

STR e-Filing Guide



This document is meant to provide you with the necessary guidelines on how to use the Dominica Financial Intelligence Unit's e-Filing System (DEFS).

Financial Intelligence Unit

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**Corner of Turkey lane &
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Roseau

(767)-266-3349

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STR e-Filing Guide

Version 1.0

Welcome to the Dominica Financial Intelligence Unit Suspicious Transaction Report Electronic Filing System (DEFS)

NOTICE

DEFS IS NOT MEANT TO REPLACE MANUAL FILING OF STRS BUT MERELY TO SERVE AS AN ALTERNATIVE METHOD OF FILING SUSPICIOUS TRANSACTION REPORTS (STRS) WITH THE FINANCIAL INTELLIGENCE UNIT (FIU).

Confidentiality: Suspicious Transaction Reports (STR), and any information that would reveal the existence of an STR, are confidential.

Tipping Off (Section 5 – Money Laundering (Prevention) Act No. 8 of 2011): (1) A person who has reasonable grounds to believe that an investigation into a money laundering offence has been, is being or is about to be made shall not prejudice the investigation by divulging the fact to another person.

(2) A person who contravenes subsection(1) commits an offence and is liable on conviction to a fine not exceeding five hundred thousand dollars and to imprisonment for a term not exceeding five years.

(3) A court may, on conviction of a person under subsection (1), order the suspension of the license of the person.

Who Must File: All *Scheduled Entities* listed in PART I and PART II of the Schedule to the Money Laundering (Prevention) Act No. 8 of 2011 namely:

SCHEDULE

PART I

ACTIVITIES OF FINANCIAL INSTITUTIONS

1. “Banking business” and “financial business” as defined in the Banking Act 2005;
2. “Banking business” as defined in the Offshore Banking Act 1996;
3. Venture risk capital;
4. Money transmission services;
5. Issuing and administering means of payments (e.g. credit cards, travellers’ cheques and bankers’ drafts);
6. Guarantees and commitments;
7. Trading for own account of customers in-
 - (a) money market instruments (e.g. cheques, bills, certificates of deposits, commercial paper, etc);
 - (b) foreign exchange;
 - (c) financial and commodity-based derivative instruments (e.g. options, interest rate and foreign exchange instruments etc);
 - (d) transferable or negotiable instruments;
8. Money Broking;
9. Money Lending and Pawning;
10. Money Exchange (e.g. casa de cambio);
11. Mutual Funds;
12. Credit Unions;
13. Building Societies;
14. Trust Business

15. Insurance Business;
16. Securities Exchange

PART II

OTHER BUSINESS ACTIVITIES (*Designated Non-Financial Business or Professionals*)

1. Real Estate Business;
2. Car dealerships;
3. Casinos (gaming houses);
4. Courier services;
5. Jewellery Business;
6. Internet Gaming and wagering services;
7. Management companies;
8. Asset management and advice-custodial services;
9. Nominee service;
10. Registered agents;
11. Any business transaction conducted at a post office involving money orders;
12. Securities brokerage;
13. Telecommunications companies;
14. Utility companies;
15. Dominica Social Security;
16. Inland Revenue Department.
17. Lawyers and accountants when they prepare for or carry out transactions for a client in relation to the following activities –
 - (a) buying and selling of real estate;
 - (b) managing client money, securities or other assets;
 - (c) managing bank, savings or securities accounts;
 - (d) organization of contributions for the creation, operation or management of companies;
 - (e) creation, operation or management of legal persons or arrangements, and buying and selling of business entities.”.

Filing Timeline: An STR shall be filed with the FIU as soon as is reasonably practicable after the date of the initial detection by the reporting financial institution of facts that may constitute a basis for filing a report.

Getting Started

Filing Reports: To file electronic suspicious transaction reports using DEFS please contact the Financial Intelligence Unit directly at the below-mentioned contact details to register your financial institution or designated non-financial business or profession and then obtain your login details:

Director
Financial Intelligence Unit
Corner of Turkey Lane and Independence Street
Roseau
Commonwealth of Dominica
West Indies
Tel.: (767)-266-3349/3374/3084
Fax: (767)-440-0373
E-mail: fiu@dominica.gov.dm
Website: www.fiu.gov.dm

Upon receiving your login details, please proceed to www.fiu.gov.dm and click on the Menu **“STR e-Filing”** menu. You may choose to proceed directly to login or download the **“STR e-Filing Guide”** by clicking on the displayed link.

To login, click on the **“Click Here, e-Filing System Login”** button. On the next page you will be prompted to enter your username and password. If it is your first time logging into the site, you will be asked to change the temporary password provided to you by the FIU.

Filling out Fields: Complete each e-STR by providing as much information as possible. Although all items should be completed fully and accurately, fields marked with an asterisk (*) are **mandatory fields** and must be completed. Filers must follow the electronic filing instructions for these items by providing the required data. Field names that are not marked with an asterisk (*) must be completed if the data are known and should be left blank if the data are unknown.

NB: Verify the data entered on the “STR Report Details” form prior to clicking “Next”. Clicking the back button on your browser after “Next” has been clicked will invalidate the value in the **“Reporting Entity STR Reference No. field.”**

STR Report Details Form: Having filled in the remainder of the fields on the *STR Report Details form*, please select:

- ✓ whether the report is being filed pursuant to the *Terrorism Act* or the *Money Laundering Act*;
- ✓ whether the report is being filed against a *Company* or a *Person*;
- ✓ the appropriate *Suspicious Activity (ies) Type*;
- ✓ whether the transaction is completed or not;
- ✓ enter the reason (s) for suspicion; and

click “Next”.

Adding Links:

Linking and/or adding *Persons or Companies* to a Suspicious Transaction Report.

Relationship to STR Field

The initial relationship between the STR being filed and the reported entity (*Company* or *Person*) against whom the report is being filed is “*Suspect*”. For example:

DomBANK suspects that John DOE (person) or ABC INC. (Company) has engaged in a transaction that involves property that is the proceeds of crime. Hence the link between the STR and the person being reported is “suspect”.

Linking additional persons or companies to the STR.

On completing the data entry for the respective forms (i.e. *person, telephone, identification, address, account*) click the “**Submit**” button at the bottom of the page.

At the next page, make the appropriate selection:

- add another *Person* or *Company* to the STR;
- download an acknowledgement of receipt; or
- download a copy of the STR.

Additionally, you can add another *Person* or *Company* to the STR as:

- a. *Company Director*;
- b. *Company Beneficiary*;
- c. *Company Shareholder*;
- d. an *Account Signatory*; or
- e. *Account Beneficiary* on a bank account

by simply selecting the appropriate value in the *Relationship to STR* field on the *Person* or *Company* forms.

Telephone/Address/Account Forms – Company

Relationship to Company Field

The value entered in this field is relative to the relationship between the telephone/address/account records and the company.

Telephone/Identification/Address/Account Forms - Person

Relationship to Person Field

The value entered in this field is relative to the relationship between the telephone/identification/address/account and the Person.

Attachments & Narrative

STR Attachments

Click the *Upload Photo* located in the *STR Attachments* section for uploading a photo (s) of suspect (s) against whom the STR is being filed.

Click the *Upload Additional Documents* for uploading attachments to the STR.

Reason (s) for Suspicion – Narrative

The narrative or the reasons for suspicion section of the report is critical to understanding the nature and circumstances of the suspicious activity. The care with which the narrative is completed may determine whether the described activity and its possible criminal nature are clearly understood by investigators.

Filers must provide a clear, complete, and concise description of the activity, including what was unusual or irregular that caused the suspicion. This description should encompass the data that will be provided in the respective forms, but should include any other information necessary to explain the nature and circumstances of the suspicious activity. Filers should provide any information the filers believe necessary to better enable investigators to understand the reported suspicious activity. Narratives must be completed in English.

Points To Note:

- a. Describe the conduct or transaction(s) that caused suspicion. If appropriate, this description should be chronological when the activity involves multiple instances or encompasses more than one day.
- b. Explain whether any transaction(s) involved were completed or only attempted.
- c. Explain who benefited and how they benefited, financially or otherwise, from the activity.
- d. Describe all supporting documentation and retain the documentation for seven (7) years.
- e. Describe and retain any admission or explanation of the activity or transaction(s) provided by the subject(s), witness(s), or other person(s), including to whom and when it was given.

- f. Indicate whether the suspicious activity is an isolated incident or related to other activity.
- g. Indicate whether any U.S. or foreign currency or other negotiable instruments were involved. If foreign currency or other foreign instruments, provide the foreign amount, currency name, and country of origin.
- h. Identify the names of financial institutions associated with reported suspicious transactions.
- i. If the subject is a foreign national provide all available information on the subject's passport(s), visa(s), and other identification. Include identifying data such as date of birth, issuing date, country, document numbers, issuing authority, and nationality.
- j. If the suspicious activity involves transfers of funds to or from a foreign country or currency exchanges involving foreign currencies, identify the foreign currency, country of issue, and the source or destination of the funds.
- k. If a subject involved in the suspicious activity has an insider relationship with a financial institution, describe the subject's position with the financial institution and how that position related to the suspicious activity.
- l. Indicate if any information was excluded from this report and explain the nature of the excluded information and the reason(s) for exclusion.

Please contact the Financial Intelligence Unit directly if you require any further assistance.

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