



GOVERNMENT OF TRINIDAD AND TOBAGO
MINISTRY OF FINANCE



FINANCIAL INTELLIGENCE UNIT OF TRINIDAD AND TOBAGO

SUSPICIOUS TRANSACTION/ACTIVITY REPORTING STANDARDS

GUIDANCE FOR REPORTING ENTITIES

Purpose

This Guidance is intended to provide assistance to all Financial Institutions and Listed Businesses (Reporting Entities) in meeting their obligations to make a quality Suspicious Transaction or Suspicious Activity Report (STR/SAR) to the Financial Intelligence Unit of Trinidad and Tobago

FIUTT REFERENCE: GN/001/2026

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1.0	September 2019	Analysis Division	Approved Final Version	Director FIUTT	Final
1.1	October 2025	Legal Division	<i>Included requirement to identify type of Legal Person or Arrangement and Description of Legal Persons and Arrangements.</i>	Director FIUTT	<i>Draft</i>
1.2	April 2026	Analysis Division	Included reporting under the Counter Proliferation Financing Act, 2025 and Proliferation Financing Red Flags.	Director FIUTT	Final

PART I

INTRODUCTION

This Guidance Note is intended to provide assistance to Financial Institutions and Listed Business (“Reporting Entities”) in meeting their obligations to make a Suspicious Transaction or Suspicious Activity Report (“STR/SAR”) to the Financial Intelligence Unit of Trinidad and Tobago (“the FIUTT”). These obligations are imposed under section 55A (1) of the Proceeds of Crime Act (“the POCA”); sections 22AB (d) and 22C (3) of the Anti-Terrorism Act (“the ATA”); and sections 3(2) and 4(2) of the Counter-Proliferation Financing Act, 2025 (“the CPFA”). This Guidance Note includes information on who should file, when to file, how to complete the STR/SAR form (as prescribed by the FIUTT) and the procedure for submission to the FIUTT.

STRs/SARs play a crucial role in the fight against money laundering, terrorism financing and proliferation financing (“ML/TF/PF”). The FIUTT is committed to ensuring that Reporting Entities in the Republic of Trinidad and Tobago submit STRs/SARs of the highest quality.

This Guidance Note should be read together with the POCA, the ATA, the Financial Obligations Regulations, 2010 (the FORs), the Financial Obligations (Financing of Terrorism) Regulations, 2011 as amended¹, and the CPFA. Further, reference to Proliferation Financing throughout this document should be read as including reference to sanctions evasion, non-implementation or breach as it relates to proliferation financing.

The information contained herein is subject to change based on the application and impact of laws and other exigencies.

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¹ The Guidance Note was updated in November 2025 following the proclamation of sections 1, 2, 3(a), (b), (d) and 3(e)(i), (ii), (iii) and (iv), 4(a), 5(a), (b), (c), (d) and (e), 6(a), (b) and (c), 7, 8 and 9 of the Miscellaneous Provisions [Proceeds of Crime, Anti-Terrorism, Financial Intelligence Unit of Trinidad and Tobago, Securities, Insurance, Non-Profit Organisations, the Civil Asset Recovery and Management and Unexplained Wealth and Miscellaneous Provisions (FATF Compliance)] Act, No. 17 of 2024 on 15 August, 2025 via Legal Notice No. 283 of 2025; as well as the entry into force of the Counter-Proliferation Financing Act, 2025 on 22 October, 2025.

PART II
REPORTING ENTITIES' OBLIGATIONS UNDER THE AML/CFT LAWS

1. *Who is required to report a Money Laundering, Financing of Terrorism or Proliferation Financing transaction or activity?*

Section 55A (1) of the POCA; sections 22AB (d) and 22C (3) of the ATA and sections 3(2) and 4(2) of the CPFA.

The POCA, the ATA and the CPFA requires that an STR/SAR be made to the FIUTT by Reporting Entities when **they know** or have **reasonable grounds for suspicion** of Money Laundering, Financing of Terrorism or Proliferation Financing.

Reporting Entities are:

(a) Financial Institutions:

- (i) a bank licensed under the Financial Institutions Act;
 - (ii) a financial institution licensed under the Financial Institutions Act;
 - (iii) a building society registered under the Building Societies Act;
 - (iv) a Credit Union under the Cooperative Societies Act;
 - (v) an insurance company or an agency or brokerage registered under the Insurance Act involved in the underwriting and placement of life insurance, other than term life insurance, and other investment related insurance;
 - (vi) a person licensed under the Exchange Control Act to operate an exchange bureau;
 - (vii) a person licensed under the Securities Act as a broker-dealer, underwriter or investment adviser;
 - (viii) a person who carries on money or value transfer services;
 - (ix) a person or entity managing a collective investment scheme under the Securities Act;
 - (x) development banks, trust companies, mortgage companies; or
 - (xi) any other person declared by the Minister by Order, subject to negative resolution of Parliament to be a financial institution for the purpose of this Act;
- and

(b) Listed Business means a business or professional listed in the First Schedule of the POCA:

- (i) **Real Estate Business** - Any natural or legal person, partnership or firm carrying on the business of - the auctioning or negotiating the sale, exchange, purchase, lease or licensing of real property; advertising or holding himself out as being engaged in the business of auctioning or negotiating the sale, exchange, purchase, lease or licensing of real property; engaging in property management

either as a consultant or an agent; taking part in the procuring of vendors, purchasers, lessors, lessees, landlords or tenants of real property; or directing or assisting in the procuring of prospects, or the negotiation or closing of transactions which result in the sale, exchange, lease or licensing of real property.

Notwithstanding the foregoing, a person shall not be regarded as engaging in real estate business by reason only of the fact that—

- (a) he acts for and on behalf of a client under a power of attorney for the purpose of negotiating or executing a contract, transfer or conveyance in respect of real property, provided always that he does not engage in these transactions in breach of his fiduciary duties or for personal profit;
 - (b) he furnishes legal advice and services ancillary thereto in his capacity as an Attorney-at-law;
 - (c) he is—
 - (i) an administrator, executor, receiver or trustee acting under or by virtue of an appointment by will or written instrument or by order of a court; or
 - (ii) an assignee, custodian, liquidator, receiver, or trustee acting under any written law;
 - (d) he deals with real property of which he is an owner or a part owner;
 - (e) he is a developer; or
 - (f) he is employed as a salaried employee of a financial institution dealing with real estate transactions.”;
- (ii) **Motor Vehicle Sales** - Any natural or legal person, firm or partnership, carrying on the business of selling or leasing new or used motor vehicles as defined under the Motor Vehicles and Road Traffic Act.
 - (iii) **Money or Value Transfer Services** - A financial service that accepts cash, cheques, other monetary instruments or other stores of value in one location and pays a corresponding sum in cash or other form to a beneficiary in another location by means of a communication, message, transfer or through a clearing network to which the money value service belongs.
 - (iv) **Gaming House** - Any such business registered under the Gambling and Betting Act.
 - (v) **Pool Betting** - Any such business registered under the Gambling and Betting Act.
 - (vi) **Jewellery** - A business licensed under the Precious Metals and Precious Stones Act.
 - (vii) **A Private Members' Club** - A club within the meaning of the Registration of Clubs Act.
 - (viii) An Attorney-at-law, Accountant or other person performing the functions of an Accountant or Other Independent Legal Professional when they prepare for, or carry out, transactions for their clients concerning the following activities:

- (a) buying and selling of real estate;
 - (b) managing of client money, securities and other assets;
 - (c) management of banking, savings; organization of contributions for the creation, operation or management of companies, legal persons or arrangements or buying or selling of business entities.
- (ix) **An Art Dealer** - An individual or company that buys and sells works of any category of art.
- (x) **Trust and Company Service Providers** - persons who prepares for and carries out transactions for a client in relation to the following activities:
- (a) acting as a formation agent of legal persons;
 - (b) acting as (or arranging for another person to act as) a director or secretary of a company, a partner of a partnership or a similar position on relation to other legal persons;
 - (c) providing a registered office, business address or accommodation, correspondence or administrative address for a company a partnership or any other legal person or arrangement;
 - (d) acting as (or arranging for another person to act as) a nominee shareholder for another person.

2. Attorney-at-law or other Independent Legal Professional -

An Attorney-at-law or other Independent Legal Professional is not required to report any information they receive or obtain from a client in privileged circumstances. However, no information or other matter required to be reported under section 55A (1) shall be treated as coming to an Attorney-at-law in privileged circumstances if it is communicated or given with a view to furthering a criminal purpose.

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PART III

TIME TO SUBMIT AN STR/SAR TO THE FIUTT

An STR/SAR must be sent to the FIUTT as soon as possible but in any event within **five (5) days**² of the date on which the Reporting Entity's personnel (the Compliance Officer) knew or formed the suspicion that:

- (a) that funds being used for the purpose of a transaction are the proceeds of a specified offence (*including tax offences*); or
- (b) that funds for a transaction are linked or related to or to be used in whole or in part for the financing or terrorism;
- (c) that funds for a transaction are linked or related to or to be used in whole or in part for proliferation financing; or
- (d) where a designated or listed entity (for either Terrorist Financing or Proliferation Financing) attempts to transact business.

Reporting Entities should ensure that their internal systems support the timely filing of STRs/SARs and avoid unnecessary delay.

PART IV

WHAT IS A SUSPICIOUS TRANSACTION/ACTIVITY

1. Suspicion of money laundering, financing of terrorism or proliferation financing requires a degree of satisfaction that may not amount to belief, but should extend beyond mere speculation and be based on some foundation that money laundering, terrorist financing or proliferation financing has occurred or is about to occur.

Suspicion involves a much more personal and subjective assessment. Reporting Entities have to assess whether there are reasonable grounds to suspect that a transaction is related to a money laundering offence, a financing of terrorism offence or a proliferation financing offence.

2. In this regard Reporting Entities are required to pay special attention to:

² On 15 August, 2025, the proclamation of section 3(b) of the Miscellaneous Provisions [Proceeds of Crime, Anti-Terrorism, Financial Intelligence Unit of Trinidad and Tobago, Securities, Insurance, Non-Profit Organisations, the Civil Asset Recovery and Management and Unexplained Wealth and Miscellaneous Provisions (FATF Compliance)] Act, 2024, [via Legal Notice No. 283] amended the time for filing of an STR/SAR after forming a suspicion from fourteen (14) days to five (5) days.

- a) business transactions with individuals, corporate persons and financial institutions in or from other countries which do not or insufficiently comply with the recommendations of the Financial Action Task Force;
 - b) a transaction which is complex, unusual or large³ transaction, whether completed or not;
 - c) unusual patterns of transactions; and
 - d) insignificant but periodic transactions which have no apparent or visible, or lawful purpose.
3. A transaction includes:
- (a) the receiving or making of a gift. The sum of money involved in the transaction is irrelevant. There is no monetary threshold for making a report of a suspicious transaction;
 - (b) a one-off transaction. This means any transaction other than one carried out in the course of an existing business relationship;
 - (c) two or more one-off transactions which appear to be linked;
 - (d) a transaction which is attempted i.e. which is not completed.
4. Reporting Entities may become suspicious because the customer activity deviates from the normal activity for that customer, business or sector. Reporting Entities must therefore understand what is the normal activity of each customer and how this transaction, differs from that.
5. When considering making a quality suspicious transaction report, the Reporting Entities should consider all the circumstances of the transaction. Relevant factors include your knowledge of the customer's business, financial history, background and behaviour. As a general principle, any transaction that causes a Reporting Entity to have a feeling of apprehension or mistrust about the transaction should be closely examined and the entity should consider submitting an STR/SAR.
6. Finally, Reporting Entities should bring together all the relevant factors, some factors may seem individually insignificant, but taken together may raise the suspicion of money laundering, the financing of terrorism or proliferation financing.
7. Distinction between knowledge and suspicion:

³ POCA 55(3C) – “For the purpose of subsection (2)(a)(ii), “large transaction” means a transaction, the value of which is fifty thousand dollars or such other amount as the Minister may by Order prescribe.”
In accordance with LN 396 of 2019 – The Proceeds of Crime (Large Transactions) Order, 2019 - the value of a large transaction is prescribed as fifty thousand dollars.

Having knowledge means actually knowing something to be true and can be inferred from surrounding circumstances. Suspicion of money laundering, financing of terrorism or proliferation financing on the other hand, requires a degree of satisfaction that may not amount to belief, but should extend beyond mere speculation and be based on some foundation that money laundering, terrorist financing or proliferation financing has occurred or is about to occur.

In the case of either knowledge or suspicion, an STR/SAR should be submitted to the FIUTT.

PART V

HOW TO IDENTIFY A SUSPICIOUS TRANSACTION OR SUSPICIOUS ACTIVITY

1. The Red Flags below are some general indicators which may be helpful in identifying a suspicious transaction/activity. The presence of one or more of these indicators does not necessarily mean that Money Laundering, Financing of Terrorism or Proliferation Financing is in fact taking place. The Reporting Entity, upon the examination of the Transaction, must build its conclusions on objective basis and consider carefully all related conditions and evidence.

Red Flags which point to a transaction being related to the Financing of Terrorism are similar to those relating to money laundering. In fact, it is possible that a transaction could be related to both. For example, funds to be used for terrorist activity could be the proceeds of criminal activity as well as from legitimate sources.

2. Red Flags pointing to Financing of Terrorism⁴

Behavioural Indicators:

- (a) The parties to the transaction (owner, beneficiary, etc.) are from countries known to support terrorist activities and organization.
- (b) Use of false corporations, including shell-companies.
- (c) Inclusion of the individual or entity in the United Nations 1267 Sanctions list.
- (d) Media reports that the account holder is linked to known terrorist organizations or is engaged in terrorist activities.
- (e) Beneficial owner of the account is not properly identified.
- (f) Use of nominees, trusts, family member or third party accounts.

⁴ Adapted from "FIUs and Terrorists Financing Analysis - A review by the Egmont Group of sanitised cases related to Terrorist Financing" www.egmontgroup.org/library/download/58

- (g) Use of false identification.
- (h) Abuse of non-profit organization.

Indicators linked to the financial transactions:

- (a) The use of funds by the non-profit organization not consistent with the purpose for which it was established.
- (b) The transaction is not economically justified considering the account holder's business or profession.
- (c) A series of complicated transfers of funds from one person to another as a means to hide the source and intended use of the funds.
- (d) Transactions which are inconsistent with the account's normal activity.
- (e) Deposits structured below the reporting requirements to avoid detection.
- (f) Multiple cash deposits and withdrawals with suspicious references.
- (g) Frequent domestic and international ATM activity.
- (h) No business rationale or economic justification for the transaction.
- (i) Unusual cash activity in foreign bank accounts.
- (j) Multiple cash deposits, in small amounts into an account, followed by a large wire transfer to another country.
- (k) Use of multiple, foreign bank accounts.

3. Red Flags pointing to Money Laundering:

- (a) The client cannot provide satisfactory evidence of identity.
- (b) Situations where it is very difficult to verify customer information.
- (c) Situations where the source of funds cannot be easily verified.
- (d) Transactions in which the parties are non-resident and their only purpose is a capital investment (they are not interested in living at the property they are buying).
- (e) Frequent change of ownership of same property in unusually short time periods with no apparent business, economic or other legitimate reason & between related persons.
- (f) Client wants to re-sell property shortly after purchase at a significantly different purchase price, without corresponding changes in market values in the same area.
- (g) Client wishes to form or purchase a company whose corporate objective is irrelevant to the client's normal profession or activities, without a reasonable explanation.
- (h) The client sets up shell companies with nominee shareholders and/or directors.
- (i) Client repeatedly changes Attorneys within a short period of time without any reasonable explanation.
- (j) Client purchases property in names of other persons or uses different names on offers to purchase, closing documents and deposit receipts.
- (k) Client deposits large amount of cash to make payments which is outside of the client's profile.

- (l) Client negotiates a purchase but wants to record a lower value on documents, paying the difference “under the table”, (inadequate consideration).
- (m) Client’s documents such as identification, statement of income or employment details are provided by an intermediary who has no apparent reason to be involved, (the intermediary may be the real client).
- (n) Client gives power of attorney to a non-relative to conduct large transactions (same as above).
- (o) Transaction involves legal entities and there is no relationship seen between the transaction and the business activity of the buying company, or the company has no business activity.
- (p) Client requests the firm to act as his agent in obtaining high sum bankers’ drafts, cashiers’ cheques and other cash equivalent or near cash monetary instruments or in making wire transfers to and from other banks or financial institutions, (anonymity).
- (q) Divergence from the type, volume or frequency of transactions expected in the course of the business relationship.

4. Red Flags pointing to Proliferation Financing:

- (a) Customer Profile Red Flags
 - Customer operates in industries linked to dual-use goods.
 - Reluctance to provide information on beneficial ownership.
 - Newly established companies engaging in high-value international trade.
 - Customers with links to high-risk or sanctioned jurisdictions.
- (b) Transactional Red Flags
 - Transactions inconsistent with the customer’s known business profile.
 - Payments involving multiple intermediaries with no clear rationale.
 - Repeated transactions just below reporting thresholds.
 - Unusual routing of funds through unrelated countries.
- (c) Trade-Related Red Flags
 - Discrepancies between shipping documents and invoices.
 - Vague or generic descriptions of goods (e.g., “equipment,” “materials”).
 - Shipment of goods to countries unrelated to the buyer or seller.
 - Use of freight forwarders or trans-shipment points in high-risk jurisdictions.
- (d) Sanctions-Related Red Flags
 - Matches or near matches to sanctions lists.
 - Transactions involving entities with similar names to sanctioned parties.
 - Payments referencing countries subject to international sanctions.

5. Impact on the Business Relationship /Transaction after Forming a Suspicion:

The law does not require a Reporting Entity who has filed a STR/SAR to end or terminate their financial relationships with the reported individual or entity except in the two (2) following circumstances:

- (a) where satisfactory evidence of identity has not been obtained; or
- (b) where a designated or listed entity attempts to enter into a transaction or continue the business relationship.

In all other cases Reporting Entities should be aware that the decision to continue the business relationship after filing a STR/SAR should be based on commercial or risk containment reasons. However, a decision to terminate the business relationship must also ensure that the customer is not alerted to the filing of the STR/SAR which would constitute the offence of tipping off.

PART VI

HOW TO MAKE A SUSPICIOUS TRANSACTION/ACTIVITY REPORT

1. Format of the STR/SAR

The prescribed STR/SAR form should be used by Reporting Entities. The STR/SAR form is available on the FIUTT's website [Report Types – Financial Intelligence Unit](#) and a Microsoft word form would also be made available by emailing a request to the FIUTT at fiutt@gov.tt.

It is essential that Reporting Entities complete all relevant fields in the form with accurate information.

2. Contents of the STR/SAR

The value of an STR/SAR depends on the **quality** of information it contains. An STR/SAR should set out in a clear manner the basis for knowledge or suspicion of Money Laundering, Financing of Terrorism or Proliferation Financing.

Reporting Entities should include as much relevant information about the customer, transaction or activity available from its records.

In Part 2 "Suspicious Transaction / Suspicious Activity Report" **Item 6 – Report Narrative**, a detailed explanation as to why the Reporting Entity is submitting a suspicious transaction report should be given.

The information about the transaction and what led to your suspicion is important in completing the STR/SAR. Provide as much details as possible including anything that made you suspect that it might be related to Money Laundering, Financing of Terrorism or Proliferation Financing or any combination of these offences. It is not critical for the Reporting Entity to determine whether the offence is one or the other, it is the information about your suspicion that is important, not the distinction between Money Laundering, Financing of Terrorism or Proliferation Financing offences.

Supporting documents

You are to describe supporting documentation which you attached to your submission, or documents which you retained. Where necessary you should also enclose photocopies of documents facilitating the transaction and identifying the party or parties to the transaction.

Note: The STR/SAR is to be completed after the Customer leaves. It must not be completed in the presence of the Customer. The Customer should not be told that a STR/SAR would be made or has been made to the FIUTT.

3. STR/SAR Submission to the FIUTT

STRs/SARs must be reported by the following methods to the Director FIUTT, either:

- (a) electronically⁵, by a secure reporting system established by the FIUTT;
- (b) by submitting the completed STR/SAR forms in writing, and delivered in a **SEALED** envelope and stamped "**CONFIDENTIAL**" addressed to:

**The Director
Financial Intelligence Unit of Trinidad and Tobago
Level 25, Tower D
International Waterfront Complex
1A Wrightson Road,
Port of Spain
Trinidad and Tobago**

⁵ *The Financial Intelligence Unit of Trinidad and Tobago (FIUTT) has implemented a secure electronic reporting solution called caseKconnect®. This solution is designed to allow only caseKconnect® registered Reporting Entities to prepare and electronically submit Suspicious Transaction Reports/Suspicious Activity Reports (STRs/SARs) and other Reports as they become available, to the FIUTT in a secure and efficient manner. Through caseKconnect®, it is anticipated that the hand delivery of paper based reports by Reporting Entities to the FIUTT will be reduced with the adoption of this new filing method. Reporting Entities seeking to submit reports using the secure reporting solution must be registered in caseKconnect®.*

<https://fju.gov.tt/reporting/fju-connect-log-in/>

<https://casekconnect.fju.gov.tt/index.php?module=users/login>

caseKconnect® User Manual <https://fju.gov.tt/wp-content/uploads/2024/04/User-Manual-caseKconnect.pdf>

(c) Registered post addressed to the Director at the above address.

or

The method of delivery of an STR/SAR will depend on the circumstances of the report.

The FIUTT may specify additional modes, which may be used for submitting STRs/SARs by notification published in the Gazette and in two newspapers in daily circulation in Trinidad and Tobago.

The Reporting Entity may in limited circumstances, make a STR/SAR via telephone [(868) 612-4FIU (4348)] where the Reporting Entity believes the immediate attention of the FIUTT is required *i.e. urgent cases*. Such urgency could arise:

- (a) where a Reporting Entity's impression of a transaction has gone beyond suspicion and amounts to knowledge or belief that the transaction involves money laundering, financing of terrorism or proliferation financing;
- (b) where there is belief of an imminent crime; or
- (c) to avoid flight of assets out of Trinidad and Tobago which may be irrecoverable.

In each case that an oral report is made it must be followed as soon as practicable by a written report.

4. FIUTT Procedures upon the Receipt of a STR/SAR

Upon the receipt of an STR/SAR through the FIUTT's secured electronic system, the Reporting Entity will receive an automated feedback which confirms the receipt of the STR/SAR, by the FIUTT. In the case of an STR/SAR, hand delivered in a **sealed envelope** and stamped **CONFIDENTIAL**, or delivery by registered post, the FIUTT will provide feedback in the form of a written acknowledgement letter to the Reporting Entity's Compliance Officer within thirty (30) days from the day received. This feedback will be provided via the FIUTT's secured email, to the Compliance Officer of the Reporting Entity.

In addition, upon the preliminary analysis of the STR/SAR received, where the STR/SAR was found to be deficient, the FIUTT will provide to the Reporting Entity a Deficiency Feedback outlining the type of information that should have been included. This feedback enables Reporting Entities to improve their internal and external reporting procedures, as well as, improve the quality of their STRs/SARs. The FIUTT may also require a Reporting Entity to produce specific information that the FIUTT may reasonably require to conduct its analysis. Reporting Entities should be cooperative in this regard.

Subsequent to the analysis process, the FIUTT will also provide further written feedback, termed, 'Special Feedback' on the STR/SAR that:

- (a) an intelligence report was sent to the appropriate Law Enforcement Authority (LEA) for investigation;
- (b) the LEA has advised that the investigation has been closed;
- (c) the STR/SAR has been filed for intelligence purposes; or
- (d) the suspect has been charged with/convicted of an offence.

PART VII

HOW TO COMPLETE AN STR/SAR FORM

This guidance is provided to assist Reporting Entities (Financial Institutions or Listed Businesses) in preparing the STR/SAR reporting form.

- **General Guidelines**

All fields on the STR/SAR form should be completed. No field is to be left blank. Insert the letters “N/A” (not applicable) where information requested does not relate to your reporting.

Dates – Dates should be entered using the format “yyyy/mm/dd,” where “yyyy” is the year, “mm” is the month and “dd” is the day. Zero (0) should precede any single digit number. If the month or day is not available or unknown, enter zeros in the space for “mm” and “dd.” For example, 2022/01/00 indicates an unknown day in January 2022.

Numbers – Monetary amounts should be entered using the format “\$0,000,000”. (Round **UP**, to the nearest whole dollar). All amounts should be reported in the currency in which the transaction was conducted in. For example - TTD, USD, £, €, ¥, etc.

- **Specific Guidelines**

Your Reference No. – *The space marked “Your Reference No.” at the top right hand corner of the STR/SAR form is for the Reporting Entity’s unique identifier given to each STR/SAR submitted to the FIUTT. All reports to the FIUTT should be sequentially numbered and that number written in this space. A record of all STRs/SARs submitted should be kept securely by the Financial Institution or Listed Business.*

Item 1

Check the appropriate boxes as it relates to report being submitted. This is situated at the very top of the report form just below the instructions and offences text box.

- (a) **Initial Report** – If you are submitting a report on the subject for the first time, check the box labelled (a) – Initial Report.

- (b) **Corrected Report** - If you are correcting a previously filed report, check the box labelled (b) – Corrected Report. Complete the report in its entirety and include the corrected information in all of the applicable boxes. Then describe the changes that are being made in **Part 2 Item 6 – Report Narrative**.

- (c) **Supplemental Report** – If you have previously submitted an initial report and the subject has conducted another suspicious transaction that requires another report being submitted, check the box labelled (c) – Supplemental Report. Complete the report in its entirety.

Intentionally left blank

STR/SAR FORM
PART 1 - INFORMATION ABOUT THE REPORTING FINANCIAL INSTITUTION OR LISTED BUSINESS

Item 2 - Name:

You should enter the full legal [Trade] name of the Financial Institution (FI) or Listed Business (LB) or company completing the report.

Item 3 - Address of Main office:

Enter the main office, building number and street address of the FI or LB as named in Item 2. **A street address is required; a Post Office (P.O.) Box number must not be used.**

Item 4 - Address of Branch Office(s) where transaction or activity occurred:

If the location of the suspicious activity is different from that provided in Item 3, enter the street address of the branch or office **where the activity occurred**. Otherwise, enter “same as Item 3 above.” If the suspicious activity occurred at more than one branch, include this information in Part 2 Item 6 – Report Narrative.

Item 5 - Asset size of Reporting Financial Institution/Listed Business or Company:

Enter a TT dollar value of the total asset size of the Reporting Entity.

STR/SAR FORM
PART 2 – REPORT NARRATIVE

Item 6 – Report Narrative

Item 6 of the STR/SAR is critical. The care with which it is written may determine whether or not the described conduct and its possible criminal nature are clearly understood.

Provide a complete chronological account of what is unusual, irregular or suspicious about the transaction. The narrative should include the material indicated in the Form but should also include any other information necessary to better enable the FIUTT to understand the transaction reported. If necessary, continue the narrative on a copy of this page and attach to the STR/SAR.

Each party mentioned in the narrative should have been identified with bio-data (if available) in Parts 4, 9 and 10 of the STR/SAR form. If no bio-data was available give as much detail as possible in the narrative.

If a continued page is attached or not, be sure to respond in the following field below Item 6 – Report Narrative. – ‘Continued on Separate Sheets: () Yes or () No.’

STR/SAR FORM
PART 3 – PREPARER INFORMATION

Item 7 – First Name, Item 8 – Middle Name and Item 9 – Last Initial

Enter the name of the person who prepared the information (“the preparer). **It would be extremely helpful if the individual identified in this section has specific knowledge of the underlying facts.**

Item 10 - Title:

State the Position/ Title held by the preparer of the information at the Reporting Entity. *For example: Compliance Officer, Alternate Compliance officer.*

Item 11 - Phone Number:

Enter a phone number, including area code, where the preparer can be reached.

Item 12 – First Name, Item 13 – Middle Name and Item 14 – Last Initial

Enter the name of the person who can be contacted for additional information (if different from preparer).

Item 15 - Title:

State the Position/ Title held by the person to contact for assistance at the Reporting Entity. *For example: Compliance Officer, Alternate Compliance officer.*

Item 16 - Phone Number:

Enter a phone number, including area code, where the person to be contacted for assistance can be reached.

Signature – A signature should be made by the person who can be contacted for assistance.

Date – The date the report was completed should be stated here, according to the prescribed format the prescribed format [yyyy/mm/dd].

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STR/SAR FORM

PART 4 – TYPE OF ACTIVITY THAT INITIATED TRANSACTION

Item 17 – What type of activity initiated the Transaction?

Check one or more of the checkboxes available which denotes the type of activity which initiated the transaction. If the checkbox labelled 'Other' is selected, please indicate the unnamed activity which may have occurred to initiate the transaction.

Item 18 – Account Number(s) if the transaction involved an account

(Items 19 – 24 must be completed if an account number is provided):

Number and list each financial account(s) that were affected by the suspicious activity in sequential order. If more than four (4) accounts were involved, provide the additional accounts in **Item 6 – Report Narrative**.

For example: 1) 2e391203 2) 36316017 3)642877.

Item 19 – Type of account:

Check the appropriate box(es), if applicable, of the type of financial accounts detailed in **Item 18**. When selecting "Other" clearly indicate the account type by name and simple description (e.g. Investment account).

Item 20 – Account holder(s):

List the full names of sole and joint account holders for all accounts identified at **Item 18**. Indicate account held by using the **corresponding sequential number** as quoted in **Item 18**. Include identification numbers and/or date of birth for any party named here and not previously identified in the report.

For example: 1) John Doe 2) John Strong 3) Mary James

Where the account holder is a legal entity such as a business, company or non-profit organization; identify the natural person(s) authorized to transact business on behalf the legal entity. Include identification numbers and/or date of birth for any party named here and not previously identified in the report.

For example: 2) Doe's Car Wash – John Doe 01/01/1900; Mary Doe 02/02/1900

Item 21 – Account Balance:

State the current account balance with the corresponding date.

Item 22 – Account beneficial owner(s):

Where the Reporting Entity has **knowledge/suspicion** that the account holder/authorized natural person is not the ultimate beneficial owner of the account; identify the **known/suspected** beneficial owner. Include, name, identification numbers, date of birth and addresses (if available) for any party named here and not previously identified in the

report. Furthermore, outline in Item 6 – Report Narrative, the premise upon which this **knowledge/suspicion** is based.

Item 23 – Have any of the Institution’s or relevant business accounts related to this matter been closed? () Yes or () No

If any of the accounts affected in the transaction being reported were closed, select the appropriate response, whether () Yes or () No, as it relates to the above question. If ‘Yes’, list the account number (s) of the account which was/were closed in the fields provided.

Item 24 – Account History:

Fill in the table provided with account history details. List the account numbers in the column titled Account No, the corresponding Year in the column labelled Year and Total Annual Deposits and Withdrawals, and Currency Type in their respective columns. *See Example below.*

Account No	Year	Total Annual Deposits	Total Annual Withdrawals	Currency Type (eg. TTD, USD, CAD, etc.)
36316017	2016	15,564.00	35,456.00	USD
	2017	18,359.00	15,564.00	TTD
	2018	35,456.00	18,359.00	TTD
37619630	2016	35,456.00	18,359.00	TTD
	2017	18,359.00	15,564.00	CAD
	2018	15,564.00	35,456.00	USD

Item 25 – State name and full details of ultimate beneficiary of the transaction/activity:

Identify the final recipient(s) of the funds, property, etc. involved in the transaction (if available). Complete the table providing the names and details of the ultimate beneficiary of the transaction activity. *See Example below.*

Transaction No	Date	Amount	Beneficiary (Full Details)
R07358	09-Nov-2018	TT\$40,000.00	James Doe, ID#153698, Add: #Happy Vale St., Maryland, Port of Spain
R8976	15-Dec-2018	TT15,500.00	John Doe, ID#698755, Add: #Happy Vale St., Maryland, Port of Spain

Item 26 – Have you attached supporting documents?

Check one or more of the checkboxes available, which denotes the supporting documents attached. Additionally, if 'Other' is selected, please describe the unnamed supporting documentation and enclose photocopies of all documents facilitating the transaction and identifying the party or parties to the transaction.

Item 27 – Have you retained supporting documents?

In the event of any requests for further information, the Financial Institution, Listed Business or company is expected to retain supporting documents. Select the appropriate checkbox Yes or No, as it relates to the above question. If Yes, list the documents retained.

Remember that any supporting documentation such as spreadsheets, photocopies of cancelled checks or other documents, surveillance photos, etc., must be retained at the Financial Institution or Listed Business for a period of 6 years.

STR/SAR FORM

PART 5 – DETAILS OF THE SUSPICIOUS TRANSACTION ACTIVITY

Item 28 – Details of the Suspicious Transaction/Activity (Check all that apply):

Check one or more of the checkboxes available, which denotes the type of activity that gives details of the suspicious transaction activity.

STR/SAR FORM

PART 6 – SUSPECTED CRIMINAL CONDUCT

Item 29 – Indicate the known or suspected criminal conduct (Check all that apply):

Check one or more of the check boxes which apply to the known or suspected criminal activity being reported.

STR/SAR FORM

PART 7 – COURT / JUDICIAL INFORMATION

Item 30 – State any relevant charge, conviction, litigation:

If any charges, convictions or litigations are known to be associated with any of the suspected individuals named in this report and/or involved in the suspicious transaction being reported, please state in the fields provided. Include information source.

STR/SAR FORM
PART 8 – ATTACHMENTS

Item 31 – List the attachments included with this STR/SAR submission:

State the name(s) of the supporting documents you have attached to your submission. Ensure that the supporting documents are correctly labelled with the corresponding names for ease of identification.

STR/SAR FORM
PART 9 – SUSPECT INFORMATION

Item 32 – Relationship to Financial Institution or Listed Business:

Select, from the options provided, the relationship of the suspected individual to the financial institution or Listed Business/company making the report.

Individual

Item 33 – Title: Select the appropriate title of the individual in question.

Item 34 – First Name, Item 35 – Middle Name and Item 36 – Last Name

- If the suspicious activity involves an individual, enter his or her first name in Item 34, middle initial in Item 35 and last name in Item 36. If there is no middle initial, enter “N/A” in Item 35.
- If both formal and alias names are established, enter the full legal name in Items 34, 35 and 36 and the alias name(s) in Part 2, Item 6 – Report Narrative.
- If the suspicious activity involves an organization (entity), enter its name and details in Item 49 and enter “N/A” in Items 34, 35 and 36.
- If there is more than one individual/suspect involved, enter the names and related bio-data (Dates of birth and addresses) in Part 10, Item 57 – Related Parties.
- If no information about the Suspect is available, indicate in Part 2, Item 6 – Report Narrative. This will alert the FIUTT that this information has not been inadvertently omitted.

Item 37 – Gender (M/F): Provide the appropriate gender of the individual in question.

Item 38 – Marital Status: Provide the appropriate marital status of the individual in question.

Item 39 – Nationality: State the legal status which denotes the country where the individual was born or is a legal citizen e.g. Trinidadian, American, English, French.

Item 40 – Citizenship: Provide any resident status obtained by the individual either through Inheritance, Marriage or Naturalization of a country other than that of his or her birth. If more than one citizenship is involved please list all.

Item 41 – Usual Place of Residence (local address): State the permanent address of the individual in Trinidad and Tobago; include any apartment or suite numbers of the person. If more than one address is known, please provide all.

Item 42 - Usual Place of Residence (outside of Trinidad and Tobago): If the individual is from a foreign country or holds an address or addresses in a foreign country, state the foreign address of the individual. If more than one address is known, please provide all.

Item 43 - Date of Birth: - Using the prescribed format [yyyy/mm/dd], enter the year, month and day of birth of the individual entered in Items 34-36.

Item 44 - Telephone Number

- (a) **Home Tel. No:** Enter the home telephone number, including the area code for the individual entered in Items 34-36.
- (b) **Cell No.:** Enter the cellular number, including the area code for the individual entered in Items 34-36.
- (c) **Work Tel. No.:** Enter the business telephone number, including area code of the individual or organization entered in Items 34-36.

Item 45 - Email Address: If an email address of the individual is known, please provide in this area.

Item 46 - Occupation:

Fully identify the occupation, profession or business of the individual entered in Items 34-36. *For example, Secretary, Shoe salesman, Carpenter, Attorney-at Law, Housewife, Restaurant owner, Liquor store clerk, etc. Do not use non-specific terms such as merchant, self-employed, businessman, etc.*

Item 47 - Place of Employment:

Fully identify the name of the company, business or organisation where the individual identified in Items 34-36 is known to be employed. If the individual is self-employed, please indicate 'Self-Employed' and state the name of their company or business.

Item 48 – Forms of Identification

- (a) Driver's License, (b) Passport, (c) National I.D. Card,
- (d) Social Security Card, (e) Other:

Check appropriate box for identification provided by the individual and use the lines provided to give specific data such as driver's license number or passport number, the issuing authority and/or country and the date issued.

For Box (e), “Other,” provide a brief explanation in the space provided of the form of identification. If more space is required, enter the information in Part 2, Item 6 – Report Narrative.

Company/Business Entity

Item 49 – Name of Company/Business Entity:

- If the suspicious activity involves an organization (entity), enter its name in Item 49 and enter “N/A” in Items 34, 35 and 36.

- If the Financial Institution or Listed Business has knowledge of a separate “trading as” name, in Part 2, Item 6 - Report Narrative, also enter the alternate organization’s name, followed by the phrase “T/ A.” and the name of the business. For example:
 - **John R. Smith T/A Smith Auto Sales or**
 - **Johnson Enterprises T/A PJ’s Pizzeria.**

- In this section provide the details listed in Item (a) – (i) as relates to the company or business.
 - (a) **Company Reg. No./Business Reg. No:** Provide the company or business registration number as given to the entity by the Companies Registry in Trinidad and Tobago.
 - (b) **Date of incorporation or Registration** Using the prescribed format [yyyy/mm/dd], provide the date of the company’s incorporation, registration or in some cases, continuance.
 - (c) **Country of Incorporation or Registration:** State the country wherein the company or business is incorporated/registered.
 - (d) **Status:** Select the current status of the company or business.
 Current *Inactive* *Struck Off*
 - (e) **Address:** Enter the registered address of the Company or Business.
 - (f) **VAT Reg. No:** State the company or business VAT registration number, if available.
 - (g) **B.I.R. No:** State the Board of Inland Revenue number, if available.
 - (h) **Share Capital:** State the Share Capital of the company or business, if available
 - (i) **Website:** If available, provide the company or business website address.

Item 50 – Nature of Business Operation:

This is a mandatory field once the suspicious entity is a business or company. The nature of activities in which the business is involved must be stated.

Sub Item 50(a) – type of legal entity:

Identify the type of legal entity which holds the account. This can be selected from the checkboxes available, e.g. *Private Limited Liability Company, Sole Trader, Non-Profit*

Company or Organisation. A full description of the types of legal entities available is included at Part VIII herein.

STR/SAR FORM

PART 10 – DATE OF TRANSACTION/ACTIVITY AND VALUE OF FUNDS INVOLVED

Item 51 – Transaction/Activity Status:

(a) Completed (b) Attempted

This is a mandatory field. Select the appropriate checkbox indicating whether the transaction being reported was completed or attempted.

Item 52 – Date of Suspicious Transaction or Activity:

Enter the first known date of the suspicious transaction or activity. If multiple or related activities were conducted by the suspect during the reporting period, the Financial Institution or Listed Business may enter the date of the initial activity and the last occurrence date in Item 55 of the form. Report all activity on one STR/SAR form. The first known date is a mandatory field.

Item 53 – Dollar amount involved:

In this report enter the dollar amount involved in the suspicious activity. If less than a full dollar is involved, round it to the next highest dollar. An aggregated total of all transactions for multiple or related suspicious activities by the same individual or organization within the same reporting period may be shown in this field. The break-down of this total may then be listed in Part 2, Item 6 – Report Narrative.

Item 54 – Is the suspicious transaction/activity an Isolated Incident?

Select the appropriate checkbox in response to the above question.

Item 55 – State the period during which the suspicious transaction or activity occurred.

If multiple or related transactions were conducted by the suspect during the reporting period, the Financial Institution or Listed Business may enter the date of the initial activity and the last occurrence date in this field.

Item 56 – Does the suspicious transaction/activity involve other parties?

Select the appropriate checkbox Yes or No, as it relates to the above question. If yes, respond to Item 57.

Item 57 – State name and full detail of the related parties

List the full names, identification numbers and addresses of the related parties.

PART VIII
EXPLANATION OF THE DIFFERENT TYPES OF LEGAL ENTITIES

Name	Description
Private Limited Liability Company	A legal entity incorporated under the Companies Act, Ch. 81:01 (“CA”) that is formed to conduct business for profit or gain, offers shares or membership interest but not to the general public and where the liability of the shareholders or members is limited.
Private Unlimited Liability Company	A legal entity incorporated under the CA that is formed to conduct business for profit or gain, offers shares or membership interest but not to the general public and where the liability of shareholders or members is unlimited
Public Limited Liability Company	A legal entity incorporated under the CA that is formed to conduct business for profit or gain, whose shares are offered to the general public and where the liability of shareholders is limited.
Non-Profit Company	A legal entity incorporated under the CA that is formed for the promotion of a patriotic, religious, philanthropic, charitable, educational, cultural, scientific, literary, historical, artistic, social, professional, fraternal, sporting or athletic purpose or some other useful object without share capital and without pecuniary gain to its members
Non-Profit Organisation incorporated by Act of Parliament	A legal entity incorporated under a specific Act of Parliament other than the CA that is formed for the promotion of a patriotic, religious, philanthropic, charitable, educational, cultural, scientific, literary, historical, artistic, social, professional, fraternal, sporting or athletic purpose or some other useful object without pecuniary gain to its members.
Unincorporated Non-Profit Organisation	An unincorporated body of persons that is formed for the promotion of a patriotic, religious, philanthropic, charitable, educational, cultural, scientific, literary, historical, artistic, social, professional, fraternal, sporting or athletic purpose or some other useful object without pecuniary gain to its members.
Partnership	An unincorporated body of two or more natural persons or legal entities registered under the Registration of Business Names Act, Ch. 82:85 who have entered into partnership with one another with a view to carrying on business for profit and where the liability of partners is unlimited.
Trusts and other Legal Arrangements	An express trust or other similar type of legal arrangement whereby one or more settlors entrust property to be managed by a trustee or equivalent for the benefit of the beneficiaries of the express trust or other legal arrangement that are governed by the laws of Trinidad and Tobago or administered in Trinidad and Tobago or for which the trustee resides in Trinidad and Tobago.

PART IX

ADDITIONAL INFORMATION RELATING TO STR/SAR SUBMITTED TO THE FIUTT

REQUEST FOR FURTHER INFORMATION

The Director may, having regard to the intricacy of a case being analyse, make a request for additional information from the Reporting Entity or from any other Financial Institution or Listed Business in order to facilitate the exercise of its powers under the Act.

TIPPING OFF/ CONFIDENTIALITY

As a Reporting Entity, **you are not allowed to inform anyone**, including the client/customer, about the contents of a STR/SAR, or even that you have made such a report. It is an offence under the POCA and the FIUTT Act to do so. Additionally, it is suggested that you should be wary of requesting any information that you would not normally request during a normal transaction which may alert your customer/client that you are making a suspicious transaction report.

IMMUNITY

No criminal or civil proceedings can be brought against the Financial Institutions or Listed Businesses and your employees, staff, directors, owners or other representatives as authorised by law; for making a report in good faith concerning a suspicious transaction. This protection also extends to information provided voluntarily to FIUTT because of your suspicions of money laundering, financing of terrorism or proliferation financing activity.

PENALTIES

Penalties apply for failure to comply with the suspicious transaction/activity reporting obligations. Failure to report a suspicious transaction could lead to, on summary conviction, to a fine of TT\$500,000 and up to two years imprisonment, and on indictment, to a fine of TT\$3,000,000 and up to seven years imprisonment. Failure to provide further information upon request by the FIUTT is an offence which could lead to, on summary conviction to a fine of TT\$500,000 and a further fine of TT\$25,000 for each day of default, and on indictment to a fine of TT\$1 million and a further fine of TT\$50,000 for each day of default.

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For feedback on or clarification about this Guidance Note **ONLY contact-**

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