

BUILDINGART, S. DE R.L. account exceeded the Incoming and Outgoing amount for January 2016. Account 18192645 was reviewed for the period January 2016 through February 2016. Account balance: \$3,184.38

There were 2 Incoming Wires totaling \$1,550,000 as follows: \$1MM from DETERGENTES LTDA – household products (<http://www.bloomberg.com/profiles/companies/6989313Z:CB-detergentes-ltda> + <http://www.dersa.com.co/pagina/>) at JPMC and \$550K from CORSONAR SA at COUTTS AND COMPANY – related entity, Daniel Haime is a Director (<https://opencorporates.com/companies/pa/199278>).

**Comment [TM1]:** Specify alerted INCOMING/OUTGOING amount/count activities for the month of January and Feb 2016 January - INCOMING amount \$1,000,000.00 OUTGOING amount \$740,526.26

There were 14 Outgoing transactions totaling \$1,062,732.26. Activity consisted of:

13 Outgoing Wires for amounts ranging from \$300K to \$3K. Sampling review of wires were sent as follows: \$300K to JP MORGAN CHASE FFC: BREMOND FINANCIAL INC, \$250K to BANK OF NEW YORK FFC: BUTTERFIELD BANK (BAHAMAS) LIMITED REF: SONIA GUTT HAIME (related party), \$200K to JP MORGAN CHASE FFC: ALASTOR ENTERPRISES INC – related entity, Daniel Haime is Director & President (<https://opencorporates.com/companies/pa/111591>), \$51.2K to FIRST MERIT BANK NA FFC: VSA PARTNERS INC - branding company ([www.vsapartners.com](http://www.vsapartners.com)), and \$20.0K to FIRST AMERICAN BANK FFC: APPLIED WAYFINDING INFORMATION DESIGN – information design firm ([www.appliedwayfinding.com](http://www.appliedwayfinding.com)).

**Comment [TM2]:** Missing link

\$150K Transfer to related A/C 18192776 – JESSAMINE GROUP LTD

Account is under the GUTT, DANIEL RELATIONSHIP. Per KYC #01048205, BuildingArt, S.de R.L. is a Panamanian Corporation incorporated on 12/17/2012. They are involved in Architecture and construction operations in Panama and Bahamas. This checking account was established to meet settlement of invoices from engineers / architects involved in several construction operations being developed by Mr. Daniel Haime. The Haime Gutt family is a well known and reputable family in Bogota, Colombia. Additionally, Mr. Daniel Haime sold his tubing company called Tubo Caribe to Maverick Tube in 2005 for US\$ 86 million.

The client used their account to receive funds from a household products company and a related entity as well as to send funds to related parties/entities and pay business related expenses . Similar activity found in prior case reviews. Activity is in line with KYC and does not appear suspicious. No change in profile necessary.

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