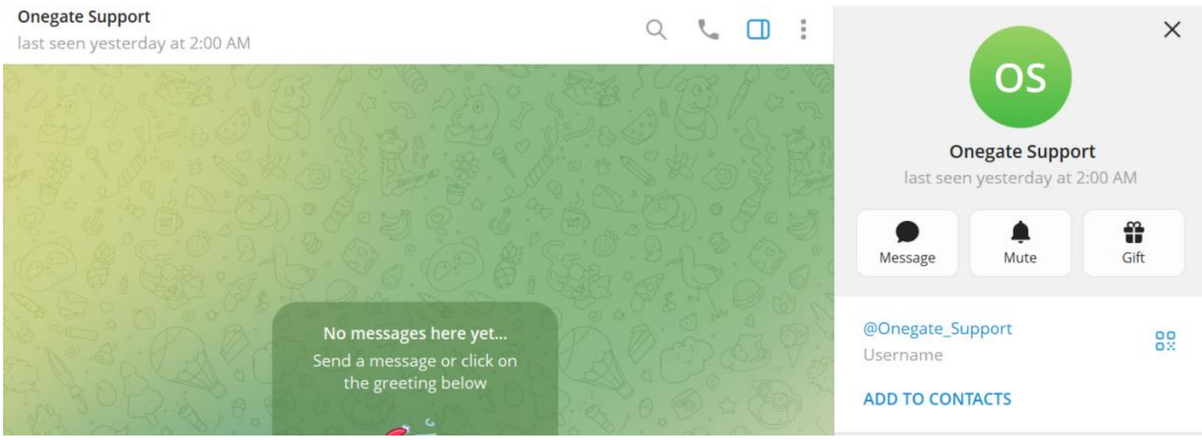


Fig 6: The OneGate support account (@Onegate_Support) on Telegram, captured 20 August 2026, showing recent activity.

5. THE ONEGATE COMPANIES

5.1. MAPLE DIGITAL FINANCIAL SOLUTIONS DBA MAPLE FINANCE (CANADA)

As mentioned above, Maple Finance appears to be the earliest of the companies in The OneGate s network to be integrated by TGR.

According to company records, the company was registered on 24 August 2019 to an address in Burnaby, British Columbia, and was originally named Fexcool Payments Ltd. Canadian Money Services Business Registry records show that it was registered on 28 August 2019 with the Canadian regulator FINTRAC for foreign exchange dealing, money transfer and dealing in virtual currencies (registration number M19504222). This registration appears to have expired in August 2024 but been reinstated and is currently (as of August 2026) listed as active until 15 January 2027.

CIR has not identified any connection between Fexcool Payments' original directors and TGR. On 2 February 2021, however, key TGR member Andrejs Carenoks was registered as the new director of the company. Notably TGR does have a history of buying pre-existing companies, especially those with useful financial licenses or regulatory approval. On 22 February, as noted above, maplefinance[.]ca was registered with Carenoks as the named individual Whois registrant and Fexcool Payments listed as the company registrant.

On 1 April 2021 Fexcool Payments' name was changed to Maple Digital Financial Solutions. On 4 August 2021, Carenoks was replaced as director by an individual named as "Mi Gen I", whom CIR has not identified. This person was later replaced by an Elen Kazarian/Ghazaryan (both spellings are used in the corporate records) who was replaced by Jānis Zvīgulis in February 2023.

As of August 2026, Maple Finance s current registered director is still Jānis Zvīgulis, whose listed address is in Riga, Latvia. The listed company address for Maple Finance (both on corporate records and on maplefinance[.]ca) is Suite 3000, 1055 Dunsmuir Street Vancouver. This is the address of the business legal firm Osler, Hoskin and Harcourt LLP. It is unclear whether Maple Finance has any physical office in Canada.

An archive of the site from September 2021 shows that at that time maplefinance[.]ca presented Maple Finance as a comprehensive cross-border money transfer service, stating that *At Maple Digital Financial Solutions we contribute to the global financial inclusion initiative through our modern digital payments solution, which provides users with a convenient and secure alternative to the traditional banking marketplace*."

Services offered included creating an IBAN account without needing to interact with a bank and sending and receiving transfers via different methods (Figure 7).

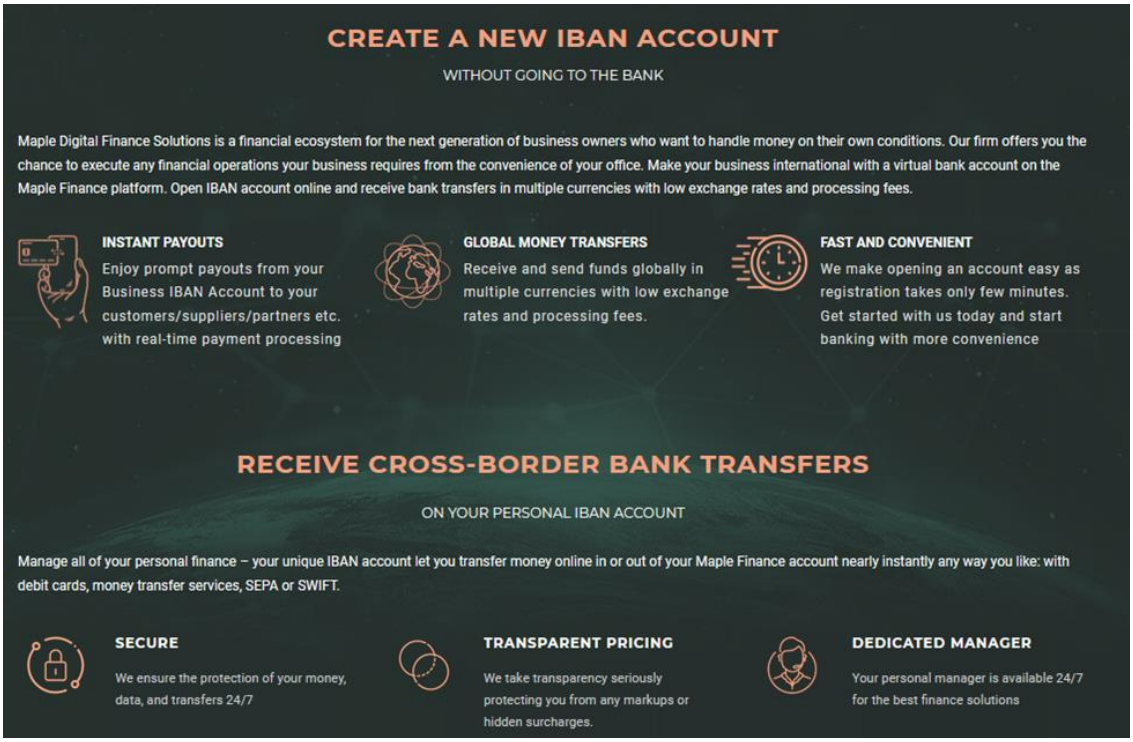


Fig 7: Screenshots of September 2021 archive of maplefinance[.]ca domain. Source.

In practice Maple Finance appears to have worked at least partially via third party and white-label service providers. As discussed above, initially the Maple Finance cards' were supplied by OneCard, which in turn was accessing Mastercard s network via the white-label card provider PFS.

The Sign In link on Maple Finance s website from 2021 to May 2024 funnelled users via the auth page for FX Press Payment Service (later PlutusFX and now called Finseta).[5] CIR has found no indication that this company is owned or controlled by the TGR network, and it is likely to be a third-party service provider. FX Press/Finseta offers a range of international payment solutions including partnerships and bespoke options. It is not clear exactly which services it provided to Maple Finance from 2021 to May 2024.

[5] The complete URL redirect was https://auth.api.**fxpress-payments.com**/auth/realms/plutusfx/protocol/openid-connect/auth?client_id=**ember-maple**&redirect_uri=https%3A%2F%2F**customer.app.maplefinance.ca**%2F&state=6bb76620-0a04-4266-92d0-956655bdcc24&response_mode=fragment&response_type=code&scope=openid&nonce=26c448d6-0362-4d49-841c-f6b1f545a025", highlighting added by CIR.

Between May and September 2024, based on intermittent archives, Maple Finance s site underwent a major redesign. This appears to have been linked to the creation of The OneGate network and Maple Finance s integration into it.

The 1 September 2024 archive of the site is the first to reference The OneGate, and its Sign In and Open Accounts buttons direct to the main OneGate domain theonegate[.]com. The site footer reads:

"*The OneGate is a trading name of Maple Digital Financial Solutions Ltd which is authorized and regulated by the Financial Transactions and Reports Analysis Centre of Canada (Ref No M19504222) and registered and operating under the Jurisdiction of incorporation within Provincial or Territorial (Canada): British Columbia with company registration number BC1220615.*"

5.2. THE ONEGATE CAPITAL AG (SWITZERLAND)

Based on Swiss company records, the company which became The OneGate Capital AG was founded in 2018, originally named HIG Capital AG, later Hilman Capital AG. It was registered to an address in Luzern, Switzerland. It was founded and directed by Israeli citizen Pavel Hilman, who ran it as a regulated asset management firm until it was *acquired by Theonegate.com*" according to his Crunchbase profile. As noted above, TGR has a history of purchasing existing companies with financial licenses or regulated status to integrate into their operations.

Swiss company records show that in February 2024 the company s name was changed to The OneGate Capital AG. In May 2024 records showing a change in the company s management were published, removing Hilman and replacing him with Jānis Zvīgulis as company president. The registered purpose of the company was changed to the *Provision of financial and consulting services, in particular in the areas of investment advice, risk management, financial consulting, business consulting and fiduciary services*." It created 100,000 shares valued at 1 CHF each; the owners of the shares are not publicly disclosed. As of April 2026 Jānis Zvīgulis remains the company president, based on the latest available Swiss company notification from July 2025.

As mentioned above, a major role of The OneGate Capital AG appears to provide the multi-currency wallets and foreign exchange services for the broader The OneGate service offering, according to its Product Terms and Information as of April 2026.

5.3. CANNERET S.R.O. (CZECH REPUBLIC)

Canneret was registered in the Czech Republic on 10 December 2020, owned by lawyers and financial consultants Rami and Ido Mashinsky via their Mashinsky Group s.r.o.

On 5 December 2023, Jānis Zvīgulis became the sole shareholder and owner of the company, according to company records. As of April 2026, the company remains active and owned by Zvīgulis, according to available records.

According to archives of theonegate[.]com, as discussed above, Canneret s key role between 2023 and at least January 2025 appears to have been to provide cryptocurrency wallets and *cryptocurrency solution*" [sic]. Specific references to Canneret were removed from the site as of January 2025.

As of August 2026, Canneret remains registered as active but it is unclear what if any role the company is currently playing in The OneGate.

5.4. THE ONEGATE LIMITED (UK)

The OneGate Limited was registered on 24 May 2023 to the address 5 Stratford Place in London, with Jānis Zvīgulis as the sole shareholder and director according to Companies House records. As of August 2026, the company remains active and remains owned and directed by Zvīgulis. On 31 March 2026 it filed financial statements for the financial year ending 31 May 2025, showing total assets of £2.27 million.

It is unclear from open sources whether the UK The OneGate Ltd provides a specific financial product or service directly to The OneGate customers, or whether it plays another role in The OneGate, and TGR s, broader operations. It does serve as the corporate owner for the Polish company The OneGate Sp.z.o.o (below). As noted above, the UK has been and continues to be a significant hub of operations for TGR and Maksakov.

5.5. THE ONEGATE SP.Z.O.O. (POLAND)

The company which later became The OneGate Sp.z.o.o. (KRS 0000959787) was registered on 15 March 2022 to an address in Warsaw, and was originally named Silvertip Pay sp. z o.o.[6] and its original director was Harijs Raubišķis. CIR has not identified any connection between Raubišķis and TGR.

Company records indicate that on 21 December 2022, Jānis Zvīgulis replaced Raubišķis as director and sole shareholder. On 24 April 2023, the company name

[6] Silvertip Pay, possibly also associated with companies under the name ABF Pay, appears to have been an international network of payment companies which may warrant further analysis.

was changed to The OneGate. On 11 January 2024, the UK company The OneGate Ltd became its sole shareholder. Again, this sequence of events appears to align with TGR's practice of acquiring existing companies with financial licenses. Between February 2024 and April 2025, Olga Bertosh was listed as a notified signatory for the company according to Polish company records (download 'Informacje pełne' PDF to see full records). CIR has found connections between Bertosh and Leadtone, another of the OneGate connected companies, and Novatum, which co-owns Leadone. See Section 5 on Novatum for more detail.

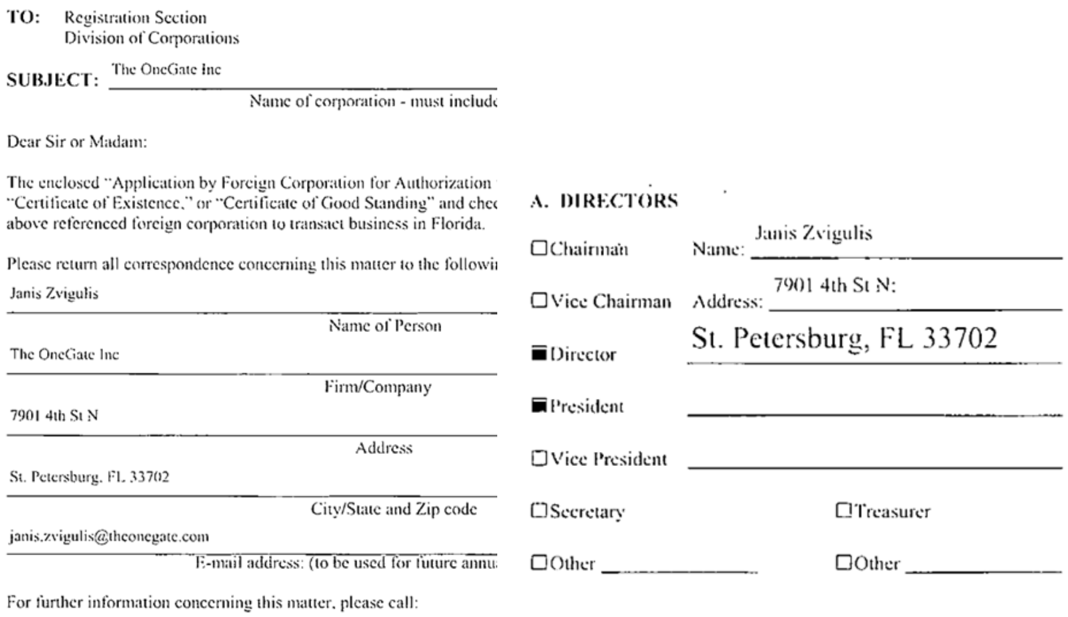
Zvīgulis remains as company director as of August 2026.

According to archives of theonegate[.]com, The OneGate Sp.z.o.o. s key role between 2023 and at least January 2025 appears to have been to supply debit cards. It most likely did this via a white label card service accessing MasterCard or Visa s network (similarly to OneCard and to Leadtone Asia) but CIR has not found evidence to indicate which service the company may have used at that time.

5.6. THE ONEGATE INC (US)

On 11 September 2024 The OneGate Inc (5054501) was registered in Delaware using the registered agent Corporation Service Company. Delaware does not hold public records of company shareholders and does not make information about registered directors or shareholders publicly available.

However, on 24 September The OneGate Inc also registered a branch in Florida. Company records for the Florida branch show Jānis Zvīgulis as the listed director, president and point of contact as of April 2026 (Figure 8).



TO: Registration Section
Division of Corporations

SUBJECT: The OneGate Inc
Name of corporation - must includ

Dear Sir or Madam:

The enclosed "Application by Foreign Corporation for Authorization "Certificate of Existence," or "Certificate of Good Standing" and chec above referenced foreign corporation to transact business in Florida.

Please return all correspondence concerning this matter to the followi

Janis Zvigulis
Name of Person

The OneGate Inc
Firm/Company

7901 4th St N
Address

St. Petersburg, FL 33702
City/State and Zip code

janis.zvigulis@theonegate.com
E-mail address: (to be used for future annu

For further information concerning this matter, please call:

A. DIRECTORS

☐ Chairman — Name: Janis Zvigulis
☐ Vice Chairman — Address: 7901 4th St N:
■ Director — St. Petersburg, FL 33702
■ President
☐ Vice President
☐ Secretary ☐ Treasurer
☐ Other ☐ Other

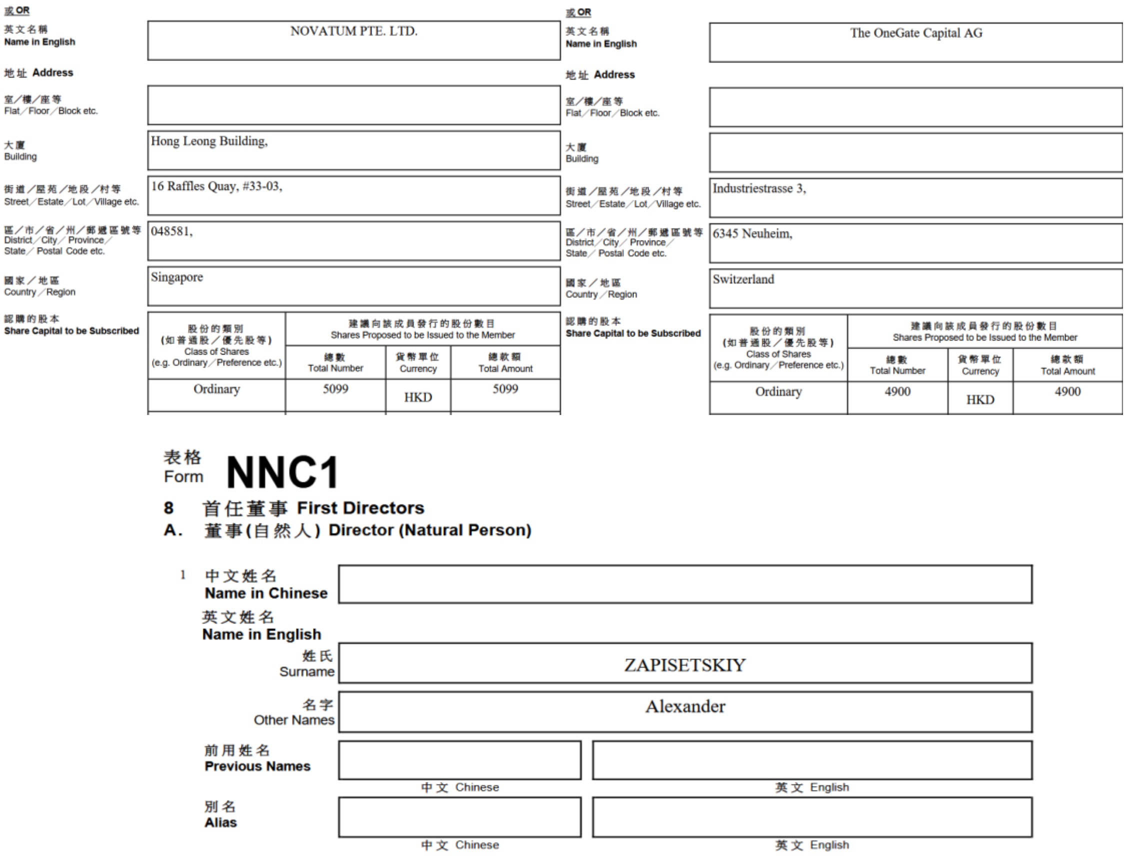
Fig 8: Screenshots from 24 September 2024 registration filing for Florida branch of Delaware company The OneGate Inc. Source.

The Florida branch was originally registered to the address 7901 4th St N, STE 300. St. Petersburg, Florida, which is the address of the company registration service [Florida Registered Agent LLC](). In April 2026 the Florida branch s address was changed to Suite 3000 1055 Dunsmuir Street Vancouver, BC. This is the same listed address used by Maple Finance, located in the offices of Canadian law firm, [Osler, Hoskin & Harcourt LLP](), as noted above.

It is unclear what role The OneGate Inc plays in the network, or why it was deemed necessary to have both a Delaware company *and* a Florida branch (as opposed to simply registering in one or the other).

5.7. LEADTONE ASIA LIMITED (HONG KONG)

Leadtone Asia Limited (Leadtone) was [registered]() on 23 May 2025 to a Hong Kong address owned by [Hawksford](), a corporate and business administration service. Hong Kong corporate records show that Leadtone Asia is 50.9% owned by Novatum PTE, a Singaporean company, and 49% owned by The OneGate AG (the remaining 0.1% is owned by P-Comsec Limited, a Hong Kong company linked to Hawksford, likely for administrative purposes). The registered director as of August 2026 Alexander Zapisetskiy, who is also the owner of Novatum PTE (see Section 5).



或 OR

英文名稱 Name in English	NOVATUM PTE. LTD.
地址 Address	
室／樓／座等 Flat／Floor／Block etc.	
大廈 Building	Hong Leong Building,
街道／屋苑／地段／村等 Street／Estate／Lot／Village etc.	16 Raffles Quay, #33-03,
區／市／省／州／郵遞區號等 District／City／Province／State／Postal Code etc.	048581,
國家／地區 Country／Region	Singapore

認購的股本 Share Capital to be Subscribed

股份的類別 (如普通股／優先股等) Class of Shares (e.g. Ordinary／Preference etc.)	建議向該成員發行的股份數目 Shares Proposed to be Issued to the Member 總數 Total Number	貨幣單位 Currency	總款額 Total Amount
Ordinary	5099	HKD	5099

或 OR

英文名稱 Name in English	The OneGate Capital AG
地址 Address	
室／樓／座等 Flat／Floor／Block etc.	
大廈 Building	
街道／屋苑／地段／村等 Street／Estate／Lot／Village etc.	Industriestrasse 3,
區／市／省／州／郵遞區號等 District／City／Province／State／Postal Code etc.	6345 Neuheim,
國家／地區 Country／Region	Switzerland

認購的股本 Share Capital to be Subscribed

股份的類別 (如普通股／優先股等) Class of Shares (e.g. Ordinary／Preference etc.)	建議向該成員發行的股份數目 Shares Proposed to be Issued to the Member 總數 Total Number	貨幣單位 Currency	總款額 Total Amount
Ordinary	4900	HKD	4900

表格 Form **NNC1**

8 首任董事 First Directors

A. 董事(自然人) Director (Natural Person)

1 中文姓名 Name in Chinese		
英文姓名 Name in English 姓氏 Surname	ZAPISETSKIY	
名字 Other Names	Alexander	
前用姓名 Previous Names	中文 Chinese	英文 English
別名 Alias	中文 Chinese	英文 English

Fig 9: Corporate records for Leadtone Asia Limited, dated 23 May 2025. With thanks to [Source Material]() for access to the records.

Unlike most of The OneGate s companies (with the exception of Maple Finance, which predated The OneGate) Leadtone has been developed as a corporate identity in its own right, including its own domain. Leadtonegroup[.]com was registered on 7 July 2025 using Whois privacy protections (leadtonegroup[.]online was registered on the same day through the same registrar, but is not in use as of August 2026).

As of August 2026, Leadtone s site presents Leadtone as *a technology platform [which] connects clients to licensed card and stablecoin infrastructure through a single API-driven interface*.”

A link in the homepage banner directs to a page advertising OneGate payment cards (Figure 10). The page states that *OneGate is a corporate Card programme operated by Leadtone for businesses in Hong Kong. Cards are issued by Reap Technologies Limited and made available to Authorised Users nominated by your Organisation through the Leadtone Platform. Cards run on the Visa® network*.”

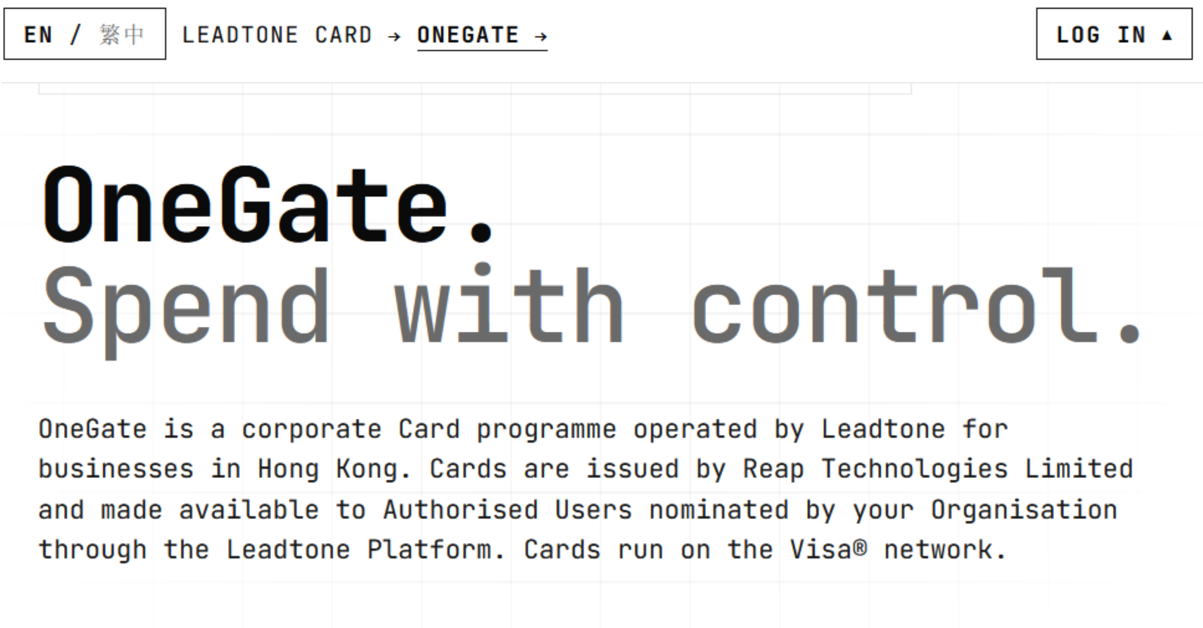


Fig 10: Screenshot of OneGate page on leadtonegroup.com, captured 21 August 2026. Source.

There are multiple connections between Leadtone and The OneGate which indicate that the operational infrastructure of the two entities is closely integrated. As of April 2026, The OneGate s Product Terms and Information s Cards section referred to Leadtone as the provider of its payment cards. Meanwhile the Cards section of Leadtone Group s Help Center referred to the OneGate card.

As of August 2026, the Business Log In option on leadtonegroup[.]com directs users to card[.]theonegate[.]com (Figure 11).

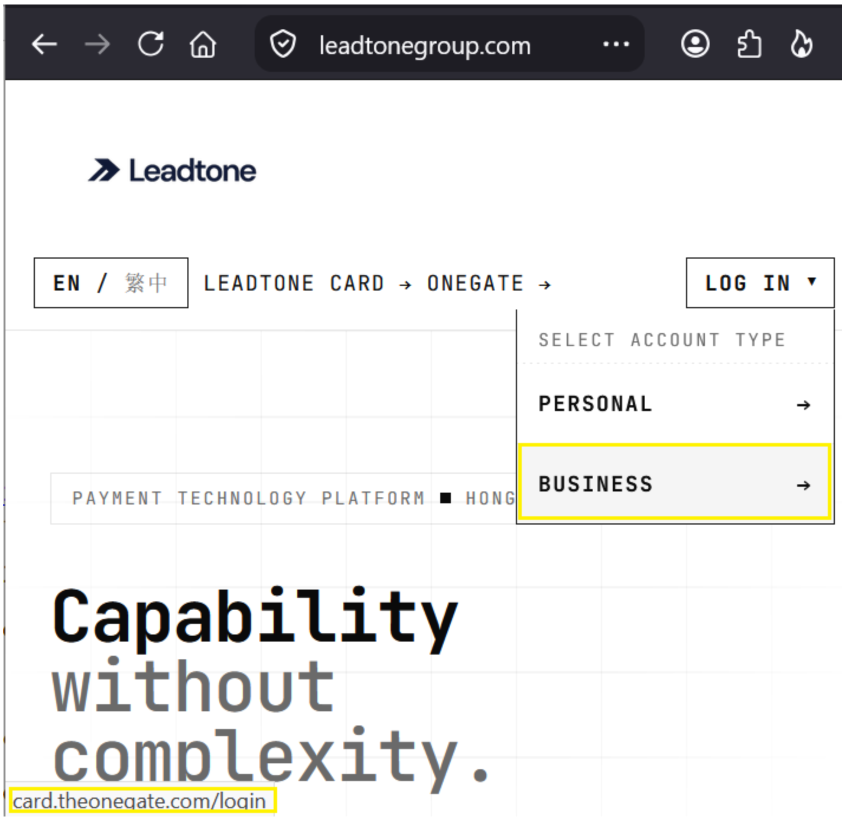


Fig 11: Screenshot from theonegate[.]com showing link via Business Log In button to card[.]theonegate[.]com, capured 21 August 2026. Source.

Card[.]theonegate[.]com s Terms and Conditions link in turn returns to leadtonegroup[.]com s Terms and Conditions as of August 2026. On Leadtone s own login portal the Leadtone logo is a hyperlink to theonegate[.]com (Figure 12).

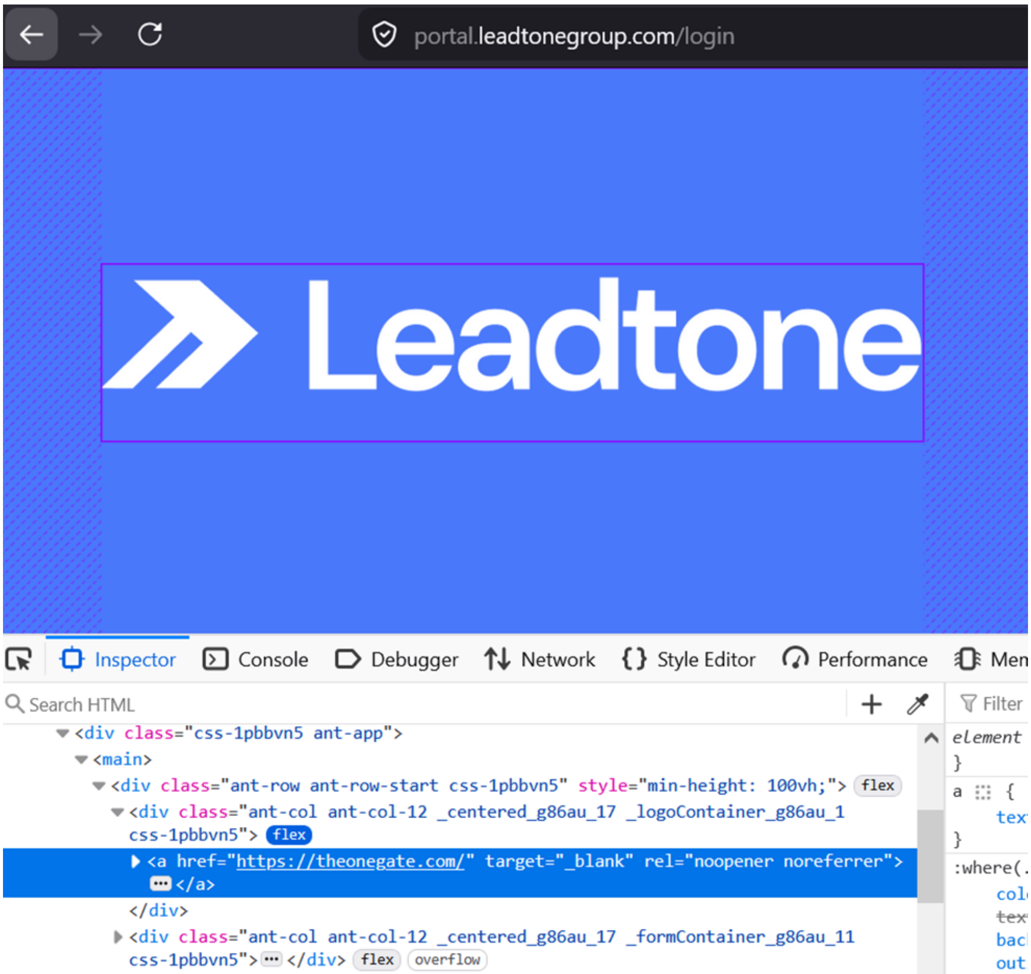


Fig 12: Screenshot of leadtonegroup[.]com s log in portal showing link to theonegate[.]com. Source.

In addition to The OneGate cards, Leadtone offers Leadtone cards , also provided via Reap Technologies, exclusively available to residents of Hong Kong. These cards can be topped up via USDC or USDT via an unnamed *licensed stablecoin infrastructure partner*."

PDF metadata in Leadtone s Privacy Policy, dated September 2025, cites the author as Olga Bertosh (Figure 13). This is the same name as the notified signatory for the Polish The OneGate Sp.z.o.o. between April 2024 and February 2025. See Section 5 on Novatum Tech for further notes on Bertosh.

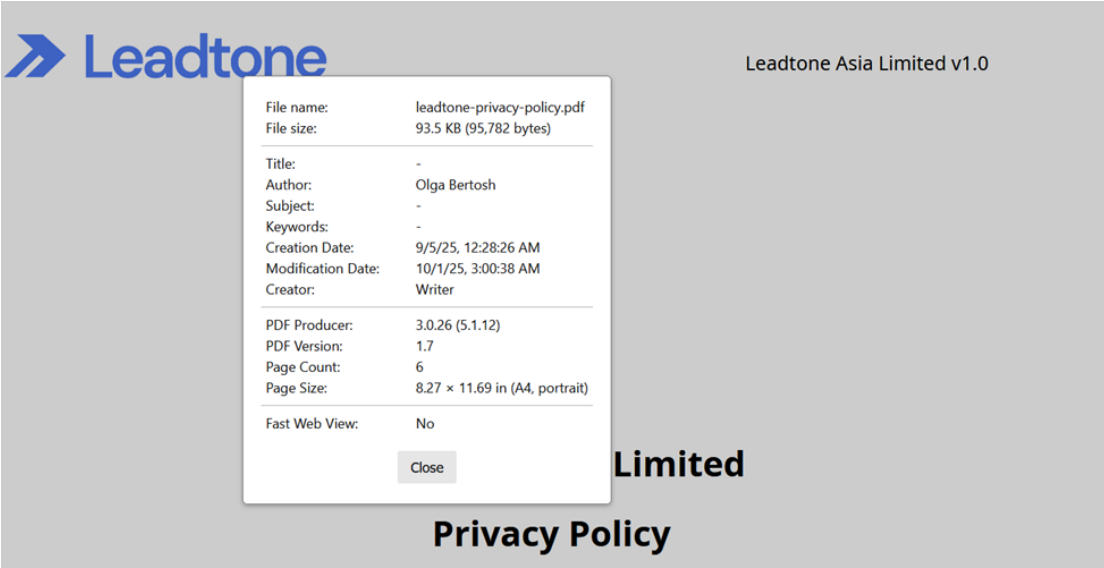


Fig 13: Leadtone Portal Privacy Policy PDF metadata. Source.

Leadtone s site and Terms and Conditions indicate that it accesses Visa s network via the white label payment card provider Reap Technologies (Reap). Reap is a Hong Kong-based company which offers corporate customers the ability to produce their own branded cards which can be topped up directly via the stablecoins USDT and USDC. Reap s cards operate on the Visa network via Visa s Business Payment Solutions Provider program. On LinkedIn the company describes its services as:

> *"Our card issuing API and white-labelling solutions enable businesses to swiftly launch their own branded card programs. Acting as the card producer, issuer, BIN sponsor, and distributor, we handle every aspect, allowing businesses to focus on their core expertise. [...] Reap Pay, our payout solution, facilitates effortless cross-border payments and settling of bank bills using preferred digital or fiat currencies, ensuring necessary bill payments are settled within one business day."*

CIR has not found any indication that Reap is connected to TGR, or is aware of Leadtone or OneGate's connections to TGR. It appears likely that Reap is a third-party service provider.

Leadtone s site takes pains to emphasise that it does not directly provide any regulated financial services or manage any transactions. On its homepage these disclaimers of responsibility include:

- *"Card issuance, payment processing and stablecoin custody are performed exclusively by licensed infrastructure partners under their own regulatory authorisations. Leadtone provides the platform layer — not the regulated service."*

- *"Leadtone holds no private keys. Controls no wallets. Handles no stablecoins. The private keys to every wallet in the top-up flow belong to the infrastructure partners. Leadtone provides the destination address — nothing more."*
- *"Leadtone connects clients to licensed card and stablecoin infrastructure through a single API-driven interface. The regulated layer is owned by licensed financial institutions — Leadtone owns the connection."*

Leadtone describes itself as a Co-Brand Partner" of Reap Technologies. It claims that its added value for customers is integrating Reap s services with the ability to make stablecoin settlements", writing *Regulated payment card infrastructure and stablecoin settlement are integrated into a single API-driven platform. Clients access both through Leadtone s technology — without managing two separate regulated relationships*."

As noted above, Leadtone does not publicly indicate which company is providing the stablecoin services. It simply states that *the wallet is operated by a licensed stablecoin infrastructure partner*." This partner is likewise not named in either the Terms and Conditions or Privacy Policy.

Leadtone does not publicly state any pricing information. As The OneGate network more broadly, it does not appear to have any social media presence and CIR has not identified any form of advertising or other public effort to engage a customer base. This is atypical for payments businesses, which normally advertise to attract clients.

6. NOVATUM NETWORK

CIR has identified leads linking The OneGate and a network of companies mostly branded Novatum . Further investigation is needed determine their significance and implications.

CIR has not identified any evidence of criminal wrongdoing by Novatum or any of the individuals associated with it. CIR has not identified evidence indicating that owners, directors or employees in the Novatum network named below are aware of The OneGate s links to TGR or of the alleged criminal elements of TGR s operations.

6.1. LINKS TO THE ONEGATE

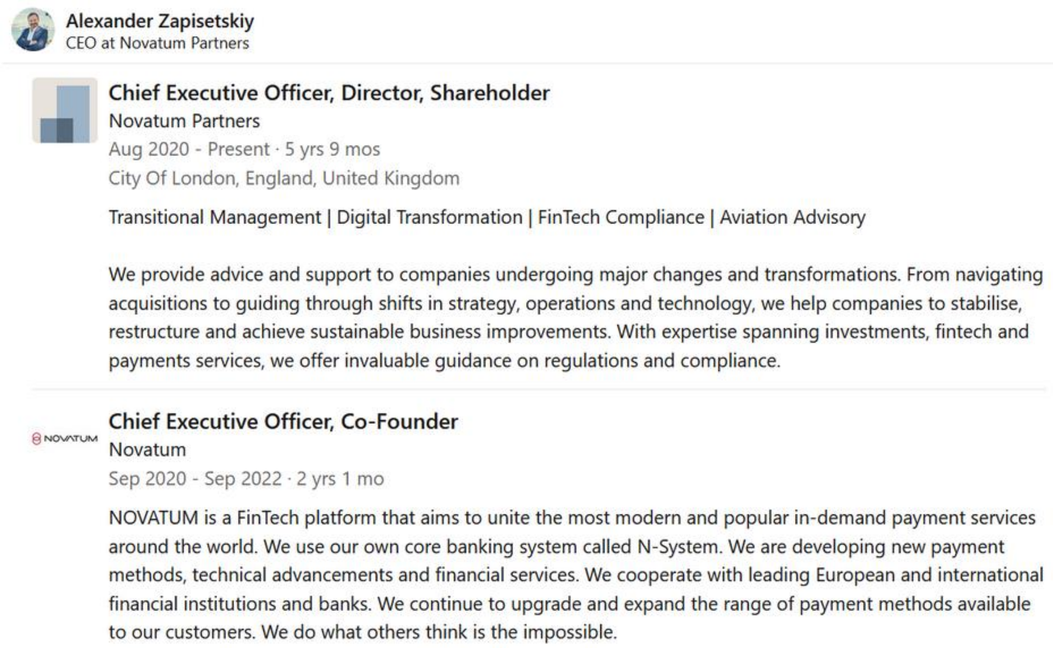
As discussed above, Novatum PTE in Singapore co-owns Leadtone Asia Limited with The OneGate AG. Leadtone is also directed by Alexander Zapisetskiy, who is the registered owner of Novatum PTE according to Sayari records.

As of August 2026, Zapisetskiy lists his role on LinkedIn as CEO of Novatum Tech, a UK registered fintech company discussed below. He is a Russian-born pilot and aviation entrepreneur. Zapisetskiy was previously CEO of Master Communication (Мастер-Связь), a St. Petersburg company which created a card payment system for internet services according to a Kommersant article from 2002.

He then lived in New Zealand for an extended period beginning around 2005, during which time he appears to have gained New Zealand nationality (based on Companies House records which list his nationality as New Zealander'). New Zealand company records show that Zapisetskiy was owner and/or director of multiple companies during this time.

Three are of particular note due to the name similarities with Leadtone Asia: Leadtone Limited, Leadtone Trading Limited and Leadtone Holdings Limited (later renamed The First Light Export Import Limited). These companies are all now deregistered.

In 2019, Zapisetskiy appears to have relocated from New Zealand to London, based on social media posts (Figure 14).


Alexander Zapisetskiy
CEO at Novatum Partners

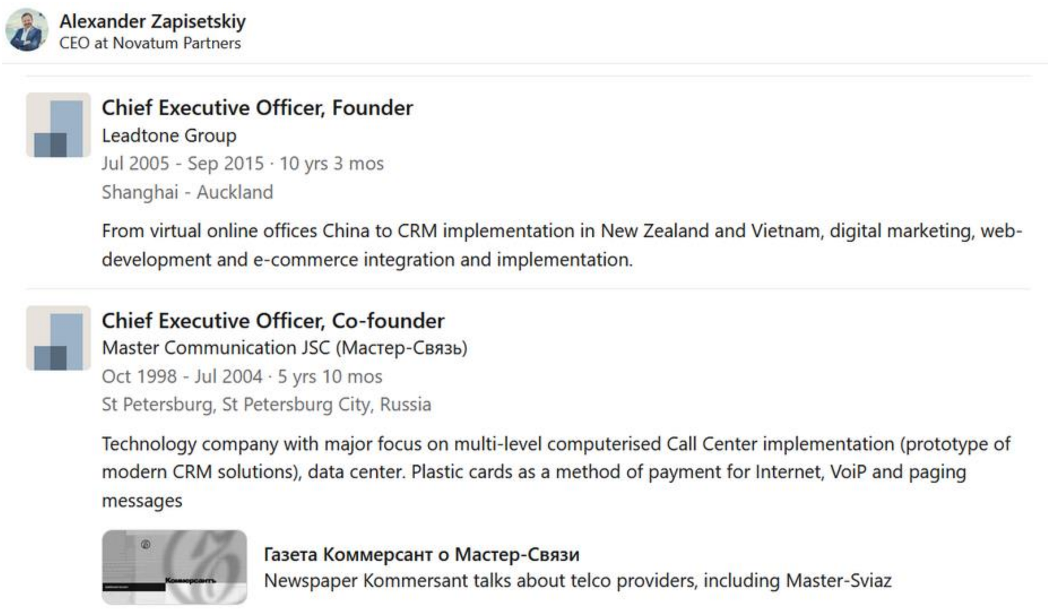
Chief Executive Officer, Director, Shareholder
Novatum Partners
Aug 2020 - Present · 5 yrs 9 mos
City Of London, England, United Kingdom

Transitional Management | Digital Transformation | FinTech Compliance | Aviation Advisory

We provide advice and support to companies undergoing major changes and transformations. From navigating acquisitions to guiding through shifts in strategy, operations and technology, we help companies to stabilise, restructure and achieve sustainable business improvements. With expertise spanning investments, fintech and payments services, we offer invaluable guidance on regulations and compliance.

Chief Executive Officer, Co-Founder
Novatum
Sep 2020 - Sep 2022 · 2 yrs 1 mo

NOVATUM is a FinTech platform that aims to unite the most modern and popular in-demand payment services around the world. We use our own core banking system called N-System. We are developing new payment methods, technical advancements and financial services. We cooperate with leading European and international financial institutions and banks. We continue to upgrade and expand the range of payment methods available to our customers. We do what others think is the impossible.



Alexander Zapisetskiy
CEO at Novatum Partners

Chief Executive Officer, Founder
Leadtone Group
Jul 2005 - Sep 2015 · 10 yrs 3 mos
Shanghai - Auckland

From virtual online offices China to CRM implementation in New Zealand and Vietnam, digital marketing, web-development and e-commerce integration and implementation.

Chief Executive Officer, Co-founder
Master Communication JSC (Мастер-Связь)
Oct 1998 - Jul 2004 · 5 yrs 10 mos
St Petersburg, St Petersburg City, Russia

Technology company with major focus on multi-level computerised Call Center implementation (prototype of modern CRM solutions), data center. Plastic cards as a method of payment for Internet, VoiP and paging messages

Газета Коммерсант о Мастер-Связи
Newspaper Kommersant talks about telco providers, including Master-Sviaz

Fig 14: Partial screenshots of Zapisetskiy s LinkedIn profile, captured 23 April 2026.

Among Zapisetskiy's 101 Instagram followers as of August 2026 are TGR s Elena Chirkinyan; Jānis Zvīgulis; former TGR employee and current The OneGate COO Anastasia Bezuglaya; and Olga Bertosh (he does not appear to follow any of them back).

There are other apparent links between the Novatum and OneGate networks.

As noted above, a person named Olga Bertosh was a notified signatory for the Polish The OneGate Sp.z.o.o. between April 2024 and February 2025 and appears to have authored Leadtone s Privacy Policy in September 2025, based on PDF metadata.

PDF metadata from theonegate[.]com s list of Prohibited Countries & Transactions shows that the document was authored by Liza Sadova or Sadovaya (written Liza Sadova Садовая") in July 2025 (Figure 15).

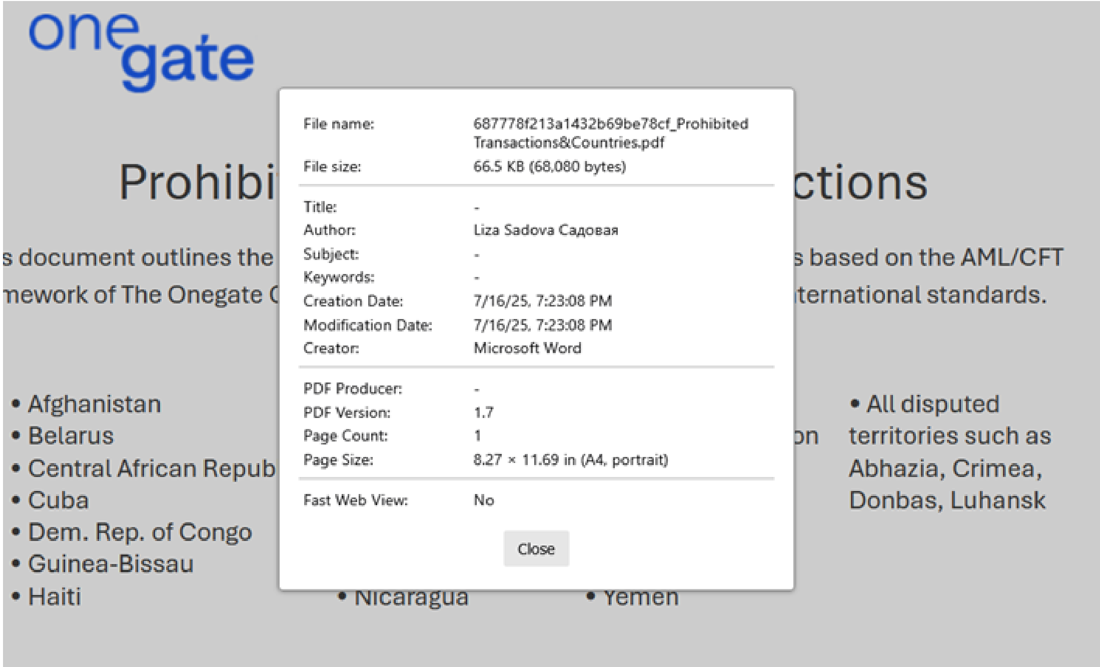


Figure 15: PDF metadata showing "Liza Sadova Садовая" as the author of theonegate[.]com's list of Prohibited Countries & Transactions

Both an Olga Bertosh and a Liza Sadova appear to have worked for the Novatum network during those periods in 2024 and 2025 when documents link them to OneGate.

Bertosh s LinkedIn account lists her current role as Chief Financial Officer and Partner at Novatum since 2020. The same birth date is used for both the Olga Bertosh listed in The OneGate sp.z.o.o. s company records and for the Olga Bertosh associated with Novatum, based on UK company records for SHF Compliance (see below). Based on this, it seems reasonable to conclude these are highly likely to be the same individual. This means that Bertosh would have been working for Novatum during the period in 2024-2025 in which she was also a signatory for The OneGate in Poland, as well as in September 2025 when she apparently authored Leadtone s Privacy Policy.

Liza Sadova s LinkedIn account (notably, the URL indicates her name may originally have been transliterated as Sadovaya) lists her current position as Head of Public Relations and Editor of Website at Novatum since June 2022. This means she would have been working for Novatum during the time The OneGate s Prohibited Countries & Transactions document was authored by someone of the same name.

One of the five employees listed working for The OneGate on LinkedIn, Head of Compliance Steven Fuse, lists his previous job as VP of International Development for Novatum, including a period of four months overlap between his Novatum and The OneGate roles (Figure 16).

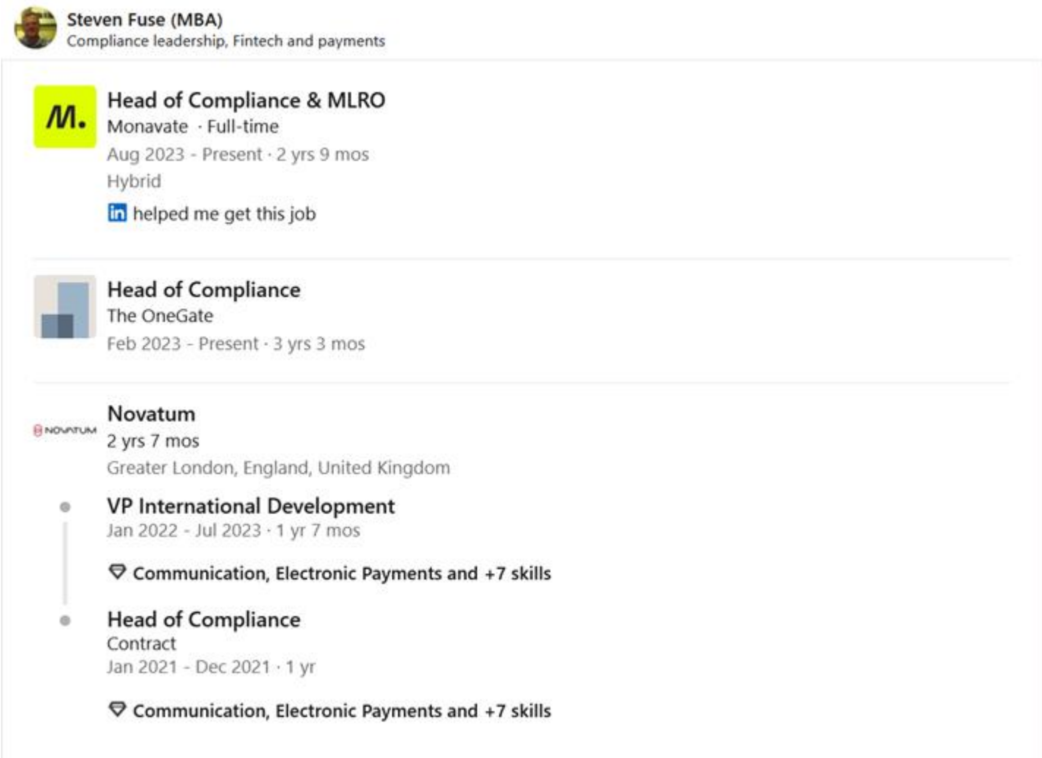


Fig 16: Screenshot of Steven Fuse s LinkedIn profile, captured 23 April 2026.

Fuse, whose initials are SHF, was previously the owner and director of SHF Compliance. As of March 2026, SHF Compliance is 50% owned by Novatum CEO Alexander Zapisetskiy and 25% owned by Bertosh (with the same birthdate as used on the Polish The OneGate sp.z.o.o.) and Aleksandr Bobreshov respectively, according to Companies House records.

The Novatum Partners' domain copyright notice cites *Novatum PTE Limited and SHF Compliance Limited'*. Novatum PTE Ltd is a Singaporean company 100% owned by Zapisetskiy, according to Sayari records. Novatum PTE and other related companies are briefly discussed in the section below.

6.2. NOVATUM/NOVATUM PARTNERS/NOVATUM TECH

A first-pass assessment has identified at least five companies which it appears constitute a network referred to here as the Novatum network'. More time would be needed to confirm these connections; establish the nature of the links between the companies; determine which are currently actively involved in Novatum s operations; and review connections to The OneGate and TGR more broadly.

The companies are:

1. Novatum Tech (UK)
    a. FinCause UAB (Lithuania)

2. Novatum Inc (US) (US)
3. Novatum PTE (Singapore)
4. Novatum BV (Netherlands)
5. Novatum Vit (registered in Belarus, apparent presence in Russia, Cyprus, Turkey)

The below sections contain brief initial overviews of the companies.

6.2.1. NOVATUM TECH (UK)

According to Companies House records, Novatum Tech was registered in August 2019. It was initially owned (from October 2019 onwards) by Sergei Zhirikhin and Andrei Boulgakov. Both appear to be Russian-origin financial services professionals and have listed themselves as Israeli nationals in the Novatum Tech company documents. Zhirikhin is a former CEO of WireCapital, and is linked to multiple other fintech, tech and payment companies. Boulgakov appears to currently be the director of Indian-based fintech Enovate.

In November and December 2020, Zhirikhin was replaced as a Person of Significant Control by Vikzu Limited, an investor company owned by Iurii Zubarovskii (who appears to use multiple transliterations of his name, including Yury Zubarovskiy) and Viktoriia Zubarovskaia, also both listed as Israeli citizens.

Zubarovskii was also appointed as a company director during this period, as was Alexander Zapisetskiy (who does not appear to have ever held an ownership stake in the company). Zapisetskiy was removed as a registered director in September 2022. He continues to list himself as CEO of Novatum Partners" on his LinkedIn profile. Novatum Partners" does have a website, but CIR was unable to identify any registered company of this specific name; rather, Novatum Partners appears to be a partnership between Novatum PTE and SHF Compliance (both discussed below).

As of August 2026 the current registered directors are Inga Poskiene, Alice Semeniouk and Olga Zhukova, all of whom are listed as Novatum employees on LinkedIn. The sole shareholder is DigitalMethod Tech Limited, which lists its Person of Significant Control as Yelyzaveta Ovdeyenko, a Ukrainian resident in Israel. The company appears to itself be a fintech payments company, going by the trading name Digimeth.

In the Capital Commitments section of Novatum Tech s financial accounts made up to December 2025, filed with Companies House in April 2026, there is a reference to a subsidiary Novatum Inc as waiving debt owed to the UK company. It also notes the purchase of *remaining 91% shares in Fincause UAB*." Fincause UAB appears to be a licensed payments business in Lithuania.

6.2.2. NOVATUM INC (US)

Novatum Inc (6920802) is an American company registered in Delaware on 19 July 2022. Similarly to The OneGate Inc, it has both a Delaware company - about which very little information is available due to jurisdictional regulations - and a Florida branch. As of April 2026, the Florida branch appears to be inactive due to failing to provide annual reports. The Delaware company itself appears to remain active.

In the initial Florida filing, the registered directors were listed as Steven Fuse (discussed above, now linked to The OneGate) and Vukasin Zizic. Olga Bertosh (discussed above, now linked to The OneGate) was added as director shortly after. In November 2022, Fuse, Bertosh and Zizic were all removed and replaced by Iurii Zubarovskii (who, as discussed above, is connected to the UK Novatum Tech company)(Figure 17).

Title/ Capacity	Name	Address	Type of Action
D/P	Vukasin Zizic	915 HELENA DRIVE	Add
		LAKE WORTH, FL 33461-3134	▪ Remove
D	Steven Fuse	9 AUDEN CLOSE MOMMOUTH	Add
		EN NP25-3NW UK	▪ Remove
D	Olga Bertosh	2054 VISTA PARKWAY	Add
		WEST PALM BEACH, FL 33411	▪ Remove
D/P	Iurii Zubarovskii	2054 VISTA PARKWAY, SUITE 400	▪ Add
		WEST PALM BEACH, FL 33411	Remove

Fig 17:: Florida company filing for Novatum Inc, 21 November 2022. Source.

6.2.3. NOVATUM PTE (SINGAPORE)

As of April 2026 the novatum[.]partners domain lists Novatum PTE, not Novatum Tech Ltd, in its copyright notice.

Novatum PTE is a Singaporean company registered 26 June 2020. According to Sayari records, since 12 January 2022 it is 100% owned by Alexander Zapisetskiy.

Zapisetskiy is a former director for the UK Novatum Tech and lists his current role on LinkedIn as CEO of Novatum Partners”, as discussed above.

Also as noted above, as of August 2026 Novatum PTE co-owns Leadtone Asia along with The OneGate SA. Zapisetskiy is Leadtone Asia s registered director.

6.2.4. NOVATUM B.V. (NETHERLANDS)

Novatum B.V. was registered to an address in Amsterdam on 22 November 2021. According to Sayari records, it is 100% owned by Novatum Tech Ltd; its listed directors are Iurii Zubarovskii and Alice Semeniouk, a Novatum Tech employee and current registered director of Novatum Tech, as of June 2026.

Its website is almost identical to the Novatum Tech UK website, including the legal disclaimer in the site footer which refers to Novatum Tech and a direct link to portal[.]novatumtech[.]uk.

Notably, both sites claim to be MasterCard Principal program members (Figure 18).

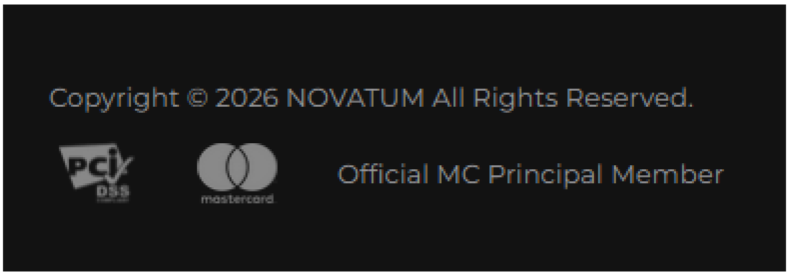


Fig 18: Footer from novatumtech[.]nl, captured 28 April 2026.

Sergei Zhirikhin lists his current role as CEO of Novatum B.V. on LinkedIn as of April 2026.

6.2.5. NOVATUM VIT (BELARUS)

Novatum Vit LLC (ООО Новатум Вит) was registered to an address in Minsk in September 2018. Several pieces of evidence suggest it is part of the Novatum network under consideration here and that it offers to facilitate the shipment of goods from Europe to Russia and Belarus in the face of sanctions.

For example, in its profile on the Russophone recruiting site HeadHunter, the company s About section states that *Novatum Vit LLC is an enterprise part of the fintech holding headquartered in London, UK. The main activities of the holding are Internet acquiring and money transfers. The Belarusian subsidiary is responsible for working with clients and legalizing existing business processes.*”

The logo matches that used on a Facebook page for Novatum B.V. That page lists the domain novatum[.]me, is also the domain used on the HeadHunter profile. An archive of [novatum[.]me]() appears to indicate that it belonged to the UK Novatum Tech Limited. VirusTotal records show it used the same IP address concurrently with [novatum[.]uk](), the predecessor to novatumtech[.]uk; based on partial archives of novatum[.]me it appears the sites content may have been more or less exact mirrors (Figure 19).

Passive DNS Replication (10)

Date resolved	Detections	Resolver	Domain
2022-06-27	0 / 91	VirusTotal	api-docs-staging.novatum.me
2022-06-27	0 / 91	VirusTotal	admin-staging.novatum.me
2022-06-27	0 / 91	VirusTotal	staging.novatum.me
2022-06-27	0 / 91	VirusTotal	api-guide-staging.novatum.uk
2022-06-27	0 / 91	VirusTotal	api-docs-staging.novatum.uk
2022-06-27	0 / 91	VirusTotal	staging.novatum.uk
2022-06-27	0 / 91	VirusTotal	merch-staging.novatum.me
2022-06-27	0 / 91	VirusTotal	merch-staging.novatum.uk
2022-06-27	0 / 91	VirusTotal	notification-staging.novatum.uk
2022-06-27	0 / 91	VirusTotal	admin-staging.novatum.uk

Fig 19: Screenshot of VirusTotal records for IP 79.125.47.133.

ContactOut, a website which collates LinkedIn and other recruiting data, lists [Alexander Zapisetskiy]() s email address as as alexander.zapisetskiy@novatum[.]me.

A profile for [Novatum UK]()" on Habr, a Russian-language site for IT job advertisements, lists Novatum Tech s UK address and Financial Conduct Authority registration number 916677 and gives the novatum[.]me URL as its web address (Figure 20). The ad is written in English, despite it being a Russian-language site.

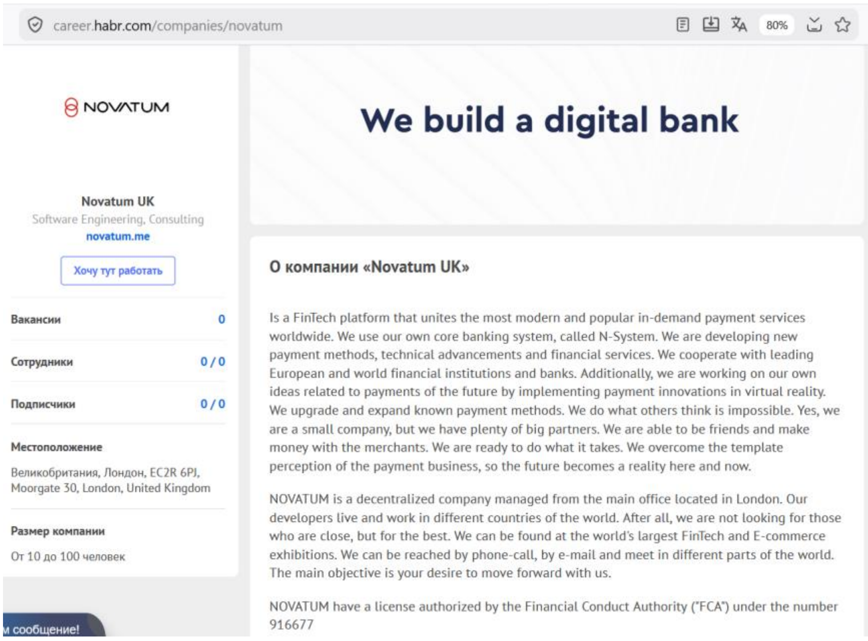


Fig 20: Profile for Novatum UK on Habr, captured 29 April 2026. [Source]().

In 2021 two job ads for software engineers were posted on Habr via the Novatum UK profile to work remotely with the possibility of later moving to the UK.

Both ads explicitly named Novatum Tech Ltd and described the roles as involving *joining a team of 10 software engineers working on core-banking and web-banking platforms. On top of that, we provide systems integration services to our clients with a variety of digital platforms and third party suppliers. Your team members are physically based in the UK, Russia and APAC regions*." [auto-translated from Russian].

While Novatum Vit appears to have had a presence in Minsk, one archived vacancy posted by Novatum Vit in 2021 shows the company recruiting a Sales Manager to work remotely for the London company from Limassol in Cyprus. No Novatum branded company has been identified in Cyprus. Iurii and Viktoria Zubarovskiy do own a company named The OnePrime Group registered in Cyprus in 2021, but it is unclear whether this is connected to either Novatum or The OneGate.

Novatum Vit also posted jobs for a Financial Operator and an International Lawyer (prepared to undertake trips to the UAE and ideally with experience working in the UAE, knowledge of German an advantage) based in Russia.

Novatum Vit appears to be more than just a fintech company. It also offers full-service assistance with shipping goods from Europe to Russia and Belarus in the face of sanctions.

The site растаможка[.]бел (растаможка means customs clearance) appears to belong to Novatum Vit. The site footer includes a copyright notice and Belarusian company registration number, Novatum Vit LLC UNP 193143103", confirming this is the same Novatum Vit discussed above. The supplied contact email is novatymvit@gmail[.]com.[7]

The site promises

"*Cargo transportation from Europe to Russia and Belarus with customs clearance of goods and cargo. We not only provide road freight transportation services from Turkey to Russia and Belarus. We provide comprehensive support for the delivery of goods to the Republic of Belarus and the Russian Federation, and help prepare a complete list of accompanying documents, allowing you to legally and smoothly complete all necessary customs clearance procedures and subsequent sale of goods in your country.*" [auto-translated from Russian].

[7] The telephone number +375296636803 appears to be linked to at least two footwear businesses in Belarus, Shoes Land and Scorpione; this appears to align with import records for Novatum Vit for multiple shipments of footwear from Turkey.

The site further states that

"*Recent trade changes and restrictions affecting the Russian Federation and the Republic of Belarus have altered the routes and methods of delivery and cargo clearance necessary for the normal operation of retail in these countries. After developing successful cases for the road transport of cargo that was impossible to deliver into the country using traditional logistics methods, we began working in a new way, offering our transportation and customs clearance services to retail chains and small businesses in Belarus and Russia.*" [auto-translated from Russian].

This appears to be an oblique reference to sanctions imposed on Russia and Belarus following the full-scale invasion of Ukraine in 2022. Novatum Vit appears to be promising to evade those sanctions for cargo which is *impossible to deliver into the country*" by working in *a new way*." The site offers a full suite of services to achieve that end, including supplying documentation and even posing as the importer (Figure 21).

CIR has not identified evidence proving that Novatum Vit has committed sanctions evasion as of the time of writing; further time for investigation would be warranted to determine whether this is the case.

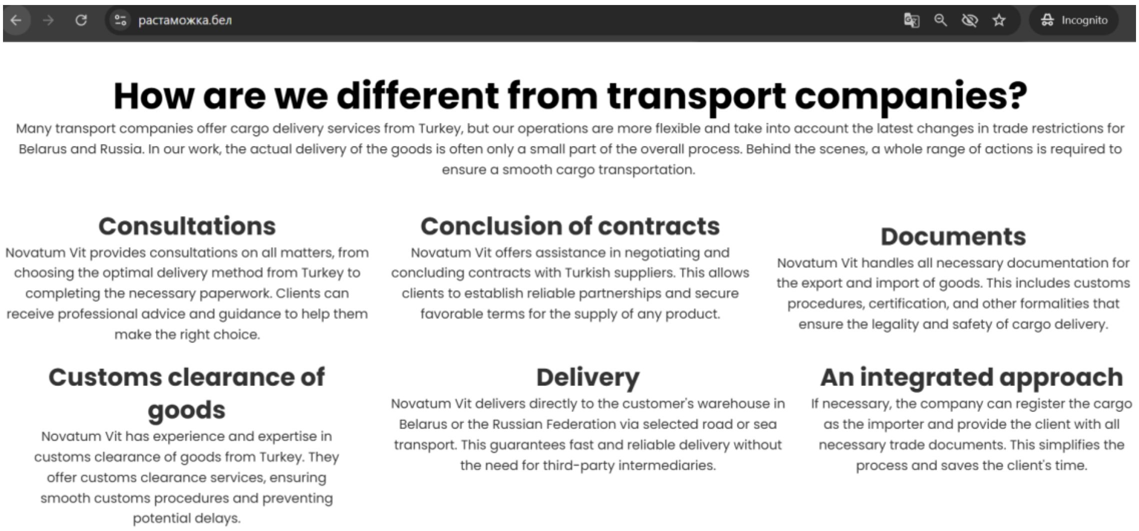


Fig 21: Screenshot of растаможка[.]бел, auto-translated via Google Chrome, captured 29 April 2026. Source.

The NCA s investigation into TGR has found that sanctions evasion forms a part of their operations.

The crossover of multiple individuals between The OneGate/Leadtone and Novatum and Zapisetskiy s role as director of Leadtone Asia appear to reflect a connection between Novatum and The OneGate. However, further investigation would be needed to establish the circumstances surrounding these leads and the nature of the link between the two networks.

As noted above, CIR is not suggesting any wrongdoing by any of the companies and individuals named in this investigation. CIR is using open-source information to illustrate the corporate networks related to The OneGate, including via shared personnel and ownership interests.

7. DISCUSSION

Moving money across borders in ways which avoid the traditional banking system and/or obscure the visibility of transactions to financial authorities and law enforcement is a core part of TGR s service offering to its clients, according to the NCA and OFAC. Over many years TGR has developed and refined a highly diversified strategy for cross-border transactions, including via cryptocurrency and payment cards.

The OneGate appears to represent a more sophisticated evolution of earlier TGR entities such as Onecard and One Remit. The strategy of acquiring companies with pre-existing financial licenses is likely easier and faster than launching a new financial services company.

The Maple Finance, The OneGate and Leadtone websites give the appearance of normal, legitimate fintech businesss, and provide an interface for clients. However, the lack of advertising to find a broad customer base suggests they have other means of finding clientele.

CIR has not identified open source evidence of wrongdoing by The OneGate or associated individuals. As noted throughout the report, CIR has not found and does not suggest any evidence of criminal activity by the companies and individuals named in this investigation.

The limitations of open-source investigation mean that significant questions remain to be answered. It is not possible to determine based on open sources how much money may have moved through The OneGate s platform, nor is it possible to identify clients, owners and shareholders for all the relevant companies due to local regulations in some jurisdictions. This obviously would be a key question for any future investigations.

What can be said, however, is that the entities operating The OneGate have invested substantially in their network, acquiring multiple companies and hiring employees. They have run and grown the network for at least five years, starting with Maple Finance, which suggests a return on the investment.

One lingering question is what purpose each of the companies fulfill in the network. In some cases, it seems evident that a company provides a specific product or service, for example Canneret provided cryptocurrency services, Leadtone provides payment cards and so on. In other instances, however, it is less clear. Why does The OneGate need a Delaware company, and why does that Delaware company need a Florida branch? What role does the UK-registered The OneGate Limited play?

Another remaining question is the full picture of who is currently running The OneGate as of April 2026. Jānis Zvīgulis s name is on every company where it has been possible to identify directors and/or shareholders via open sources, but it seems evident that The OneGate at least began as an integrated TGR project run at least partially out of TGR s European offices by a team of people. It remains to be determined how Operation Destabilise s disruption of the network may have impacted The OneGate specifically, and whether TGR s employees are continuing to operate the service.