

Date of Review	12/06/2011
Date Alert Generated	12/03/2011
Decision:	Escalated
Customer ID:	111222
Customer Name:	GHJ Equipment
Account:	362066000
Analyst:	Dan Gormly
Alert ID	22239

Comment [1]: Concise table summaries key data, in particular the date the alert was generated, when the review was completed and the decision of the analyst.

INTRODUCTION:

Alert Advisory generated an alert on account 362066000 for wire transactions involving a High Risk country conducted in August 2011.

Comment [2]: Clearly state the source and reason for the alert.

ALERTED TRANSACTION(S):

Date	Amount	Dir	Originator	Beneficiary	Country	Sender
11/21/11	\$9,974.00	I	SAMUEL OKPARA EMMANUEL	GHJ EQUIPMENT	NG	BUSINESS
11/21/11	\$9,974.00	I	ALVAN BUHARI INTERNATIONAL LIMITED	GHJ EQUIPMENT	NG	BUSINESS
11/21/11	\$9,974.00	I	D AND D RAVENS DIVINE LIMITED	GHJ EQUIPMENT	NG	BUSINESS
11/21/11	\$9,974.00	I	LUCH ULYT NIGERIA LIMITED	GHJ EQUIPMENT	NG	BUSINESS
11/21/11	\$7,474.00	I	OLADIPO OBI	GHJ EQUIPMENT	NG	BUSINESS
Totals	\$47,370.00		5			

Comment [3]: Present the transactions that caused the alert (if too many to list, then present a sample summary).

CUSTOMER BACKGROUND:

GHJ Equipment has one account at ABCD Bank (#362066000) opened on 9/10/2010. Bank CDD files state GHJ Equipment is in the business of purchasing, modifying and reselling manufacturing equipment for the light construction industry. GHJ Equipment has an address of 17877 Sullyfield Place, Herndon, VA 20171. Images on Google Maps indicate this is an industrial business park. There is one authorized signer on the account, Tunde Diya.

Comment [4]: Describe extent of relationship with bank, CDD information, business location, information when accounts were open, how many opened, who is an authorized signer.

HISTORIC REVIEW OF TRANSACTIONS/RELATED ACCOUNTS/PREVIOUS ALERTS GENERATED:

Account 362066000 was reviewed for the time period of 08/01/2011 through 11/31/2011.

Comment [5]: State the time period that the analyst reviewed. In this case a month before the alerted transactions and the month after.

Since the account has been opened there is minimal activity consisting of check deposits from what appear to be individuals and businesses. Since the account's opening there are fewer than 5 outgoing transactions a month and none for over \$7,000.

Comment [6]: Provide context of past account activity. Helps support assertion that the alerted activity is out of the ordinary.

On 11/21/11 GHJ Equipment received five wire transfers from five different individuals/entities. Four of the five wires were for the identical amount (\$9,974). Internet research is unable to determine the relationship between the originators and the beneficiary.

Comment [7]: Description of the activity that is unusual. Not too much is needed since on its face, the activity is clearly suspect.

There have been no SARs nor CTRs filed since the account's opening and no prior transaction monitoring alerts exist.

Comment [8]: Provide alert and case and CTR history for context.

CONCLUSION:

Tier I is escalating this activity to Tier II. The international wire activity included five wires sent on 11/01/2011 from Nigeria, a bank designated High Risk country from five separate individuals or businesses, four of which were for exactly the same amount. This activity appears unusual and warrants further review by Tier II investigations.

Comment [9]: Succinct statement of decision to escalate and the reason why.

QC COMMENTS:

06/06/2012 Ghaga QC Approved