Annex III
Interactive Exercise for training

Tasks for participants (specific deliverables)

A. **Initial triage**

- Produce a 1-page "suspicion memo" listing the top 6 red flags you see and a one-line recommendation (file STR/referral/monitor/close). Present to the group.

B. **STR drafting**

- Draft a mock STR/intelligence report for law enforcement and sanctions authority. Include: summary, supporting evidence, timeline, suggested urgency (normal vs. urgent), and investigative asks (AIS provider request, port inspection, account freeze). Use the provided STR template.

C. **Liaison plan**

- Identify which agencies to contact, who will be the points of contact, and the legal basis for sharing (e.g., mutual legal assistance, CNIL). Prepare a 5-point call script for the maritime authority to request urgent port inspection or detention.

D. **Follow-on analytical leads**

- Produce a prioritized list of 6 follow-on actions for the FIU (e.g., subpoena Bank C transaction details; request Helios corporate registry; request satellite imagery provider data for STS date; query vessel's beneficial owner; coordinate with foreign FIU where PetroMar is incorporated).

SCENARIO:

A domestic bank has submitted an STR after processing high-value USD wires connected to a newly onboarded trading company, Southern Star Logistics Ltd. Open-source maritime intelligence shows the vessel involved (*Emerald Dawn*, flagged Tanzania) had an extended AIS blackout and a satellite image placing it alongside a DPRK-flagged tanker shortly after loading. There are inconsistencies in shipping documents and structured cash withdrawals to a local agent.

1) Bank STR Submission

Reporting Institution: Bank A (Domestic)
STR Ref: BA-STR-2025-1147
Date Filed: 18 July 2025
Primary Subject: Southern Star Logistics Ltd. (Account # 102-447199)
Associated Parties: PetroMar Global LLC; Helios Shipping Pte Ltd.; Marina Services Co.
Indicators: Possible proliferation financing / sanctions evasion using maritime trade, AIS gaps, STS transfer with DPRK-flagged tanker, and suspicious USD flows.

Narrative (Summary):
On 22 June 2025, Bank A onboarded Southern Star Logistics Ltd. ("SSL"), a newly formed trading firm, to process a USD 1,200,000 payment for "industrial lubricants" sourced from PetroMar Global LLC. SSL immediately requested an L/C and sent a USD wire routed via a small foreign correspondent bank. Documentation contains mismatched narratives ("freight & spares" vs. "lubricants"), vague cargo descriptions, and a packing list noting "15 sealed containers – spare parts" concealed beneath drums. Maritime OSINT shows the carrying vessel, MV *Emerald Dawn*(Tanzanian flag), with AIS silence (~18 hrs) and an STS rendezvous with the DPRK-flagged *Saebyol* on 15 July 2025 near 22.0N, 129.0E. Bank statements show refunds from PetroMar to Marina Services Co. followed by structured cash withdrawals. SSL then sought another L/C for USD 950,000 to a thin-profile supplier. We assess elevated risk of sanctions evasion / PF and request law-enforcement/sanctions review.

Key Transactions (MT103 attached):

- 03 Jul 2025 — Outbound MT103, USD 1,200,000 to PetroMar Global LLC (Bank C, Country Y), via Bank B (NY USD correspondent). Narrative: "Payment for freight & spares." (Invoice says lubricants.)
- 05–13 Jul 2025 — Credits to Marina Services Co. (refunds) followed by cash withdrawals (see bank statement extract).

Actions Taken by Bank A:

- Placed transactional hold on second L/C.
- Initiated EDD and requested supporting documents from SSL.
- Performed enhanced screening; no list hits, but adverse media on Helios Shipping.
- Submission of a Suspicious Activity Report (SAR), recommending urgent maritime/Customs checks, the preservation of AIS records, and an assessment by the competent authority regarding legally appropriate precautionary measures (for example, when a match with an applicable UN Security Council designation is identified, the national freezing mechanism must be activated without delay).

Attachments: MT103; Onboarding KYC; Invoice; B/L + pre-stowage; Packing list; AIS timeline; Satellite image summary; Media excerpt; Marina Services statement; Draft L/C docs; Watchlist check; Legal extract.

---

2) Company Incorporation Extract — Southern Star Logistics Ltd.

Registry: Companies Registry, Port City X
Company Name: Southern Star Logistics Ltd.
Company No.: 2023-44891
Incorporation Date: 12 June 2023
Registered Address: Suite 505, Tower Business Centre, Port City X (shared serviced office)
Directors:

- Arman Kade (Nationality: Country Z; Passport KZ1123478)
  Shareholders:
- Southern Star Holdings Ltd. (BVI) — 100%
  Business Activity (self-declared): Import/Export of lubricants and

machinery spare parts
Status: Active

---

3) Commercial Invoice — PetroMar Global LLC

Supplier: PetroMar Global LLC
Address: 45 Marine Avenue, City Y, Country Y
Buyer: Southern Star Logistics Ltd.
Invoice No.: INV-2025-778
Date: 22 June 2025
Description: Industrial Lubricants — 3,000 drums @ USD 400 each
Total: USD 1,200,000
Terms: Wire, USD, Net 15 days
Beneficiary Bank: Bank C (Country Y), Acct: 876544123
Intermediary: Bank B (USD Correspondent), New York

---

4) Bill of Lading + Pre-Stowage Plan — MV *Emerald Dawn*

Carrier: Helios Shipping Pte Ltd.
Vessel: MV *Emerald Dawn* (Flag: Tanzania; IMO: 9412345)
Shipper: PetroMar Global LLC
Consignee: Southern Star Logistics Ltd.
Port of Loading: Port Q, Country A (ETD: 12 July 2025)
Port of Discharge: Port R, Country B (ETA: 18 July 2025)
Cargo (B/L): "Packaged chemicals" — 3 line items (no container detail)
Marks & Numbers: "PM-LUBE-001/003"
Pre-Stowage Plan (Annex): Upper-deck positions only; no reference to any sealed containers; three pallet groups noted.
Clauses: "Shipped on Board"; "Said to Contain."

---

5) Packing List — SSL Shipment

Ref: PL-SSL-2025-117
Main Cargo: Industrial lubricants — 3,000 drums
Additional: 15 sealed containers — "spare parts" (no HS codes; no serials)
Gross Weight (declared): 1,480 MT
Observed Tally (terminal): 1,655 MT (+12% variance)
Remarks: Sealed containers stowed below palletized drums; no port inspection stamp.

---

6) MT103 Wire Copy (Text Extract)

Sender: Bank A (SWIFT: BANKAXXX)
Receiver: Bank B (SWIFT: BANKBXXX)
MT103 — Customer Credit Transfer
20: TRN 20250703-SS-1200000
23B: CRED
32A: 250703USD1200000,00
50K: Southern Star Logistics Ltd., Suite 505, Tower Business Centre, Port City X
59: PetroMar Global LLC, Acct 876544123, Bank C (Country Y)
57A: BANKBXXX (USD Correspondent, New York)
70 (Remittance Info): Payment for freight & spares / INV-2025-778
71A: SHA

---

7) AIS Event Timeline — MV *Emerald Dawn*

Vessel: MV *Emerald Dawn* (IMO 9412345, MMSI 334761000; Flag: Tanzania)
Data source: Commercial AIS provider log (summary)

- 12 Jul 2025 08:20 — Depart Port Q (Country A).
- 14 Jul 2025 16:02 — Last regular AIS ping at 21.7N, 128.4E (Course 041°, Speed 11.8 kn).
- 14 Jul 2025 16:03 → 15 Jul 2025 10:09 — AIS silent (approx. 18h 06m).
- 15 Jul 2025 02:00 — *Satellite image timestamp* (see #8).

- 15 Jul 2025 10:10 — AIS resumes at 22.1N, 129.3E (Course 048°, Speed 12.0 kn).
- 17 Jul 2025 — Approaches Port R pilot station.
- 18 Jul 2025 — ETA Port R (Country B).

---

8) Satellite Image (Text Summary & Annotation)

Provider: Commercial Satellite Imagery Co.
Scene ID: SI-ED-20250715-0200Z
Date/Time (UTC): 15 Jul 2025, 02:00
Coordinates: 22.00N, 129.00E
Visual: Two tankers alongside — one positively matched to MV *Emerald Dawn* (by superstructure and deck layout), the other by hull/markings to DPRK-flagged *Saebyol* (name & IMO partially obscured; registry corroborated from prior imagery).
Analyst Note: Relative drift and fender spacing consistent with ship-to-ship (STS) transfer posture. No visible boom lighting; deck equipment deployed.

---

9) Media Excerpt — *Maritime Observer Weekly* (Adverse Media)

Headline: "Helios Shipping Pte Ltd. Reappears in Suspected STS Patterns"
Date: 09 July 2025
Excerpt:

"Open-source vessel monitoring indicates Helios Shipping Pte Ltd. vessels are repeatedly present in STS 'hot zones' of the Philippine Sea and East China Sea. One vessel consistent with the MV *Emerald Dawn* profile shows multiple AIS anomalies since 2024. While no designations are announced, maritime analysts warn of high-risk routing and potential links to sanctions evasion networks."

---

10) Bank Statements — Marina Services Co. (Extract)

Institution: Bank of Port City X
Account Name/No.: Marina Services Co. / 223-00-4217
Period: 01–15 July 2025

Date	Description	Debit (USD)	Credit (USD)	Balance (USD)
02 Jul	Opening Balance	—	—	70,000
05 Jul	Credit — PetroMar refund	—	50,000	120,000
07 Jul	Cash withdrawal (counter)	20,000	—	100,000
10 Jul	Cash withdrawal (counter)	15,000	—	85,000
13 Jul	Cash withdrawal (counter)	10,000	—	75,000

Bank note: Customer stated "local cargo handling fees" when queried.

---

11) Trade Finance Docs — L/C Application & New L/C Request

(A) L/C Application — SSL → PetroMar

- Applicant: Southern Star Logistics Ltd.
- Beneficiary: PetroMar Global LLC
- Amount: USD 1,200,000
- Goods: Industrial lubricants (3,000 drums)
- Latest Shipment: 12 Jul 2025
- Documents Required: Commercial invoice, B/L, COO — no inspection certificate requested
- Advising/Confirming Bank: Bank C (Country Y) / none
- Incoterms: CIF Port R

(B) New L/C Request — SSL → Supplier Z (Country T)

- Amount: USD 950,000
- Goods: "Valve assemblies and spares"

- Supplier Z Website: one page; no corporate registry link; no phone landline.
- Routing: same vessel *Emerald Dawn* (placeholders in draft request)
- Banker's Note: Additional references not provided; publicly limited footprint.

---

12) Watchlist Check (Condensed Results)

Date run: 16 July 2025
Lists: UN, OFAC, EU, HMT, Domestic Sanctions; commercial media/adverse tools

- Southern Star Logistics Ltd.: No direct list hits; new entity.
- Arman Kade: No hits.
- PetroMar Global LLC / Bank C: No list hits; insufficient corporate transparency.
- Helios Shipping Pte Ltd.: No list hits; adverse media (STS patterns, AIS anomalies).
- MV *Emerald Dawn* (IMO 9412345): Not designated; history of AIS gaps (open-source).
- Marina Services Co.: No list hits; large cash withdrawals.

STR TEMPLATE

Header: FIU Ref No, date, urgency.

Executive summary (2–3 lines) — why you suspect PF/sanctions evasion.

Subjects & entities — full legal names, registration numbers, identifiers (IMO, MMSI), accounts, known PEP/sanctions hits.

Transactions & amounts — MT103 details, dates, amounts, currencies, correspondent chain.

Supporting evidence — B/L, invoice, AIS timeline, satellite image, adverse media summary (attach images).

Analytic assessment — concise reasoning linking maritime events to financial flows and PF risk.

Asks / Requests — immediate actions: freeze account X; request port authority inspect cargo at Port R; request vessel detention if in jurisdiction; request provider to preserve AIS/satellite logs; bilateral request to foreign FIU (Bank C) for beneficiary account detail.

Contact info — FIU case officer name, phone, secure email.