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GUIDANCE NOTE FOR ATTORNEYS-AT-LAW

on Preparing and Submitting High Quality
Suspicious Transaction/Suspicious Activity
Reports

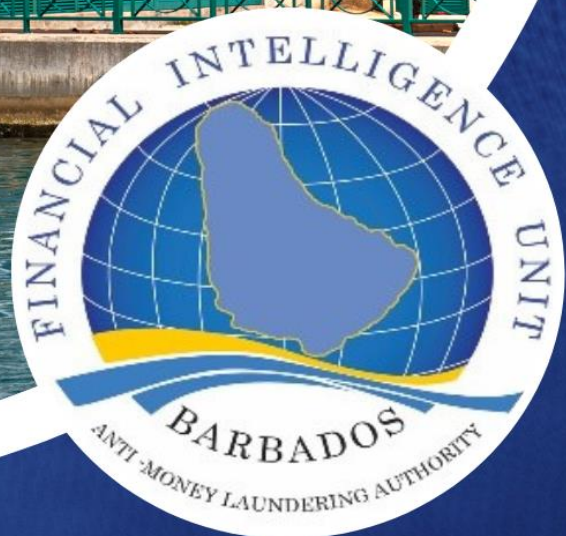


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1. Introduction

Objective

The objective of this Guidance Note is to provide guidance for Attorneys-at-Law on their legal obligations to deter and detect money laundering and financing of terrorism. The Guidance Note seeks to promote and engender a high quality of excellence among Attorneys-at-Law, in the preparation and reporting of suspicious transactions and/or suspicious activity, to the Financial Intelligence Unit (FIU).¹

Importance of Suspicious Transaction/Suspicious Activity Reporting

The information provided in a Suspicious Transaction Report (STR) - alternatively referred to as a Suspicious Activity Report (SAR) - is invaluable. The information is useful to the FIU's development of critical intelligence that can assist law enforcement in domestic and international money laundering and terrorist financing investigations and other criminal cases. STRs also enable the FIU to develop typologies as it relates to anti-money laundering, combating the financing of terrorism, and proliferation financing (AML/CFT/ PF) matters in both the regulated and unregulated sectors.

Some STR filings can result in immediate action being taken to stop criminal activity, leading to arrests and successful prosecutions. Other STRs can provide useful information such as aliases, bank account details, and information regarding other previously unknown assets that can assist in ongoing investigations or provide information that can initiate new investigations.

STRs can also provide an understanding of the threats against the jurisdiction by identifying trends, patterns, and changes in the types of crimes being perpetrated, as well the vulnerabilities of certain legal persons, arrangements, sectors, products, and services for misuse and abuse by domestic and international criminal elements. From this, alerts and industry advisories can be prepared and disseminated.

In some instances, the FIU receives multiple STRs/SARs on the same subject(s). Development of the information provided in these STRs can identify new subjects, provide the "missing link", and ultimately lead to the successful prosecution of criminals and recovery of assets.

¹ The information presented in this Guidance Note should be read in conjunction with the published guideline of domestic supervisory authorities.

1.1 Legal Framework

The Barbados AML/CFT/PF legislative framework for this Guidance Note on Preparing and Submitting High-Quality STRs/SARs includes the following:

- The Money Laundering and Financing of Terrorism (Prevention and Control) Act, 2011-23 (MLFTA);
- The Anti-Terrorism and Counter-Proliferation of Weapons of Mass Destruction Act 2002, Cap. 158, (ATCPWMDA);
- The Anti-Terrorism (Amendment) Act 2019, 34;
- The Proceeds and Instrumentalities of Crime Act, 2019-17
- The Anti-Terrorism (Amendment) Act 2015, 28.

2. The Suspicious Transaction Report

2.1 What is a Suspicious Transaction Report (STR)?

A suspicious transaction report is a formal mechanism that allows for the disclosure of transactions suspected to be linked to the proceeds of crime, terrorist financing as well as transactions considered suspicious or unusual.

2.2 Do these obligations apply to you?

These obligations apply to Attorneys-at-law admitted to practice law in Barbados, only if they are performing the following listed activities on behalf of any individual or entity.

- The purchase, sale, or other disposal of real property;
- The management of money, securities, or other assets of a customer;
- The management of bank savings or securities accounts;
- The organization of contributions for the creation, operation, or management of bodies corporate;
- The creation, operation, or management of legal persons or arrangements; or

- The purchase or sale of business entities.²

2.3 When should you report a suspicious transaction?

You must submit a suspicious transaction report promptly to the FIU where you have reasonable grounds to suspect that a transaction:

- involves proceeds of crime;
- involves the financing of terrorism;
- is of a suspicious or unusual nature; or and
- is conducted by, or relates to, a person against whom a terrorist designation order is in force or relates to the property of such a person.³

A Terrorist Designation Order means an order of the Court designating a person as a terrorist or terrorist entity. A Terrorist Designation Order may be granted by a Judge on the application by the Director of Public Prosecutions for an order designating a person as a terrorist or terrorist entity where;

- the person is included in a list of individuals and entities designated by, or under the authority of, the United Nations Security Council as terrorists or terrorist entities;⁴
- the Director of Public Prosecutions has reasonable grounds to believe that the person has committed or participated in the commission of terrorism; or
- a request to designate a person as a terrorist or terrorist entity is transmitted to Barbados from another country, is supported by reasonable grounds for the designation, and is accepted by Barbados.⁵

2.4 Reasonable Grounds to Suspect

Suspicious transactions are financial transactions that you have reasonable grounds to suspect are related to the commission of a money laundering, terrorist financing, or proliferation financing offence. In this context, transactions include those that are completed or attempted as explained in Section 3 Part A.

² Section 3 of the Second Schedule of the Money Laundering and Financing of Terrorism (Prevention and Control) Act 2011-23

³ Section 23 (1) of the Money Laundering and Financing of Terrorism (Prevention and Control) Act 2011-23 as amended by Section 4 of the Money Laundering and Financing of Terrorism (Prevention and Control) (Amendment) Act 2019-22

⁴ United Nations Consolidated List at: <https://scsanctions.un.org/b57z8en-all.html>

⁵ Section 8 (1) of the Anti-Terrorism (Amendment) Act, 2019-34

The standard/ test applied here is an objective one. The requirement to report will apply to you if based on the facts of the particular case, a person of your qualifications and experience would be expected to conclude that those facts should have led to a suspicion of money laundering, terrorist financing, or proliferation financing.

An Attorney-at-Law is therefore unable to argue that they failed to report because they had no conscious awareness of money laundering, terrorist, or proliferation activity. For example, by turning a blind eye to incriminating information which was available to them.

2.5 Failure to submit an STR

An Attorney-at-Law who does not make a report as required is guilty of an offence and is liable on conviction on indictment to a fine of \$100 000.⁶

Additionally, the Court may, where it is satisfied upon application by the Director of Public Prosecutions that an Attorney-at-Law has failed without reasonable excuse to comply wholly or in part with any obligation to submit an STR, issue a mandatory injunction against such Attorney-at-Law in such terms as the Court deems necessary to enforce compliance with such obligation.⁷

2.6 How to submit an STR

The FIU currently accepts STRs submitted through the following means:

1. The STR Form (available for download here: <https://www.barbadosfiu.gov.bb/forms/>); or
2. Electronically via CaseKonnnect.

Once the hard-copy format of the STR Form is completed, it can either be hand-delivered to the office of the FIU posted to their mailbox address at P.O Box 1372, Bridgetown, or submitted via encrypted email at adminfiu@barbados.gov.bb.

⁶ Section 23 (2) of the Money Laundering and Financing of Terrorism (Prevention and Control) Act 2011- 23 as amended by Section 5 in the Schedule to the Anti-Terrorism (Amendment) Act 2015-28

⁷ Section 47 (2) of the Money Laundering and Financing of Terrorism (Prevention and Control) Act 2011- 23

3. Completing the STR Form

An Attorney-at-Law (Reporting Officer) should provide comprehensive information when filing using the prescribed STR Form.

PART A -Initial Information

Part A of the STR Form requires initial information on the description of the sector in which the reporting entity operates - e.g., Attorney-at-Law. Also, the Reporting Officer must indicate whether the report relates to a Completed Transaction, Attempted/ Aborted Transaction, Terrorist Designation or Counter-Proliferation Designation.

i. Completed transactions:

A completed transaction is one that has occurred. For example, if you process a deposit from a client towards the purchase of an asset such as a life insurance policy or a house, a financial transaction has occurred. This is true even if the final sale associated with the deposit does not go through. In this example, the refund of the deposit shall also be a financial transaction.

ii. Attempted transactions:

An attempted transaction is one that a client intended to conduct and took some form of action to do so. An attempted transaction is different from a simple request for information, such as an enquiry as to the fee applicable to a certain transaction. An attempted transaction includes entering negotiations or discussions to conduct the transaction and involves concrete measures to be taken by either you or the client. The following are examples of attempted transactions:

- *A financial institution refuses to accept a deposit because the client refuses to provide identification as requested.*
- *A client of a real estate agent starts to make an offer on the purchase of a house with a large deposit but will not finalize the offer once asked to provide identification.*
- *An individual asks an accountant to facilitate a financial transaction involving large amounts of cash. The accountant declines to conduct the transaction.*
- *A money services business will not process a request to transfer a large amount of funds because the client requesting the transfer refuses to provide the identification requested.*

In some circumstances where an attempted transaction has occurred, it is recognized that all the required background information may not be available. Notwithstanding the absence of some information, you are still obliged to submit an STR to the FIU. If there's any doubt as to your obligations, you should contact the FIU.

PART B- Identity of Client

Part B of the STR Form requires the Reporting Officer to provide specific information on the identity of the Client. All information required to complete these fields should be provided where it is known to assist in identifying suspects and/or discounting potential matches. If certain information is not known at the time of the STR filing, an appropriate comment or the word 'Unknown' should be entered.

These details include the full name of the Client, along with any alternative names and spellings. Also required are details of the client's address(es), date of birth, nationality, occupation, employer, contact information (telephone numbers and email address), and account information (account number and type of account).

For Natural Persons

- Full legal name and any alternative names/spelling.
- Place and date of birth (MM/DD/YYYY format).
- Addresses used by a subject including primary residential addresses and post office box addresses.
- All nationalities of a subject.
- Telephone numbers and email addresses of a subject.
- All identification numbers associated with a subject such as a passport number, national identification number, and driver's license number.
- The occupation of a subject.
- The employer of a subject.
- All account numbers and types of accounts associated with a subject. Such as personal, corporate, trust, and joint accounts.
- Where the account is joint, the identities of the other signatories.

For Legal Persons or Arrangements

- Full legal name and any other names used for trading purposes.
- Type of company
- Country and date of incorporation (MM/DD/YYYY format).
- Company registration number

- Business activity
- Share capital
- Registered office address and other business address(es).
- Website address
- Telephone numbers, fax numbers, and email addresses.
- The relationship of a subject to a company such as Director, Legal Officer, Chief Executive Officer, Chief Financial Officer, Shareholder, Beneficial Owner, and Nominee Director⁸. Where any of these are natural persons, provide the identification details as outlined above.

PART C – Third-Party Information

Under this Part, details must be provided only if a transaction was conducted on behalf of another person/entity other than those mentioned in Part B.

- Full legal name and any alternative names/spelling.
- Place and date of birth (MM/DD/YYYY format).
- Addresses used by a subject including primary residential addresses and post office box addresses.
- Telephone numbers and email addresses of a subject.
- All identification numbers associated with a subject such as a passport number, national identification number, and driver's license number.
- Occupation
- Employer
- Type of Business
- All account numbers and types of accounts associated with a subject. Such as personal, corporate, trust, and joint accounts.
- Where the account is joint, the identities of the other signatories.

⁸ Though nominee directors are not permitted in Barbados this may apply to entities incorporated outside the jurisdiction who may have accounts with financial institutions located in Barbados.

PART D – Transaction Details

- Type of transaction, such as cash out, deposit to an account cash/cheque, life insurance policy purchased/deposit, securities, inter-account transfer, outgoing electronic transfer, currency exchange, and purchases of bank draft, jewelry, precious metals/stones, diamonds, money order, traveler’s cheques, gold, and purchase of real estate.
- Date of transaction (MM/DD/YYYY format).
- Amount and Currency. Where the transaction is not conducted in Barbados currency, the Barbados currency equivalent must be provided.
- Name of the Drawer/Ordering Customer
- Name of Payee/Beneficiary
- Any other bank or country involved
- Copies of relevant documents such as bank statements or real estate documents must be provided for suspicious or unusual activity and identification and verification purposes.

PART E – Grounds for Suspicion

A clear and complete narrative of the factors or unusual circumstances that led to the suspicion that the transaction(s) involve(s) the proceeds of crime, financing of terrorism, or proliferation financing must be provided.

PART E2

This section is used when additional information is being attached.

PART E3

Where the identity of the customer has not been identified in PART B and they are not known to the reporting officer, a description can be given. (e.g., sex, age, height, build, ethnicity, complexion, etc.)

PART F – Suspected Offences

Under this Part, details must be provided of the suspected criminal offence related to money laundering, financing of terrorism, or proliferation financing. Such suspected offences include fraud, drug trafficking, human trafficking, arms trafficking, corruption, proliferation financing, terrorist financing, kidnapping, robbery, theft etc.

PART G - Details of financial institution/place of transaction

- Name of the Organisation
- Branch where the transaction occurred if applicable
- Name and Title of the Reporting Officer
- Signature of the Reporting Officer
- Contact information for the Reporting Officer
- Internal reference number

4. Elements of a High-Quality STR

For the FIU's purposes, a high-quality STR is one which is:

- a) Timely; and
- b) Complete.

4.1 Timeliness

A timely STR enables the FIU to:

- quickly activate its analytical and intelligence-gathering activities to assist in both identifying and stemming the flow of the proceeds of crime.
- expeditiously communicate with law enforcement and inhibit the further concealment and movement of illicit funds.

In determining the timeliness of an STR, the FIU considers the following, amongst other things:

- What is the interval between the occurrence of the suspicious transaction/activity and the date the matter was submitted to the FIU?
- Was the interval between the occurrence of the suspicious transaction/activity and the date of filing of the STR due to:
 - a. The pending completion of the reporting entity's investigation?
 - b. A delay in the reporting entity's gathering of relevant information?
 - c. Exigent circumstances?

4.2 Completeness

Missing information could compromise the work of the Analyst resulting in unnecessary intelligence-gathering delays. The impact here is to further impede the FIU's ability to disseminate reports to law enforcement agencies in a timely manner.

A Reporting Officer should ensure that information pertaining to **all** the actors relevant to the transaction or suspicious activity is captured in full whether individuals, legal persons (companies), or arrangements (trusts). This also includes the type of account, value, and mode(s) of the transaction(s).

Beneficial ownership information must also be included particularly where the transaction is complex. Relevant, supporting information should also be appended to the STR.

The **grounds for suspicion** must be clear and provide sufficient detail as to what occurred. Why is the report being submitted in the first place? What does your investigation reveal? Is the information contained in the STR coherent, that is:

- Is the suspicious transaction reason (s) for filing the STR clearly conveyed?
- Are the relevant money laundering/ terrorist financing/ proliferation financing indicators stated?
- Are appropriate linkages made between/among the various actors involved?
- Are conclusions consistent with what occurred?

The noted questions form the basis of a complete STR. Clear thought must therefore be given to this vital component as it influences, in part, the risk rating the FIU will apply to the STR and therefore the level of urgency accorded it.

The above notwithstanding, it may not always be possible to acquire all the relevant information necessary to file the STR in a timely manner. Or even though there may be suspicion, there is still not a clear understanding of what is going on, and therefore the completeness requirement may be impacted. Under such anomalous conditions, it is best to establish contact with the FIU for further guidance.

5. Developing the STR Narrative

In providing the STR Narrative, consideration must be given to identifying the five essential elements of information – **Who? What? When? Where? and Why?** – in relation to the

suspicious transaction/activity being reported. The method of operation (i.e., **How?**) is also important, and the reporting entity should answer this question as thoroughly as possible.

5.1 Who is involved in or conducting the suspicious transaction?

- List the **conductor, beneficiary, and holders** of all accounts involved in the transaction.
- Take **reasonable measures** to verify the identity of the conductor of the transaction. This means that you are expected to ask the client for this information unless you think doing so will tip them off to your suspicion. The purpose of requesting this information is to determine if another person or entity is instructing the client to conduct an activity or a transaction.

Reasonable measures include asking a client if they are acting on someone else's instructions or retrieving the information that may already be contained in your records. When determining whether an individual has conducted or attempted a suspicious transaction on anyone else's behalf, it is not about who owns or benefits from the money, or who is carrying out the transaction or activity, but rather about **who gives the instructions** to handle the money or conduct the transaction/activity.

Where it has been determined that a third party was instructing the customer/client, then the reporting entity must indicate if the transaction was conducted on behalf of an entity or behalf of another person. If there is no third party, or the reporting entity is unable to determine whether there is a third party, then indicate that this part is not applicable.

- Provide **identifying information** on the parties involved in the transaction. This could include the information you recorded to identify the conductor, as well as any information you have on the other parties to the transaction or its recipients.
- **List owners, directors, officers, and those with signing authority, when possible.** If the transaction involves an entity, you could include information on the ownership, control, and structure of the business in the STR.
- Provide **clear information about each person or entity's role** in each of the financial transactions described. It is important to know who is sending and receiving the funds.
- **Explain the relationships among the persons or entities (if known).** This is very helpful to the FIU when trying to establish networks of persons or entities suspected of being involved in the commission or attempted commission of a money laundering, terrorist financing, or proliferation financing offence.

The Reporting Officer should provide a summary regarding the movement of funds.

This summary should identify:

- Source of funds;/ Source of wealth;
- All account numbers at the reporting institution that are affected by the suspicious transaction; and
- Accounts at other institutions that the reporting entity has identified as having interacted with the account(s) associated with the suspicious transaction/activity. This information can be gathered by reviewing the subject’s bank account activity, wire transfer records, and other transfer or deposit activity.

5.2 When did the suspicious transaction occur?

In some instances, the reporting entity may identify that a suspicious transaction has occurred over a period. The Reporting Officer should provide the date they first noticed the suspicious transaction, as well as the period over which the suspicious transaction has been observed. Individual dates and amounts of transactions should be included to better track the flow of funds.

5.3 Where did the suspicious transaction occur?

The reporting entity should clearly state whether a subject has used multiple branches, locations, or offices to conduct the suspicious transaction. For example, a subject may use multiple locations of a money remitter to circumvent reporting requirements and make detection more difficult.

In other cases, the suspicious activity may involve a foreign jurisdiction, as well as other domestic and foreign financial institutions. Details of the jurisdiction, local and foreign financial institutions, and any cross-border movement of funds should be provided.

5.4 Why does the Reporting Officer think that the transaction is suspicious?

The Reporting Officer should clearly explain the rationale for filing the STR. Consideration should be given to providing a description of the industry or business that the reporting entity is involved in (e.g. depository, trust and corporate services, money services business, etc.).

The Reporting Officer should then explain as thoroughly as possible, why the activity or the transaction(s) is unusual or suspicious for the customer. In doing so, support can be given by stating the specific money laundering, terrorist financing, and or proliferation financing indicators and the suspected criminal offence related to the money laundering, terrorist financing, and or proliferation financing, if known. Furthermore, references can be made to

the normal expected activity of similar customers and the types of products and services offered by the reporting entity and other participants in that industry or business sector.

5.5 How did the suspicious transaction/activity occur?

The Reporting Officer should describe the “modus operandi” or the method of operation of the subject conducting the suspicious transaction. Describe how the suspicious transaction or pattern of transactions was committed. To the extent possible, provide a complete picture of the suspicious activity involved.

6. Structuring the STR Narrative

After the Reporting Officer has carefully considered the information that should be provided in the STR Form, the STR Narrative should be presented in a clear, concise, and chronological manner. All elements of the five W’s (**Who? What? When? Where?** and **Why?**) and the **How?** should be adequately addressed in the narrative, as well as any other pertinent information that can assist law enforcement.

The FIU recommends that the Reporting Officer use paragraphs to separate the narrative into an introduction, a body, and a conclusion.

6.1 Introduction

The introductory paragraph can be used to provide the following:

1. The reason for filing the STR and a description of the circumstances surrounding the suspicious activity that has been observed.
2. The date and reference numbers (assigned by the FIU) of any previous STRs filed on the subject, or the connection to any other STRs filed where a link was not previously detected by the reporting entity.
3. A summary of the indicators and suspicious patterns of transactions or activity that triggered the STR filing. Alternatively, this may be included in the concluding paragraph.

6.2 Body

The paragraph(s) following the introductory paragraph can be used to provide all of the relevant details supporting the reason why the STR filing is being made, such as:

1. All facts and information that the reporting entity is aware of regarding the subject(s) that were involved in the suspicious activity or that facilitated the suspicious financial transaction(s). The Reporting Officer is permitted to include any observations or logical deductions that have been made surrounding the suspicious activity. For example, discrepancies or inconsistencies noted in statements made by the subject(s), inconsistencies in the documentation provided, the financial account appears to be used as a “pass-through” account (indicative of the layering stage of money laundering), lack of economic rationale for financial transactions, financial flows not consistent with the expected activity level, etc.
2. Where the suspicion being reported relates to financial activity, a detailed description of all accounts and transactions involved should be provided. The reporting entity should adequately explain why any transactions that have been identified have been deemed to be suspicious. E.g., if observed financial activity deviates from the normal activity level for the customer, an explanation should be provided as to how the activity differs.
3. Information regarding the origination, application, and destination of funds should be provided where known. Transactions should be listed in chronological order, along with the amount (currency should be identified). Transactions can be further broken down into debits and credits.
4. Moreover, details including the name and location of all financial institutions (domestic and international) involved, names, addresses, account numbers, and other details regarding the originator and beneficiary of transactions should be included. These details are key in understanding the flow of funds, and ultimately for asset tracing and recovery.
5. For transactions conducted using cheque or bank drafts, details regarding the cheque number, the bank and account it was drawn on, the payee, the date issued, the date the cheque was presented for a deposit, etc., and the amount of the cheque should be included. Details on cash transactions such as the location (e.g. bank branches or ATM location); where the transaction (s) occurred and how the transaction (s) occurred (e.g. night deposit, ATM deposit/withdrawal, etc.) should be included.
6. An explanation should accompany suspicion that has arisen due to circumstances other than as a result of financial transactions. For example, an entity may have discovered adverse media linking a customer or a controlling person of its customer to criminal activity but is unable to state accurately whether its customer has facilitated the flow of criminal proceeds or is involved in criminal activity. Where the nature of reporting entity’s relationship with a client does not involve financial

transactions (e.g. registered agent), details regarding how the reporting entity's fees are settled should also be included.

7. Where the reporting entity has observed any relationships among the parties to the transactions identified at point 2, these should also be included. For example, the originator and beneficiary may be related parties due to a common beneficial owner.

6.3 Conclusion

The final paragraph of the STR Narrative should summarize the report and can include:

1. Information regarding any action(s) that the reporting entity intends to take (e.g. termination of the business relationship, disbursement of funds pursuant to the terms of liquidation, ongoing monitoring of activity, enhanced due diligence, etc.)
2. Additional information that the reporting entity may deem useful to law enforcement.
3. A statement as to whether an STR or a similar report has been made by a related financial institution or contracted third party either locally or in another jurisdiction.
4. A statement as to whether the reporting entity has been served with a court order, or whether law enforcement has made inquiries regarding a particular customer. This may have prompted a review of the business relationship which ultimately resulted in the STR being filed.
5. The names of any law enforcement personnel who may be investigating the subject(s). This reduces duplication of efforts by the FIU and the law enforcement agency.

6.4 Supporting Documentation

The FIU welcomes the provision of documents that support the information presented in an STR. Items such as bank statements, wire transfer records, copies of agreements, corporate records (e.g. Memorandum & Articles of Association and any amendments), Register of Members, etc.), insurance policies, schedule of subscriptions and redemptions made to and from an investor(s), etc. are all useful and reduces the need for the FIU to formally request information, which further reduces the time it takes for the FIU to complete its analysis of a matter.

7. Submitting an STR via CaseKonnnect

7.1 Initial Guidance⁹

The caseKonnnect e-filing system allows for the submission of comprehensive information on all actors involved in or linked to an unusual transaction or suspicious activity. Users should therefore make full use of the specific tabs highlighted within the platform to ensure fulsome completion of the STR.

7.2 Log-In Details

Each reporting entity is required to register before contacting the FIU for login credentials. In this regard, a formal letter is to be prepared and sent to **Director, FIU – caseKonnnect Credentials**.

The letter must identify identifying the MLROs/Compliance Officers who will be using the system and may be sent via e-mail. Upon receiving your login details, please proceed to <https://fiuconnect.gov.bb/casekonnnect/index.php?module=users/login>. Proceed to the right side of the screen and right-click.

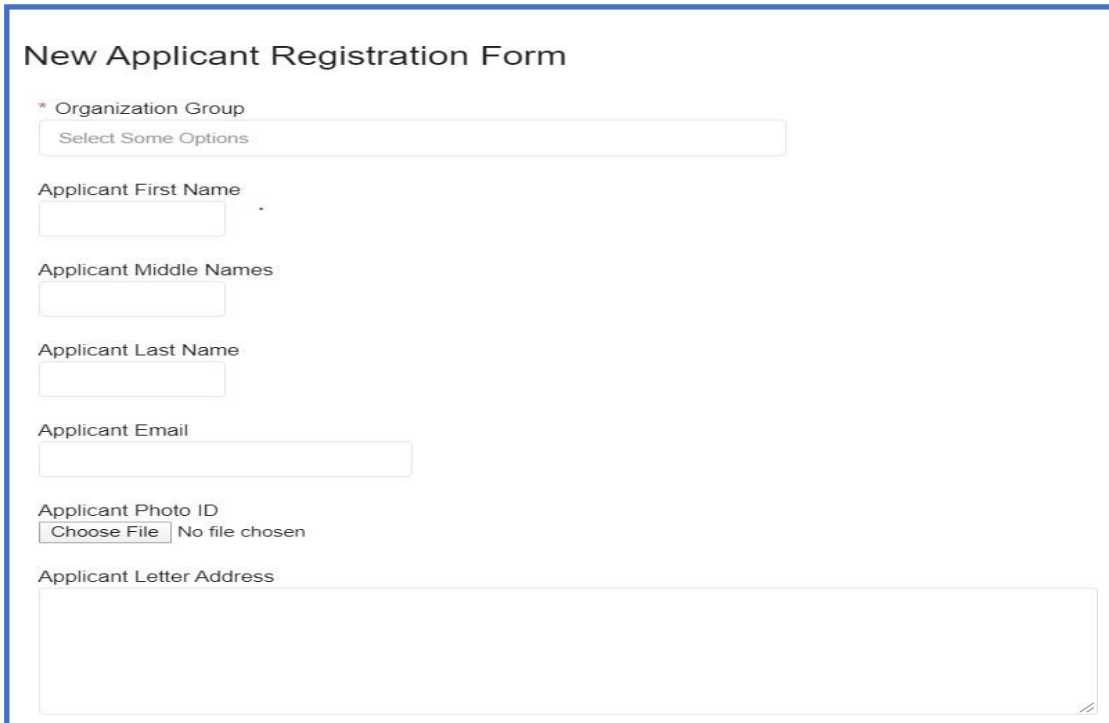
The login screen will appear as follows:



Login at the prompt and click on the “New User Registration” tab.

⁹ This section provides introductory instructions in the use of caseKonnnect. Comprehensive instructions will be forthcoming in a supplementary to this Guidance Note in due course.

You will see the following screen:



New Applicant Registration Form

* Organization Group
Select Some Options

Applicant First Name

Applicant Middle Names

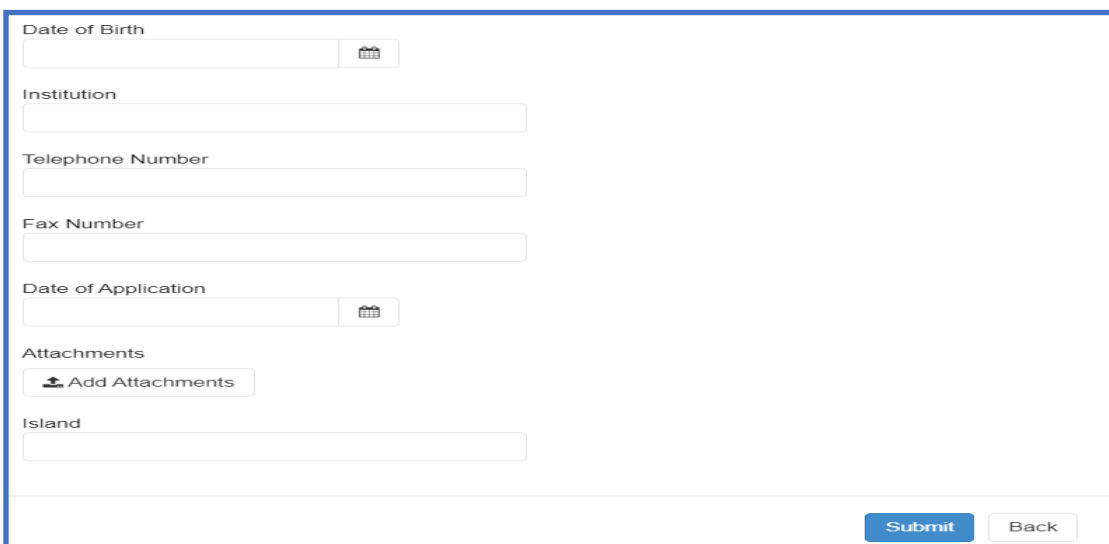
Applicant Last Name

Applicant Email

Applicant Photo ID
Choose File No file chosen

Applicant Letter Address

You are to complete all the information requested. Please note that some fields are mandatory, and you will not be able to proceed unless they are completed.



Date of Birth

Institution

Telephone Number

Fax Number

Date of Application

Attachments
Add Attachments

Island

Submit Back

Field names that are not marked with an asterisk (*) must be completed if the data is known and left blank if unknown.

Once you submit your application, along with the necessary attachments (if necessary), the FIU will review it. Once it is approved, you will receive an email indicating that you are registered, and you will be provided with your USER PROFILE and a TEMPORARY PASSWORD.

7.3 Entering Information via CaseKonnnect

Filing an STR requires information to be entered in multiple sections, in the following order:

- **Info** – this is a general overview of the STR
- **Person** – this relates to information on all persons that constitute the STR
- **Company** – this relates to information on all companies that constitute the STR; and
- **Monetary Value** – this relates to the value of all financial instruments used in the transaction (e.g. cash, cheques, wires). It also relates to the currency(s) used.

Each of the noted sections must be completed with the relevant information. Once this information is entered, the STR will be ready for filing.

8. How does the FIU use STRs?

STRs provide the FIU with important information that assists its team in the analysis, review, and reporting on both operational and strategic intelligence. As such, a key outcome of the FIU's work is to provide a quality intelligence product to law enforcement agencies and supervisory authorities in accordance with the domestic, regional, and international reporting obligations of Barbados.

9. Confidentiality of STRs

Where a financial institution discloses information to the FIU concerning the proceeds of criminal conduct, the financing of terrorism, or information that is of a suspicious or unusual nature, such a disclosure does not constitute a breach of any confidentiality provisions by enactment or otherwise. An action, suit, or proceeding does not lie against a financial

institution, an officer, employee, or agent of the institution acting in the course of his or her employment or agency.¹⁰

Except for the purposes of the administration and enforcement of the MLFTA, no person shall disclose any information that will identify or is likely to identify the person who prepared or made an STR or handled the transaction in respect of the STR.¹¹

Also, a person shall not be required to disclose an STR or any information contained therein or provided, or the identity of the person who prepared or made the STR or handled the transaction in respect of which the STR was made in any judicial proceeding unless the Judge or Magistrate, as the case may be, is satisfied that the disclosure of the information is necessary in the interest of justice.¹²

10. Offence of Tipping Off

Attorneys-at-Law and their agents should be mindful of the offence of ‘tipping off’ as set out in Section 43 of the MLFTA. Where a person who knows or suspects that an investigation into money laundering or financing of terrorism has been, is being, or about to be made, or that an order has been made by or maybe made requiring the delivery or production of any document and

- (a) divulges that fact or other information to another person whereby the investigation is likely to be prejudiced; or
- (b) falsifies, conceals, destroys or otherwise disposes of, or causes or permits the falsification, concealment, destruction or disposal of, any matter or thing that is or likely to be material to the investigation is guilty of an offence and is liable on summary conviction to a fine of \$50,000 or to imprisonment for 2 years or to both.

¹⁰ See Section 46 (8) of the Money Laundering and Financing of Terrorism (Prevention and Control) Act 2011- 23

¹¹ See Section 48 (7) of the Money Laundering and Financing of Terrorism (Prevention and Control) Act 2011- 23

¹² See Section 48 (8) of the Money Laundering and Financing of Terrorism (Prevention and Control) Act 2011- 23

11. Indicators of Suspicious Transaction

Over the years, international bodies such as the Financial Action Task Force (FATF) and The Egmont Group, have identified various typologies and indicators that could be indicative of money laundering, terrorism financing, and proliferation financing. These indicators are merely examples of factors that may be helpful when evaluating transactions. The list is not exhaustive and does not intend to cover every possible situation. The indicators suggested here should not be viewed in isolation and should always be taken into consideration in conjunction with all other circumstances pertaining to a particular transaction. Also of note is that the presence of an indicator does not necessarily mean that criminal activity has occurred. Likewise, the absence of an indicator does not mean that suspicious activity has not occurred.

If you observe one or more of the following indicators during the course of a business relationship, consideration should be given to conducting further enquiries to determine whether the activity observed meets the threshold for suspicion. Several indicators together, without a reasonable explanation, may provide a suitable basis for which the reporting entity may choose to file an STR.

Below are some indicators for client behaviours and transactional patterns which are specially intended to aid Attorneys-at-Law in identifying a suspicious transaction.

11.1 Indicators for Client Behaviour:

The Client

- is overly secret or evasive about who is the ultimate beneficial owner, where the money is coming from, or, why they are doing this transaction this way, or what the big picture is.
- is using any Attorney-at-Law without good reason.
- is actively avoiding personal contact without good reason.
- is reluctant to provide or refuses to provide information, data, and documents usually required to enable the transaction's execution.
- holds or has previously held a public position (political or high-level professional appointment) or has professional or family ties to such an individual and is engaged in unusual private business given the frequency or characteristics involved.
- provides false or counterfeited documentation.

- is a business entity that cannot be found on the internet and/or uses an email address with an unusual domain part, especially if the client is otherwise secretive or avoids direct contact.
- is known to have convictions for acquisitive crime, known to be currently under investigation for an acquisitive crime, or have known connections with criminals.
- is or is related to or is a known associate of a person listed as being involved or suspected of involvement with terrorist or terrorist financing-related activities.
- shows an unusual familiarity with respect to the ordinary standards provided for by the law in the matter of satisfactory customer identification, data entries, and suspicious transaction reports – that is – asks repeated questions on the procedures for applying the ordinary standards.
- is a ‘politically exposed client’ who is linked to negative news/crime or any client who is a family member or close associate of such politically exposed person.
- is found or associated with persons/entities on the terrorist designation list published by United Nations Security Council.
- is from a country or jurisdiction in relation to which the FATF has called for countermeasures or enhanced client due diligence measures, or a jurisdiction known to have inadequate measures to prevent money laundering and the financing of terrorism.
- is a company that has a long period of inactivity following incorporation, followed by a sudden and unexplained increase in financial activities.
- is a company registered at an address that is also listed against numerous other companies or legal arrangements, indicating the use of mailbox service.
- is a company beneficial owners, shareholders, or directors are also listed as beneficial owners, shareholders, or directors in multiple other companies.
- appears to be acting on somebody else’s instructions without disclosure.
- offers to pay unusually high levels of fees for services that would not ordinarily warrant such a premium.
- changes their means of payment for a transaction at the last minute and without justification (or with suspect justification).
- gave instructions for the creation of complicated ownership structures where there is no legitimate or economic reason.

- makes payments to other companies with similar or identical directors, shareholders, or beneficial owners.
- makes large cash payments for the purchase of an interest in land whose value is far less, or the method of funding is unusual such as funding from a third party who is not a relative or known to the buyer, or there is an absence of any logical explanation from the parties why the property is owned by multiple owners or by nominee companies.
- transfers goods that are inherently difficult to value (e.g. jewels, precious stones, objects of art or antiques, virtual assets), where this is not common for the type of clients, transaction, or generally without any appropriate explanation.
- conducts transactions using untraceable payment methods, including bearer shares or new payment methods.
- insists on loss-making transactions where the loss is avoidable or an absence of documentation to support the client's story, previous transactions, or company activities.
- insist on making payments in cash without any plausible reason.
- makes large payments to subsidiaries or other entities within the group that does not appear within the normal course of business.
- makes payments to other companies with similar or identical directors, shareholders, or beneficial owners.
- pays for services that appear excessive in relation to the services provided.
- abandons transactions with no concern for the fee level or after receipt of funds.
- requests for payments to third parties without substantiating reason or corresponding transaction.

11.2 Indicators for Transactional Patterns:

- Complex or unusual transactions, possibly with unrelated parties.
- Unauthorised or improperly recorded transactions; inadequate audit trail.
- Instructions to an Attorney-at-Law from the client to conduct transactions without legitimate or economic reason or when such transactions are conducted by the client.
- Services where an Attorney-at-Law is asked to assure the client's standing, reputation, and credibility to third parties, without a commensurate knowledge of the client's affairs.
- Services where an Attorney-at-Law is asked to act as a trustee/director that allows the client's identity to remain anonymous.
- Apparent structuring of transactions to avoid dealing with identification requirements or regulatory record-keeping and AML/CFT reporting thresholds.
- Disproportionate amount used for the purchase of real estate/property which is inconsistent with the socio-economic profile of the client.
- Unusually high levels of assets or unusually large transactions in relation to what might reasonably be expected of clients with a similar profile.
- Transfers of goods that are inherently difficult to value (e.g. jewels, precious stones, objects of art or antiques, virtual assets), where this is not common for the type of clients, transaction, or generally without any appropriate explanation.
- Transactions using untraceable payment methods, including bearer shares or new payment methods.
- Transactions with little commercial logic taking place in the normal course of business or transactions not related to the normal course of business.
- Transfer of real estate between parties in an unusually short time.

Please also consult the AML/CFT guidelines for legal professionals and law firms issued by the Compliance Unit – Barbados Anti Money Laundering Authority.

12. Sanctions List Matters

From time to time the United Nations updates its Consolidated List of individuals and entities that are subject to measures imposed by Resolution of its Security Council. These measures, or sanctions, are aimed at the prevention and suppression of terrorism, terrorist financing, and the proliferation of weapons of mass destruction and their financing.

Under the Anti-Terrorism and Counter-Proliferation of Weapons of Mass Destruction Act 2002 Cap 158, Barbados can also designate persons as terrorists or as terrorist entities.

The FIU and relevant Competent Authorities will disseminate immediately any updates to the UN Security Council (UNSC) Consolidated List (and to domestic lists, if any) against which Attorneys-at-Law must screen clients, including beneficial owners. Additionally, all lists will also be placed on the websites of the FIU and the Compliance Unit.

If you determine that

- a. your client features on the UNSC Consolidated List or any domestic list; or
- b. your client is dealing with any person or entity from the noted lists; or
- c. you have accounts owned or controlled by or on behalf of anyone on the noted lists,

You must

- a. **REPORT** the matter immediately, to the FIU using the STR; and
- b. Complete and submit, immediately, to the FIU and your regulatory authority, the TF/PF Asset Freeze Report (AFR) Form either electronically or manually.

For detailed information on handling the UNSC Consolidated Lists/updates and related matters, please refer to the Guideline on Targeted Financial Sanctions for Financial Institutions and Designated Non-Financial Business Entities and Professionals published by the Compliance Unit.

Appendix 1: Examples of Fulsome and Insufficient STR Narratives

Fulsome STR Narratives

STR 1

BMX Chambers (BMX) is a recently established law practice of colleagues who graduated from regional law schools in the past 2 years. Our core business involves, inter-alia, the creation, operation, and management of legal persons or arrangements.

On April 25, 2022, BMX conducted a virtual meeting with representatives of Electronics and Wireless Tech Inc. (EWTI) to set up a legal arrangement. EWTI is a regional subsidiary of a North American-based company involved in technological services.

Once BMX agreed to set up the legal arrangement, EWTI requested our account information and immediately remitted USD 420,000.00 in advance of the necessary paperwork being completed. Accordingly, the funds were placed into an escrow account.

On May 1, 2022, EWTI advised by e-mail that they were no longer interested in proceeding with the transaction. BMX was therefore advised to repatriate the funds to EWTI less the full (10%) fee for services rendered. Despite our efforts, we were unable to establish telephone contact with EWTI to confirm the reason(s) for discontinuing the transaction. In apparent recognition of the inconvenience to BMX in this matter, EWTI advised by e-mail that a further 3.5% of the full amount should be retained.

Initially, we were keen to have undertaken this transaction, however, the last-minute withdrawal from the near-completed arrangement when coupled with the payment of our full fees/ costs, as well as an additional gratuity, though beneficial to our new firm, seem unusual in the circumstances, and prompted us to immediately file this STR.

COMMENTS ON STR QUALITY

1. Timeliness

- BMX appears to have promptly filed the STR upon observation of the unusual activity in the course of engaging their client.

2. Completeness

- The transaction is considered aborted and while all elements of the completeness metric may not be fully captured in such circumstances, the STR nonetheless, has identified important red flags: -

- a. BMX are inexperienced practitioners who have been engaged on a remote basis to execute a high-value transaction.
- b. Funds are immediately dispatched to BMX's account.
- c. There is a "last minute" withdrawal from the transaction.
- d. BMX is paid its full professional fee and an additional "tip".
- e. No legal services have been dispensed in full.
- f. The possibility exists that the cheque is fraudulent and the clients are attempting to obtain the funds by fraudulent means.

3. Conclusion

Though incomplete, the transaction reflects a typology of money laundering using legal professionals.

STR 2

Citizen X and her family have been clients of our law firm for many years. Having moved to Canada over 2 decades ago, Citizen X continued to pursue a nursing career as a healthcare professional. She has since retired and is taking steps to return to Barbados permanently.

This past week, in seeking to close a transaction of BDS \$360,000.00 relating to the sale of a property on the west coast, Citizen X presented a mixture of cheques and cash to our office, as follows:

- BDS \$150,000.00 (a cheque drawn on the local credit union account of our client's grandson)
- CAN \$100,000.00 (a cheque drawn on our client's savings account at Bank of Montreal, Toronto (BDS equivalent \$146,000.00).
- CAN \$20,000.00 (BDS equivalent \$29,200.00) cash which was declared on entry at the Grantley Adams International Airport on the day before appearing at our office; and
- BDS \$30,000.00 in cash comprising mostly of out-of-circulation \$100 bills. The staff receiving the Barbados cash complained of a musty smell.

On enquiring as to the various source of funds presented, Citizen X grew irritable and stated that she was tired of people asking her where her money came from and insisting it was hard-earned.

Citizen X's reluctance to respond to our questions remains of concern to us particularly as we have been unable to reasonably ascertain the source of funds notably in relation to the Barbados cash presented. It is on that basis that this disclosure is made to your good office.

Should you require further clarity and or additional information kindly let us know.

COMMENTS ON STR QUALITY

1. Timeliness

- The law firm has cited “this past week” as the timeline within which the transaction has taken place and therefore reasonably meets the promptness requirement.

2. Completeness

- The rationale for submitting the STR is clearly stated.
- Generally, the STR sufficiently captures the remaining elements required for completeness.

3. Conclusion

- Real estate transactions are considered an attractive option for laundering proceeds of crime. In that regard and given the high levels of cash involved and the fact that the Barbados currency is outdated and carries a musty scent, it is imperative that the source of funds must be established.

STR 3

Charlie Chambers is part of a syndicate of regional law firms engaged to support the merger of three small financial services institutions (C, D, and E) located across the Eastern Caribbean. Upon completion of the necessary due diligence and assuming regulatory approvals, the new firm CEED Financial is to commence business in QTR 1, 2025.

While conducting our due diligence on the parties involved, the compliance team noticed several unflattering press reports on two members of the senior management team of financial institution C and a director of financial institution E. The press reports have, in turn, linked these persons to other individuals who have since been indicted for many predicate

money laundering offences (i.e., corruption, racketeering, drug trafficking). See appended internet downloads and the links to the article.

Indeed, these reports are worrisome, yet instructive, as to the continued progress of the noted merger.

Due to the linkage of parties involved in this pending transaction to the criminal activity, we believe immediate escalation to your office is essential.

COMMENTS ON STR QUALITY

1. Timeliness

- The immediate submission of the STR to the FIU upon discovery satisfies the promptness requirement.

2. Completeness

- There are “reasonable grounds to suspect” money laundering or terrorist financing in light of the political exposure of the parties noted and their links to parties who have been indicated in overseas courts.

3. Conclusion

- Not all aspects of the completeness rubric need to be indicated given the special context within which the suspicion has been derived.

Insufficient STR Narratives

STR 1

As a law firm whose core business involves the management of client assets, amongst other things, our internal compliance protocols require the quarterly review of the accounts of our high-net-worth clients. One such client, P & Q Holdings beneficially owned by a now elderly couple, have financial interests in several private and commercial properties throughout the country. Funding for these properties was derived over time, from a combination of personal savings, re-invested bonuses from various places of work, and interest proceeds from various other investments. Additional investments were facilitated through the proceeds of a lawsuit arising from a fall occurring at a campus apartment while P was a student at an overseas university in the United Kingdom.

During a recent review of the activity of P & Q Holdings, the compliance team observed deposit activity that seemed out of sync with the account's levels. To wit, the monthly rental deposits of BBS 20,000.00 from the tenant of a commercial property were observed to be up to 75% more over each month in the period November 15, 2022, to February 15, 2023.

Upon establishing contact with the company's Chief Financial Officer (CFO), we were told that a new Accountant was hired for the post vacated by the last incumbent. This, along with overlapping vacations during the period in question, was said to have resulted in the erroneous transfer of funds. The CFO apologised and requested the immediate return of the excess funds. This was obliged by our firm.

Our staffing issues and delayed in-house investigation did not allow for the prompt reporting of this matter. Please, therefore, accept our apologies.

COMMENTS ON STR QUALITY

1. Timeliness

- There was some delay in reporting the matter to the FIU due to the strictures outlined in the STR.

2. Completeness

- Notwithstanding the significant background information provided, there is a clear omission of the rationale for submitting the STR.

3. Conclusion

- Certain money laundering and or terrorist financing typologies are known to involve the repatriation of excess funds to the originator as a means of legitimizing or "cleaning" illicit funds. While possible in the circumstances outlined, the FIU is hindered by the reporting entity's failure to identify the purpose of its STR.

STR 2

Client J retired from politics several years ago and is currently pursuing some business interests. At the dawn of 2023, Client J approached our firm to assist in formally setting up 2 companies whose core business spans the retail, corporate services, and tourism sectors, respectively.

During the course of our interaction, Client J insisted he was known to the firm and felt it unnecessary to provide the information to satisfy our due diligence requirements. Client J, therefore, left our office without completing the transaction.

A few days later, Mr. RH, a well-known associate of Client J visited our office to continue the transaction. There was a similar refusal to provide the requested information, and therefore the matter was not concluded.

The back-to-back efforts to secure our services by different, yet associated parties (both of whom are linked politically) and without due consideration of our compliance protocols, are concerning and are the primary reasons for making this submission.

COMMENTS ON STR QUALITY

1. Timeliness

- Outside of the reference to 2023, no dates of the engagement have been supplied. It is therefore difficult to determine timeliness.

2. Completeness

- All aspects of the completeness requirement are not fulfilled and are unlikely in circumstances of this nature.

3. Conclusion

- The STR did not meet a high threshold of suspicious activity, however, a report of this nature is retained in the FIU's database for on-going intelligence purposes.

Appendix 2: Suspicious/Unusual Transaction Report Form

CONFIDENTIAL

SUSPICIOUS/UNUSUAL TRANSACTION REPORT

PLEASE TYPE INFORMATION OR WRITE
IN BLOCK LETTERS

IMPORTANT: Complete using information obtained during normal course of the transaction. The report should be completed as soon as practicable AFTER the dealing, and a copy forwarded to:

THE DIRECTOR, FINANCIAL INTELLIGENCE UNIT
ANTI-MONEY LAUNDERING AUTHORITY
P.O. BOX 1372 Bridgetown, Barbados
FACSIMILE NO. (246) 436-4756
Email: adminfiu@barbados.gov.bb
For urgent reporting – Tel. (246) 436-4734/5

FOR OFFICIAL USE ONLY

FIU Reference No.:

PART A – Initial Information

- | | |
|---|--|
| 1. <input type="checkbox"/> Completed Transaction | <input type="checkbox"/> Attempted/Aborted Transaction |
| <input type="checkbox"/> Terrorist Designation | <input type="checkbox"/> Counter-Proliferation Designation |

2. Is this report a correction or follow-up to a Report previously submitted?

NO
(Skip to No.4)

YES
 Correction
 Follow-up

3. If yes, original Report's date: [Click here to enter a date.](#)

4. Reporting date: [Click here to enter a date.](#)

5. Which one of the following reporting entities best describes you:-

- | | |
|---|---|
| <input type="checkbox"/> Accountant | <input type="checkbox"/> Life Insurance Broker/Agent |
| <input type="checkbox"/> Attorney-at-Law | <input type="checkbox"/> Life Insurance Company |
| <input type="checkbox"/> Commercial Bank | <input type="checkbox"/> Merchant Bank |
| <input type="checkbox"/> Cooperative Society | <input type="checkbox"/> Money Service Business/Money or Value
Transmission Services |
| <input type="checkbox"/> Credit Union | <input type="checkbox"/> Mutual Fund Administrator/Manager |
| <input type="checkbox"/> Corporate &/or Trust Service Provider | <input type="checkbox"/> Real Estate Agent/Entity |
| <input type="checkbox"/> Dealer in Precious Metals &/ or Stones | <input type="checkbox"/> Regulator |
| <input type="checkbox"/> Finance Company | <input type="checkbox"/> Securities Dealer |
| <input type="checkbox"/> Gaming Institution | <input type="checkbox"/> Trust Company/Corporation |
| <input type="checkbox"/> General Insurance Company | <input type="checkbox"/> Other |
| <input type="checkbox"/> International/Offshore Bank | |

Part B – Identity of Customer/Client 1

1. Click or tap here to enter text.
Surname
2. Click or tap here to enter text.
Given Name
3. Click or tap here to enter text.
Middle Name(s)
4. Click or tap here to enter text.
Alternative Names/Spelling
5. Click or tap here to enter text.
Address (es)
6. Click or tap here to enter text.
Nationality/(ies)
7. Date of Birth

--	--	--

(MM/DD/YYYY)
8. Identifier #1 ID Card
 Passport
 Driver’s License
 Other.....
9. Click or tap here to enter text.
ID No: (1)
10. Click or tap here to enter text.
Place of Issue
11. Identifier #2 ID Card
 Passport
 Driver’s License
 Other
12. Click or tap here to enter text.
ID No: (2)
13. Click or tap here to enter text.
Place of Issue
14. Click or tap here to enter text.
Occupation
15. Click or tap here to enter text.
Employer
16. Click or tap here to enter text.
Telephone # (Include area Code) (H)
Click or tap here to enter text.
Telephone # (Include area Code) (C)
- Click or tap here to enter text.
Telephone # (Include area code) (W)
17. Click or tap here to enter text.
Email: Address(es)
- Click or tap here to enter text.
Email: Address(es)
18. Click or tap here to enter text.
Account Number(s)
- Personal
 Corporate
 Trust
 Other Click or tap here to enter text.
19. Click or tap here to enter text.
State if account is joint, other signatories, etc.
20. Click or tap here to enter text.
Provide other account(s) customer may have at institution, include account type, whether joint, other signatories, etc.

CUSTOMER/CLIENT 2

1. Click or tap here to enter text.
Surname
2. Click or tap here to enter text.
Given Name
3. Click or tap here to enter text.
Middle Name(s)
4. Click or tap here to enter text.
Alternative names/Spelling
5. Click or tap here to enter text.
Address (es)
6. Click or tap here to enter text.
Nationality/(ies)
7. Date of Birth
(MM/DD/YYYY)
8. Identifier #1 ID Card
 Passport
 Driver's License
 Other
9. Click or tap here to enter text.
ID No. (1)
10. Click or tap here to enter text.
Place of Issue
11. Identifier #2 ID Card
 Passport
 Driver's License
 Other
12. Click or tap here to enter text.
ID No.(2)
13. Click or tap here to enter text.
Place of Issue
14. Click or tap here to enter text..
Occupation
15. Click or tap here to enter text.
Employer
16. Click or tap here to enter text.
Telephone # (Include area Code) (H)
Click or tap here to enter text.
Telephone # (Include area Code) (C)
- Click or tap here to enter text.
Telephone # (Include area code) (W)
17. Click or tap here to enter text.
Email Address(es)
- Click or tap here to enter text.
Email address(es)
18. Click or tap here to enter text.
Account Number(s)
- Personal
 Corporate
 Trust
 Other Click or tap here to enter text.
19. Click or tap here to enter text.
State if account is joint, other signatories, etc
20. Provide other account(s) customer may have at institution, include account type, whether joint, other signatories, etc.
Click or tap here to enter text.

Customer 2 applies where there is a transfer between customers.

CUSTOMER/CLIENT – Company

Name:
Please enter the name of the company.

Date of Incorporation:
Click or tap to enter a date.

Share Capital
Click or tap here to enter text.

Country of Incorporation
Click or tap here to enter text.

Number
Click or tap here to enter text.

Type of Company Click or tap here to enter text.

Business Activity
Click or tap here to enter text.

Website
Click or tap here to enter text.

Relationship to Company:
Please enter the relationship

Items in Relationship to Company Drop-Down Box	
Legal Officer	Director
Chief Executive Officer	Shareholder
Chief Financial Officer	Beneficial Owner
	Nominee Director

1. Click or tap here to enter text. 2. Click or tap here to enter text. 3. Click or tap here to enter text.

Surname

Given Name

Middle Name(s)

4. Click or tap here to enter text.
Alternative names/Spelling

5. Click or tap here to enter text.

Click or tap here to enter text.
Address (es)

6. Click or tap here to enter text.

7. Date of Birth

Nationality/(ies)

(MM/DD/YYYY)

8. Identifier #1 ID Card
 Passport
 Driver's License
 Other

9. Click or tap here to enter text.
ID No. (1)

10. Click or tap here to enter text.
Place of Issue

11. Identifier #2 ID Card
 Passport
 Driver's License
 Other

12. Click or tap here to enter text.
ID No. (2)

13. Click or tap here to enter text.
Place of Issue

14. Click or tap here to enter text..
Occupation

15. Click or tap here to enter text.
Employer

16. Click or tap here to enter text.
Telephone # (Include area Code) (H)
Click or tap here to enter text.
Telephone # (Include area Code) (C)

Click or tap here to enter text.
Telephone # (Include area code) (W)

17. Click or tap here to enter text.
Email Address (es)

Click or tap here to enter text.
Email address (es)

18. Click or tap here to enter text.
Account Number(s)

- Personal
- Corporate
- Trust
- Other

19. Click or tap here to enter text.
State if account is joint, other signatories, etc

20. Click or tap here to enter text.
Provide other account(s) customer may have at institution, include account type, whether joint, other signatories, etc.

Customer/Client 2 applies where there is a transfer between customers.

PART C – To be completed only if the transaction was conducted on behalf of another person/entity other than those mentioned in Part B.

1. Click or tap here to enter text. Surname 2. Click or tap here to enter text. Given Name 3. Click or tap here to enter text. Middle Name(s)

4. Click or tap here to enter text. Alternative names/Spelling 5. Click or tap here to enter text. Address (es)

6. Click or tap here to enter text. Nationality/(ies) 7. Date of Birth

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 (MM/DD/YYYY)

8. Identifier #1 ID Card Certificate of Incorporation
 Passport Registration for Business Name
 Driver’s License
 Other Click or tap here to enter text.

9. Click or tap here to enter text. ID No.(1) 10. Click or tap here to enter text. Place of Issue 11. Click or tap here to enter text. Occupation/Type of Business

12. Click or tap here to enter text. Employer	13. Click or tap here to enter text. Telephone (#1)- area code (H)
Click or tap here to enter text. Telephone (#2) - area code (W)	Click or tap here to enter text. Telephone (#3)- area code (C)

14. Click or tap here to enter text. Email Address #1 Click or tap here to enter text. Email Address #2

15. Click or tap here to enter text. Account Number(s)

16. Click or tap here to enter text. State if a/c joint, other signatories, etc

PART D – Transaction Details

1. Type of Transaction

- | | |
|--|---|
| <input type="checkbox"/> Cash Out | <input type="checkbox"/> Conducted Currency Exchange |
| <input type="checkbox"/> Deposit to an account Cash/Cheque | <input type="checkbox"/> Inter-account transfer |
| <input type="checkbox"/> Life Insurance Policy purchased/deposit | <input type="checkbox"/> Outgoing electronic funds transfer |
| <input type="checkbox"/> Purchase of bank draft | <input type="checkbox"/> Purchase of diamonds |
| <input type="checkbox"/> Purchase of Jewelry | <input type="checkbox"/> Purchase of money order |
| <input type="checkbox"/> Purchase of precious metals/stones | <input type="checkbox"/> Purchase of traveller's cheques |
| <input type="checkbox"/> Securities | <input type="checkbox"/> Purchase of Gold |
| <input type="checkbox"/> Real Estate Purchase | |
| <input type="checkbox"/> Other | |

2. Date(s) of transaction(s)

--	--	--

DD MM YYYY

3. Click or tap here to enter text.
Amount & Currency

4. Click or tap here to enter text.
BBD \$ Equivalent

5. Click or tap here to enter text.
Name of drawer/Ordering Customer

6. Click or tap here to enter text.
Name of Payee/beneficiary

7. Click or tap here to enter text.
Other bank involved, other Country

Please provide copies of relevant documents (e.g. bank statements, real estate documents, etc.) for suspicious or unusual activity and identification and verification information.

PART E – Grounds for Suspicion

(Please describe clearly and completely the factors or unusual circumstances that led you to suspect that the transaction(s) involve(s) the proceeds of crime, involve(s) the financing of terrorism, is of a suspicious or unusual nature.)

If the report relates to attempted transaction(s), describe why each one was not completed.

Click or tap here to enter text.

PART E2

If additional information is attached, please tick box

PART E3

If identity of the customer has not been established in PART B and they are not known to the officer, give a description (e.g., sex, approximate age, height, built, ethnicity, complexion, etc.)

PART F - Suspected Offences

- Participation in an organised criminal group and racketeering
- Terrorism, including terrorist financing;
- Trafficking in human beings and migrant smuggling
- Sexual exploitation, including sexual exploitation of children
- Illicit trafficking in narcotic drugs and psychotropic substances
- Illicit arms trafficking; and illicit trafficking in stolen and other goods
- Corruption and bribery
- Fraud
- Counterfeiting currency
- Counterfeiting and piracy of products
- Environmental crime
- Murder, grievous bodily injury
- Kidnapping, illegal restraint and hostage-taking
- Robbery or theft
- Smuggling; (including in relation to customs and excise duties and taxes)
- Tax crimes (related to direct taxes and indirect taxes)
- Extortion
- Piracy Forgery
- Insider trading and market manipulation
- Proliferation Financing
- Unknown

PART G - Details of financial institution/place of transaction

1. Click or tap here to enter text.
Organisation
2. Click or tap here to enter text.
Branch where transaction occurred if applicable
3. Click or tap here to enter text.
Name and Title of Reporting Officer
4. Click or tap here to enter text.
Signature of Reporting Officer
5. Click or tap here to enter text.
Dealers internal reference number
6. Click or tap here to enter text.
Reporting Officer's direct telephone number

**To submit an STR, please
download the STR Form at:**
<https://barbadosfiu.gov.bb/forms/>