

Possible Money laundering from BAFT tied to UBNT

| BAFT Red Flag  | Ubiquiti   |
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| Customer conducts business in jurisdictions that are at higher risk for money laundering, terrorist financing or other financial crimes  | YES!!!! Ubiquiti big markets are Paraguay (FlyTec), Poland (Batna), Iran (AlfaTech)...   |
| Customer shipping items to, through or from higher money-laundering risk jurisdictions including countries identified by the Financial Action Task Force as “noncooperative jurisdictions” in regards to anti-money laundering regulations | Again Yes!!!   |
| Customers transacting in activities/goods that potentially involve a high risk of money laundering and other financial crimes including activities/goods that may be subject to export/import restrictions                                 | Yep! Ubiquiti Violated Iran sanctions by shipping goods to Iran via two distributors ( <a href="#">Press release</a> )   |
| Obvious over or under pricing of goods   | Yes, many distributors complain about Ubiquiti product being sold at or below cost   |
| The transaction appears to involve use of front or shell companies for the purpose of hiding the true parties involved   | Yes, see <a href="#">Layer Limited</a> (a UBNT distributor) ... founding address is linked to Panama papers & MB Capita and is owned by Tondav S.A. holding co. based in Seychelles. |
| Transacting parties appear to be affiliated, conduct business out of a residential address, or provide only a registered agent’s address   | See Batna.   |