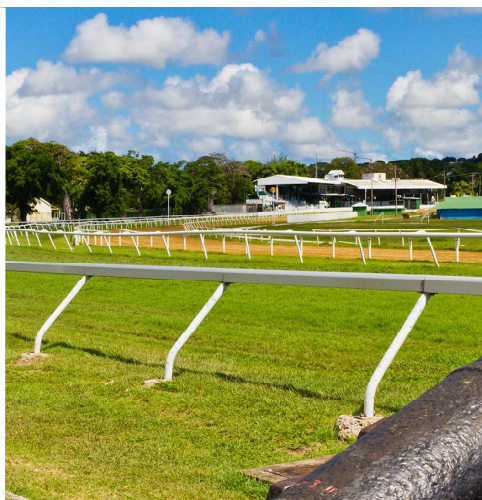
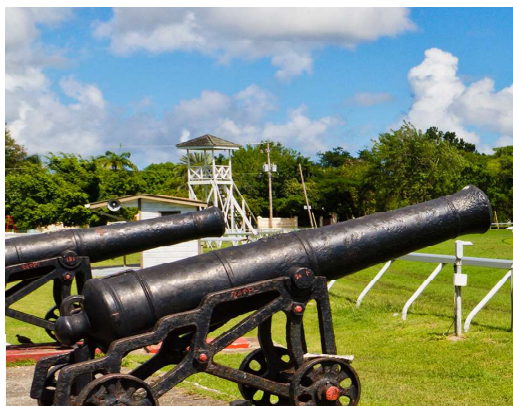
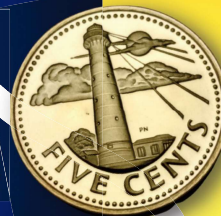


NOVEMBER 2023



@BajanFIU presents

# THE Dollar Watch NEWSLETTER



## INSIDE THIS ISSUE

ON THE WATCH -THE RECAP 1

STR SUPPORT 2

ONWARD WITH CASEKONNECT 3

TRAINING DAY 4

LOCAL LEADS 5

## ON THE WATCH - THE RECAP

*What a rollercoaster of a year!*

Working at the FIU is not for the fainthearted, it often requires what one might call *"a strong constitution"*. But we try not to complain (at least not too often). The truth is we love what we do and enjoy being able to add value to Barbados, by protecting its reputation as a jurisdiction with high regard for international norms such as the FATF's 40 Recommendations. This is why, for example, we engage so deeply in awareness building amongst our stakeholders through our training and outreach initiatives.

In fact, the agility of criminals to quickly come up with new ways of concealing illicit funds in the global financial services system is known to far outstrip the ability of the good guys to sometimes comprehend the creative methods far less keep up with them. Understanding new ML/TF schemes and how financial products and services, legal persons and arrangements as well as designated non-financial business and professions may be used to hide "dirty" money, is therefore critical.

To be sure, with every new financial (disruptive) innovation comes an inherent opportunity for its abuse. Remember the early days of cryptocurrency when there was little understanding of the blockchain? This was a prime opportunity to take advantage of an unregulated space, engage in illicit business and aggressively distance criminal proceeds from its illegal source. This was the context in which the Silk Road market emerged and thrive, albeit until US federal authorities intervened, ultimately prosecuting the entity's boss, Mr. Ross Ulbricht.

This is why, ultimately, the passing of laws and development of regulations become necessary, for the public good. And with laws and regulations come guidelines; and with guidelines come the development of the necessary organisational policies and procedures to shape employee behaviour along legal and regulatory requirements. Herein lies the overarching purpose of compliance - ORDER. We will discuss this a bit more in our next edition. Stay Tuned!

### Analyst Roger Rawlins on STRs



STRs to most, may seem like your everyday 'run of the mill' reports but to me, STRs tell a story. There is no such thing as a 'straightforward' STR.

SEE PAGE 2 FOR MORE ON STRS

## By The Analysts

## What is defensive reporting?

**CONFIDENTIAL**  
**SUSPICIOUS/UNUSUAL TRANSACTION REPORT**  
PLEASE TYPE INFORMATION OR WRITE IN BLOCK LETTERS  
FOR OFFICIAL USE ONLY  
FIU Reference No.: \_\_\_\_\_

**IMPORTANT:** Complete using information obtained during normal course of the transaction. This report should be completed as soon as practicable (24/7) the filing, and a copy forwarded to:  
THE DIRECTOR, FINANCIAL INTELLIGENCE UNIT  
ANTI-MONEY LAUNDERING AUTHORITY  
P.O. BOX 1572, Bridgetown, Barbados  
FACSIMILE NO. (246) 436-4736  
Email: [admin@barbados.gov.bb](mailto:admin@barbados.gov.bb)  
For urgent reporting - Tel: (246) 436-4734/5

**PART A - Initial Information**

1.  Completed Transaction  
 Terrorist Designation  
 Attempted/Aborted Transaction  
 Counter-Proliferation Designation

2.  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.

fiu BARBADOS -/2

This is often based on occurrences external to the financial institution filing the STR that may be linked directly or indirectly to the client. For example An MLRO or Compliance Officer, after learning negative article or news story linking the financial institution's client to an individual or related-company presently before a foreign court may submit an STR. This is also true where an FI's client has been charged, in Barbados, for a predicated ML offence such as fraud, drug trafficking/possession etc. Since the comingling of illicit funds with legitimately derived funds is possible in such circumstances and also in an effort to mitigate regulatory and related risks to the FI, the MLRO will submit the STR.

In short, defensive reports are not necessarily submitted to the FIU based on an internal analysis or systematic monitoring of an account or observation of unusual activity.

## How useful are defensive reports?

Some defensive STRs have clear inherent value and in those cases are escalated to law enforcement. However most defensive STRs are held in the FIU's database and are available for further research and analysis.

## What is a timely STR/SAR?

A timely STR/SAR is one which is submitted to the FIU in the shortest possible time following observance of the suspicious transaction or activity.

## How helpful is a timely STR/SAR?

A timely STR/SAR:

- Helps in exposing potential money laundering, terrorist or proliferation financing activity (early);
- Quickly activates the FIU's internal analysis and investigation mechanisms;
- Enhances the FIU's intelligence product;
- Supports the work of law enforcement agencies (LEAs): -
  - opens up new targets for investigation;
  - adds additional intelligence to LEA files;
  - progresses the investigation of on-going matters;
  - opens up surveillance opportunities;
  - supports prosecution of matters.

## STR vs SAR

Is there any difference between a Suspicious Transaction Report (SAR) and a Suspicious Activity Report (STR)?

- **Yes and No.**

Practically both terms are used interchangeably but critically the main difference between these two is the object of suspicion. For an STR the object of suspicion is the transaction. For an SAR the object is more so the activity.

# Onward with caseKconnect!

Case Management Software

By Dir. Kirk Harrison Taitt

A web-based application, caseKconnect allows for the delivery of STRs/SARs by way of the user's Controlled Access in a Secure Environment. The application is indigenous to the Caribbean region having been developed by IT professionals with deep experience in and exposure to the work of financial intelligence units.

The ultimate benefit accruing to FIU Barbados with the implementation of caseKconnect is an enhanced efficiency in the administration of the STR process. This includes the management of cases and the dissemination of reports to law enforcement/competent authorities. That said, the secure delivery of these highly sensitive reports to the FIU in the first place is necessary for stakeholder comfort and the protection of those individuals to whom the awesome responsibility of filing an STR/SAR has been delegated by their organisation.

The other benefits of caseKconnect include an enhanced ability to mine data. This, in turn, improves our ability to conduct research aimed at developing strategic analysis products for use by competent authorities. It also enables the "extraction" of typologies for integration into our training and outreach interventions.

CaseKconnect is presently in use across Financial Intelligence Units in the Caribbean region, including The Bahamas FIU, FIU Trinidad and Tobago as well as FIU Guyana.



## Registration on caseKconnect

All stakeholders are required to register on caseKconnect. If you have not already done so, kindly take note of the following important steps:

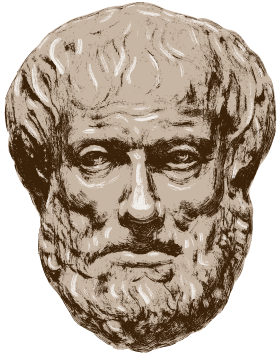
A screenshot of a document titled 'Requirements for Registration' from caseKconnect. The document is framed with a blue border. At the top right is the caseKconnect logo. The text lists three requirements for registration:

- (1) A Letter of Authority (LOA) must be submitted to the FIU, originating from either of the following:
  - the reporting entity's Chief Executive Officer (or designated senior officer); or
  - the licensee's Chief Compliance/Risk Officer (or equivalent)The LOA should advise the name(s) of the individual(s) [i.e. Compliance Officer/Money Laundering Reporting Officer] authorised by the entity to make disclosures of suspicious activity/suspicious transactions to the FIU, pursuant to Section 23 (1) of the Money Laundering and Financing of Terrorism (Prevention and Control) Act 2011-23, as amended.
- (2) The LOA must include specific details with regard to the level of authority accorded the reporting officer, i.e., the individual (s) authorised to either 1) prepare or submit the STR; or 2) the individual (s) authorised to both prepare and submit the STR.
- (3) The signed LOA should then be scanned and emailed to [FIUAdminSecretary@barbados.gov.bb](mailto:FIUAdminSecretary@barbados.gov.bb); or [fiusupport@barbados.gov.bb](mailto:fiusupport@barbados.gov.bb).

[1] Please also note that the authority delegated under the LOA also holds for the submission of STRs/SARs to FIU by hand/e-mail, in cases where the caseKconnect platform may not be available.

In order to conclude the registration process, reporting entities are asked to monitor their e-mail for further instructions from the FIU upon completion of the steps outlined above. For security purposes, MLROs/Compliance Officers may be asked to upload a photo of themselves. For further details in relation to the steps necessary for the onboarding process, please call the FIU at (246) 4364734/36. Alternatively, you are free to make use of the email addresses noted herein.

## By Us for Us



A quote by Greek philosopher and polymath Aristotle, underlines the importance of habit.

*"We are what we repeatedly do. Excellence then is not an act but a habit."*

In concurrence with Aristotle, success is derived from continuous actions such as training and development.

Training for FIU staff, as with any other organisation, is essential. It enhances individual expertise and builds departmental capacity thereby enabling the organisation to execute its core mandate efficiently and effectively.

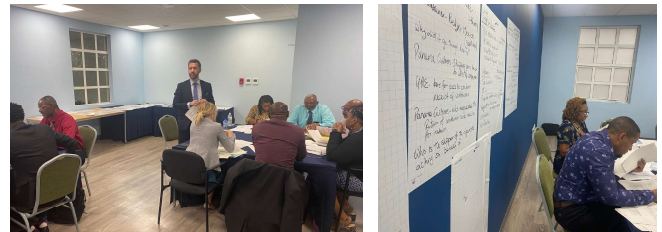
Training in itself is undertaken at various levels and ranges from basic through to advanced courses, and generally is aimed at shoring up, systematically, the knowledge base as well as the professional deportment of the FIU's AML/CFT professionals.

Invariably training helps us and you to be better and to do better!

Over the past year, FIU staff and law enforcement agencies, have been involved in several sessions aimed at development. One such session was a week-long training course jointly organised by the United Nations Office on Drugs and Crime (UNODC), the Regional Security System Asset Recovery Unit (RSS ARU), the Caribbean Community Implementation Agency for Crime and Security (CARICOM IMPACS) and the Government of Barbados.



This workshop, which took place in November 2022, sought to raise awareness of the public security threats stemming from trade-based money laundering, and strengthen the capacities of local law enforcement agencies to investigate, detect and prosecute money laundering through trade more effectively.



The seminar emphasised practical guidance for assessing the risks and applying the proper due diligence to counter TBML; with case studies relevant to subject.

Fast forward to September 2023, where the FIUBB alongside The Barbados Police Service (TBPS) and the Regional Security System (RSS) participated in a specialised cryptocurrency investigative course delivered by the US Federal Bureau of Investigation (FBI). This course was designed to empower law enforcement entities with the basic knowledge necessary to navigate the complex world of digital assets.



The details of the workshop encompassed the practical intricacies of blockchain transactions which in most cases, are relatively easy to trace, if LEAs know what to look for. And this is why training is so critical!

# Local Leads

Our Stories, Our Updates

As we close out this last quarter of 2023 and prepare for the traditional Christmas celebrations, we call to mind the emotions experienced by Bajans and visitors alike at the unveiling of the monument 'We Loyal Sons And Daughters All' by Prime Minister Mia Amor Mottley, on the cusp of the nation's 57th year of Independence on Tuesday November 28, 2023, in Heroes Square. In the words of designers Hugh Holder and Vincent Jones, "The monument, 'We Loyal Sons And Daughters All' follows the Barbadian family's journey, past and present. It recognises them as the heroic beacons of our nation from which all National Heroes came."

In keeping with this theme, Prime Minister Mottley encouraged Bajans to return to their roots and rebuild the strength of family and community bonds.

Our coming together at the FIU, to play our part in neutralising the ML/TF/PF threat confronting Barbados and impacting its reputation in the global community of nations, has seen the building of family-like relationships. Therefore we encourage all our stakeholders to continue to build their own sense of community to further enhance our collective resilience, for the betterment of all the families of this great nation.

Season's greetings and blessings, to all.



**57**  
YEARS OF  
INDEPENDENCE!



Before you go...



is the official newsletter of the Barbados Financial Intelligence Unit. Its purpose is to share key insights and valuable information with our network of stakeholders as well as prospective subscribers. Our goal is to inform and educate as we strive to protect our country against money laundering, terrorist financing and proliferation financing.



Contact the FIU

**Barbados Financial Intelligence Unit**  
P.O Box 1372  
Bridgetown, Barbados

☎ (246) 436 - 4734/35  
✉ [adminfiu@barbados.gov.bb](mailto:adminfiu@barbados.gov.bb)  
🌐 <https://barbadosfiu.gov.bb>

**For more information visit us at**  
<https://barbadosfiu.gov.bb/>