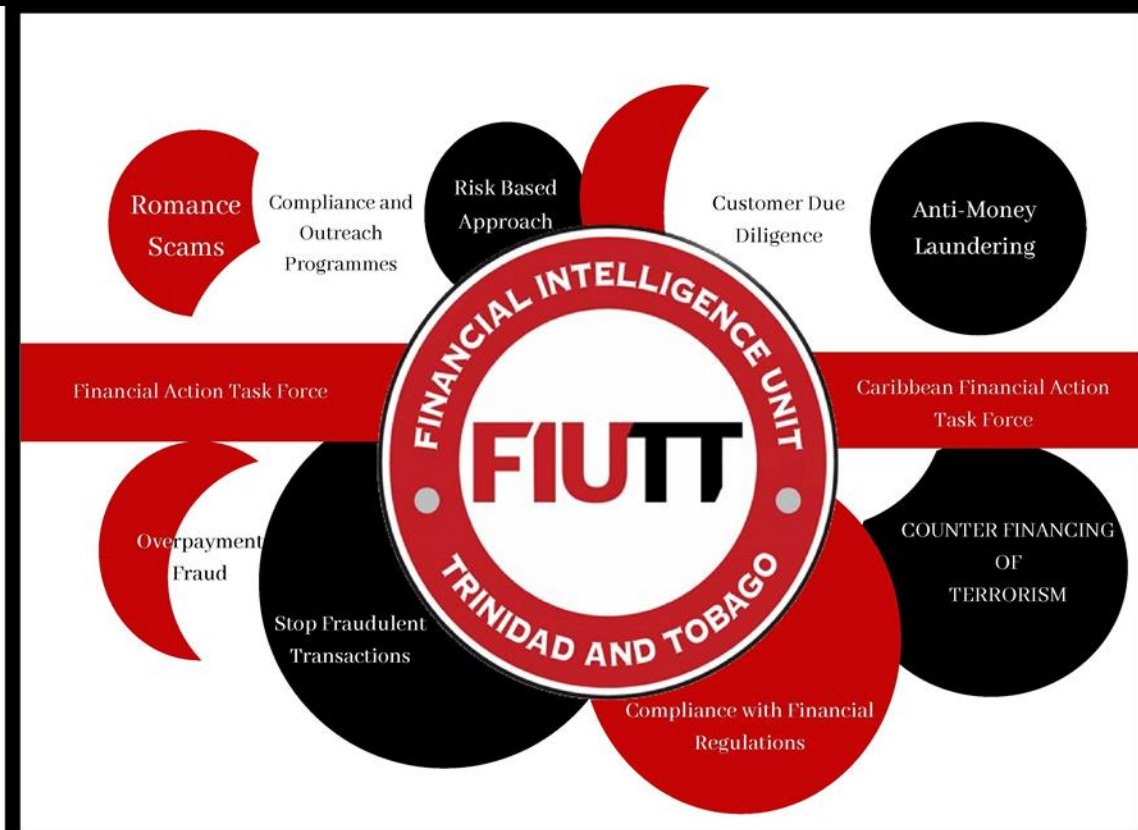




GOVERNMENT OF THE REPUBLIC OF TRINIDAD AND TOBAGO

# FINANCIAL INTELLIGENCE UNIT OF TRINIDAD AND TOBAGO



# 2021 ANNUAL REPORT







## GOVERNMENT OF THE REPUBLIC OF TRINIDAD AND TOBAGO

---

FIUTT Ref: INF/0752/2021/PAO

November 29, 2021

The Honourable Mr. Colm Imbert  
Minister of Finance  
Ministry of Finance  
Level 8  
Eric Williams Finance Building  
Independence Square  
PORT OF SPAIN

Dear Minister,

**RE: LETTER OF TRANSMITTAL**

I have the honour to submit the Annual Report on the operation and activities of the Financial Intelligence Unit of Trinidad and Tobago in combatting money laundering, financing of terrorism and the proliferation of weapons of mass destruction.

The Annual Report for the period October 01, 2020 to September 30, 2021 is submitted in accordance with section 18(1) of the Financial Intelligence Unit of Trinidad and Tobago Act, Chap. 72:01.

Yours sincerely,

Nigel Stoddard  
Director (Ag.)  
Financial Intelligence Unit of Trinidad and Tobago





## Our Vision



**VISION**

*Our vision is for Trinidad and Tobago to have strong and dynamic financial and business sectors free from money laundering, financing of terrorism and other financial crimes.*

## Our Mission



*Our Mission is to effectively detect and deter money laundering and financing of terrorism, in collaboration with local law enforcement, regulators and international counterparts, thereby contributing towards a safe and stable financial, social and economic environment.*

# CONTENTS

<b>MESSAGE FROM THE PERMANENT SECRETARY OF THE MINISTRY OF FINANCE .....</b>	<b>8</b>
<b>LIST OF ABBREVIATIONS .....</b>	<b>9</b>
<b>2021 AT A GLANCE .....</b>	<b>12</b>
<b>DIRECTOR'S FOREWORD .....</b>	<b>13</b>
<b>FIUTT HISTORY .....</b>	<b>17</b>
<b>PROLOGUE.....</b>	<b>19</b>
<b>CHAPTER I - COMBATting MONEY LAUNDERING AND THE FINANCING OF TERRORISM .....</b>	<b>20</b>
1. FATF STANDARDS .....	20
2. THE FIUTT.....	20
3. ORGANISATIONAL STRUCTURE OF THE FIUTT .....	22
4. THE SUPPORTING LEGISLATIVE REGIME .....	24
5. RECENT DEVELOPMENTS IN THE AML/CFT/CPF LEGAL REGIME .....	25
6. ADDITIONAL MEASURES .....	25
<b>CHAPTER II – FOSTERING A CULTURE OF COMPLIANCE.....</b>	<b>28</b>
1. COMPLIANCE FOR INTELLIGENCE .....	28
2. COMPLIANCE OBLIGATIONS TO THE FIUTT .....	32
3. ASSISTANCE AND GUIDANCE TO ENTITIES .....	50
4. MANAGEMENT OF RESOURCES .....	52
<b>CHAPTER III – FINANCIAL ANALYSIS .....</b>	<b>56</b>
1. CORE FUNCTIONS .....	56
2. ANALYSIS OF INTELLIGENCE REPORTS DISSEMINATED .....	80
3. REQUESTS FOR INFORMATION.....	85
4. USE OF FIUTT'S INTELLIGENCE.....	87
5. STRATEGIC ANALYSIS .....	89
6. ONLINE SUBMISSION OF STRs/SARs.....	93
7. ACHIEVEMENTS OF THE ANALYSIS DIVISION .....	95
<b>CHAPTER IV – STRATEGIC ALLIANCES: CO-OPERATION AND COLLABORATION .....</b>	<b>96</b>
1. CO-OPERATION AND COLLABORATION .....	96
2. DOMESTIC CO-ORDINATION AND ENGAGEMENT .....	98
3. INTERNATIONAL ENGAGEMENT AND CO-OPERATION .....	108
4. MOUs SIGNED WITH FOREIGN FIUs .....	113
5. PARTICIPATION IN INTERNATIONAL FORA.....	116
<b>CHAPTER V - RESOURCES AND INFRASTRUCTURE .....</b>	<b>119</b>
1. RESOURCES.....	119
2. INFORMATION SYSTEMS AND TECHNOLOGY .....	119
3. ORGANISATIONAL DEVELOPMENT .....	122

**CHAPTER VI – STRATEGIC PRIORITIES 2022: BUILDING ON STRENGTHS ..... 131**

- 1. WORKFORCE EXCELLENCE .....131
- 2. INFORMATION TECHNOLOGY INFRASTRUCTURE .....131
- 3. LEGAL AND POLICY PROJECTIONS .....133
- 4. CHALLENGES .....133
- 5. THE WAY FORWARD .....135

**APPENDIX A – LIST OF REPORTING ENTITIES ..... 137**

**APPENDIX B – GENERAL ML/FT SUSPICIOUS INDICATORS..... 139**

**APPENDIX C – ROMANCE SCAM/FRAUD ALERT ..... 141**

**APPENDIX D – OVERPAYMENT SCAM/FRAUD ALERT ..... 142**

**GLOSSARY ..... 143**



## **MESSAGE FROM THE PERMANENT SECRETARY OF THE MINISTRY OF FINANCE**

It is my distinct honour as Permanent Secretary in the Ministry of Finance to address the critical role and function of the Financial Intelligence Unit of Trinidad, and Tobago (“the FIUTT”), which is for the implementation of the Recommendations of the Financial Action Task Force on money laundering and the financing of terrorism and related matters. The FIUTT continues to meet its obligations in providing assistance to the Law Enforcement Authorities domestically and internationally, foreign Financial Intelligence Units (FIUs), Supervisory Authorities, Financial Institutions, Listed Business, other Competent Authorities and the General Public.

The assistance rendered by the FIUTT in accordance with the FIUTT Act provided financial intelligence to the law enforcement authorities to further their investigations. The FIUTT also produced typologies, trends, advisories and alerts to all its stakeholders, including the general public on several fraud scams that were prevalent during the pandemic restriction.

In this reporting period, the FIUTT marked its tenth year in operation by amending Section 2(1) of the FIUTT Act, which officially changed the acronym “FIU” to “FIUTT.” The change in the acronym also led to the official re-design of FIUTT’s logo, which distinguishes the FIUTT both nationally and internationally.

The COVID-19 pandemic and the necessary restrictions implemented by the Ministry of Health and the Government posed numerous challenges to the operations of the Ministry of Finance. The FIUTT as a department within the Ministry of Finance has embraced the challenges presented by the COVID-19 pandemic by creating various new ways to effectively execute its operational responsibilities to stakeholders, including:

- the more significant usage of the secure online reporting solution for Reporting Entities in submission of Suspicious Transaction Reports/ Suspicious Activity Reports;
- the establishment of a digital presence on social media platforms (Facebook and LinkedIn) to have the ability to reach a wider audience;
- the provision of other services via electronic means, including the submission of Registration, De-registration, Quarterly Terrorist Reports and compliance documents;
- the conducting of virtual AML/CFT outreach and awareness sessions and the conduct of virtual meetings with stakeholders.

I therefore, unreservedly commend the efforts of the management and staff of the FIUTT to effectively and strategically meet the challenges created by the COVID-19 pandemic. The Ministry of Finance will continue to support the FIUTT in achieving its objective, to effectively detect and deter money laundering and financing of terrorism, in collaboration with local law enforcement, regulators and international counterparts. Such efforts will further create a safe and stable financial, social and economic environment in no small measure.

Suzette Taylor-Lee Chee  
Permanent Secretary  
Ministry of Finance



## LIST OF ABBREVIATIONS

ABBREVIATION	MEANING
ACO	Alternate Compliance Officer
AGLA	The Office of the Attorney General and Ministry of Legal Affairs
AITTF	Anti-Illicit Trade Task Force
AML/CFT	Anti-Money Laundering/Counter Financing of Terrorism
AML/CFT/CPF	Anti-Money Laundering/Counter Financing of Terrorism/Counter Proliferation Financing
A-SAC	Advanced Strategic Analysis Course
ATA	Anti-Terrorism Act, Chapter 12:07
BIR	Board of Inland Revenue
BOD	Board of Directors
CARF	Competent Authority Request Form
CENTRAL BANK	Central Bank of Trinidad and Tobago
C&E	Customs and Excise
CFATF	Caribbean Financial Action Task Force
CICAD	Inter-American Drug Abuse Control Commission
CO	Compliance Officer
CPF	Counter Proliferation Financing
CRTMG	CFATF Risks Trends and Methods Group
CU	Credit Union
DPP	Director of Public Prosecutions
ECOFEL	Egmont Centre of FIU Excellence and Leadership
EFUR	Enhanced Follow-up Report
EMI	Electronic Money Issuer
ESO	Economic Sanctions Order
ESW	Egmont Secured Website
FATF	Financial Action Task Force
FI	Financial Institution
FIB	Financial Investigations Branch
FINTECH	Financial Technology
FIU	Financial Intelligence Unit
FIUTTA	Financial Intelligence Unit of Trinidad and Tobago Act, Chapter 72:01
FIUTTR	Financial Intelligence Unit of Trinidad and Tobago Regulations, 2011
FIUTT	Financial Intelligence Unit of Trinidad and Tobago
FOR	Financial Obligations Regulations, 2010 as amended
FSRB	FATF Styled Regional Body
FTFs	Foreign Terrorist Fighters
FT	Financing of Terrorism
FUR	Follow Up Report
GELAVEX	Expert Group on The Control of Money Laundering
GORTT	Government of The Republic of Trinidad and Tobago
HoFIUs	Heads of Financial Intelligence Units
ICATT	Institute of Chartered Accountants of Trinidad and Tobago

<b>ABBREVIATION</b>	<b>MEANING</b>
<b>ICT</b>	Information and Communication Technology
<b>IDMS</b>	Intranet and Document Management Solution
<b>IMM</b>	Immigration
<b>ISIL</b>	The Islamic State of Iraq and the Levant
<b>IT</b>	Information Technology
<b>JW</b>	Jewellers
<b>KYC</b>	Know Your Customer
<b>LB</b>	Listed Business
<b>LEA</b>	Law Enforcement Authority
<b>LEWG</b>	Law Enforcement Working Group
<b>MER</b>	Mutual Evaluation Report
<b>ML/FT</b>	Money Laundering/Financing of Terrorism
<b>ML/FT/PF</b>	Money Laundering/Financing of Terrorism/Proliferation Financing
<b>ML</b>	Money Laundering
<b>MOU</b>	Memorandum of Understanding
<b>MVS</b>	Motor Vehicle Sales
<b>MVTS</b>	Money or Value Transfer Services
<b>NAMLC</b>	National Anti-Money Laundering and Counter Financing of Terrorism Committee
<b>NPOs</b>	Non-Profit Organisations
<b>NPOA</b>	Non-Profit Organisation Act, No. 7 of 2019
<b>NRA</b>	National Risk Assessment
<b>NRFIs</b>	Non-Regulated Financial Institutions
<b>OAS</b>	The Organisation of American States
<b>OFAC</b>	Office of Foreign Asset Control
<b>PCA</b>	Police Complaints Authority
<b>PEP</b>	Politically Exposed Person
<b>PF</b>	Proliferation Financing
<b>PMC</b>	Private Members' Club
<b>POCA</b>	Proceeds of Crime Act, Chapter 11:27
<b>PPSP</b>	Public Private Sector Partnership
<b>QTR</b>	Quarterly Terrorist Property Report
<b>QTR1</b>	Quarterly Terrorist Property Report 1 – Not in possession/control of terrorist property
<b>QTR2</b>	Quarterly Terrorist Property Report 2- In possession/control of terrorist property
<b>RAQ</b>	Risk Assessment Questionnaire
<b>RBA</b>	Risk-Based Approach
<b>RGB</b>	Registrar General Department
<b>SOP</b>	Standard Operating Procedure
<b>STR/SAR</b>	Suspicious Transaction Report/Suspicious Activity Report
<b>TFS</b>	Targeted Financial Sanction
<b>TTIFC</b>	Trinidad and Tobago International Financial Centre
<b>TTPS</b>	Trinidad and Tobago Police Service

<b>ABBREVIATION</b>	<b>MEANING</b>
<b>TTSEC</b>	Trinidad and Tobago Securities and Exchange Commission
<b>UN</b>	United Nations
<b>UNODC</b>	United Nations Office on Drugs and Crime
<b>UNSCR</b>	United Nations Security Council Resolution
<b>VA</b>	Virtual Asset
<b>VASP</b>	Virtual Asset Service Provider

## 2021 AT A GLANCE



ADVISORIES

Romance Scams (over TT\$ 2M loss)  
Identity Theft  
Real Property Fraud



Change of FIU acronym and logo



92 Intelligence Reports disseminated to LEAs



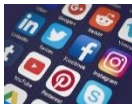
1,638 STRs/SARs (TT\$ 3,177,713,721)



506 (54%) Increase in New Registrations



81 Compliance Examinations



Creation of FIUTT Facebook and LinkedIn social media platforms



30 Virtual Outreach Sessions with 1,633 Participants



3 Local MOUs  
1 Foreign MOU signed



49 Online Training/Webinars attended by FIUTT Staff

## **DIRECTOR'S FOREWORD**

I acknowledge that indeed the COVID-19 Pandemic caused the year under review, to be a year of disruption in unimaginable proportions, affecting all facets of life, not only in Trinidad and Tobago. We pay tribute to and remember all lives lost and hardships suffered due to COVID-19. In this reporting period, the Financial Intelligence Unit of Trinidad and Tobago (“the FIUTT”) faced many unique challenges which altered the normal operations of the FIUTT. However, we have re-committed ourselves in purpose to assist Trinidad and Tobago to prevent and combat ML/FT and PF and all forms of other related financial crimes.

I am pleased to present the Annual Report 2020/21 for the FIUTT. Each year the FIUTT publishes a report providing an account of its activities for the past financial year. This is the twelfth such report. This year has been another eventful year, despite all the hardships experienced. I am proud to share with you the achieved results of the FIUTT, which is an exceptionally courageous Team, for the 2020/21 financial year. The FIUTT with our stakeholders in the public and private sectors remained steadfast as we weathered the COVID-19 storm and battled its challenges together to ensure an effective AML/CFT/CPF regime was maintained in Trinidad and Tobago.

While this has indeed been a very challenging year, the FIUTT continues to operate proficiently, managing its resources in this new normal. However, with every crisis new opportunities are birthed. Some of these new opportunities include:

- the more significant usage of the secure online reporting solution for Reporting Entities in submission of Suspicious Transaction Reports/ Suspicious Activity Reports;
- the establishment of a digital presence on social media platforms (*Facebook and LinkedIn*) to have the ability to reach a wider audience;
- the provision of other services via electronic means; such as the submission of Registration, De-registration, Quarterly Terrorist Reports and compliance documents;
- the conduct of virtual AML/CFT/CPF outreach and awareness sessions; and
- the conduct of virtual meetings with stakeholders.

The FIUTT marked its eleventh year in operation by amending Section 2(1) of the Financial Intelligence Unit of Trinidad and Tobago Act, Chap. 72:01, which officially changed the acronym “FIU” to “FIUTT.” The change in the acronym also led to the official re-design of FIUTT’s logo, which distinguishes the FIUTT both nationally and internationally.

### **STR/SAR Analysis**

The FIUTT received a total of 1,638 STRs/SARs. This represents an 11% decrease when compared to the previous reporting period in which the demonetisation exercise of the \$100 cotton based notes was conducted. Of the 1,638 STRs/SARs received, 1,569 were submitted via FIUConnect® (secure E-filing

solution) and 69 were received via manual submission. The Banking sector submitted the highest number of STRs/SARs, accounting for 82% of the total STRs/SARs received. This was followed by the MVTs sector which accounted for 7% of the total STRs/SARs received.

During this reporting period, the FIUTT noted a 43% decrease in STRs/SARs submissions from the LBs, a 38% decrease in submissions from money value transfer service (MVTs), and a 33% decrease in submissions from Co-operative Societies, in comparison to the previous year. While total STRs/SARs submission from the FIs decreased by 3%, the FIUTT noted a 5% increase in submissions from the Banking sector. Submissions from Insurance Companies, Investment Companies, Mortgage Companies, Jewellers and Private Members' Clubs sectors, all decreased.

Although the demonetisation exercise ended in April 2020, of the 1,638 STRs/SARs received in this reporting period, 16% or 262 STRs/SARs were primarily associated with the demonetisation of the cotton-based hundred dollar bills. In addition, it was noted that in this reporting period, 24 reports of suspicious transactions were submitted by the Central Bank under Section 52 of the Proceeds of Crime Act.

The suspected monetary value of the 1,638 STRs/SARs submitted to the FIUTT totalled TT\$ 3,177,713,721 which was significantly less (by 88%) from the previous reporting period of TT\$ 27,013,069,082. In this reporting period, the monetary value of the 1,449 completed STRs/SARs amounted to TT\$ 2,086,588,624 and 189 attempted STRs/SARs amounted to TT\$ 1,091,125,097 respectively. A combination of factors can be attributed to the monetary decrease, such as, less STRs/SARs being reported; the suspicious transactions/activities conducted was of a lesser value; a significant decrease in STRs/SARs related to the demonetisation exercise and the continuing customer due diligence and enhanced due diligence being conducted by the Reporting Entities.

### **Use of Financial Intelligence**

The FIUTT continued to make progress to increase its output and quality of Intelligence Reports to both foreign FIUs and Law Enforcement Authorities (LEAs), as well as, local Competent Authorities. Although COVID-19 restrictions impacted the proper functioning of the FIUTT, the Analysis Division disseminated 92 Intelligence Reports in this reporting period. Of the 92 reports, 52 were disseminated to the Commissioner of Police, 30 to the Chairman of the Board of Inland Revenue, four to other local Competent Authorities and six to foreign authorities.

Requests for financial intelligence were received from local LEAs and Intelligence Agencies which amounted to 156 requests relating to 432 suspects. The requested financial intelligence was provided by the FIUTT in ML/FT and other criminal matters under investigation by the LEAs. The financial intelligence also assisted the Financial Investigations Branch (FIB) and the Fraud Squad of the Trinidad and Tobago Police Service (TTPS) in their investigations and charges against suspects. In this reporting period, financial intelligence requested and provided to the FIB and Fraud Squad assisted in three suspects being charged with 15 ML charges valued at TT\$ 31,130,254.

## **The Compliance Adjustment**

The FIUTT is aware of challenges Supervised Entities faced regarding customer identification and verification due to ongoing physical distancing requirements. The FIUTT along with the other Supervisory Authorities, continued to provide guidance to Reporting Entities to ensure their policies and procedures adapted to the changing business environment due to the COVID-19 restrictions. In this reporting period, despite the limitations, the FIUTT registered 506 new registrants and conducted 81 compliance examinations on Supervised Entities. 147 Non-Profit Organisations (NPOs) also came under the supervision of the FIUTT.

## **Enhancing Public Awareness**

The FIUTT conducted 30 virtual AML/CFT/CPF outreach and awareness sessions where 1,633 participants attended and benefitted from the topics offered. In addition, to increase its reach to the wider public, the FIUTT has established a digital presence on social media platforms such as, Facebook and LinkedIn. A digital outreach project is currently underway and is intended to provide information on Reporting Entities' AML/CFT/CPF obligations. This project will highlight information on red flags, criminal trends and the FIUTT's role in safeguarding the financial system to all stakeholders including the general public.

## **Access to Information**

In addition to the information obtained from Reporting Entities, the FIUTT is mandated to acquire additional information to perform its analysis properly. In this reporting period, the FIUTT continued to expand its collection of vital data by entering into three memoranda of understanding (MOUs) with the Police Complaints Authority (PCA), the National Insurance Board of Trinidad and Tobago and the Commissioner for Cooperative Development.

## **International Co-operation**

The FIUTT is part of a team led by the Egmont Group of FIUs and the World Customs Organisation, that have embarked on a project to develop a Training Compendium for personnel of FIUs and Customs, around the world. The FIUTT is developing one of the six training modules, the Strategic Analysis Module, in collaboration with the Customs and Excise Division of Trinidad and Tobago.

Within the region, the FIUTT is the Co-Chair of Caribbean Financial Action Task Force (CFATF) Risks Trends and Methods Group (CRTMG) and continues to contribute to projects such as, the new Virtual Assets (VA) and Virtual Asset Service Providers (VASPs) project, as well as the Financial Flows from Human Trafficking/Smuggling of Migrants project which was completed in May 2021. The FIUTT continues to assist other regional FIUs to build capacity by providing workshops on operational and strategic analysis and compliance supervision for Designated Non-Financial Business Professional (DNFBPs) in their jurisdictions. This regional assistance is to further strengthen ensure that the financial system in the different jurisdictions in the region is protected from ML and FT.



## **Looking Ahead**

Despite the current COVID-19 situation and the unique challenges we face, ML and FT will continue to receive our full attention in 2022, thus contributing to the integrity of the financial system for a safe and stable financial, social and economic environment.

Looking ahead, the FIUTT will continue to increase our proactive monitoring and surveillance activities to deter non-compliance with the AML/CFT/CPF regulatory obligations by our Supervised Entities. The FIUTT continues to explore new avenues through technology to provide timely and quality reports to LEAs and other Competent Authorities on ML/FT/PF trends, patterns, typologies and red flags of financial crimes affecting Trinidad and Tobago.

## **Acknowledgements and Appreciation**

I wish to thank the staff of the FIUTT for their commitment to ensuring that the work of the FIUTT continued unabated. The notable achievements of the FIUTT this year is attributed to the determination and dedication of the staff despite the challenging circumstances brought on by the pandemic. I remain proud that the FIUTT has been incessant in its efforts to detect and deter ML/FT/PF and other related financial crimes.

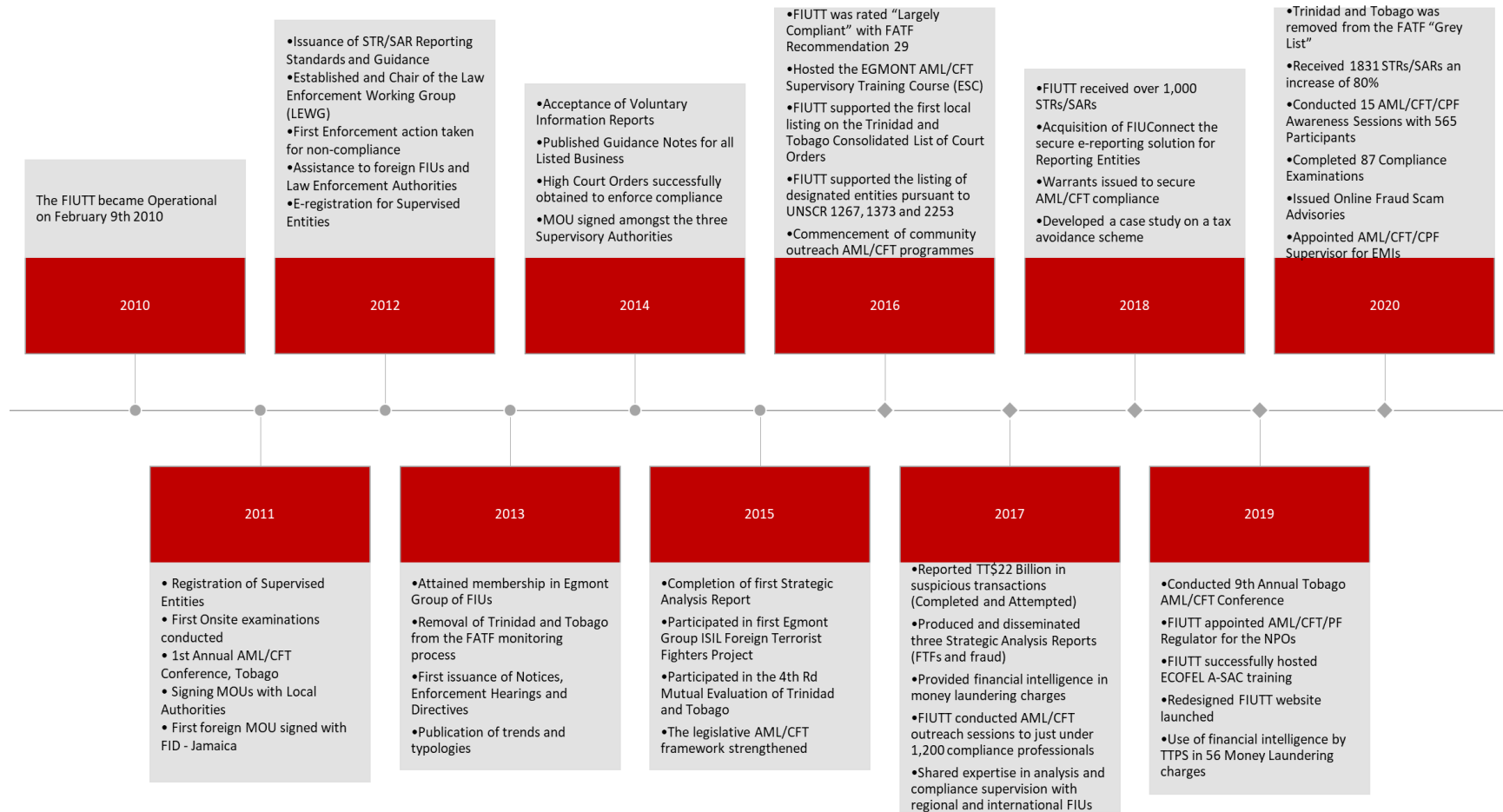
I would like to acknowledge with deep appreciation the contribution made by our now late colleague Mr Rennie Lakhan. Mr Lakhan was a Senior Analyst in our Analysis Division from the early days of the formation of the FIUTT until his untimely passing in July of 2021. He will be remembered for his sterling contributions as a trainer in Tactical/Strategic Analysis with the Caribbean Financial Action Task Force; the lead on several major Strategic Analysis Projects undertaken by the FIUTT; and a Financial Investigator 'par-excellence'. Our deepest condolences are again extended to the Lakhan family.

I wish to extend gratitude to the Ministry for Finance for its ongoing confidence in the FIUTT and support of our daily operations. I also must extend appreciation to the Competent Authorities and Reporting Entities with whom the FIUTT collaborates, both nationally and internationally, and who provide support to ensure that our operations are effective and valuable.

Now, I invite you to read this annual report and allow its pages to speak for themselves.

Nigel Stoddard  
Director Ag.

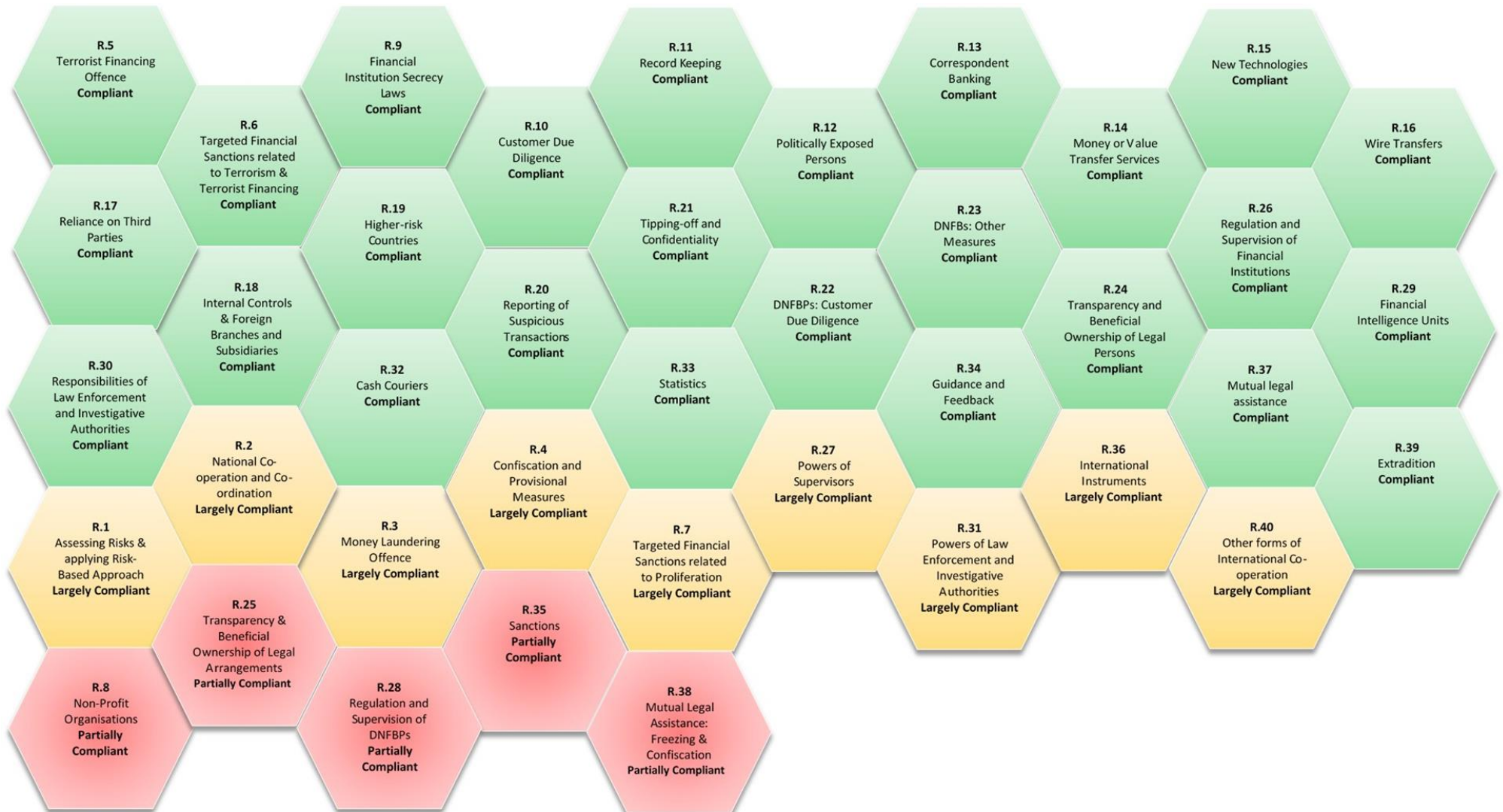
# FIUTT HISTORY



**This page has been intentionally left blank.**

# PROLOGUE

Trinidad and Tobago has made substantial progress in rectifying the deficiencies identified in the 4<sup>th</sup> Round Mutual Evaluation Report. The country attained Compliant ratings in 26 recommendations, Largely Compliant ratings in 9 recommendations and Partially Compliant ratings in 4 recommendations. The country currently has a moderate level of effectiveness in 6 Immediate Outcomes, and low in 5 Immediate Outcomes.



# CHAPTER I - COMBATTING MONEY LAUNDERING AND THE FINANCING OF TERRORISM

## 1. FATF STANDARDS

The Financial Action Task Force (FATF) is the global standard-setting body tasked with the responsibility of establishing policies that promote the effective implementation of legal, regulatory and operational measures for combatting Money Laundering (ML), Financing of Terrorism (FT) and other related threats to the international financial system. Trinidad and Tobago is a member of the Caribbean Financial Action Task Force (CFATF), a FATF Styled Regional Body (FSRB), which seeks to achieve the effective implementation of, and compliance with the Forty Recommendations of FATF for the prevention of ML/FT. In accordance with Recommendation 29 of the FATF's Recommendations, all FATF's member States and members of FSRBs must establish a Financial Intelligence Unit (FIU) as an autonomous and independent body to serve as the national centre for the collection, analysis and dissemination of financial intelligence and information relative to ML/FT.

## 2. THE FIUTT

The Financial Intelligence Unit of Trinidad and Tobago (FIUTT) was established by the **Financial Intelligence Unit of Trinidad and Tobago Act, Chap. 72:01 (FIUTTA)** for compliance with FATF's Recommendation 29.

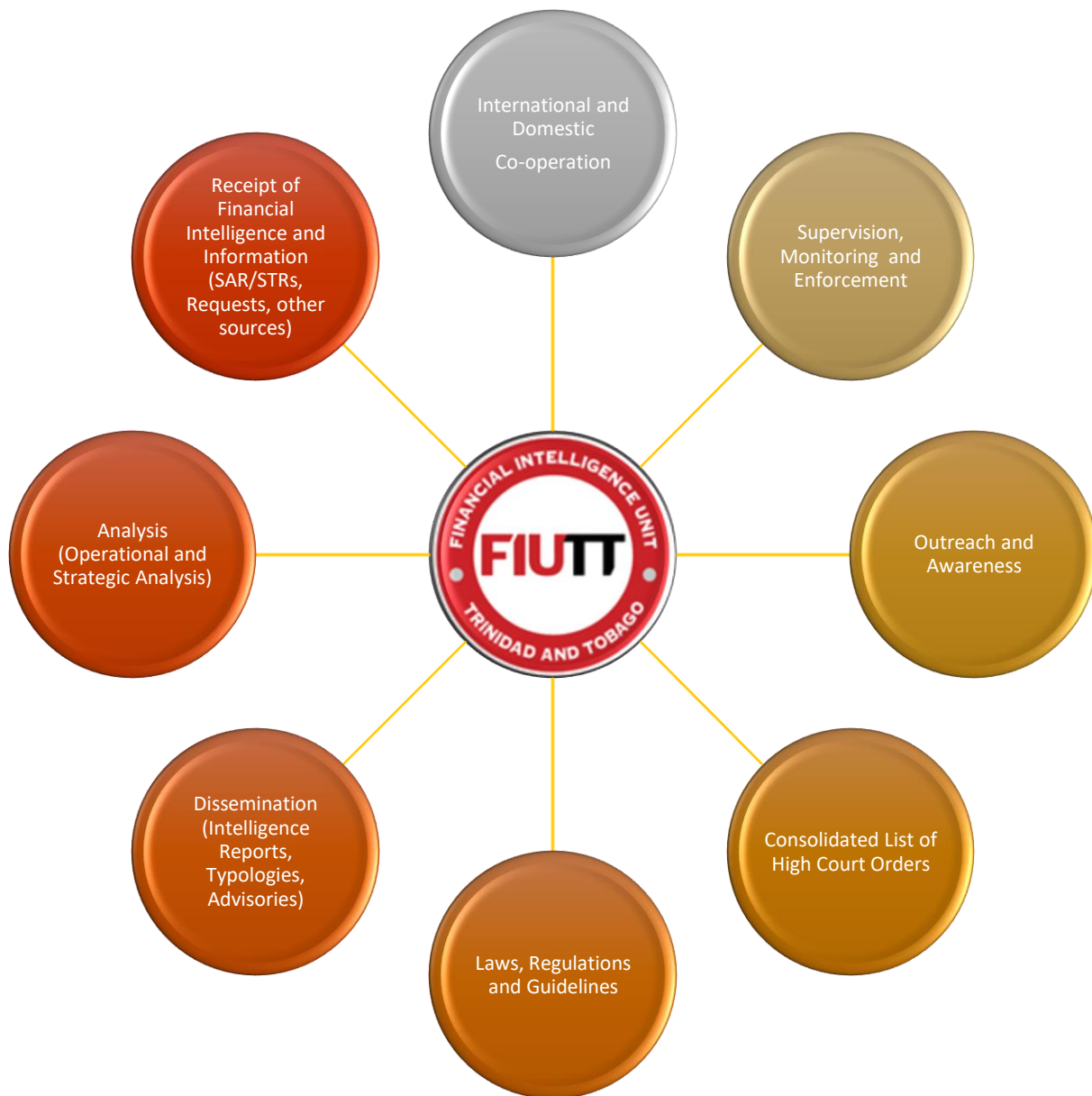
The FIUTT was established as an administrative type FIU within the Ministry of Finance. It is an independent department with autonomous control over office, resources and staff. As an administrative type FIU, the FIUTT is specialised in intelligence gathering and analysis. It does not have investigative powers, powers of arrest, nor the ability to charge suspects or restrain properties. It also does not perform a prosecutorial function within the Anti-Money Laundering/Counter Financing of Terrorism/Counter Proliferation Financing (AML/CFT/CPF) regime. These functions are performed by the Law Enforcement Authorities (LEAs) and the Office of the Director of Public Prosecutions (DPP). The FIUTT's role is to collect financial intelligence and information and analyse, disseminate, and exchange same among law enforcement authorities and other Competent Authorities in Trinidad and Tobago and internationally. The FIUTT is also an integral part and contributor to LEAs in their successful investigations and prosecutions of ML/FT/PF and other related crimes in Trinidad and Tobago.

In addition to its function as a specialised intelligence agency, the FIUTT also acts as the AML/CFT/CPF Supervisory Authority, for businesses listed in the First Schedule of the Proceeds of Crime Act, Chapter 11:27 (POCA) and non-regulated financial institutions specified in Section 2(1) of the FIUTTA (together referred to as Supervised Entities). As the Supervisory Authority, the FIUTT monitors Supervised Entities for compliance with the AML/CFT/CPF laws and regulations, and where necessary, initiates enforcement action to secure compliance with these laws.

The FIUTT's powers and functions are comprehensively set out in the FIUTTA and the Financial Intelligence Unit of Trinidad and Tobago Regulations, 2011 (FIUTTR).

Diagram 1 illustrates the role of the FIUTT.

**DIAGRAM 1  
ROLE OF THE FIUTT**



### 3. ORGANISATIONAL STRUCTURE OF THE FIUTT

The FIUTT's approved staff complement comprises of 60 officers. For efficiency, the FIUTT is organised into three layers: Executive, Operational and Support.

A brief description of the three layers are as follows:

#### EXECUTIVE:

- **Director**  
**Appointment:** By the Public Service Commission.  
**Functions:** Responsible for the overall operations of the Unit.
- **Deputy Director**  
**Appointment:** By the Public Service Commission.  
**Functions:** Supports in the overall operations of the Unit.

#### OPERATIONAL:

- **Analysis Division**  
**Functions:** Responsible for the analysis of suspicious transaction or activity reports, dissemination of intelligence reports, operational and strategic analysis reports and international co-operation.
- **Compliance and Outreach Division**  
**Functions:** Supervises Supervised Entities with an aim for their compliance with the AML/CFT/CPF legislation, and includes conducting outreach and awareness sessions.
- **Legal Division**  
**Functions:** Advises on legal matters, updates and maintains the Consolidated List of High Court Orders pursuant to section 22AA of the Anti-Terrorism Act, Chap. 12:07 ("ATA"), and manages the enforcement aspects of AML/CFT/CPF legislation.

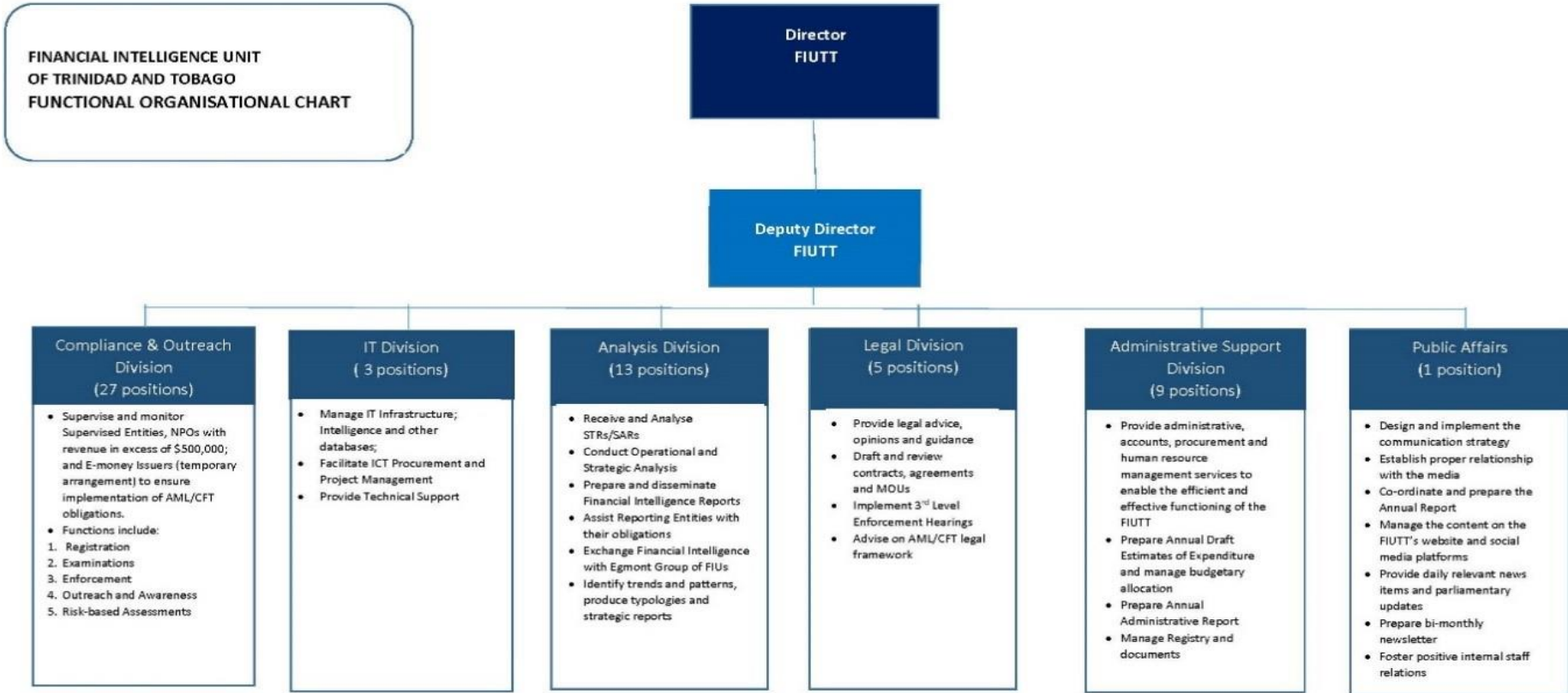
#### SUPPORT:

- **Administrative Support Division**  
**Functions:** Responsible for all the Unit's administrative functions.
- **Information and Technology Division**  
**Functions:** Responsible for all the Unit's software, electronic equipment, computer and security systems.

Diagram 2 shows the FIUTT's organisational structure.



**DIAGRAM 2  
ORGANISATIONAL STRUCTURE OF THE FIUTT**



#### 4. THE SUPPORTING LEGISLATIVE REGIME

In addition to the FIUTTA and the FIUTTR, the current AML/CFT/CPF legislative framework comprises the **Proceeds of Crime Act, Chap. 11:27 (POCA)**, the **Anti-Terrorism Act, Chap. 12:07 (ATA)**, associated regulations and the **Economic Sanction Orders (ESOs)**.

- **The POCA** enables and establishes procedures for the confiscation of proceeds of crime and establishes the offence of ML. Furthermore, the **Financial Obligations Regulations, 2010 (FORs)**, established under **section 56 of the POCA**, requires Listed Businesses and Financial Institutions (Reporting Entities) to report suspicious transactions and/or activities to the FIUTT and contains the AML/CFT/CPF measures and procedures which must be implemented to enable the deterrence and detection of ML.
- **The ATA** criminalises terrorism and provides for the detection, prevention, prosecution, conviction and punishment of terrorist acts, FT and for the confiscation, forfeiture and seizure of terrorists' assets. Furthermore, **the Financial Obligations (Financing of Terrorism) Regulations, 2011**, made pursuant to **section 41 of the ATA**, ensures that the obligations stipulated under the FORs for ML apply equally to FT.
- As it relates to FT, Section 22B of the ATA aims to prohibit terrorist entities from misusing Reporting Entities and the financial system. This prohibition occurs through the issuance of Orders by the High Court of Trinidad and Tobago to declare, *inter alia*, entities designated by the United Nations Security Council as terrorist entities to be Listed Entities in Trinidad and Tobago, and to freeze the property of such Listed Entities.
- The FIUTT plays a key role in the issuance of such Orders as it is mandated through section 22AA of the ATA to furnish the Attorney General with information required to facilitate an application for the Order; to maintain a Consolidated List of these High Court Orders; and to circulate the said list at regular intervals to ensure all Reporting Entities in Trinidad and Tobago are aware of their obligation to comply with the freezing order.
- For this reporting period, the FIUTT has assisted with the issuance of three High Court Orders declaring designated entities to be Listed Entities and the consequent freezing of their associated properties; and three High Court Orders declaring that entities were no longer to be considered Listed Entities and for the unfreezing of their associated properties. The Consolidated List of High Court Orders contained 103 Orders for the freezing of funds as at the end of this reporting period.
- **The ESOs** were made under section 4(1) of the Economic Sanctions Act, Chap. 81:05 for the purpose of suppressing the Financing of Proliferation of weapons of mass destruction (PF) by

providing for the implementation of targeted financial sanctions. The ESOs are **the Economic Sanctions (Implementation of United Nations Resolutions on the Democratic People's Republic of Korea) Order, 2018** and **the Economic Sanctions (Implementation of United Nations Resolutions on the Islamic Republic of Iran) Order, 2018** which impose targeted financial sanctions on Democratic People's Republic of Korea and the Islamic Republic of Iran respectively.

## 5. RECENT DEVELOPMENTS IN THE AML/CFT/CPF LEGAL REGIME

In December 2020 the **Miscellaneous Provisions (FATF Compliance) Act, No. 25 of 2020** was enacted to, inter alia, fortify the AML/CFT/CPF Regime in Trinidad and Tobago by amending the FIUTTA, POCA, and the ATA. The **FIUTTA** was amended to:

- (a) authorise the disclosure of intelligence reports involving police officers to the Police Complaints Authority (PCA) for investigation;
- (b) allow a Supervised Entity to de-register from the FIUTT upon application or upon the FIUTT's own volition, once the FIUTT is satisfied that the Supervised Entity is no longer performing the activities which requires it to be registered; and
- (c) newly empower the FIUTT to administer administrative penalties alongside issuing directives to any Supervised Entity for breaches of AML/CFT/CPF obligations, as well as to introduce the administration of such penalties as an alternative to directives issued by the FIUTT.

The **POCA** and the **ATA** were also simultaneously amended to allow for the administration of these penalties on persons in breach of obligations under the respective Acts and Regulations.

## 6. ADDITIONAL MEASURES

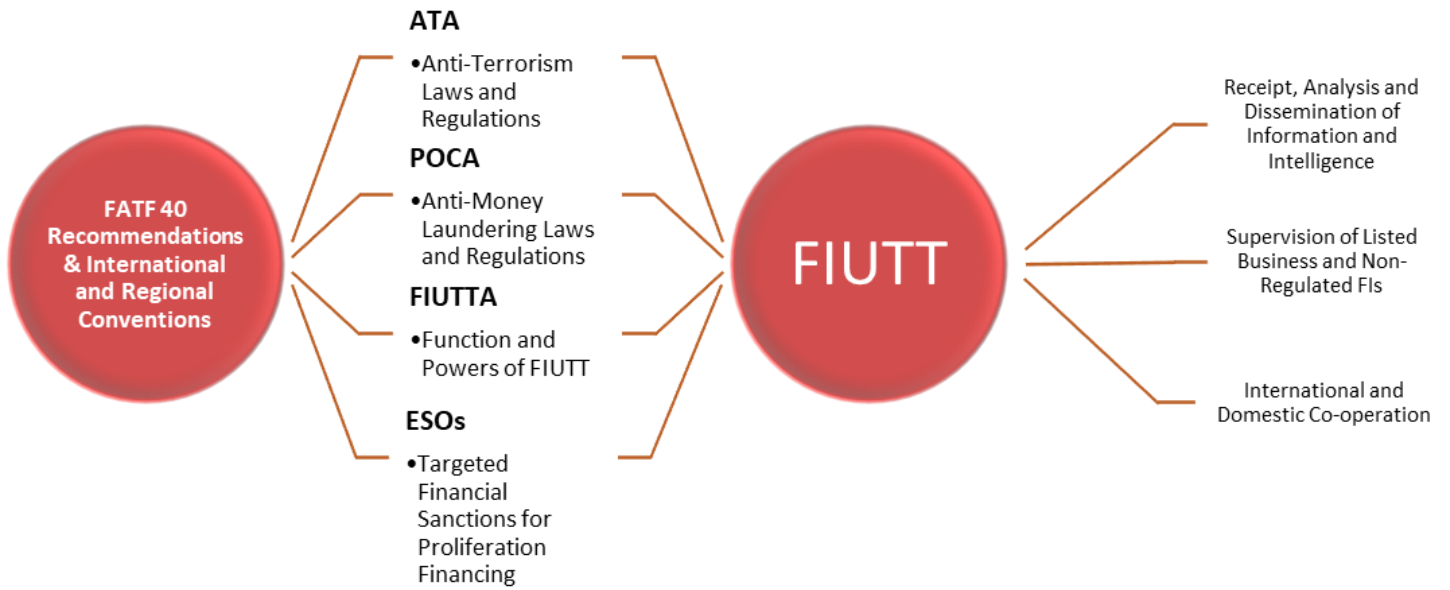
In this reporting period, other legislative actions were taken to bolster the AML/CFT/CPF regime including the following:

- The assent of the **Miscellaneous Provisions (FATF Compliance) Act, 2020** on December, 18 2020 which:
  - Amended the Central Bank Act, Chap. 79:02 to, inter alia, empower the Central Bank to administer administrative fines under any written law under which it has a supervisory role or general administration. This would include the administrative penalties on FIs for breaches of AML/CFT/CPF obligations in undertaking its AML/CFT/CPF supervisory function over FIs in Trinidad and Tobago;

- Amended the Securities Act, Chap. 83:02 to make provision for the combatting of ML/FT and PF by also expanding the powers of the Commission to administer administrative fines or other sanctions on any person registered under that Act and found to be in breach of the AML/CFT/CPF Laws;
- Amended the Income Tax Act, Chap. 75:01, the Financial Institutions Act, Chap. 79:09, the Central Bank Act, Chap. 79:02 and the Securities Act, Chap. 83:02 to exclude the application of secrecy laws in certain instances where a witness statement is provided to a high rank police officer or the PCA for the purpose of criminal investigations including police corruption. These enactments enhance the AML/CFT/CPF regime by further facilitating the prosecution of persons, including police officers, who may be guilty of committing predicate offences to ML, FT and PF;
- Amended the Securities Act, Chap. 83:02 to include the PCA as a body to which the Commission, or any duly authorised person or entity, may disclose confidential information in enforcing that Act, and thereby increasing co-operation and information sharing which can aid in combatting ML/FT/PF involving police officers; and
- Amended the Non-Profit Organisations Act, No. 7 of 2019 to clarify the FIUTT as the Supervisory Authority for NPOs, which is defined as the competent authority responsible for ensuring compliance by Reporting Entities with requirements to combat ML.
- The assent of **the Gambling (Gaming and Betting) Control Act, No. 8 of 2021** on July 12, 2021. This Act provides for the regulation of the gaming and betting sector primarily through the establishment of the Gambling (Gaming and Betting) Control Commission, which inter alia introduces a licensing regime. Notably, the Act ensures that the FIUTT continues to be the Supervisory Authority responsible for the AML/CFT/CPF supervision of gambling establishments, and thereby requiring any new establishments to apply for registration with the FIUTT within five business days from obtaining their licence to operate as a gaming or betting establishment. Through the new section 33 and schedule 2 of this Act, criminals are prohibited from controlling any such establishment by allowing the Commission to first assess the fitness and propriety of a person before the granting of a license. The Commission is also empowered to revoke the licence of any owner, operator, key person or associate who has been convicted of any criminal offence through section 44 of this Act; and
- The assent of **the Evidence (Amendment) Act, 2021** on February 25, 2021. This Act amended the Second Schedule of the Evidence Act, Chap. 7:02 to include the words “Financial Intelligence Unit of Trinidad and Tobago” in Column I, and thus making it possible that FIUTT documents may be received in evidence in the Courts of Trinidad and Tobago and all legal proceedings once certified by the Director.

Diagram 3 below illustrates a summary of the AML/CFT/CPF legal framework.

**DIAGRAM 3**  
**THE FIUTT AND AML/CFT/CPF LEGAL FRAMEWORK**



## CHAPTER II – FOSTERING A CULTURE OF COMPLIANCE

### 1. COMPLIANCE FOR INTELLIGENCE

Financial Intelligence plays a pivotal role in the detection, deterrence and prevention of money laundering, terrorist financing and the evolving threat of proliferation of weapons of mass destruction.

At the FIUTT, part of our success is measured by the submission of quality STRs/SARs reports from Reporting Entities and the subsequent dissemination of the quality of financial intelligence reports to LEAs. The FIUTT as part of its mandate also produce reports on ML/FT trends, patterns, typologies, advisories and alerts of ML/FT and other financial crimes targeting Reporting Entities, Government departments and the general public.

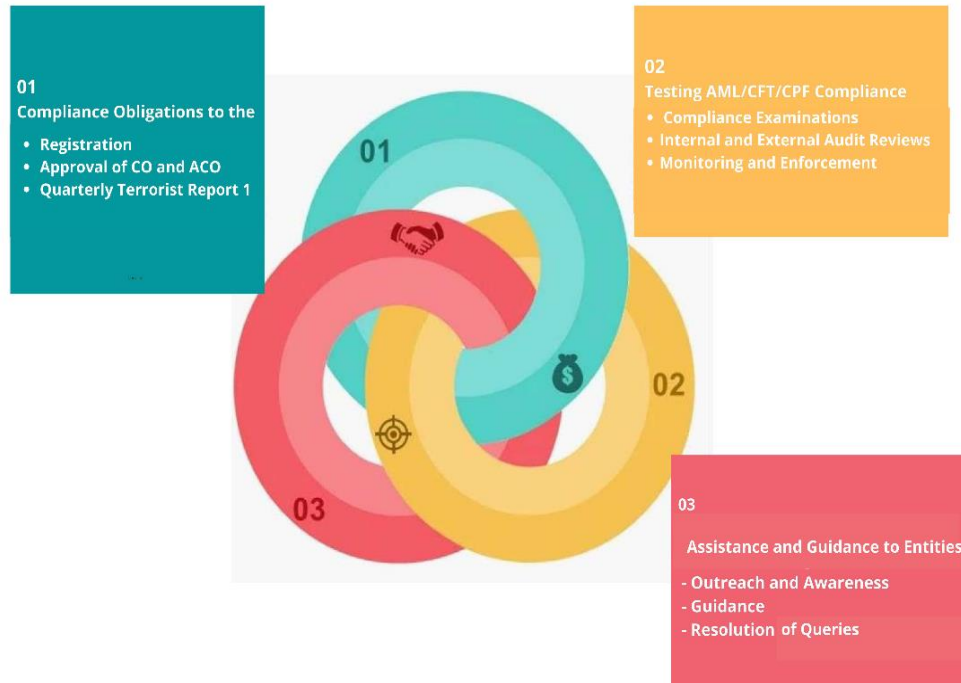
As the Compliance and Outreach Division of the FIUTT, we understand the importance of embracing and utilising the analysis reports produced by the Analysis Division of the FIUTT. Supervision and analysis is used in the implementation of AML/CFT/CPF strategy for compliance. These two core functions can be summarised in the phrase “*Compliance for Intelligence*”.

It must be clearly emphasised that implementing an effective AML/CFT/CPF strategy cannot be built in isolation. The FIUTT fulfils its supervisory mandate through its ongoing monitoring activities and the provision of guidance and support to entities to ensure their compliance with the following AML/CFT/CPF legal obligations:

- registration with the FIUTT;
- appointment of the CO and ACO;
- assessment of risk;
- identification and verification of customers;
- record keeping;
- internal policies and procedures;
- effective reporting;
- AML/CFT/CPF training; and
- independent testing.

Diagram 4 illustrates the key elements of the FIUTT’s supervisory functions.

**DIAGRAM 4**  
**SUPERVISORY FUNCTIONS OF THE COMPLIANCE AND OUTREACH DIVISION**



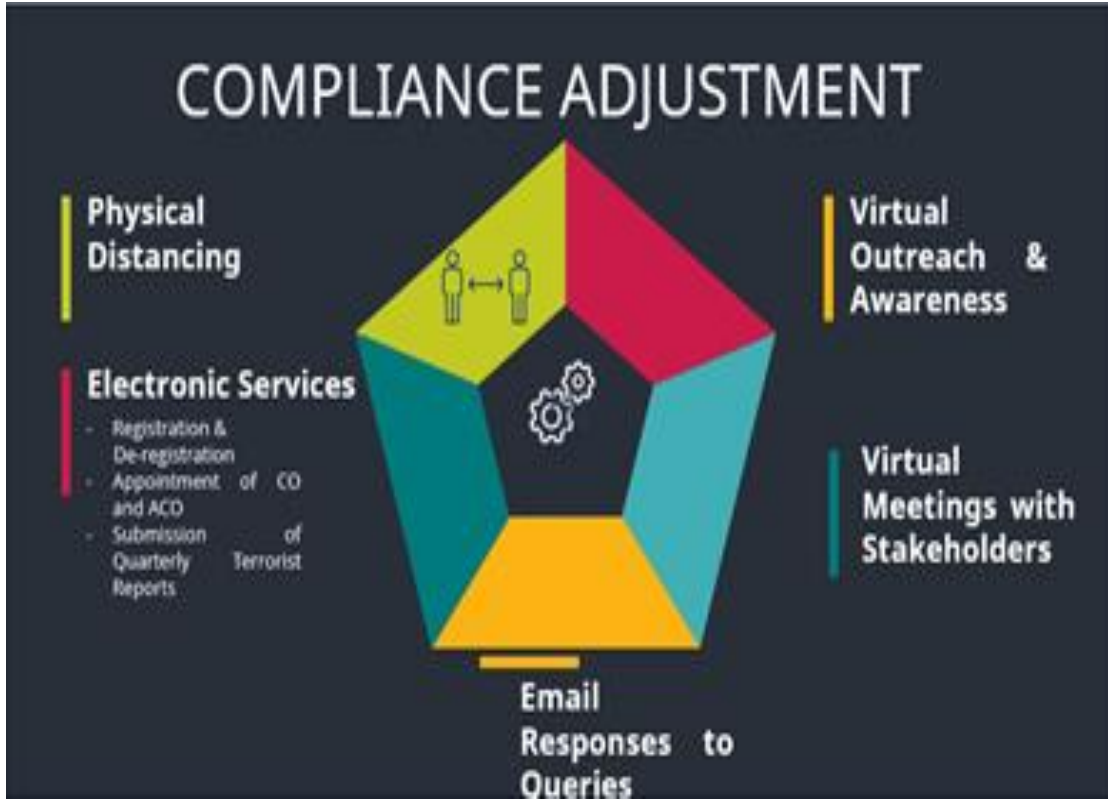


- **The Compliance Adjustment**

The FIUTT is aware of challenges faced by Non-Regulated Financial Institutions (NRFIs) and Listed Businesses (LBs), collectively referred to as “Supervised Entities”, regarding customer identification and verification due to ongoing physical distancing requirements. The FIUTT along with the other Supervisory Authorities and Regulators, continues to provide guidance to Reporting Entities to ensure their policies and procedures are adapted to the changing business environment. Ultimately, the FIUTT’s goal is to ensure Supervised Entities’ compliance with their legal obligations whilst maintaining their staff and customer safety.

Diagram 5 illustrates an overview of the compliance adjustment.

DIAGRAM 5  
THE COMPLIANCE ADJUSTMENT



## 2. COMPLIANCE OBLIGATIONS TO THE FIUTT

The FIUTT monitors 15 sectors comprising of Supervised Entities. The FIUTT also supervises E-Money Issuers (EMIs) under the category of Money or Value Transfer Services (MVTs), and NPOs with a gross annual income exceeding five hundred thousand dollars (\$500,000.00). These Supervised Entities, as defined in the First Schedule of the POCA and Section 2(1) of the FIUTTA, are mandated to comply with their AML/CFT/CPF obligations.

### i. Registrations

Supervised Entities, with the exception of NPOs, are required to register with the FIUTT within three months of commencing business activity or incorporation as a company, in accordance with Regulation 28(1) of the FIUTTR. By registering with the FIUTT, Supervised Entities, have taken only the first step to become compliant with the AML/CFT/CPF laws of Trinidad and Tobago.

In this reporting period, 506 entities registered with the FIUTT. This represents a 54% increase from the previous reporting period. The Attorney-at-Law (AAL) and Real Estate sectors continued to account for the highest numbers of new registrants with 184 and 231 respectively. The total number of entities registered with the FIUTT as at September 30, 2021 is 3,766.

The FIUTT continued to adapt procedures to overcome the challenges posed by the COVID-19 pandemic. In addition to manual submissions, the FIUTT also encouraged and accepted electronic submissions of the completed FIUTT Registration Form RG1 and all supporting documents via email.

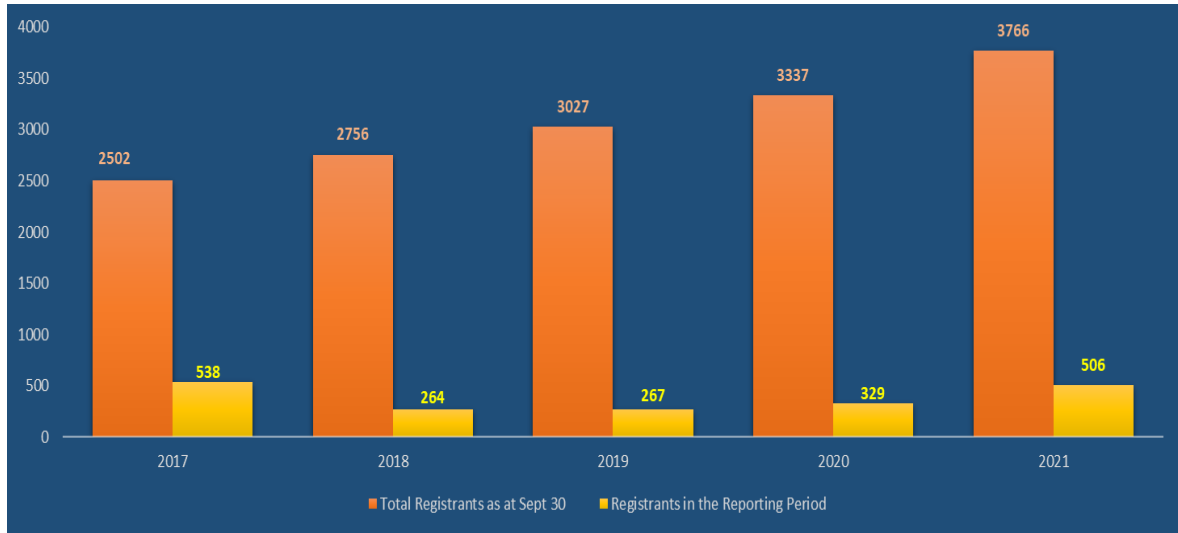
Continued compliance with this obligation is attributed to the realignment of the FIUTT's strategies in response to the changing business environment. This realignment included the:

- update of registration form to capture further information;
- acceptance of electronic submissions via email;
- continued surveillance for unregistered businesses and enforcement action for failure to register with the FIUTT;
- publication of notices and guidance on the FIUTT's website and social media pages on the obligation to register; and
- partnering with government agencies and stakeholder industry associations.

The FIUTT's list of registrants is updated and published quarterly on its website. This list allows for Reporting Entities and other local and foreign Competent Authorities to access updated information in the conduct of their due diligence measures and investigations.

Diagram 6 illustrates the total number of registrants for the past five years.

**DIAGRAM 6**  
**TOTAL REGISTRANTS FOR THE PAST FIVE YEARS**



## **ii. Non-Profit Organisations**

The FIUTT as a Supervisory Authority continues to work with the Registrar General's Department (RGD) in the Office of the Attorney General and Ministry of Legal Affairs (AGLA). The RGD is responsible for the registration of all NPOs, in accordance with the NPO Act, No. 7 of 2019.

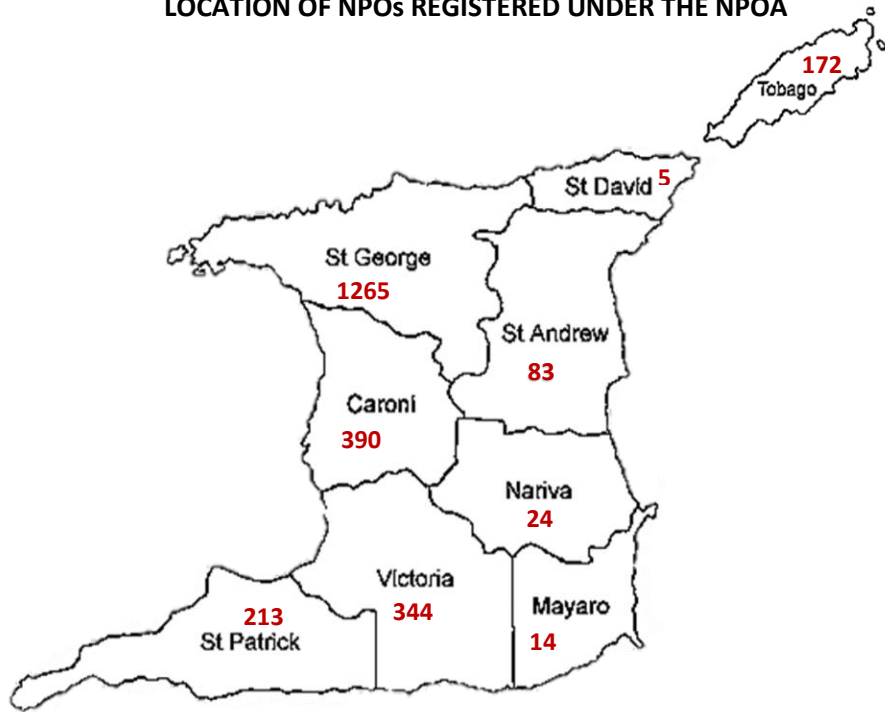
As part of the registration process with the RGD, NPOs are mandated to complete an AML/CFT/PF Risk Assessment Questionnaire (RAQ). The RGD subsequently forwards the RAQs to the FIUTT for assessment which guides risk based supervision. The results of this assessment is used to determine the subset of NPOs engaged in higher risk activities, their geographic location, as well as those NPOs with an annual income exceeding five hundred thousand dollars (\$500,000.00). These NPOs are then selected by the FIUTT to assist them in building awareness of their FT vulnerabilities.

The FIUTT also continues to receive and analyse data contained in the RAQs. To date the FIUTT has reviewed RAQs submitted by a total of 2,516 NPOs. The analysis has thus far revealed that 50% of NPOs were located in the county of Saint George followed by Caroni (16%) and Victoria (14%).

The Diagram 7 shows the number of NPOs located in nine jurisdictions throughout Trinidad and Tobago.

DIAGRAM 7

LOCATION OF NPOs REGISTERED UNDER THE NPOA



Despite the challenges due to the pandemic restrictions, the FIUTT continued to receive RAQs from the RGD, which were submitted by 1,411 NPOs. This represents a 128% increase from the previous reporting period. The FIUTT's assessment of the NPO sector is on-going as NPOs continue to register with the RGD to meet the extended registration deadline of January 5, 2022. In this reporting period, from the 1,411 NPOs, there were 147 NPOs with an annual income exceeding five hundred thousand dollars (\$500,000.00). This brought the total number of NPOs under the FIUTT's supervision as at September 30, 2021 to 294.

The FIUTT also continues to engage the sector through sensitisation sessions and outreach activities. These activities are further discussed later in this chapter in the section titled '*Assistance and Guidance to Entities*'.

The Diagram 8 below illustrates the NPO Risk Assessment Questionnaires received.

**DIAGRAM 8**  
**NPOs RISK ASSESSMENT QUESTIONNAIRES RECEIVED**





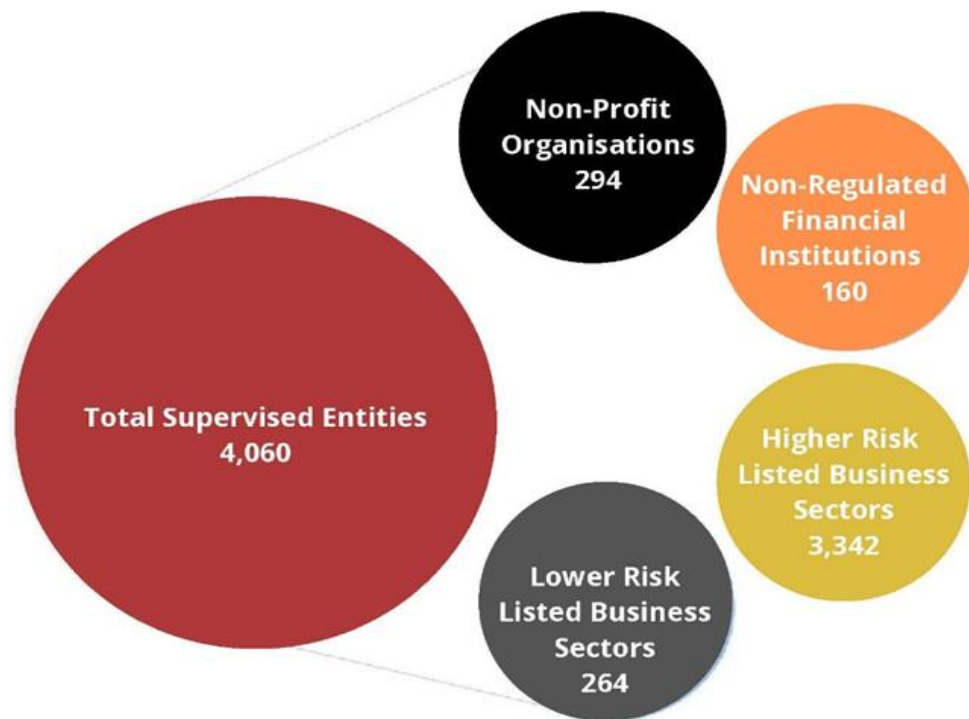
### iii. De-registration

The FIUTTA was amended in this reporting period with the inclusion of Section 18BA which treats with the de-registration of a Supervised Entity. Businesses and individuals that no longer perform the functions of a Supervised Entity, may apply for de-registration with the FIUTT in accordance with Section 18BA(1) of the FIUTTA. The beneficial owner of such entities or a person authorised by the entity is required to complete and submit a De-registration of Listed Business form (RG2) and sign the legally binding declaration. Further, the inclusion of Section 18BA (2) allows the FIUTT on its own motion, to de-register a registrant. The FIUTT must be satisfied that the Supervised Entity is no longer performing the activities of an NRFI or LB (with the exception of NPOs).

In keeping with this mandate, the FIUTT updated its de-registration process to preclude entities from circumventing their AML/CFT/CPF obligations. The updated process also provides Supervised Entity with an opportunity to make representation in support of or in objection to the proposed deregistration. In this reporting period 37 entities were de-registered. The FIUTT's lists of registrants and de-registrants are updated and published quarterly on the FIUTT's website ([www.fiu.gov.tt](http://www.fiu.gov.tt)) in accordance with its legal obligation.

Diagram 9 illustrates the total number of Supervised Entities.

**DIAGRAM 9**  
**TOTAL NUMBER OF SUPERVISED ENTITIES AS AT SEPTEMBER 30 2021**



#### **iv. Approval of the Compliance and Alternate Compliance Officers**

The ultimate responsibility for a Supervised Entity's compliance regime lies with senior management. Part of senior management's responsibility in directing and overseeing the entity's performance, includes appointing senior staff members (or competent professionals for LBs only) to ensure continuous compliance with the AML/CFT/CPF regime of Trinidad and Tobago.

All Supervised Entities have the responsibility to appoint suitably qualified candidates to perform the roles of Compliance Officer (CO) and Alternate Compliance Officer (ACO).

The CO is the primary liaison between the Supervised Entity and the FIUTT and is responsible for ensuring organisational compliance with AML/CFT/CPF legislation by performing the following:

- implementing, monitoring and reviewing AML/CFT/CPF procedures and controls;
- ensuring organisational compliance with current AML/CFT/CPF legislation;
- receiving and analysing internal suspicious transaction/activity reports submitted by members of staff;
- determining whether a report ought to be submitted to the FIUTT based on available information and the results of analysis conducted;
- reporting to the FIUTT on the possession of terrorist funds or property; and
- maintaining records to facilitate requests from the FIUTT and LEAs.

To effectively execute these functions, the CO should occupy a senior position with sufficient independence and AML/CFT/CPF competence. The CO and ACO should be adequately and continuously trained in AML/CFT/CPF to effectively identify, assess and understand their entity's risk to implement the required mitigating measures.

In this reporting period, the FIUTT observed an increase in the submission of Compliance Officer Fit and Proper Questionnaires from Supervised Entities. 314 applications were received and 263 applications were approved at the time of this report.

The FIUTT took a proactive approach and adopted the following measures to ensure compliance with this obligation:

- streamlining of the registration process to include simultaneous submission of Compliance Officer Fit and Proper Questionnaires;
- continuous sensitisation highlighting the importance of the CO and ACOs role within the compliance regime; and
- monitoring the entity's compliance with this obligation.

In instances where the applicant did not meet the requirements of Regulation 3 of the FORs, applications were returned and the FIUTT advised the Supervised Entity accordingly.

## **v. Quarterly Terrorist Property Reports**

The FIUTT remains committed to combatting terrorism and FT. Section 33(3) of the ATA mandates that FIs including NRFIs consult the United Nations Security Council Resolution 1267, 1989 and 2253 List and the Trinidad and Tobago Consolidated List of Court Orders as the minimum regulatory requirement.

FIs are required to report to the FIUTT every three months whether the institution is or is not in possession of terrorist funds. The FIUTT monitors the UNSC 1267, 1989 and 2253 list daily, updates its website accordingly and informs the Office of the Attorney General and Legal Affairs and Reporting Entities of any amendments to the UNSC designated lists.

Following the FIUTT's adjustment in the last reporting period, procedures to facilitate the secure electronic submission of QTRs were implemented. This measure resulted in more timely submissions from FIs and allowed for faster review of the QTRs by the FIUTT. While the method of electronic submission has been widely adopted, some entities continue to make manual submissions. FIs are generally compliant with this obligation. However, based on a compliance analysis of QTR submissions by the FIUTT there is a need for improved compliance by some Credit Unions.

## **vi. Testing AML/CFT/CPF Compliance**

The Compliance Programme approved by senior management must contain written AML/CFT/CPF policies and procedures which are intended to mitigate ML/FT/PF risks identified during the risk management process. The effective implementation of these internal controls will assist in providing valuable and actionable intelligence to the FIUTT and by extension LEAs. The following tools are used to test whether these internal controls are effectively implemented by Supervised Entities.

### **• Independent Testing**

Supervised Entities are required by law to conduct an annual independent review of its AML/CFT/CPF policies and procedures. An independent and competent AML/CFT/CPF professional who possesses the relevant training, experience and qualifications must be engaged by the Supervised Entity to fulfil this legal obligation. The review must:

- evaluate compliance with the relevant legislation and guidelines bearing in mind the Supervised Entity's risk profile;
- test the adequacy of the entity's internal controls;
- test the implementation of the entity's internal controls;
- identify gaps in the entity's compliance with their AML/CFT/CPF legal obligations; and
- make recommendations for the strengthening of internal policies and procedures to ensure compliance with the AML/CFT/CPF legislative regime.

Independent testing is not only a legal obligation, but it is also an essential compliance tool, beneficial to Supervised Entities and to the FIUTT. The law mandates that an internal and external audit must be conducted.

Further, while most independent audits submitted to the FIUTT have been accepted without issue, in some cases, the audits were returned due to identified shortcomings. The following shortcomings were identified:

- the auditor was not sufficiently competent in AML/CFT/CPF testing; and
- there was a tick box approach to compliance, that is, a cursory examination of the entity's, policies and procedures.

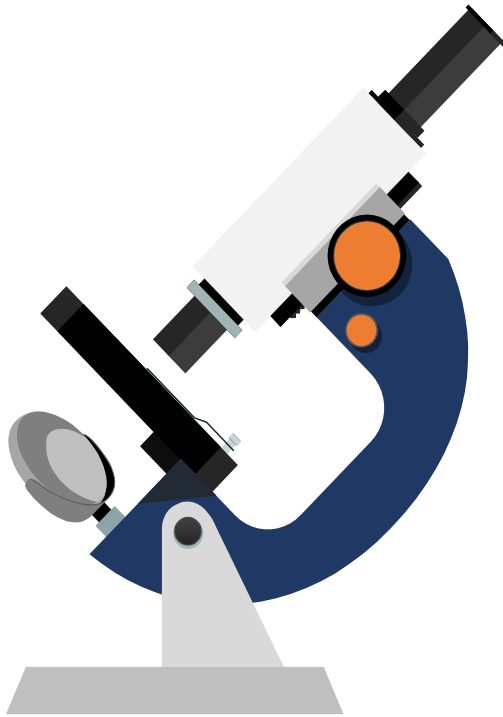
These factors prohibit the Supervised Entity and FIUTT from reaping the full benefit of this compliance tool. In order to remedy these identified gaps, the FIUTT has published guidance on its website to assist entities in initiating the independent review process. The guidance can be accessed at [Guide to Structuring an AML/CFT Compliance Programme for Supervised Entities \(fiu.gov.tt\)](http://fiu.gov.tt)

In this reporting period, there was a 53% increase in the submission of external audit reports to the FIUTT despite mandatory business closures and consequential loss of income for many Supervised Entities. Independent audits were received from the higher risk sectors including AALs, Private Members' Clubs (PMCs'), Credit Unions (CUs), Motor Vehicle Sales (MVS), and Real Estate. The FIUTT remains committed to improving compliance with this legal requirement.

Diagram 10 illustrates the scope of the FIUTT's systems for testing Supervised Entities.

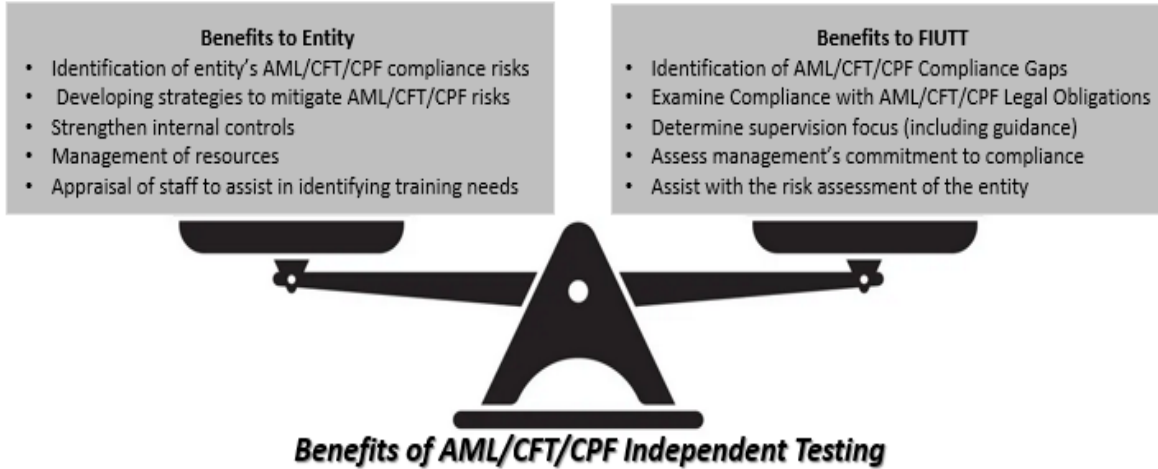
Diagram 11 illustrates benefits of AML/CFT/CPF independent testing.

**DIAGRAM 10**  
**SCOPE AREAS OF COMPLIANCE TESTING**



- Compliance Officer approval, training and functions
- Systems of Internal Controls, Risk Assessment, CDD Sanctions Screening, Transaction Monitoring
- Training and Screening of Staff
- Record Keeping and Retrospective Due Diligence
- Reporting Obligations internal procedures and reporting the the FIUTT
- Independent testing of Compliance
- Compliance Programme approved by senior management

**DIAGRAM 11**  
**BENEFITS OF AML/CFT/CPF INDEPENDENT TESTING**



- **Compliance Examinations**

The effects of COVID-19 restrictions on businesses continued well into this reporting period. With reported increases in fraudulent activity, it became even more imperative that entities implement and maintain a strong compliance environment to:

- comply with the regulatory framework;
- mitigate and manage risks; and
- protect against ML/FT/PF, while protecting their brand and reputation.

Notwithstanding continued closures of non-essential business activities during the reporting period, the FIUTT maintained its robust risk based compliance assessments. Conventional supervisory activities such as onsite or face-to-face engagements were limited in line with government regulations. To ensure that the division's core function was not further disrupted, a virtual meeting component was introduced to the hybrid compliance examination procedure.

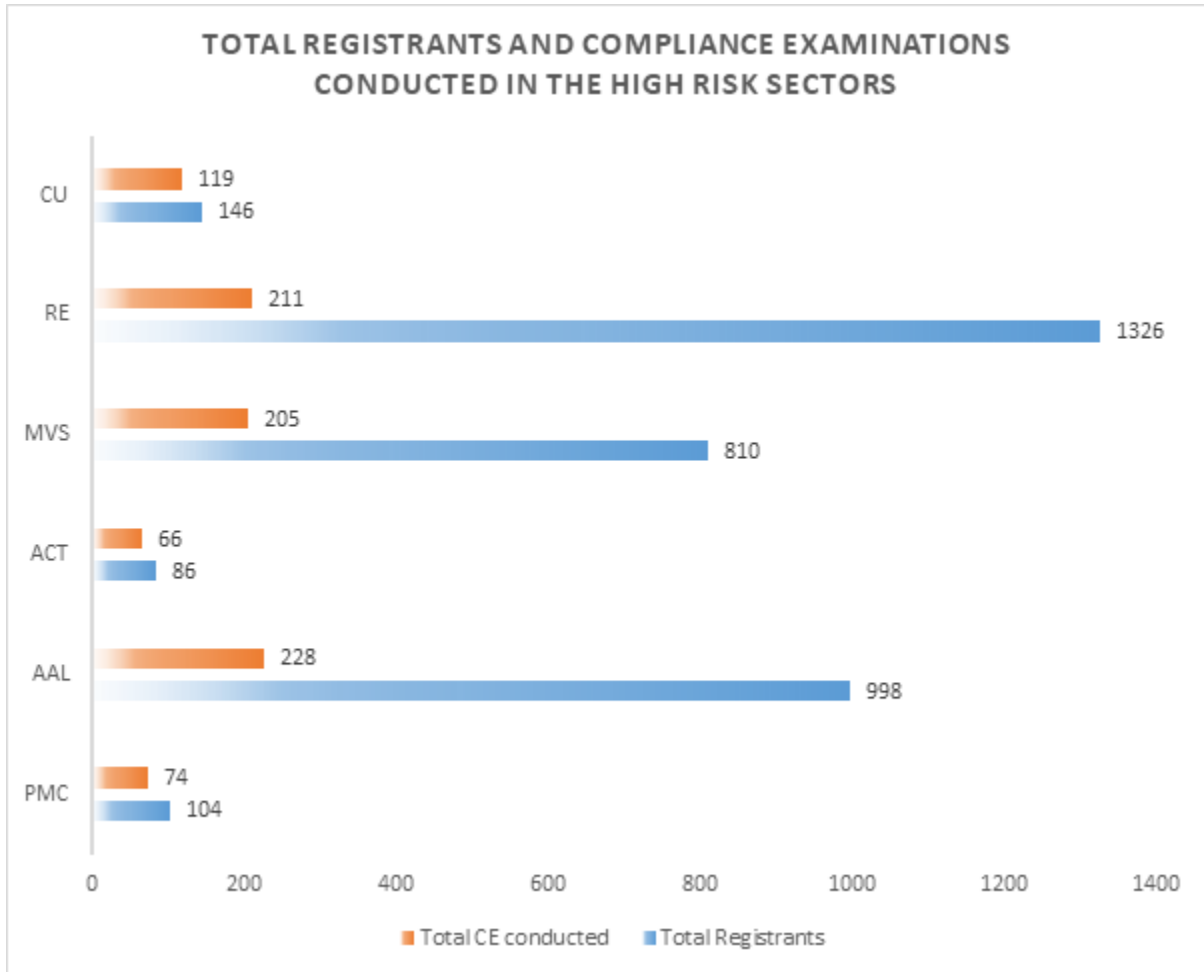
Higher risk sectors remained the primary focus of intensive supervisory engagements. In this reporting period, 81 compliance examinations were conducted of which 81% were on entities in the higher risk sectors including the AAL, Real Estate and MVS sectors. Second round compliance examinations attributed to 5% of the 81 examinations conducted for this period, to assess the effectiveness of mitigating measures and to determine whether previous non-compliance was rectified.

A total of 1,041 AML/CFT/CPF compliance examinations on 972 Supervised Entities have been conducted as of September 30, 2021. 88% of NRFIs (CU, Building Societies and MVTs) registered with the FIUTT were tested for compliance.

Diagram 12 below represents total registrants and AML/CFT/CPF compliance examinations conducted in the higher risk sectors.



**DIAGRAM 12**  
**AML/CFT/CPF EXAMINATIONS CONDUCTED**



- **Monitoring for Compliance and Enforcement**

The FIUTT applies a risk-based approach to all aspects of AML/CFT/CPF regulation and supervision, including monitoring for compliance with legal obligations. This monitoring is a continuous process, which encompasses the following activities:

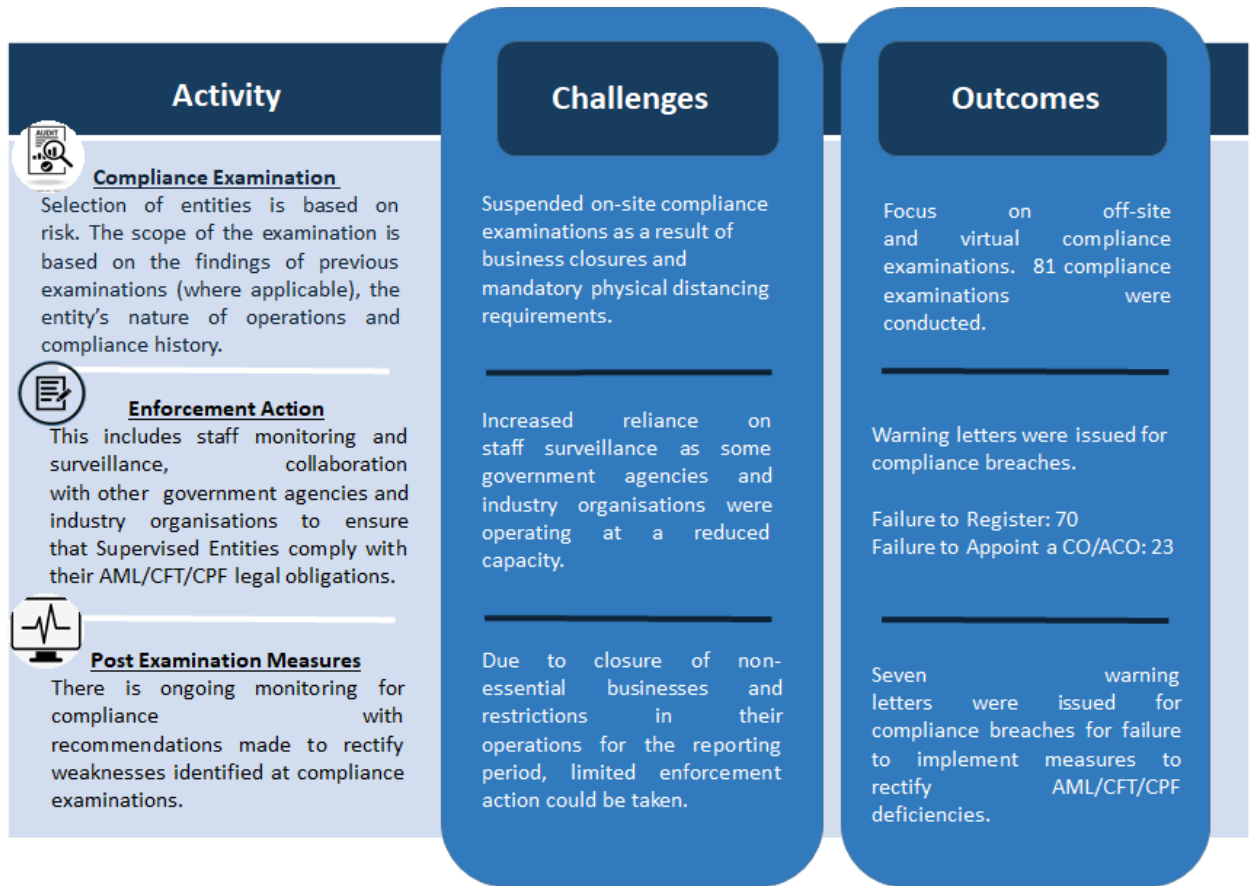
- staff surveillance and collaboration with stakeholders to ensure that entities performing the functions of Supervised Entities are registered;
- staff surveillance regarding Supervised Entities' compliance with the following obligations:
  - to appoint and obtain approval for the CO and ACO
  - to submit QTRs to the FIUTT;
- AML/CFT/CPF internal and external audit assessment;
- post compliance examination communication and follow-up with Supervised Entities regarding their implementation of the FIUTT's recommendations;
- evaluation of remedial measures implemented to rectify weaknesses identified at compliance examinations; and
- assessment of compliance after the initiation of enforcement action.

The effects of the ongoing COVID-19 pandemic, the challenges of the 'New Normal' and the evolving AML/CFT/CPF risks informed the application of a Risk-Based Approach to the above activities. The FIUTT's usual monitoring and enforcement processes were stymied as a result of mandatory business closures of some Listed Businesses. There was an increase in e-commerce activity as many businesses migrated their activities online. Consequently, the FIUTT increased its online surveillance activities and focused its monitoring and enforcement efforts on the registration obligation for these entities.

The Diagram 13 below summarises the monitoring and enforcement activities of the FIUTT for this reporting period.

Diagram 14 below details the AML/CFT/CPF compliance activities process by the FIUTT.

**DIAGRAM 13  
SUMMARY OF THE FIUTT'S MONITORING AND ENFORCEMENT ACTIVITIES**



**DIAGRAM 14**  
**COMPLIANCE EXAMINATION ACTIVITIES**

- 01**
- PRE-EXAMINATION**
- Assess entity risk
  - Verification Checks on Beneficial Owners
  - Obtain Consent and specific documents
  - Review documents
- 02**
- CONDUCT OF COMPLIANCE EXAMINATION**
- Interview entity representatives
  - Document review
  - Inspect premises
  - Provide feedback and recommendations
- 03**
- MONITOR FOR COMPLIANCE**
- Assess evidence of remedial measures
  - Provide guidance
  - Re-assess entity risk profile
- 04**
- ENFORCEMENT**
- FIUTT action (Hearing and Directive)
  - High Court action (Court Order)



### **3. ASSISTANCE AND GUIDANCE TO ENTITIES**

#### **1. Outreach and Awareness**

In this reporting period, the FIUTT relied on the use of technology in fulfilling its legislative mandate to provide guidance and inform Reporting Entities of emerging ML/FT/PF trends and typologies.

The FIUTT conducted 30 virtual outreach sessions which focused on the following areas:

- detecting and reporting suspicious transactions and activities;
- protecting NPOs from FT abuse;
- adopting a Risk-Based Approach to combat emerging ML/FT/PF Risks;
- informing Reporting Entities of the impact of COVID-19 on terrorism, counter terrorism and counter proliferation financing; and
- informing new registrants and new compliance officers of their obligations.

A virtual workshop component was incorporated in many of the sessions to encourage discourse between participants and the FIUTT. These sessions, also provided Supervised Entities with assistance in the practical application of risk mitigating strategies.

The FIUTT utilises feedback from the outreach sessions as one of the mechanisms to inform the Risk Based Approach to supervision and assist in contributing to the Compliance and Outreach Division's operational activities.

#### **2. NPO Outreach**

In this reporting period, the FIUTT conducted twelve virtual outreach and awareness sessions to the NPO sector. This 33% increase in FIUTT's outreach and awareness efforts was to ensure NPOs which fell under FIUTT's AML/CFT/CPF supervision, were adequately introduced to their legal obligations. The FIUTT observed that there was an increase in the number of NPOs which fell under the FIUTT's supervision by 147 NPOs during this reporting period. In these outreach and awareness sessions, NPOs were informed of:

- FT threats to NPOs;
- the Role of NPOs in the AML/CFT/CPF Regime;
- identifying and reporting suspicious transactions/activities relative to FT; and
- how NPOs can protect themselves from being used by terrorists and terrorist financiers.

The FIUTT also hosted general awareness sessions for those NPOs which do not fall under its AML/CFT/CPF supervision to inform them of their FT vulnerabilities.

#### **3. New Initiative: Digital Outreach Project**

In this reporting period, the FIUTT embarked on a Digital Outreach initiative to widen its engagement of Supervised Entities, stakeholders and the general public. The Digital Outreach Project comprises the

development of informational videos, which will be uploaded to the FIUTT's and Ministry of Finance's websites and social media pages. The video topics include:

- understanding the AML/CFT/CPF Regime of Trinidad and Tobago;
- what is a suspicious transaction;
- identifying red flags to avoid scammers;
- supervision for AML/CFT/CPF compliance; and
- what is ML/FT/PF and how to protect yourself.

The desired outcome of the FIUTT's Digital Outreach Project is to enhance awareness of AML/CFT/CPF and to minimise public misinformation regarding the functions and activities of the FIUTT.

#### **4. Guidance to Stakeholders**

The FIUTT continues to fulfill its obligation in the provision of guidance to all stakeholders.

In this reporting period, the FIUTT provided guidance independently as well as in collaboration with the Central Bank and Trinidad and Tobago Securities and Exchange Commission (TTSEC). Further, the following updates were published on the FIUTT's website.

- Guidance Note on Procedures for Reporting Terrorist Funds;
- Romance Scam Advisory, August 27th, 2021;
- Media Release – To affirm FIUTT's confidentiality regarding all intelligence and information gathered in the execution its functions;
- FIUTT Strategic Analysis Case Compilation 2015-2020 (May 2021);
- List of Accounting Officers as at February 4th 2021;
- FIUTT Guidance Note to Financial Institutions and Listed Businesses on Sanctioned Entities TT Gazette No. 52 of 2021;
- FIUTT Guidance to Reporting Entities on Proliferation Financing Orders;
- FIUTT Annual Report 2020;
- Guidance to Non-Regulated Financial Institutions and Listed Business on Independent Testing of Compliance Programme; and
- Notice to Attorneys at Law on Registration with the FIUTT.

#### **5. Feedback to AML/CFT/CPF Enquiries**

The FIUTT continued to receive enquiries from Supervised Entities, NPOs, government departments, stakeholders and the general public on AML/CFT/CPF matters. Feedback was provided via email and telephone to enquiries relating to the following areas of concern:

- nature of business that requires registration with the FIUTT;
- supervision of NPOs;
- individuals and businesses not appearing on the FIUTT's List of Registrants;
- training COs and ACOs;
- conduct of external audits;

- establishing new business in Trinidad and Tobago; and
- fraudulent matters and suspected tax evasion.

Table 1 lists 2020/2021 outreach and awareness seminars.

#### **4. MANAGEMENT OF RESOURCES**

The FIUTT's role is paramount in ensuring that AML/CFT/CPF compliance of Supervised Entities is in alignment with the global fight to combat ML/FT/PF. Due to the nature of business activities performed by sectors supervised by the FIUTT, Supervised Entities are frequently confronted with the risk of being targeted by criminals and organised criminal syndicates seeking to exploit the financial system.

With 4,060 entities currently under the FIUTT's supervision, the Compliance and Outreach Division has made significant strides in managing its resources. The noted shift in onsite supervision due to pandemic related challenges, resulted in the adjustment of supervision strategies and activities that were more proactive, targeted and relevant.

Based on the advice from FIs there was an increase in applications for registration from persons<sup>1</sup> who are not required by law to register with the FIUTT for AML/CFT/CPF supervision. This negatively impacted the resources of the FIUTT as their nature of business (e.g. ice cream parlour, poultry farms, etc.) does not fall within the First Schedule of POCA. The FIUTT has taken steps to have the erroneous applications addressed by the FIs and their Supervisory Authority.

Notwithstanding, the challenges the Compliance and Outreach Division maintains a high-level of commitment to ensure that Supervised Entities comply with the AML/CFT/CPF laws of Trinidad and Tobago. This is underscored by the dedicated team of compliance professionals that continue to adapt to the changing landscape and promote a strong culture of compliance in supervision of LBs and NRFIs.

---

<sup>1</sup> Persons include both individuals and legal entities.

**TABLE 1  
2020/2021 OUTREACH AND AWARENESS SEMINARS**

<b>No.</b>	<b>Month</b>	<b>Sector</b>	<b>Nature of Seminar</b>	<b>Co-ordinating Agency</b>	<b>Participants</b>
1	October	NPO	Developing and Implementing Measures to Protect Your NPO from FT abuse	FIUTT	37
2	October	Real Estate	The Role of Internal Controls in AML/CFT/PF Risk Framework	FIUTT	65
3	November	MVTS/CU	Adopting a RBA to combat emerging ML/FT/PF Risks	FIUTT	53
4	December	NPO	Sensitisation Session for Non-Profit Organisations	FIUTT	22
5	December	All Sectors	Developing a Risk Based Strategy to mitigate PF Risks	FIUTT	104
6	January	NPO	Developing and Implementing Measures to Protect Your NPO from FT abuse	FIUTT	85
7	February	New COs and ACOs	The role of the Compliance Officer	FIUTT	62
8	February	General Session	Detect and Report: Understanding Suspicious Transaction Reporting (Case Study on ML)	FIUTT	160
9	February	NPO	Developing and Implementing Measures to Protect Your NPO from FT abuse	FIUTT	28
10	March	NPO	Developing and Implementing Measures to Protect Your NPO from TF abuse	FIUTT	74
11	March	AAL/ACT/TCSPs	Adopting a RBA to combat emerging ML/FT/PF Risks	FIUTT	37
12	March	New Registrants (All Sectors)	Introduction to the AML/CFT/CPF Compliance	FIUTT	10



No.	Month	Sector	Nature of Seminar	Co-ordinating Agency	Participants
13	April	CFF/Credit Union	Role and Functions of the FIUTT	FIUTT	36
14	April	Motor Vehicle Sales	Detect and Report: Understanding Suspicious Transactions Reporting (Case Study on ML/FT)	FIUTT	43
15	April	Real Estate	Detect and Report: Understanding Suspicious Transactions Reporting (Case Study on ML/FT)	FIUTT	40
16	April	PMC	Detect and Report: Understanding Suspicious Transaction Reporting (Case Study on ML)	FIUTT	33
17	April	JW/AD	Detect and Report: Understanding Suspicious Transaction Reporting (Case Study on ML)	FIUTT	23
18	April	NPO	Developing and Implementing Measures to Protect Your NPO from FT abuse	FIUTT	47
19	May	NPO	Developing and Implementing Measures to Protect Your NPO from FT abuse	FIUTT	24
20	June	MVS	Effective Suspicious Transaction Reporting/Suspicious Activity Reporting	FIUTT	73
21	July	NPO	Developing and Implementing Measures to Protect Your NPO from FT abuse	FIUTT	76
22	July	NPO	Developing and Implementing Measures to Protect Your NPO from FT abuse	FIUTT	60
23	August	All Sectors (New Registrants)	The Role and Function of the FIUTT	FIUTT	70

No.	Month	Sector	Nature of Seminar	Co-ordinating Agency	Participants
24	August	All Sectors (New Registrants)	Effective Reporting	FIUTT	32
25	August	All Sectors	Risk Based Approach	FIUTT	125
26	August	NPO	Developing and Implementing Measures to Protect Your NPO from FT abuse	FIUTT	21
27	September	CU & Building Societies	Detect and Report: Understanding Suspicious Transactions Reporting (Case Study on Terrorism Financing)."	FIUTT	46
28	September	All Sectors	The Impact of COVID-19 on Terrorism, Counter Terrorism and Counter Proliferation Financing	FIUTT	76
29	September	NPO	Sensitisation Session for Non-Profit Organisations	FIUTT	35
30	September	NPO	Developing and Implementing Measures to Protect Your NPO from FT abuse	FIUTT	36
					<b>1,633</b>

## CHAPTER III – FINANCIAL ANALYSIS

### 1. CORE FUNCTIONS

#### i. Overview

The Analysis Division remains committed to the Vision and Mission of the FIUTT to ensure strong and dynamic financial and business sectors and to effectively detect and deter ML and FT in collaboration with its stakeholders. The FIUTT continues to be a fundamental pillar in Trinidad and Tobago's AML/CFT/CPF infrastructure. The FIUTT provides valuable financial intelligence to support the operations of local and foreign authorities, in their investigation, prosecution and asset recovery of ML/FT/PF and other related criminal activity.

**The FIUTT does not conduct criminal investigations.** Its role in the AML/CFT/CPF regime is to focus on the financial aspects of criminal conduct. As mandated by FATF's Recommendation 29, the FIUTT produces both operational and strategic financial intelligence. This is achieved through the collection and analysis of information from both internal and external sources.

**Operational analysis** uses available information to identify specific targets (e.g., persons, assets, criminal networks and associations). The information obtained is used to follow the trail of particular activities or transactions. This information determines links between those targets and possible proceeds of crime, money laundering, predicate offences or terrorist financing. Operational intelligence products support local and foreign law enforcement, foreign FIUs and other Competent Authorities.

**Strategic analysis** uses obtainable information, including data that may be provided by other Competent Authorities, to identify money laundering and terrorist financing related trends and patterns. Strategic analysis may also help establish policies and goals for the FIUTT, or more broadly for other entities within the AML/CFT regime.

#### What AML/CFT/CPF Analyst do...?

- Follow the trail of transactions;
- Add value to information by using structured analytical techniques;
- Support local and foreign Competent Authorities with actionable intelligence

#### What will you find in this chapter?

- insights on the STRs/SARs received;
- analysis conducted and Intelligence Reports disseminated;
- the FIUTT's perspective on the demonetisation exercise; and
- the publication of an overview of strategic products completed by the Analysis Division from 2015 to 2020.

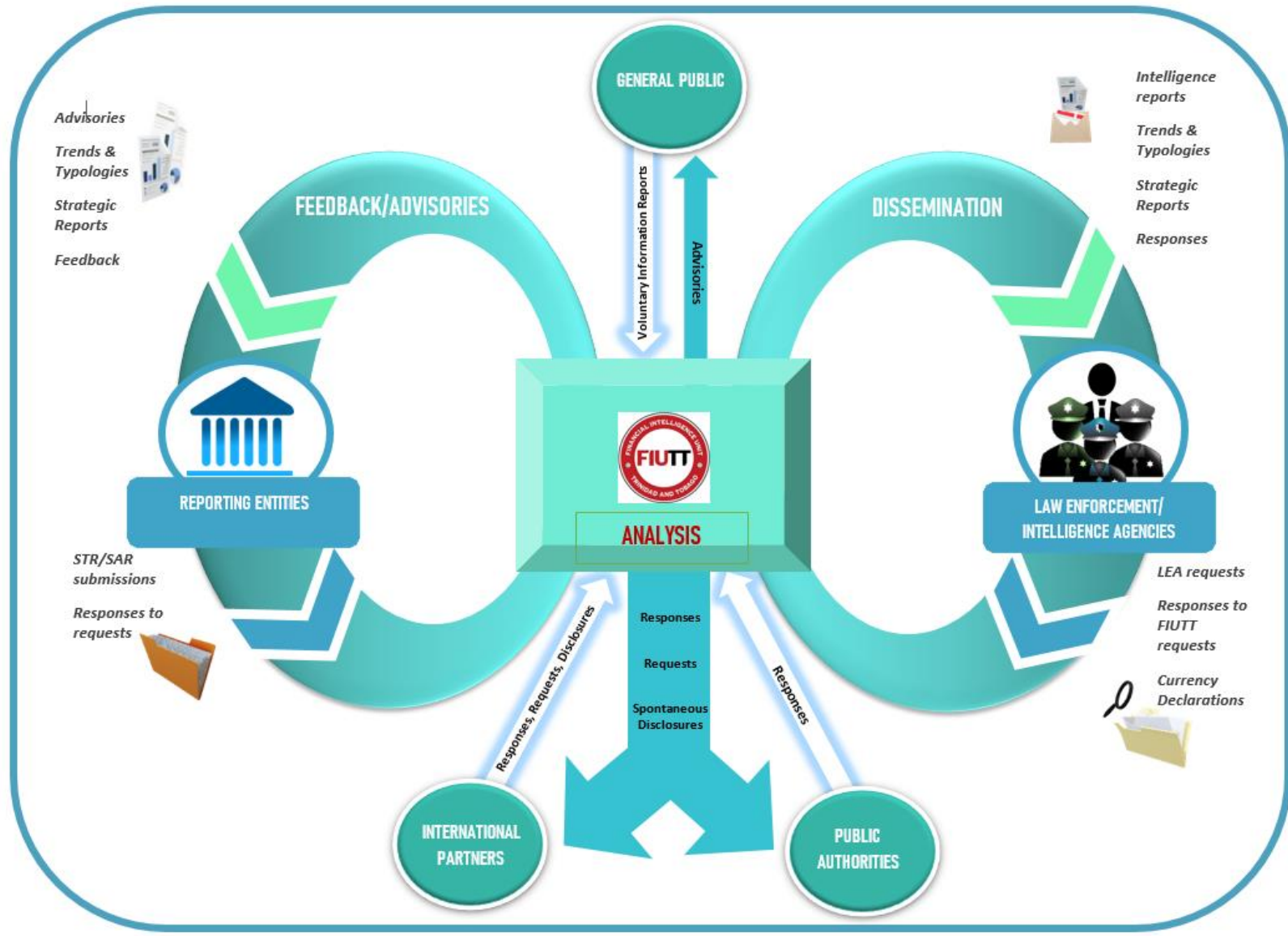
## **ii. Insights on the STRs/SARs received**

Information is a precursor to effective analysis and valuable intelligence. STRs/SARs submissions from Reporting Entities with AML/CFT/CPF obligations, are the main source of information for the FIUTT. Other sources include information received from local and foreign Competent Authorities through Spontaneous Disclosures, Incoming Requests, Incoming Responses and Voluntary Information Reports (VIRs). Open and closed sources of information are accessed during the analytical process.

Significant value is added to both the operational and strategic analysis processes using structured analytical techniques. Subsequently, valuable intelligence products are disseminated to local and foreign Competent Authorities. These products act as a guide in the investigations of criminal conduct by local and foreign Competent Authorities.

Diagram 15 below illustrates the process through which information is received, analysed and disseminated.

**DIAGRAM 15**  
**FIUTT's ANALYSIS PROCESS**



- **Overview of STRs/SARs Submitted**

In this reporting period, the FIUTT received a total of 1,638 STRs/SARs. This represents an 11% decrease when compared to the previous reporting period. This decrease can be attributed to a return to normalcy, as the submissions for the previous reporting period was an outlier as a result of the demonetisation exercise. Of the 1,638 STRs/SARs received, 1,593 were submitted via FIUConnect® (secure e-filing solution) and the other 69 were received via manual submission. The Banking sector submitted the highest number of STRs/SARs, accounting for 82% of the total STRs/SARs received. This was followed by the MVTs sector which accounted for 7% of the total STRs/SARs received.

The FIUTT noted a 43% decrease in STRs/SARs submissions from the LBs, a 38% decrease in submissions from MVTs, and a 33% decrease in submissions from Co-operative Societies, when comparing this reporting period to the previous year. While total STRs/SARs submission from the FIs decreased by 3%, the FIUTT noted a 5% increase in submissions from the Banking sector. Submissions from Insurance Companies, Investment Companies, Mortgage Companies, Jewellers and PMCs sectors, all decreased. This decrease can be attributed to the restrictions in the operations of LBs, as a result of the COVID-19 pandemic.

- **1,638 STRs/SARs received;**
- **43% decrease in STRs/SARs submissions from LBs;**
- **5% increase submissions from the Banking sector.**

Table 2 details a comparative view of STRs/SARs received for the years 2019 to 2021.

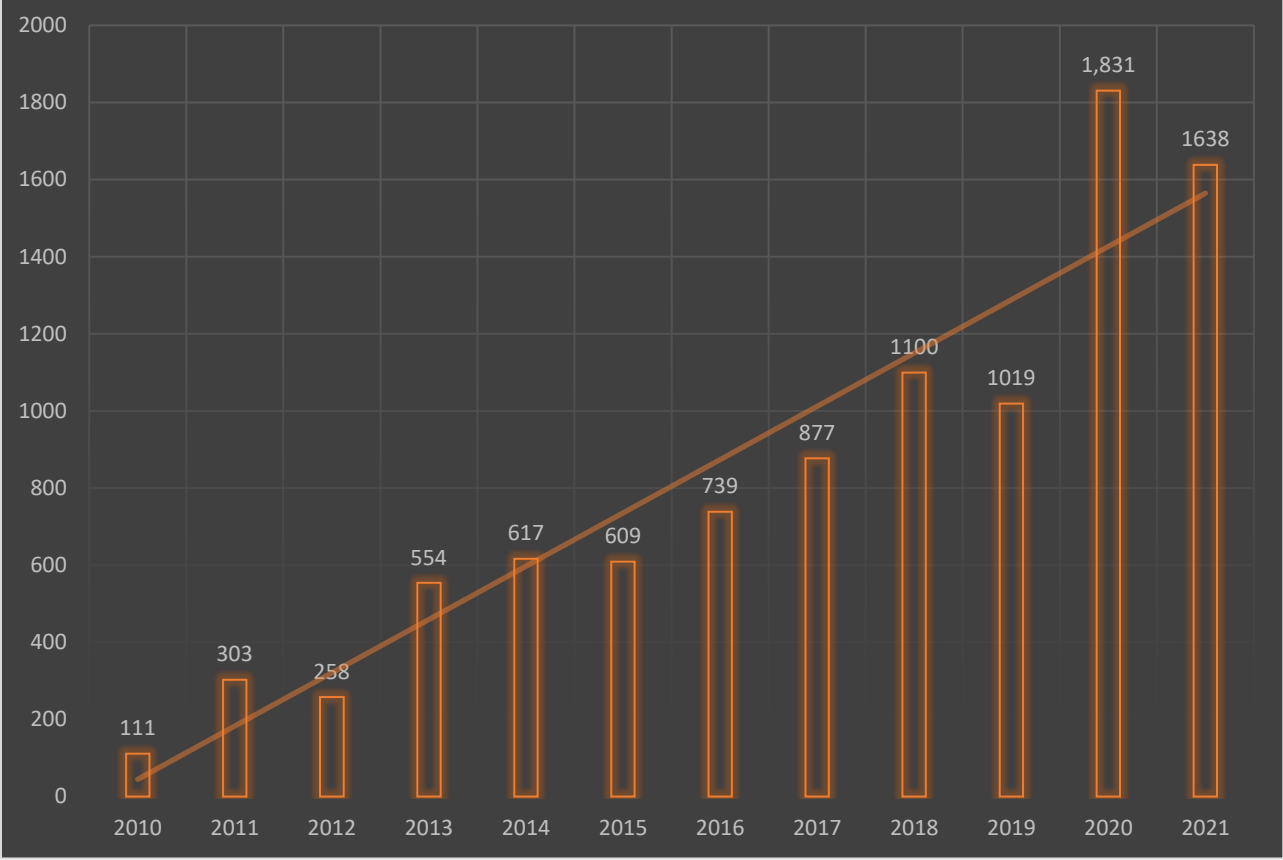
Of the 1,638 STRs/SARs received, 16% or 262 STRs/SARs were primarily associated with the demonetisation of the cotton-based hundred-dollar bills. This was due to the Legal Notice No. 357 of 2019 which demonetised the \$100 notes bearing any series dated before 2019. In addition, it was noted that 24 reports of suspicious transactions were submitted by the Central Bank under Section 52 of the POCA.

Diagram 16 gives a comparative view of total STRs/SARs submissions from the inception of the FIUTT, from 2010 to 2021.

**TABLE 2**  
**A COMPARATIVE VIEW OF THE STRs/SARs DISCLOSURES FROM 2019 TO 2021**

REPORTING ENTITIES	2019	2020	2021
Banking	536	1,289	1351
Exchange Bureau	2	2	0
Finance Co.	4	3	0
Insurance Co.	31	91	23
Investment Co.	22	49	15
Mortgage Co.	6	15	9
Securities Dealers	0	3	2
<b>Total FI submissions</b>	<b>601</b>	<b>1,450</b>	<b>1400</b>
Co-operative Societies	84	132	88
Money/Value Transfer Services	302	196	121
<b>Total NRFI submissions</b>	<b>386</b>	<b>328</b>	<b>209</b>
Accountants	0	0	0
Attorneys-at-Law	7	5	3
Jewellers	9	18	6
Motor Vehicle Sales	2	16	18
National Lotteries Online Betting Game	0	1	0
NPOs	0	0	0
Real Estate	13	2	2
Private Members' Club	1	9	0
Gaming House	0	0	0
<b>Total LB submissions</b>	<b>32</b>	<b>51</b>	<b>29</b>
<b>TOTAL STRs/SARs submissions</b>	<b>1,019</b>	<b>1,831</b>	<b>1,638</b>

**DIAGRAM 16**  
**TOTAL STRs/SARs FROM 2010 TO 2021**





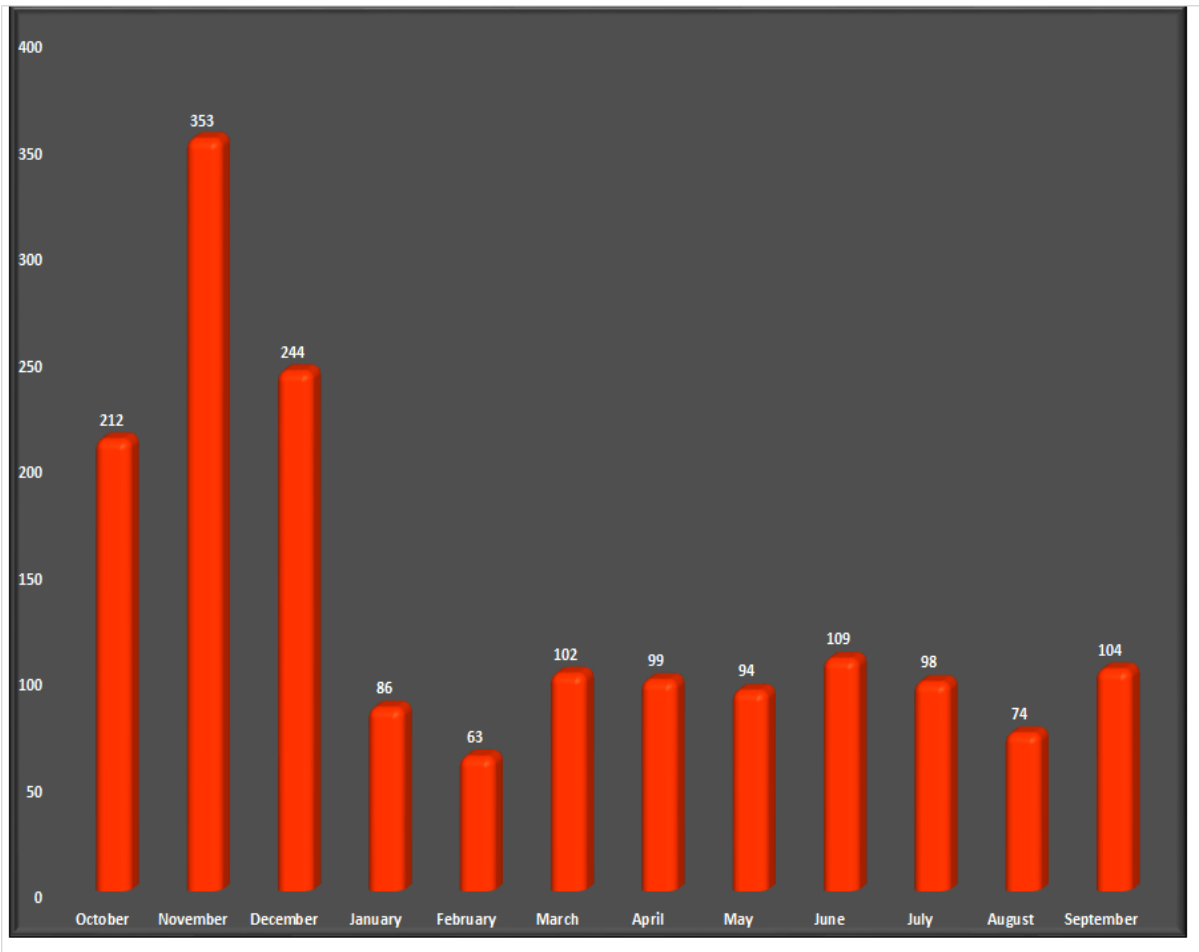
- **Comparative Monthly STRs/SARs Submissions**

In this reporting period, STRs/SARs submissions per month averaged 137 STRs/SARs. The months of October, November and December showed significant outliers, with a total of 809 STRs/SARs received. This considerable increase in STRs/SARs submission for the aforementioned months, was attributed to Reporting Entities continued submission of significant amounts of STRs/SARs due to the demonetisation exercise. Additionally, the month of November showed the highest submission of STRs/SARs, with 353 submissions.

It is important to note that although an STR/SAR was received in a given month, the suspicious transaction/activity may not have occurred in the month of submission. There are several reasons for this, for example, an activity may have occurred in a particular month, which triggered the monitoring of a transaction/activity. In light of this, retrospective due diligence may have then been initiated for previous months which confirmed the suspicion. Upon confirmation, an STR/SAR would then be submitted.

Diagram 17 shows the monthly breakdown of STRs/SARs submissions for this reporting period.

**DIAGRAM 17**  
**MONTHLY BREAKDOWN OF STRs/SARs SUBMISSIONS FROM OCTOBER 2020 TO SEPTEMBER 2021**



- **STRs/SARs Monetary Value**

The total monetary value of the 1,638 STRs/SARs received in this reporting period amounted to **TT\$3,177,713,721**. Of the 1,638 STRs/SARs, completed transactions amounted to 1,449, whilst 189 STRs/SARs were attempted transactions.

Table 3 provides a breakdown of STRs/SARs submissions classified by the categories of Reporting Entities, the monetary value and the number of completed and attempted STRs/SARs.

The monetary value of the **1,449 STRs/SARs** involving **completed transactions** was **TT\$2,086,588,624** and represented a substantial increase of 136% when compared to the previous reporting period. The monetary value of the **189 STRs/SARs** which were submitted as **attempted transactions**, was **TT\$1,091,125,097** and represented a significant 96% decrease from the previous reporting period. The identification of attempted transactions by Reporting Entities as suspicious and rejection before completion, auger well for the Reporting Entities implementation of due diligence and enhanced due diligence measures in accordance with their obligations.

Diagram 18 illustrates the number of completed and attempted suspicious transactions and the corresponding monetary values.

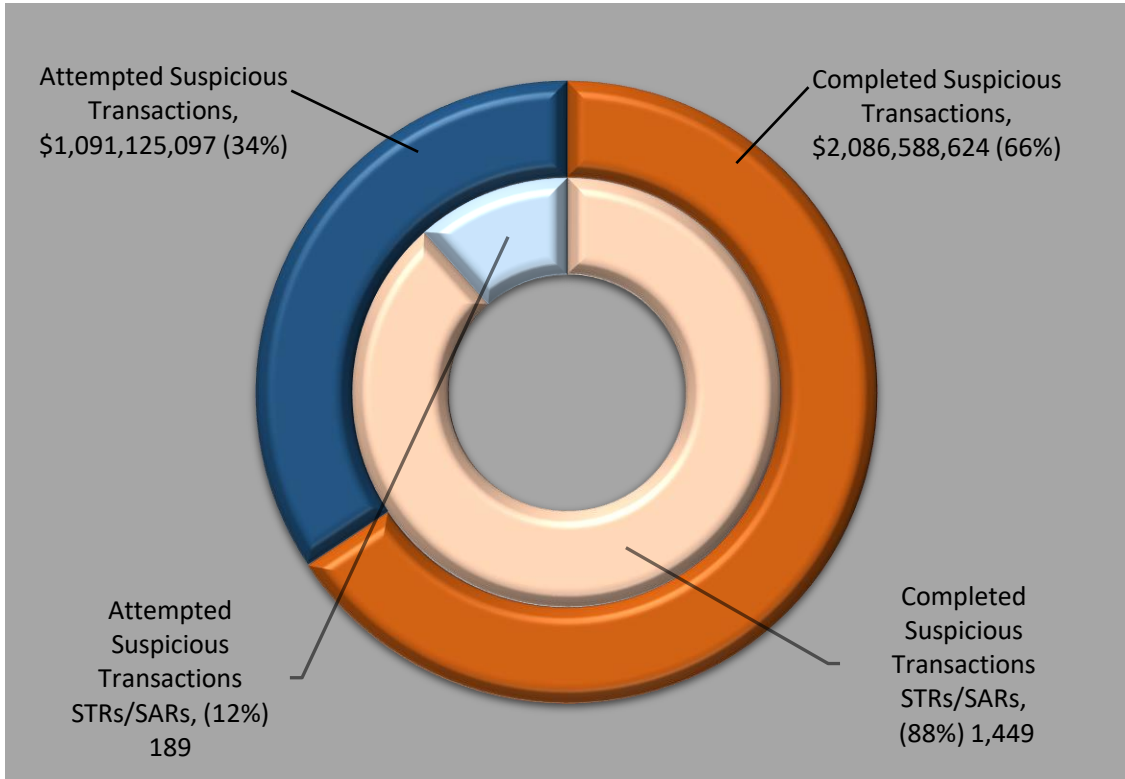
**This page has been intentionally left blank.**

**TABLE 3**  
**STRs/SARs SUBMISSIONS FROM OCT. 2020 TO SEPT. 2021**

INDICATOR  [MONETARY VALUES ARE QUOTED IN TT\$]	CATEGORIES OF REPORTING ENTITIES AND MONETARY VALUES																	Totals	
	Financial Institutions							Non-Regulated Financial Institutions		Listed Business									
	Banks	Securities Dealers	Finance Co.	Mortgage Co.	Exchange Bureau	Insurance Co.	Investment Co.	Co-operative Societies	Money Value Transfer Services	Attorneys-at-Law	Accountants	Jewellers	Motor Vehicle Sales	National Lotteries	Non-Profit Organisations	Real Estate	Private Members' Club	Total Year 2021	Total Year 2020
No. of Completed ML STRs/SARs	1,220	2	0	2	0	15	15	70	101	1	0	6	12	0	0	1	0	1,445	1,508
Value of Completed ML STRs/SARs	2,045,591,769	42,845	0	486,198	0	5,460,998	5,519,364	12,327,500	8,051,132	1,941,792	0	404,062	5,567,459	0	0	382,350	0	2,085,775,469	881,395,277
No. of Completed FT STRs/SARs	3	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	4	9
Value of Completed FT STRs/SARs	789,155	0	0	0	0	0	0	0	24,000	0	0	0	0	0	0	0	0	813,155	3,038,921
Value of Completed ML & FT STRs/SARs	2,046,380,924	42,845	0	486,198	0	5,460,998	5,519,364	12,327,500	8,075,132	1,941,792	0	404,062	5,567,459	0	0	382,350	0	2,086,588,624	884,434,198
No. of Attempted ML STRs/SARs	125	0	0	7	0	8	0	18	18	2	0	0	6	0	0	1	0	185	311
Value of Attempted ML STRs/SARs	1,081,146,755	0	0	0	0	1,041,589	0	1,276,833	1,195,932	1,941,792	0	0	1,649,596	0	0	2,150,000	0	1,090,402,497	26,128,628,284
No. of Attempted FT STRs/SARs	3	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	4	3
Value of Attempted FT STRs/SARs	714,600	0	0	0	0	0	0	0	8,000	0	0	0	0	0	0	0	0	722,6000	6,600
Value of Attempted ML & FT STRs/SARs	1,081,861,355	0	0	0	0	1,041,589	0	1,276,833	1,203,932	1,941,792	0	0	1,649,596	0	0	2,150,000	0	1,091,125,097	26,128,634,884
Total no. of STRs/SARs	1,351	2	0	9	0	23	15	88	121	3	0	6	18	0	0	2	0	1,638	1,831
Total Value (TT\$) of STRs/SARs	3,128,242,279	42,845	0	486,198	0	6,502,587	5,519,364	13,604,333	9,279,064	3,883,584	0	404,062	7,217,055	0	0	2,532,350	0	3,177,713,721	27,013,069,082

**This page has been intentionally left blank.**

**DIAGRAM 18**  
**COMPLETED AND ATTEMPTED SUSPICIOUS TRANSACTIONS**



- **Attempted Transactions**

The monetary value of the attempted transactions was less than the monetary value of the completed transactions by under TT\$1 Billion. The number of suspicious transactions which were stopped by Reporting Entities in 2021, amounted to 189, whilst in 2020, 314 suspicious transactions were stopped. A review of the number of STRs/SARs relating to attempted transactions from 2016 to 2021 shows a steady increase in the number of suspicious transactions stopped by Reporting Entities.

The Reporting Entities awareness of ML/FT indicators and trends, as well as their enhanced monitoring of customers, were the main factors of suspicious transactions being stopped at the placement of 'suspected' illicit funds into the financial system.

Table 4 shows the number and value of attempted transactions from 2016 to 2021.

ML/FT indicators also observed in attempted suspicious transactions are highlighted in Diagram 19 below.



**TABLE 4**  
**NUMBER AND VALUE OF ATTEMPTED SUSPICIOUS TRANSACTIONS FROM 2016 TO 2021**

<b>YEAR</b>	<b>NO. OF ATTEMPTED TRANSACTIONS</b>	<b>VALUE OF ATTEMPTED TRANSACTIONS (TT\$)</b>
<b>2021</b>	<b>189</b>	<b>1,091,125,097</b>
<b>2020</b>	<b>314</b>	<b>26,128,634,884</b>
<b>2019</b>	<b>86</b>	<b>929,827,326</b>
<b>2018</b>	<b>70</b>	<b>289,184,061</b>
<b>2017</b>	<b>53</b>	<b>13,644,296,764</b>
<b>2016</b>	<b>54</b>	<b>341,973,913</b>

**DIAGRAM 19**  
**INDICATORS OBSERVED IN ATTEMPTED SUSPICIOUS TRANSACTIONS**



## **X. STRs/SARs Submissions by Occupation/Profession of Subjects**

An integral part in the analysis of STRs/SARs is determining the income profile of the Subject(s). This is done by considering the reported occupation/profession of the Subject(s). This information serves to determine the legitimacy of the reported source of funds and provides an 'estimated income' which is crucial in the identification of any illicit proceeds from criminal activities. In this reporting period, Self Employed/Entrepreneurs featured the highest with 18% or 301 persons in the STRs/SARs submissions, a continuing trend over the past three reporting periods. This was followed by Skilled Workers (technicians, engineers, educators etc.) at 7% or 101 persons. Law Enforcement officials (police officers, soldiers, prison officers, security officers, etc.) represent the third largest category at 5% or 67 persons, an increase of 49% when compared to the previous reporting period. Directors/Managers also accounted for 67 persons or 5%.

Professionals (lawyers, accountants, architects, etc.) also featured significantly with 64 persons or 4%, being reported as having conducted suspicious transactions. This sector saw a 53% increase when compared to the previous reporting period. There was a notable decrease in Pensioners/Retirees with four persons when compared to 110 persons in the previous reporting period.

Administrative/Clerical employees featured with 37 persons reported as having conducted suspicious activities. Followed by Hotel/Restaurant/Leisure industry which featured 35 persons and Construction industry workers with 25 persons. Similar to the last reporting period, Politically Exposed Persons were featured five times.

Other highlighted sectors were Health Care workers, Domestic and Labourers, Financial Sector Workers and Agricultural Industry workers. The onset of the pandemic saw a variance in other novel occupations being feature in this reporting period, namely the Aviation Industry at four persons, as well as Entertainers at 10 persons.

### **• STRs/SARs Trend Analysis - Suspected Criminal Conduct**

Tax Evasion ranked the highest, for the second consecutive year, among the five most common reasons for Reporting Entities submitting STRs/SARs to the FIUTT. In this reporting period, the five most common suspected criminal conduct were:

- Tax Evasion – 534;
- Money Laundering – 477;
- Suspicious Financial Activity – 290;
- Fraud – 231; and
- Breach of the Exchange Control Act – 40.

These five suspected criminal conduct categories accounted for 96% of the total number of STRs/SARs submitted and 98% of the total monetary value of all the STRs/SARs submitted. Breach of the Exchange Control Act featured among the top five criminal conduct STR/SAR submissions, replacing Drug Trafficking.

Tax Evasion was suspected in 33% or 534 STRs/SARs submitted, followed by money laundering which also accounted for 29% or 477 STRs/SARs submitted. Suspicious financial activity accounted for 18% or 290 of the total STRs/SARs submitted.

Fraud and Tax Evasion accounted for 68% of the total value of STRs/SARs submitted; with both exceeding **TT\$1 Billion**.

### **Tax Evasion**

The FIUTT received 534 STRs/SARs on suspected Tax Evasion in this reporting period, compared with 539 in the previous reporting period. Whilst the number of suspected Tax Evasion STRs/SARs remained consistent, the total monetary value of these STRs/SARs amounted to **TT\$1,017,996,716**; an increase of 93% from the previous reporting period. In this reporting period, Tax Evasion accounted for 32% of the total monetary value of STRs/SARs.

The FIUTT in conducting its analysis noted that the increase in suspected Tax Evasion related STRs/SARs was attributed to the following identifiable activities:

- use of falsified invoices to substantiate transfers of funds between different business entities which are all controlled by the same beneficial owner;
- co-mingling of business proceeds with personal funds;
- atypical large cash deposits into business accounts, during the month of December 2019, which was not commensurate with the observed historical activity on the accounts for previous corresponding periods<sup>2</sup>;
- structuring of high-volume of funds across various accounts and/or branches of FIs;
- deposits of cash into personal accounts instead of business accounts for cash-intensive businesses (farmers, market vendors, taxi-drivers, doubles vendors, beauty salons, clothes traders, etc.);
- employees and family members of principal parties of cash-intensive businesses using personal accounts to deposit large volumes of cash; and
- remittances of a significant amount of funds to foreign jurisdictions by non-nationals<sup>3</sup> domiciled in Trinidad and Tobago.

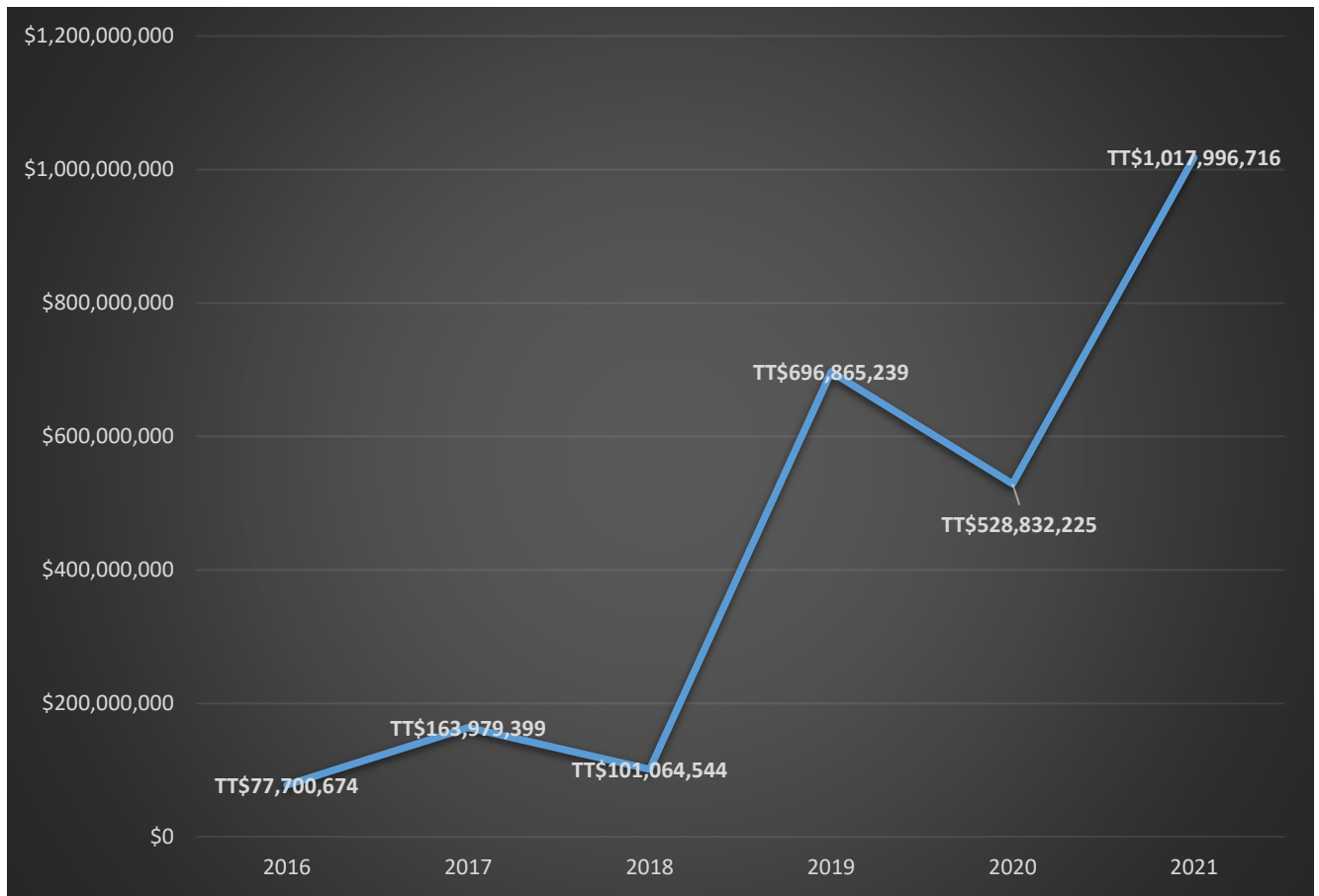
A comparative look at the total monetary value of STRs/SARs relating to Tax Evasion from 2016 to 2021, is presented below in Diagram 20.

---

<sup>2</sup> This activity coincided with the “demonetisation” exercise by Central Bank.

<sup>3</sup> These non-nationals are principal parties of business entities.

**DIAGRAM 20**  
**THE TOTAL MONETARY VALUE OF STRs/SARs RELATING TO SUSPECTED TAX EVASION**  
**FROM 2016 TO 2021**



## Money Laundering

The FIUTT received 477 STRs/SARs on suspected ML in this reporting period, compared to 530 in the previous reporting period. This represents a 10% decrease of ML related STRs/SARs. While most crimes can be criminal conduct for a predicate offence for ML, this category identifies STRs/SARs where the reason for suspicion is the specific act of disguising the original ownership and control of the illicit proceeds. These acts include structuring, layering and the movement of funds through apparent legitimate commerce. The total monetary value of these STRs/SARs amounted to **TT\$810,308,878**.

## Suspicious Activity

In this reporting period, the FIUTT received 290 STRs/SARs on Suspicious Activity; with a total monetary value of **TT\$106,296,300**.

Having analysed an STR/SAR, if such STR/SAR fails to meet the statutory threshold for reporting and no link to a specific criminal activity was established, or no elements of 'reasonable grounds for suspicion' of ML/FT were detected, the FIUTT categorises such an STR/SAR as Suspicious Activity.

Reasons for submission of an STR/SAR which is categorised as Suspicious Activity include:

- a transaction or activity which lacked an apparent lawful economic basis to support it;
- a transaction inconsistent with established client profile;
- adverse public information about a person and the subject reported was linked to that person;
- the Reporting Entity believed that the responses to their continuing due diligence enquiries were deliberately evasive or incomplete;
- structuring transactions, i.e., where there appeared to be attempts to break transactions into smaller amounts to avoid reporting thresholds; and
- general concerns about the source of funds or law enforcement enquiries.

The reasons identified above are all valid reasons for Reporting Entities to submit an STR/SAR. The FIUTT admits that it is not the function of the Reporting Entity to conduct exhaustive enquiries or investigations, however, more importantly it is for Reporting Entities to submit STRs/SARs as soon as possible within the lawful timeframe once deemed suspicious. These reports will form a vital tool as part of the intelligence gathering and help with future LEAs or foreign FIUs requests for intelligence to deter/detect against criminal elements and also contribute to building a clearer picture of the ML/FT threat to Trinidad and Tobago.

## **Fraud and Forgery**

COVID-19 has resulted in an increase in the observance of schemes related to Fraud and Forgery. This category of crime points to the increasing prevalence of online scams and the ponzi/pyramid scheme phenomenon. In this reporting period, the FIUTT's analysis showed the continued intent of criminal networks to defraud unsuspecting persons through the various social media platforms. The methods include, online romance scams, online market place scams and others. The use of fictitious social media profiles is the main tool used by perpetrators. Scammers develop an online "romantic" relationship with victims, and before long, scammers trick victims into sending their hard earned funds to them. The scammers promising to visit them giving reasons as, to 'get engaged' to get married, among others. In some cases, scammers offer goods and services for sale and fail to deliver the item(s) after part or full payment. These trends were noted to have been prevalent from December 2018, however, the global pandemic facilitated an increase in social media craze and online activity, as well as opportunities for exploitation by perpetrators.

Further, there were numerous instances of persons presenting falsified job letters, utility bills and identification documents as a means of obtaining credit facilities at FIs. Despite the issuance of several public advisories to alert members of the public about this phenomenon, the FIUTT continues to see the promulgation of this activity.

In this reporting period, the FIUTT received 231 STRs/SARs on suspected Fraud, compared with 205 in the previous reporting period. The total monetary value of these STRs/SARs amounted to **TT\$1,128,942,422**; the highest monetary value of STRs/SARs per suspected criminal conduct.

## **Breach of The Exchange Control Act**

The FIUTT has noted an alarming increase in the number of reports wherein persons and business entities have been identified as being involved in the suspected buying and selling of foreign currency through unauthorised dealers. In most instances, the currency exchanges are being undertaken at an exchange rate of at least TT\$2 more than the stipulated Central Bank exchange rates. In this reporting period, 40 STRs/SARs were received by the FIUTT on suspected breaches of The Exchange Control Act. The total monetary value of these STRs/SARs amounted to **TT\$44,980,800**.

Table 5 provides a breakdown of the number of STRs/SARs and the dollar value of suspected criminal conduct as disclosed from the STRs/SARs analysis in this reporting period.

**TABLE 5**  
**SUSPECTED CRIMINAL CONDUCT OF STRs/SARs**

<b>SUSPECTED CRIMINAL CONDUCT</b>	<b>NUMBER OF STRs/SARs</b>	<b>VALUE OF COMPLETED STRs/SARs (in TT\$)</b>	<b>VALUE OF ATTEMPTED STRs/SARs (in TT\$)</b>	<b>TOTAL DOLLAR VALUE OF STRs/SARs (in TT\$)</b>
<b>Tax Evasion</b>	534	\$1,013,247,159	\$4,749,557	\$1,017,996,716
<b>Money Laundering</b>	477	\$791,474,029	\$18,834,849	\$810,308,878
<b>Suspicious Activity</b>	290	\$101,765,863	\$4,530,437	\$106,296,300
<b>Fraud</b>	231	\$71,618,105	\$1,057,324,317	\$1,128,942,422
<b>Breach of Exchange Control</b>	40	\$41,215,508	\$3,765,292	\$44,980,800
<b>Drug Trafficking</b>	26	\$4,048,633	\$0	\$4,048,633
<b>Corruption (Including Misbehaviour in Public Office)</b>	18	\$59,631,107	\$98,045	\$59,729,152
<b>Financing of Terrorism</b>	8	\$813,155	\$722,600	\$1,535,755
<b>Human Trafficking</b>	5	\$1,987,755	\$1,000,000	\$2,987,755
<b>Murder</b>	4	\$495,367	\$0	\$495,367
<b>Participation in Organised Criminal Group (OCG)</b>	2	\$20,800	\$100,000	\$120,800
<b>Sexual Exploitation</b>	2	\$18,955	\$0	\$18,955
<b>Insider Trading</b>	1	\$252,188	\$0	\$252,188
<b>TOTAL</b>	<b>1,638</b>	<b>\$2,086,588,624</b>	<b>\$1,091,125,097</b>	<b>\$3,177,713,721</b>



## **Financing of Terrorism**

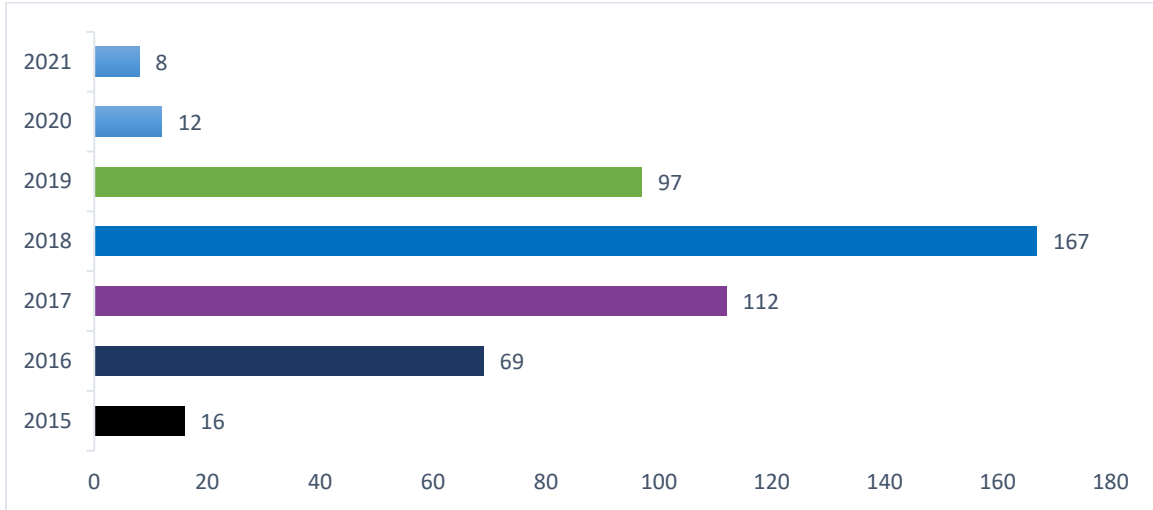
In this reporting period, the FIUTT received eight STRs/SARs on suspected FT compared to 12 in the previous reporting period. This represents a 33% decrease of FT related STRs/SARs. The FIUTT in conducting its analysis noted that the decline in FT related STRs/SARs may be further attributable to the apparent collapse of the Islamic State of Syria and Iraq (ISIS).

Overall, seven Intelligence Reports linked to FT and Terrorism were disseminated to local and foreign LEAs and foreign FIUs. The FIUTT continues to prioritise the analysis, responses to requests from LEAs and dissemination of reports relating to FT activities.

The FIUTT also takes note of the recent change in administration in the Islamic Republic of Afghanistan. This change in administration has caused the Egmont Group of FIUs to disconnect the Financial Transactions and Reports Analysis Center of Afghanistan (FinTRACA), Afghanistan FIU, from the Egmont Secure Website. The FATF also expresses its concern about the current and evolving ML/FT risk environment in the country. As such, the FIUTT will continue to closely monitor the situation by assessing and mitigating any emerging ML/FT risks identified, in accordance with a risk-based approach.

Diagram 21 presents a comparative view of FT related STRs/SARs submitted from 2015 to 2021.

**DIAGRAM 21**  
**COMPARISON OF THE NUMBER OF FT RELATED STRs/SARs FROM 2015 TO 2021**



## 2. ANALYSIS OF INTELLIGENCE REPORTS DISSEMINATED

The FIUTT completed analysis on 616 STRs/SARs; a 6% decrease in this reporting period when compared with 2020.

The STRs/SARs analysed generated a total of 92 intelligence reports; of which 85 were suspected ML cases and seven suspected FT cases. Of the 92 reports generated and subsequently disseminated, 17 were Spontaneous Disclosures<sup>4</sup>. Of the 17 Spontaneous Disclosures, 11 were submitted to local Competent Authorities whilst six were shared with foreign LEAs and FIUs.

There was a 68% decrease in Intelligence Reports disseminated for this reporting period when compared with 2020. Through the challenges of the COVID-19 pandemic, staff continued to diligently conduct analysis on STRs/SARs. However, given the phases of restrictions, it limited the number of days in office by analysts. The pandemic, together with recent staff shortages within the Analysis Division, contributed to the decrease in the number of Intelligence Reports disseminated for this reporting period. The FIUTT and the Ministry of Finance has already taken the necessary steps to address this in the first quarter of 2022.

Table 6 illustrates actions taken on STRs/SARs.

---

<sup>4</sup> FATFs Recommendation 29.5 states, *“The FIU should be able to disseminate, spontaneously and upon request, information and the results of its analysis to relevant Competent Authorities...”* Further in its Rec. 40.1, the FATF states, *“Countries should ensure that their Competent Authorities can rapidly provide the widest range of international co-operation in relation to money laundering, associated predicate offences and terrorist financing. Such exchanges of information should be possible both spontaneously and upon request.”*

**This page has been intentionally left blank.**

**TABLE 6  
ACTION TAKEN ON STRs/SARs**

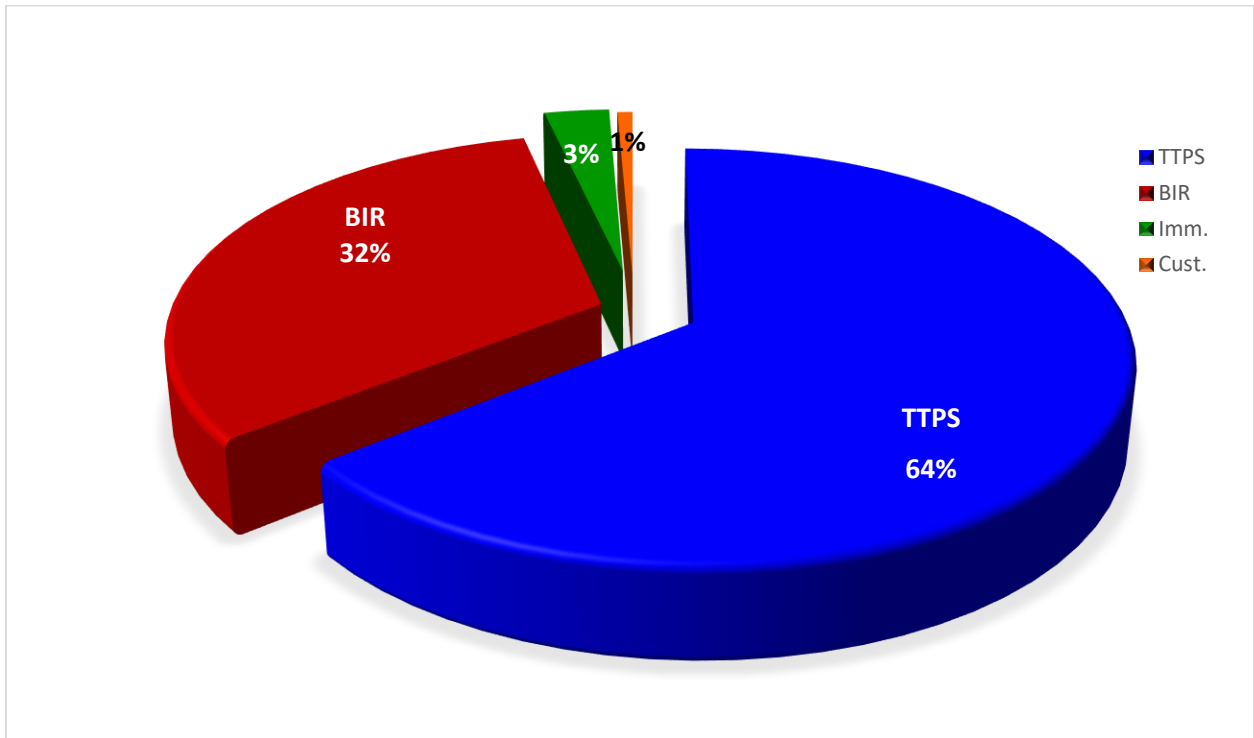
<b>OCTOBER 1 2020 - SEPTEMBER 30, 2021</b>											
<b>RECEIVED</b>	<b>ANALYSED</b>		<b>INTELLIGENCE REPORTS DISSEMINATED</b>								
			<b>LOCAL</b>						<b>FOREIGN</b>	<b>TOTAL</b>	
			<b>TTPS</b>	<b>BIR</b>	<b>IMM</b>	<b>C&amp;E</b>	<b>INTELLIGENCE AGENCIES</b>	<b>GOV'T AUTH</b>			
1,593	616		<b>ML</b>	47	30	1	0	2	1	4	85
			<b>FT</b>	5	0	0	0	0	0	2	7
			<b>TOTAL</b>	<b>52</b>	<b>30</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>6</b>	<b>92</b>

For the period 2011 to 2021, a total of 1,919 Intelligence Reports including Spontaneous Disclosures, were disseminated. Of these reports, 1,578 or 82% were disseminated to local LEAs and 334 or 18% were sent to foreign FIUs and foreign LEAs. The FIUTT is consistent and relentless to have the best quality intelligence product as well as the increase in its output to both foreign FIUs and LEAs, as well as, local LEAs.

Of the 1,578 disseminated to local LEAs, the Commissioner of Police and the Chairman of the Board of Inland Revenue together received 97% of the Intelligence Reports. The Commissioner of Police received 65% or 1,013 reports whilst the Chairman of the Board of Inland Revenue received 32% or 511 reports. The remaining 3% of Intelligence Reports were disseminated to the Comptroller of Customs and Excise Division and the Chief Immigration Officer for investigations.

Diagram 22 shows the breakdown of Intelligence Reports disseminated to Local LEAs from 2011 to 2021.

**DIAGRAM 22**  
**INTELLIGENCE REPORTS DISSEMINATED TO LOCAL LEAs FROM 2011 TO 2021**



### **3. REQUESTS FOR INFORMATION**

#### **1. Written Information Requests**

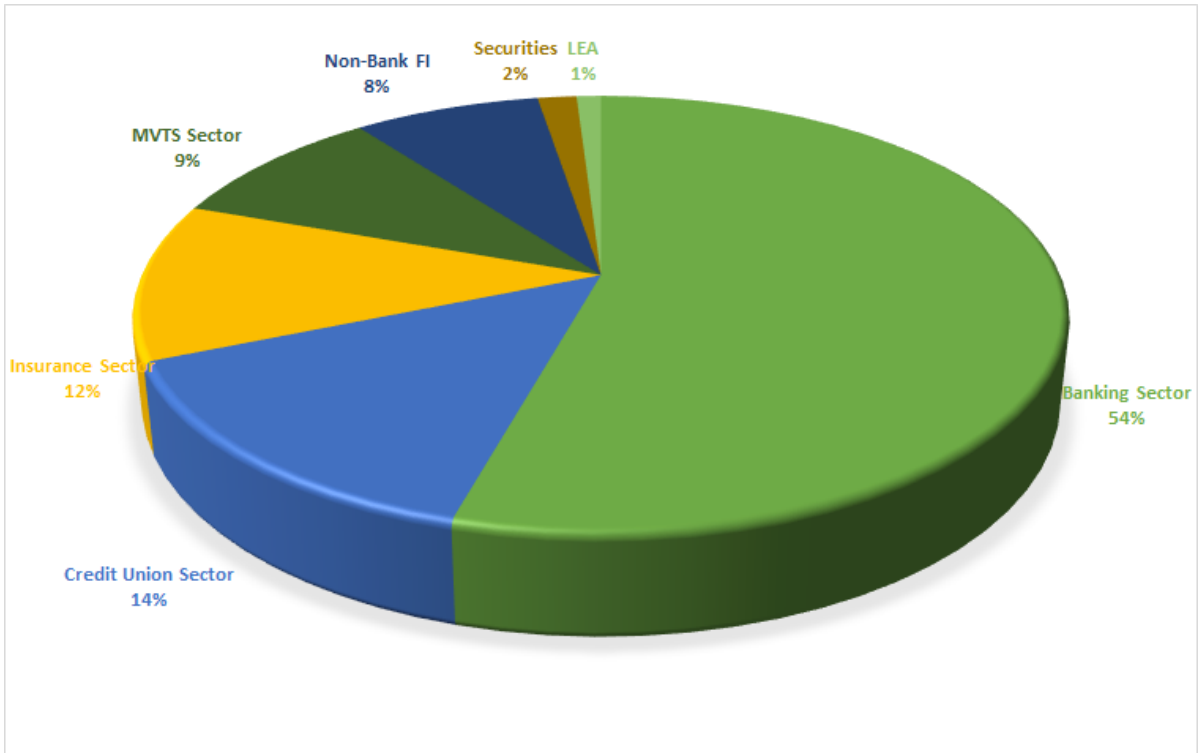
The FIUTT's authority to request information from Reporting Entities and to receive the response within a specified time is pursuant to Section 11(a) of the FIUTTA. Further, the FIUTT can request information from public authorities under the provision of Section 16(1) of the FIUTTA. These provisions are to facilitate a comprehensive analysis of an STR/SAR where the Director is of the view that further information may disclose that the proceeds of crime are located within Trinidad and Tobago or elsewhere.

In this reporting period, 1,479 requests were made to Reporting Entities. This represents a decrease of 32% as compared to the previous period and can be attributed to the disruptions caused by the COVID-19 pandemic and a decrease in the number of requests from local LEAs and foreign FIUs and LEAs.

Diagram 23 provides a visual representation of the various Requests for Information made by the FIUTT to the Reporting Entities and other Competent Authorities, during the review period.



**DIAGRAM 23**  
**FIUTT REQUESTS FOR INFORMATION BY SECTOR 2020 TO 2021**



## 2. Electronic Access to Information

The FIUTT's use of electronic access to information held on a range of external public and private databases was in excess of **17,500**. This 30% decrease correlates with the disruptions caused by the COVID-19 pandemic and a decrease in the number of requests from local LEAs and foreign FIUs and LEAs. Requests executed on databases were accessed to identify, corroborate and verify beneficial owners, KYC documentation, trace assets and identify suspected criminals and their associates. Access on these databases provide information that is critical to the in-depth analyses carried out on STRs/SARs and for the development of both operational and strategic intelligence products for the benefit of all stakeholders.

## 3. Feedback to Reporting Entities

In accordance with the legislation and FATF's Recommendations for effectiveness and efficiency, the FIUTT is mandated to provide feedback to Reporting Entities concerning STRs/SARs submitted and analysed. The feedback provided by the FIUTT assist Reporting Entities in the ongoing implementation of their risk assessment of customers, products, services, jurisdictions, etc. in meeting their AML/CFT/CPF obligations.

This feedback can be categorised into the two following areas:

- **Special Feedback** – states the action taken on the STR/SAR submitted by the Reporting Entity and the outcome of the matter. These actions include: *“Report forwarded to LEA”*, a directive for *“Continued Monitoring”* or *“Filed for Intelligence”*;
- **Deficiency Feedback** – assists the Reporting Entity in improving the quality or timeliness of its submissions.

The FIUTT provided 179 Special Feedback and 3 Deficiency Feedback Letters, during this reporting period.

## 4. USE OF FIUTT'S INTELLIGENCE

The operational and strategic reports provided by the FIUTT to LEAs perform a guiding role in relation to criminal trends, typologies and emerging threats, which may be novel to law enforcement. The FIUTT also supplements law enforcement investigations by providing intelligence on specific subjects, as requested by LEAs. This is of primary importance when LEAs conduct pro-active parallel financial investigations in the pursuit of ML/FT and other criminal conduct. This intelligence is provided to LEAs to advise and support the investigative avenues, the charges being proffered, securing convictions, forfeiting criminal property and the confiscation of criminal proceeds.

FIUTT's Intelligence is used in:

- **Money Laundering Charges**

The criminal conduct which led to the ML charges were:

- Money Laundering
- Fraud

The Trinidad and Tobago Police Service (TTPS) proffered 15 ML charges against three persons during this reporting period. The Financial Investigations Branch (FIB) and the Fraud Squad of the TTPS laid these charges. The cumulative total dollar value of Money Laundering charges was TT\$31,130,254.00.

*Source: TTPS - The Financial Investigations Branch (FIB) and the Fraud Squad*

- **Cash Seizures by LEAs**

Section 38 of the Proceeds of Crime Act Chap. 11:27 authorises the seizure of cash, in excess of the prescribed sum (TT\$20,000.00 or its equivalent in foreign currency) by LEAs. For the period under review, the FIUTT provided intelligence to law enforcement in support of their investigation of seized cash. The FIB of the TTPS investigated 36 cases where cash seized amounted to TT\$10,801,626.00, US\$165,787.00, CAD\$5,700.00 and 12 other currencies of varying values. The TTPS in this reporting period was successful in forfeiting TT\$537,844.00, US\$31,507.00, £295.00, CAD\$140.00 and €10.00, which were placed into the Seized Assets Fund.

*Source: TTPS - The Financial Investigations Branch (FIB) and the Fraud Squad*

- **Feedback to the FIUTT on intelligence disseminated**

It is extremely important for the FIUTT to receive effective feedback from all stakeholders; to continually improve its intelligence products. In particular, feedback from domestic LEAs, who receive the majority of the financial intelligence disseminated. The FIUTT continues to seek and obtain feedback via the FIUTT feedback form which is attached to all Intelligence Reports. Feedback is also obtained in meetings with the Law Enforcement Working Group (LEWG), and one-on-one interactions with individual agencies.

Some Feedback quotes from LEAs included:

- *"This was the most thorough FIU response I have ever received. Job well done. I appreciate THE EFFORT";*
- *"Disclosure provided new information regarding known and unknown subjects";*
- *"The information was actionable as it provided further people to be interviewed";*
- *"Timely supplemental response";*
- *"The information provided tables with supporting information" and*
- *The information was actionable and led to trace checks."*

- **Permission to Share**

In this reporting period, a total of 17 agencies requested 'Permission to Share' the FIUTT's intelligence with other LEAs, national security organisations, and/or relevant government departments or agencies. This is an indication that the intelligence provided by the FIUTT was of sufficient value to be used for further intelligence and investigative purposes by the receiving agency and the third-party agencies conducting ML/FT investigations.

## **5. STRATEGIC ANALYSIS**

### **i. Strategic Analysis Project**

In this reporting period, the FIUTT completed one strategic analysis product which has been disseminated to the relevant Competent Authorities and the Ministry of Finance.

The subject matter for this strategic assessment was:

- **Analysis of Trinidad and Tobago's Demonetisation Exercise – FIUTT's Perspective**

This disclosure provided stakeholders with information regarding:

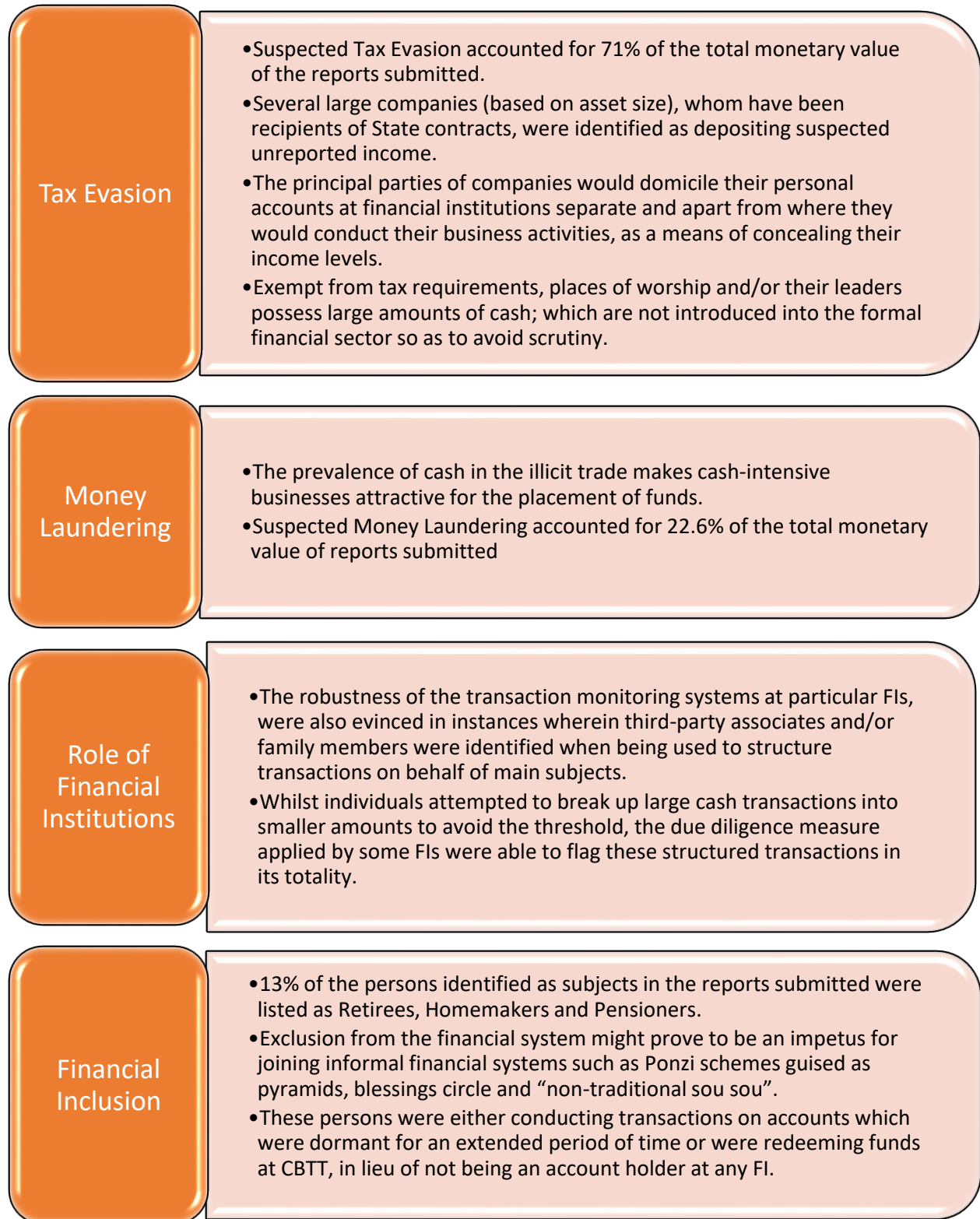
- an analysis of reports received by the FIUTT, relative to the demonetisation exercise;
- identification and assessment of areas of risk highlighted by the demonetisation exercise;
- the FIUTT's perspective in relation to steps which should be taken to mitigate these risks; and
- proposed solutions to remedy these threats.

This strategic analysis identified new areas of risk and also supported emerging risks which had been previously identified in the recent Annual Reports of the FIUTT. The two main areas of criminal conduct which were evinced from the analysis were that of Tax Evasion and Money Laundering. Cash-intensive business entities and self-employed persons were primarily identified as the subjects of the Reports received by the FIUTT, relative to the demonetisation exercise.

The key findings from this strategic analysis are illustrated below in Diagram 24.

## DIAGRAM 24

### KEY FINDINGS FROM THE FIUTT'S STRATEGIC ANALYSIS ON THE DEMONETISATION EXERCISE



Strategic analysis projects are consistent with FATF's Recommendation 29, specifically that FIUs should provide 'Strategic' as well as 'Operational' intelligence reports to LEAs and other Competent Authorities in the ongoing fight against AML/CFT/CPF. The FIUTT is constantly surveying the Trinidad and Tobago environment to bring awareness of the current risks and vulnerabilities within the jurisdiction financial system.

In its remit to provide strategic intelligence products to its stakeholders the FIUTT has embarked on another advanced strategic analysis project for completion in the next reporting period:

- **The Illicit Wildlife Trade within Trinidad and Tobago**  
The FIUTT was successful in having engaged the relevant stakeholders towards producing this strategic intelligence report.

## ii. Trends and Typologies:

The FIUTT's analysis of STRs/SARs during this reporting period continued to see the occurrence of online fraud scams and other fraudulent schemes.

Some of the trends identified during this reporting period included:

- Continuation of Romance Scam;
- Real Property Fraud;
- Asian Connection;
- The Purchase of Jewellery/Gold, relative to ML;
- Overpayment Scam/Fraud; and
- Identity Fraud.

### • **Alert (Red Flag): "Romance Scam/Fraud"**

This alert<sup>5</sup> was issued to the public as the FIUTT recorded STR/SAR submissions with approximately 100 victims of suspected Romance Scam/Fraud. This represents a loss of over TT\$ 2.3 Million to vulnerable citizens in 18 months. Red flag indicators of Romance Scam/Fraud include persons who:

- promised GIFTS;
- promised to VISIT Trinidad and Tobago to be engaged or get married;
- instruct you to PAY FUNDS into a 3<sup>rd</sup> party account (in Trinidad and Tobago) for foreign shipping payments;
- claim to be sending cash with the gift:
  - Customs has purportedly held the gift;
  - you are instructed to make a payment to a third-party for "AML clearance"; and
  - that your personal gift and cash is being shipped through Diplomatic channels.

---

<sup>5</sup> [https://fiu.gov.tt/wp-content/uploads/ADV\\_005\\_2021\\_Romance\\_Scam\\_Flyer.pdf](https://fiu.gov.tt/wp-content/uploads/ADV_005_2021_Romance_Scam_Flyer.pdf)

- **The Purchase of Jewellery/Gold relative to Money Laundering**

The FIUTT has noticed an increase in reports involving individuals who have visited Jewellery stores and used large volumes of cash to purchase multiple pieces of jewellery (mainly gold). These purchases occurred from 2019 to 2020, notably during the demonetisation period (*The demonetisation exercise was undertaken by the Government of the Republic of Trinidad and Tobago and began in December 2019.*) These purchases consisted of one to numerous items of gold jewellery, for example, chain, pendant, ring, etc. The value of each purchase ranged from TTD 2,500.00 to over TTD 279,600.00. The reason for the purchase is normally personal gifts, either for themselves or for others. In most cases, the source of funds was either unknown, not specified, or unverifiable. Persons conducted most of these transactions within the same day of the visit, purchasing several jewellery pieces during a single visit to the store. In some instances, individuals would visit several branches of a Jewellery store and conduct more than one transaction within days of each other. The ultimate goal appears to be the conversion of large amounts of money into gold, thereby transforming liquid cash into a tangible asset of similar value. An Advisory<sup>6</sup> was published for Financial Institutions (FIs) and the public.

- **Real Property Fraud**

The FIUTT continues to see cases where suspected fraud is being committed in the process leading to the transfer of property in the real estate sector. A fraudster creates and uses false deeds to pretend that he/she is the owner of the property described in the deed to effect real estate transactions. While in some cases there may be collusion between the fraudster and the prospective purchaser, the fraudster presents a false deed to the prospective purchaser which may or may not be duly registered at the Registrar General's Department (RGD) as a legitimate deed executed by the true owner and prepared by a practising attorney-at-law. An Advisory<sup>7</sup> was published for LEAs, FIs and the public.

- **Asian Nationals and Their Associates Involved in the Movement of USD from Trinidad and Tobago to Asia**

The FIUTT noted that Asian nationals, domiciled in Trinidad and Tobago have conducted significant funds transfers to Asia and when flagged, third-parties (Trinidad and Tobago nationals) were used to conduct the transactions. The third parties used their personal bank accounts to deposit large amount of funds on behalf of their associates (Asian nationals) and further, outgoing wire transfers to Asia. Subsequently, the funds are withdrawn by ATM USD withdrawals in Asia. This observed activity occurred over several years which appear to pose a significant risk for money laundering, tax evasion and other predicate crimes.

---

<sup>6</sup> [https://fiu.gov.tt/wp-content/uploads/ADV\\_001\\_2021\\_Jewellery\\_Sector\\_and\\_FIs\\_v2.pdf](https://fiu.gov.tt/wp-content/uploads/ADV_001_2021_Jewellery_Sector_and_FIs_v2.pdf)

<sup>7</sup> [https://fiu.gov.tt/wp-content/uploads/ADV\\_003\\_2021\\_FIs\\_and\\_LBs\\_v2.pdf](https://fiu.gov.tt/wp-content/uploads/ADV_003_2021_FIs_and_LBs_v2.pdf)

- **Overpayment Scam/Fraud**

The FIUTT has noticed cases whereby a fraudulent cheque, in particular a mailed-in cashier's cheque<sup>8</sup>, is credited to a hotel's bank account for alleged bookings and subsequently the "issuer" of the cheque would contact the payee / hotel requesting a partial or full refund of the cheque amount. The request for partial or full refund is usually made before the clearing period for the cheque is completed. This appears to be an emerging trend within the tourism sector. This trend appears to be different from cheque-kiting<sup>9</sup> as an overpaid fraudulent/altered cheque is used to gain money before the "clearing period", as opposed to the cheque 'bouncing' for lack of funds in the case of cheque-kiting. An Advisory was issued to FIs, Ministry of Tourism and its stakeholders; whilst an Alert<sup>10</sup> was issued for the public.

- **Loan Applications Using Stolen Identities**

The personal data (*e.g., national identification card, utility bills, job letters etc.*) of unsuspecting persons/victims are used by perpetrators or a clandestine group, to obtain loans from Financial Institutions. The stolen personal data is used to create 'fake' documents, which may carry the name, date of birth and other details of a natural/legitimate person, but with a fraudulent photo. The fake personal documents are presented to Financial Institutions via online banking loan application facilities to acquire personal loans. Once approved, the loans would be disbursed into already established accounts and accessed by the perpetrators and/or their associates. Once the loan is granted, the funds which were obtained by use of fraudulent documents, are then withdrawn in cash from the account. The funds are used in the acquisition of unknown goods, services and investments. In the event of being asked to provide 'source of funds' documents for the purchase of goods, services and investments, the perpetrators may provide the source of their funds as a loans acquisition. An Advisory was issued to FIs and a Confidential Advisory was issued to Government Authorities

## **6. ONLINE SUBMISSION OF STRs/SARs**

The FIUConnect® platform encourages Reporting Entities to submit their STRs/SARs securely at any time, online to the FIUTT. This online platform also facilitates the efficient use of FIUTT resources in the analysis of STRs/SARs. Of the 1,638 STRs/SARs submitted in this reporting period, 96% or 1,569 STRs/SARs were submitted via the FIUConnect® platform; as compared to 83% in the previous reporting period.

Diagram 25 gives a comparative view of the composition of the STRs/SARs submissions for 2019, 2020 and 2021, relative to the use of the FIUConnect® platform.

---

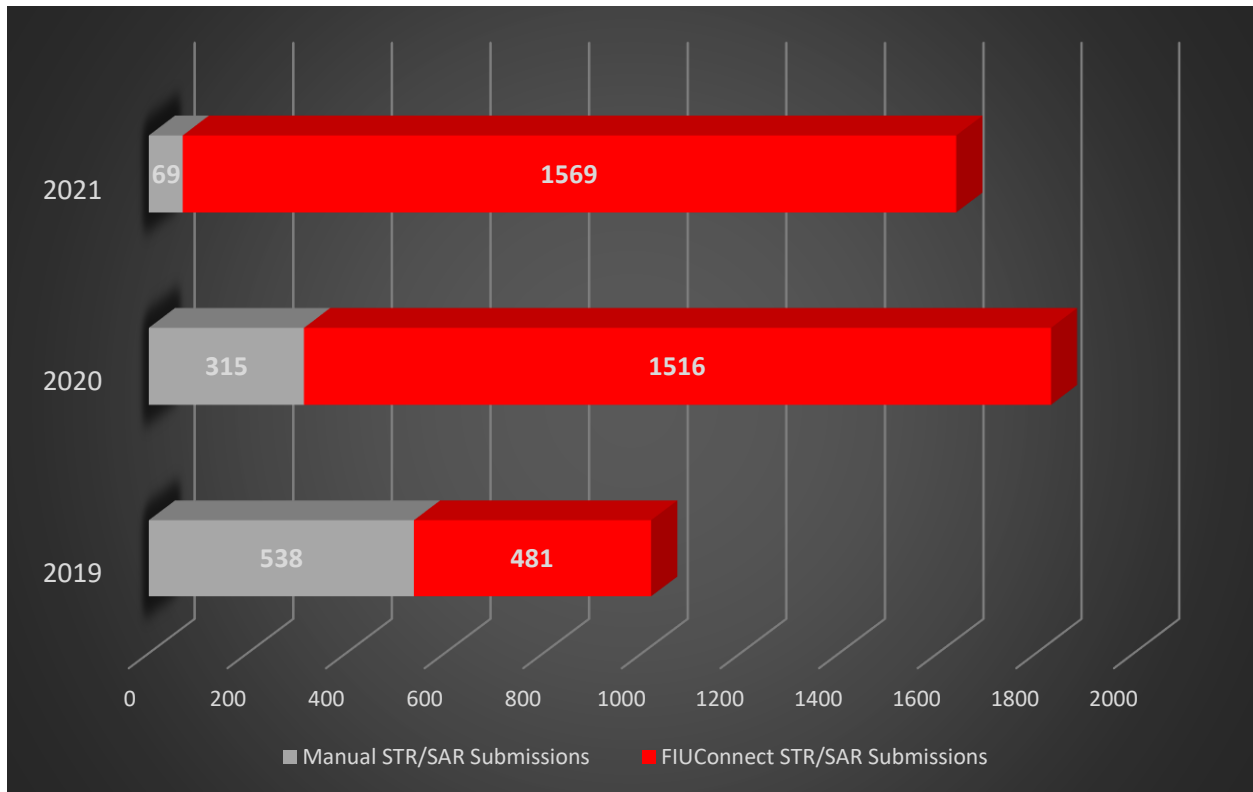
<sup>8</sup> *Cashier's cheque: A cheque that draws directly on a customer's account, making the bank the primary obligor. Customers requiring a cashier's cheque must pay the amount of the cheque to the bank. The bank will then issue a cheque to a third party named by the customer. (FATF - Money laundering and terrorist financing in the securities sector – October 2009)*

<sup>9</sup> *Cheque Kiting is a fraud scheme that usually involves several Cheque accounts at several different banks. It is done by the deliberate issuance of a Cheque for which there is not sufficient cash to pay the stated amount. The purpose of Cheque Kiting is to falsely inflate the balance of a chequing account in order to allow written cheques to clear that would otherwise bounce.*

<sup>10</sup> [https://fiu.gov.tt/wp-content/uploads/13\\_Sept\\_2021\\_APPROVED\\_ALERT\\_007\\_2021\\_Overpayment\\_Scam\\_-\\_Flyer.pdf](https://fiu.gov.tt/wp-content/uploads/13_Sept_2021_APPROVED_ALERT_007_2021_Overpayment_Scam_-_Flyer.pdf)



**DIAGRAM 25**  
**COMPOSITION OF STRs/SARs SUBMISSION METHODS FOR 2019, 2020 AND 2021**



## 7. ACHIEVEMENTS OF THE ANALYSIS DIVISION

Notwithstanding the challenges of this reporting period, the Analysis Division was able to adapt to the 'new normal' and manoeuvre its way around the unprecedented tide. As such, in this reporting period the Analysis Division accomplished the following:

- completed and disseminated an advanced strategic analysis product on the Demonetisation of the TT\$100 and another entitled "Strategic Analysis Cases Compilation 2015-2020";
- produced nine Advisories/Typologies/Alerts, having examined the emerging and existing ML/FT risks, including those brought about by the COVID-19 pandemic;
- functions as Co-Chair to the CFATF-Risk Trends and Methods Group (CRTMG) and Country Co-ordinator to the Expert Group on the Control of Money Laundering (GELAVEX);
- participate as a member of the World Customs Organisation and the Egmont Group Financial Intelligence Compendium. This work is toward the Curriculum/Module Development Manual and the delivery of training for Customs Officers, Analysts and other relevant participants in the work of AML/CFT/CPF. This work is ongoing;
- contributed significantly to the CRTMG ongoing cases updates and projects; and
- continued its collaboration with private sector partners toward the development of operational and strategic analysis products.

## **CHAPTER IV – STRATEGIC ALLIANCES: CO-OPERATION AND COLLABORATION**

### **1. CO-OPERATION AND COLLABORATION**

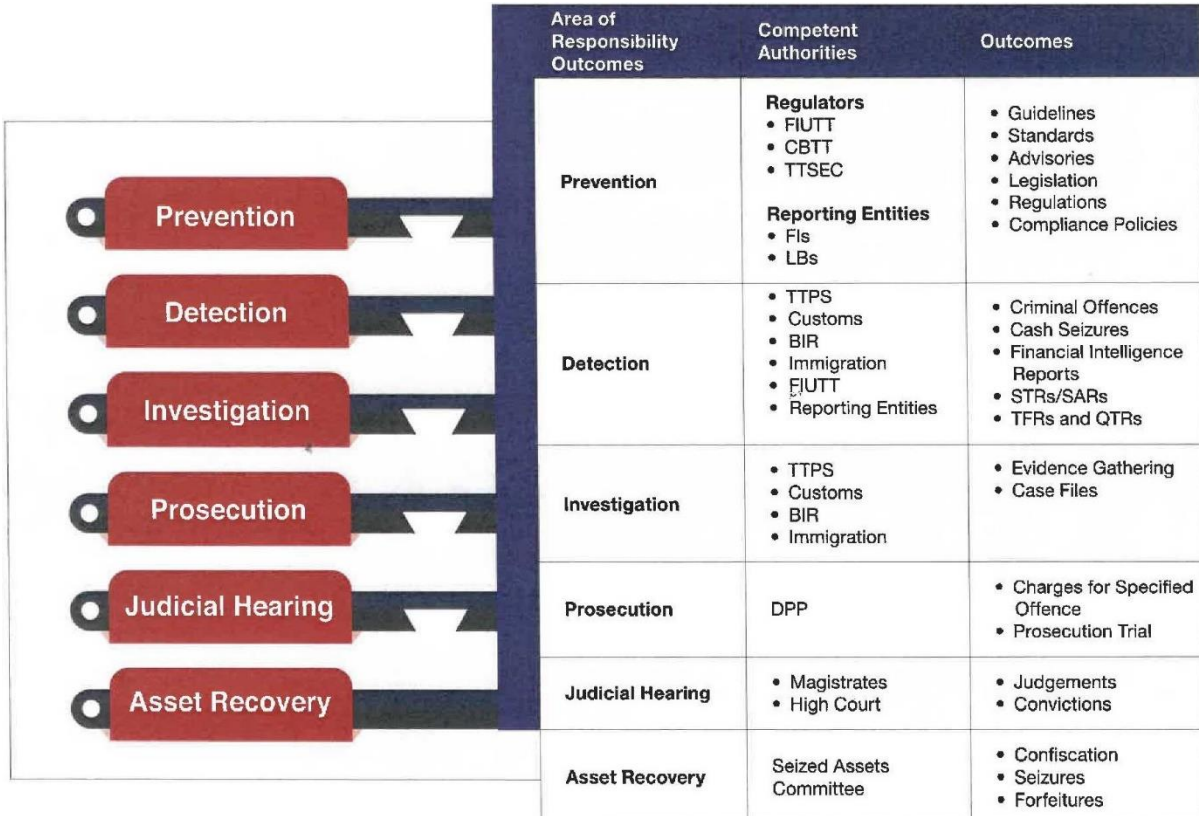
Preventing and fighting ML/FT/PF are major priorities of global leaders which contribute to the stability global financial system and of countries. The co-operation and collaboration between FIUs are of paramount importance due to the transnational nature of organised crime and of terrorist activities. FIUs are central players in addressing these challenges. FIUs in their key positions domestically and internationally navigate the work of economic operatives to detect transactions suspected of links to ML/FT/PF.

The FIUTTA governs the FIUTT to assist local and foreign authorities in their investigations and prosecution of ML/FT/PF and related crimes. The FIUTT is also obligated to co-operate with other AML/CFT Supervisors in regulating Reporting Entities and assisting them with their AML/CFT/CPF legal obligations. As a result of the legal requirements and international standards of the Egmont Group of FIUs, the FATF and the CFATF, the FIUTT engages in the exchange of information and financial intelligence domestically and internationally. This is done through established collaborative mechanisms such as, the Egmont Secure Web (ESW), national legislation, Standard Operating Procedures (SOPs) and Memoranda of Understanding (MOUs). These are the channels used by the FIUs', LEAs' and Intelligence Agencies to create strategic alliance between jurisdictions.

During the reporting period, the FIUTT continued to recognise the importance of both public and private sector partnerships. The FIUTT met with Reporting Entities, Supervisory Authorities, Public Authorities, LEAs and Intelligence Agencies on matters of mutual interest. These partnerships allowed the FIUTT to broaden its knowledge of trends, patterns and typologies.

Diagram 26 illustrates the AML/CFT/CPF linkages between the Reporting Entities and Competent Authorities.

**DIAGRAM 26  
THE AML/CFT/CPF LINKAGES**



## **2. DOMESTIC CO-ORDINATION AND ENGAGEMENT**

### **i. Law Enforcement Authorities**

The Law Enforcement Working Group (LEWG) was established to provide a forum for inter-agency co-operation and collaboration. The LEWG allows for more productive planning and co-ordination of ML/FT investigations, sharing of intelligence, evidence gathering and building expertise. This forum also provides a channel for the FIUTT to obtain feedback on the usefulness and quality of its Intelligence Reports and their relevance to the operational needs of the LEAs. In this reporting period, the LEWG held three meetings to discuss cases for advancement toward prosecution.

The LEWG has been chaired by the Office of the Director of Public Prosecutions (DPP) from 2017. The membership of the LEWG include: Fraud Squad, Special Branch, Special Investigations Unit (SIU), Anti-Corruption Investigations Bureau (ACIB), FIUTT, FIB, Customs and Excise, Immigration and the Criminal Tax Investigation Unit. Apart from the LEWG, the FIUTT engages specific agencies with responsibility for the investigation of criminal conduct that leads to ML/FT/PF, on prioritised and complex cases that require extensive collaboration.

### **ii. Information Exchange amongst the FIUTT, LEAs and Public Authorities**

The FIUTT prioritises the exchange of information with LEAs and Public Authorities as it is a key responsibility which enhances the usefulness of intelligence disseminated, in response to both LEA requests and through Spontaneous Disclosure. The timely responses provided by Public Authorities ensures that the analysis is of significant value as well meet the objectives of the LEA requests. Through MOUs, the FIUTT can access Public Authorities databases and in other instances, formal requests are made on a case-by-case basis.

In this reporting period, the FIUTT received 156 requests on 432 subjects from LEAs when compared to the 184 requests received in the previous reporting period. This represents a 15% decrease. Table 7 illustrates collaboration with LEAs and Public Authorities, the number of requests identified by the suspected criminal conduct category that was received from LEAs, and the number of requests made by the FIUTT to LEAs/Public Authorities in the course of carrying out its analytical functions.

Diagram 27 below illustrates the number of requests the FIUTT received for the period 2010 to 2021.

Cash seizures relating to ML was the highest suspected criminal conduct of the number of requests received, amounting to 42 which represents 27% of the number of requests. This represents a 21% decrease compared to 61 cash seizure requests in the previous reporting period. This decrease is likely to have been fuelled by the demonetisation of cotton-based TT\$100 that was executed during the period

December 2019 to March 2020 and the restrictions in place due to the COVID-19 pandemic. The other significant categories were Fraud 27 or 17%; Due Diligence 18 or 12%; FT 15 or 10% and ML 14 or 9%.

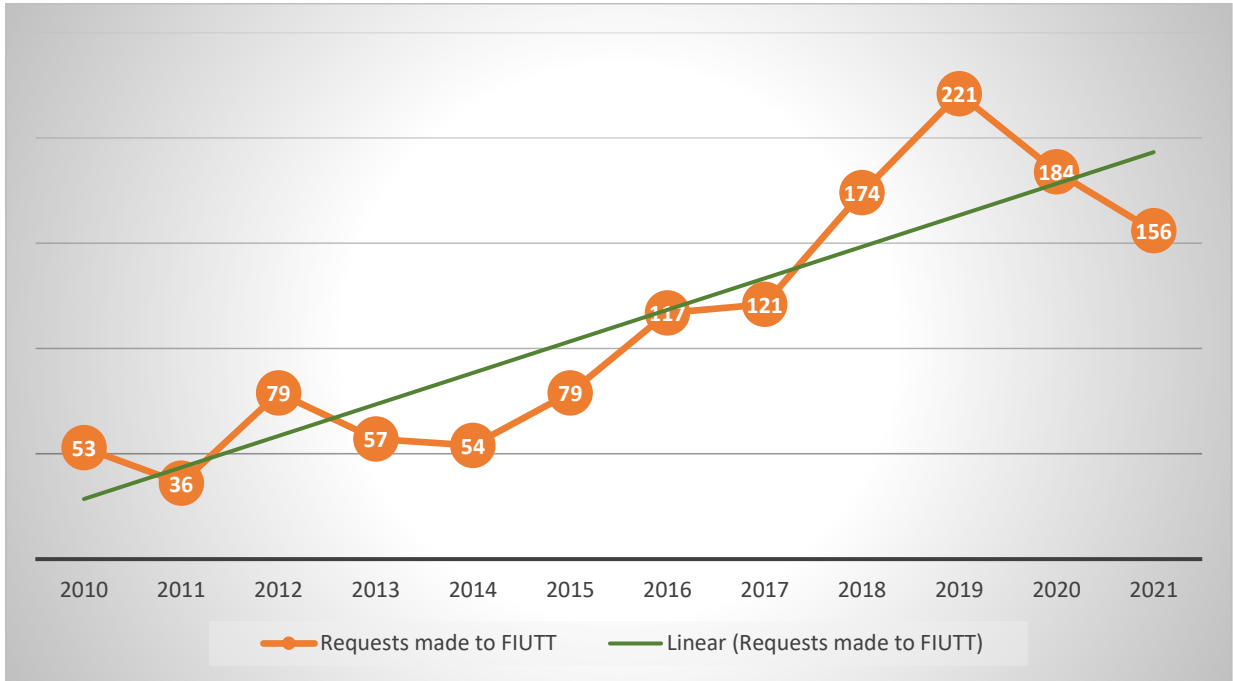
In the course of analysing STRs/SARs and to respond to requests from foreign stakeholders, the FIUTT in this reporting period made a total of 19 requests to LEAs and Public Authorities, compared with 37 made in the previous reporting period. The 49% decrease in requests made by the FIUTT can be attributed to restrictions due to the COVID-19 pandemic. Although the number of written requests to Public Authorities decreased in this period, the FIUTT made over 15,000 direct electronic queries to databases held by Public Authorities. These electronic requests from the FIUTT to Public Authorities were attributed to the complex cases under analysis from SARs/STRs submitted by Reporting Entities, requests for information from foreign FIUs and LEAs and the development of strategic analysis products.

In accordance with the FIUTTA and FATF's Recommendation 29, FIUs are required to disseminate financial intelligence spontaneously and upon request. In this reporting period, the FIUTT disseminated 17 Spontaneous Disclosures. The suspected criminal conduct related to FT/ ML, Fraud and Tax Evasion.

**TABLE 7  
COLLABORATION WITH LEAs AND PUBLIC AUTHORITIES**

Exchange of Information with LEAs and Public Authorities	SUSPECTED CRIMINAL CONDUCT CATEGORIES																								TOTAL	YEAR		
	Money Laundering	Organised Criminal Groups	Terrorism	Financing of Terrorism	Human Trafficking	Sexual Exploitation	Drug Trafficking	Corruption and Bribery/ Misbehaviour in Public Office	Conspiracy to Pervert the Course of Justice	Fraud/Extortion/Forgery	Murder	Kidnapping	Robbery/Theft	Tax Crimes	Cash Seizure	Illegal Gambling	Illegal Quarrying	Sexual Assault	Proliferation Financing	Arms Trafficking/Possession	Counterfeit Goods	Breach of Exchange Control Act	Breach of FIUTTA	Due Diligence			Missing Persons	Unexplained Wealth Order
No. of incoming requests from LEAs	9	6	0	16	9	0	22	25	1	17	10	3	1	3	61	0	1	0	0	0	0	0	0	0	0	0	184	2020
	14	2	0	15	0	0	7	7	0	27	4	2	4	3	42	0	0	0	0	0	0	0	0	18	7	4	156	2021
No. of outgoing Requests to LEAs and Public Authorities	8	0	0	5	2	0	6	3	0	6	0	0	2	1	4	0	0	0	0	0	0	0	0	0	0	0	37	2020
	3	0	0	4	2	0	2	4	0	1	0	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	19	2021

**DIAGRAM 27**  
**REQUESTS RECEIVED FROM LEAs – 2010 TO 2021**





### iii. Supervisory Authorities and Supervised Entities

- **Co-operation with Supervisory Authorities**

The FIUTT, the Central Bank and TTSEC are the Supervisory Authorities responsible for ensuring that Reporting Entities comply with their AML/CFT/CPF obligations. The FIUTT has long-standing co-operative relationships with the Central Bank and TTSEC, through MOUs and regular meetings focused on applying and strengthening AML/CFT/CPF standards.

In this reporting period, the FIUTT worked alongside Central Bank and TTSEC in four Supervisory Steering Group meetings and 13 Supervisory Working Group meetings. The co-operative efforts of the Supervisory Authorities included:

- Joint Regulatory Guidance on Customer Verification on Complying with AML/CFT due to the COVID-19 pandemic;
- Consultation with ICATT on AML/CFT external audit scope;
- AML/CFT/CPF Administrative Fine Regime;
- Identified and recommended legislative amendments to AML/CFT laws to conform with the FATF 40 Recommendations;
- Collaboration in identifying new/emerging AML/CFT threats;
- Developing standards for co-operation (Operating Procedures);
- Current ML trends and typologies;
- Mitigating risks of virtual assets;
- New trends relating to FT;
- Effective suspicious transaction/activity reporting;
- Enhanced supervision measures;
- The National Risk Assessment;
- AML/CFT legislation (Bills and Amendments);
- Trinidad and Tobago 4<sup>th</sup> MER and Enhanced Follow-Up Updates; and
- FATF and CFATF Plenary outcomes.

- **FIUTT Public-Private-Partnership Initiative**

The FIUTT established the Supervised Entities Working Group (SEWG) to provide a forum for discussing AML/CFT issues. The FIUTT restructured and renamed the working group (SEWG) in 2018 to “Supervised Entities Partnership Engagement” (SEPE) to encourage more effective engagement with the private sector. The SEPE provides a forum for representatives from the NRFIs and LBs sectors to discuss AML/CFT/CPF matters affecting their respective industries.

The FIUTT held two SEPE meetings for this reporting period. The main topics discussed were:

- Current ML trends and typologies;
- Mitigating risks of virtual assets;
- New trends relating to FT;

- Effective suspicious transaction/activity reporting;
- Enhanced supervision measures;
- The National Risk Assessment;
- AML/CFT legislation (Bills and Amendments);
- Trinidad and Tobago 4<sup>th</sup> MER and Enhanced Follow-Up Updates; and
- FATF and CFATF Plenary outcomes.

#### **iv. The National Anti-Money Laundering and Counter Financing of Terrorism Committee**

The NAMLC was established in law<sup>11</sup> as the national co-ordinating body for all Competent Authorities in the AML/CFT/CPF regime. Administratively, NAMLC falls within the Office of the Attorney General and Ministry of Legal Affairs. The Honourable Attorney General is the Prime Contact in Trinidad and Tobago for FATF and CFATF on AML/CFT/CPF matters. Consistent with FATF's Recommendation 2, NAMLC's terms of reference include:

- making recommendations to the Minister and co-ordinating the implementation of national AML/CFT/CPF policies;
- collecting and compiling statistics with respect to AML/CFT/CPF; and
- co-ordinating the conduct of national risk assessments and mutual evaluations.

The NAMLC, chaired by the Head of the Anti-Terrorism Unit and comprises the following:

- a representative of the Ministry of Finance;
- a representative of the Ministry of National Security;
- representatives of the Office of the Attorney General and Ministry of Legal Affairs;
- the Director of Public Prosecutions;
- the Commissioner of Police;
- the Director of Financial Intelligence Unit of Trinidad and Tobago;
- the Governor of the Central Bank of Trinidad and Tobago;
- the Chairman of the Board of Inland Revenue;
- the CEO of the Trinidad and Tobago Securities and Exchange Commission; and
- any other persons as the Minister sees fit.

In this reporting period, NAMLC held twelve meetings to ensure that the AML/CFT/CPF regime in Trinidad and Tobago continues to be effective.

---

<sup>11</sup> The Miscellaneous Provisions (Proceeds of Crime, Anti-Terrorism and Financial Intelligence Unit) Act, No. 20 of 2018

## **v. FIUTT in Partnership**

### **FIUTT and Fintech**

Fintech continues to be an area of rapid development over the reporting period 2020/2021. This growth was particularly recognised during the COVID-19 pandemic as the global Fintech market continued to expand to provide safe and contact-less access to financial services, where available.

Over the reporting period, the FIUTT has continued to collaborate with the other AML/CFT/CPF Supervisory Authorities namely the Central Bank and the TTSEC (the Supervisory Authorities), through the Joint Regulatory Fintech Committee. This collaboration ensures the establishment of an effective supervisory and regulatory regime for the adoption of Fintech in a manner which promotes a safe and stable financial, social and economic environment.

Through the Joint Regulatory Fintech Committee, over the reporting period the FIUTT has reviewed submissions and provided responses to enquiries made by Fintechs to the Supervisory Authorities through the Joint Innovation Hub. Additionally, as the AML/CFT/CPF Supervisory Authority of E-money Issuers (EMIs), the FIUTT has received and is processing applications for the registration of such entities for AML/CFT/CPF supervision.

- **Joint Innovation Hub**

In October 2020, the Supervisory Authorities launched the Joint Innovation Hub. The Innovation Hub functions as a central point of communication between Fintechs and the Supervisory Authorities on financial innovation and the regulatory and supervisory regimes applicable to new Fintech products and services. As a result, the Innovation Hub facilitates a two-way dialogue between the supervisors and the Fintechs with regard to their innovative products or services. Through this communication channel, the supervisors seek to understand new financial technologies, products and services proposed by Fintechs as well as the associated risks. Since its launch, over 25 entities have engaged the Supervisory Authorities for regulatory guidance concerning their Fintech products and services and as well as applications for approval as EMIs pursuant to the E-money Issuer Order, 2020.

- **Joint Regulatory Sandbox**

The establishment of the Joint Regulatory Sandbox continues to engage the attention of the Supervisory Authorities. This Sandbox is intended to provide Fintechs with a facility to test innovative financial products or services, business models and delivery mechanisms, prior to launching these products and services to the public. The performance of the Fintech's product or service in the Sandbox will determine whether the product or service can be introduced safely into the domestic market.

More information on the Joint Innovation Hub and the Regulatory Sandbox can be found on the Central Bank's website <http://www.central-bank.org.tt/>

**vi. National Drug Council**

The National Drug Council (NDC) of the Ministry of National Security was established in July 2000. The mandate of the NDC is demand-reduction, supply-control, prevention, treatment and rehabilitation of addicted persons. The NDC is tasked with maintaining the National Drug Information System, to exchange information on anti-drug related initiatives in Trinidad and Tobago. In 2014, the Director of the FIUTT was appointed as a member of the NDC. In this reporting period, the FIUTT attended eight such meetings hosted by the NDC.

Further information about the NDC can be sourced at <http://www.nationalsecurity.gov.tt/ndc>

**vii. The Office of the Attorney General and the Ministry of Legal Affairs**

In this reporting period, the FIUTT continues to support the Office of the Attorney General and the Ministry of Legal Affairs (AGLA) in applying sanctions under the ATA. In accordance with the SOP, the FIUTT and the AGLA follow the established procedures in the listing and de-listing of terrorist entities and individuals pursuant to UNSCR 1267, 1373, 1988 and 2253. The Ministry of Foreign and CARICOM Affairs also plays a critical role to immediately freeze without delay, listed terrorist individuals and entities. The Ministry of Foreign and CARICOM Affairs must inform both the FIUTT and the AGLA of any changes to the UNSCR 1257, 1373, 1988 and 2253 attesting to its authenticity. The goal is to immediately freeze terrorist funds without delay to avoid flight or dissipation as mandated by the FATF.

Table 8 below shows the total number of Court Orders obtained and the number of designated entities listed and delisted as terrorists.

The designated lists of persons and entities under UNSCR 1267, 1989, 2253; UNSCR 1373 and UNSCR 1988; as well as, UNSCR 1718 and UNSCR 2231 can be accessed on the FIUTT's website [www.fiu.gov.tt](http://www.fiu.gov.tt), and AGLA's website at <https://agla.gov.tt/>. Reporting Entities are required to examine both lists and immediately notify the FIUTT if any person/entity, hold funds in their institution.

**TABLE 8**  
**SUMMARY OF TERRORIST ENTITIES LISTED**  
**AND COURT ORDERS GRANTED FROM 2015 TO 2020**

UNSCR	Year	No. of Listed Entities and Individuals	No. of Court Orders
1267 (1999) 1989 (2011) 2253 (2015) 2368 (2017)	2015/2016	78	8
	2016/2017	258	60
	2017/2018	20	11
	2018/2019	8	8
	2020	9	7
	2021	1	1
1988(2011)	2018/2019	140	7
1373(2001)	2015	1	1
	2017	5	5
	2020	1	1
Delistings ATA Section 22B (9)	2018/2019	-21	15
	2020	-3	3
	2021	-3	3
<b>Total</b>	<b>2015-2021</b>	<b>494</b>	
<b>Total Number of Court Orders Granted</b>			<b>129</b>

*Source: Anti-Terrorism Unit of the Office of the Attorney General and Ministry of Legal Affairs*

### **viii. Public and Private Sector Consultations**

The FIUTT contributed to consultations with governmental and non-governmental organisations on particular elements to strengthening the AML/CFT/CPF regime in Trinidad and Tobago. These include:

- AML Sub-Committee of the Bankers' Association of Trinidad and Tobago – for operational and Strategic Analysis Development, training and meetings;
- Internal Revenue Service – Criminal Investigation Division, Department of Treasury, USA – for collaboration on matters of mutual interest;
- Forestry Division, Ministry of Agriculture – for Strategic Analysis development;
- Embassies and High Commissions - for strategic collaboration;
- FIs and NRFIs – for training, meetings and guidance on the sectors AM/CFT/CPF obligations;
- Fisheries Division, Ministry of Agriculture Land and Fisheries - for collaboration on matters of mutual interest;
- Maritime Services Division, Ministry of Works and Transport - for collaboration on matters of mutual interest;
- The Transport Commissioner - for strategic collaboration;
- National Insurance Board of Trinidad and Tobago - for strategic collaboration;
- UNODC – for training needs of the FIUTT; and
- The PCA – for the establishment of an MOU and SOP for the exchange of information.

### **ix. Anti-Illicit Trade Task Force**

The Government of Trinidad and Tobago has recognised the prevalence of illicit trade within the country. The effects of illicit trade have impacted government, businesses and consumers. On May 17, 2021 Senator the Honourable Paula Gopee-Scoon, Minister of Trade and Industry, appointed 11 members to the Anti-Illicit Trade Task Force (AITTF), of which the FIUTT is a member. The AITTF brings together private sector bodies, governmental bodies and non-governmental organisations, to implement the initiatives outlined in the National Action Plan to Combat the Illicit Trade in Consumer Goods in Trinidad and Tobago. The objectives of the AITTF are to:

- strengthen the legal framework to combat illicit trade – identifying and recommending legislation for review to ensure that illicit trade activities are effectively defined and addressed;
- strengthen the capacity of Ministries and enforcement agencies to combat illicit trade;
- enhance collaboration among regulatory and enforcement agencies;
- promote Public-Private Sector Partnerships (PPSP) towards fighting illicit trade; and
- increase public awareness of illicit trade and the associated dangers.

## **x. MOUs with Local Competent Authorities**

The FIUTTA authorises the Director of the FIUTT to enter into MOUs with local authorities to give effect to domestic sharing of Information to perform the functions of the FIUTT. In this reporting period, the FIUTT signed MOUs with the The Police Complaints Authority dated 27<sup>th</sup> November 2020, The National Insurance Board of Trinidad and Tobago dated 27<sup>th</sup> January 2021 and The Commissioner for Co-operative Development Division, Ministry of Youth Development and National Service dated 05<sup>th</sup> July 2021. Negotiations are ongoing with the Maritime Services Division of the Ministry of Works and Transport. It is expected that this MOU is expected to be finalised in the next reporting period.

## **3. INTERNATIONAL ENGAGEMENT AND CO-OPERATION**

### **i. Exchange of Information with Foreign Authorities**

International co-operation plays a particularly important part in the AML/CFT/CPF environment. FATF's Recommendations 29 and 40, international standards require FIUs in each jurisdiction to provide the widest range of international co-operation. The FIUTT is authorised under the FIUTTA to exchange information with foreign counterparts. Co-operation at the global level is governed by the Egmont Group of FIUs Principles of Information Exchange. The FIUTT is able to promptly provide the widest possible range of international co-operation both spontaneously and upon request in the areas of ML/FT/PF and other criminal conduct. The exchange of information with foreign authorities, allows such information to be usefully incorporated into its analyses, bringing added value to matters seeking the attention of LEAs, FIUs, judicial authorities and other competent authorities.

The FIUTT received 11 requests from foreign authorities during this reporting period, a 50% decreased when compared to the previous reporting period. These requests featured a total of 26 Subjects in contrast to 204, for the previous reporting period. The suspected criminal conduct in the majority of cases, was Corruption with six requests, comprising of 14 Subjects respectively.

The FIUTT, in conducting analysis, made a total of 28 requests comprising of 66 Subjects to foreign authorities for financial intelligence and information. There was a decrease of 32% in requests made to foreign FIUs when compared to the previous reporting period. The global pandemic was one of the main contributing factors for this reduction.

The majority of requests the FIUTT made to foreign authorities involved twelve cases of suspected ML, three cases each of corruption, and arms and ammunition and suspected FT.

Table 9 is illustrative of information exchange by type of criminal conduct.

**TABLE 9  
INFORMATION EXCHANGE BY TYPE OF CRIMINAL CONDUCT**

Exchange of Information with Foreign Authorities	Suspected Criminal Conduct Categories														TOTAL	YEAR
	Money Laundering	Cash Seizure	Corruption	Drug Trafficking	Financing of Terrorism	Robbery	Sanction Evasion	Tax Crimes	Fraud	Human Trafficking	Kidnapping	Wire Fraud	Arms and Ammunition	Compliance Check		
<b>INCOMING REQUESTS TO FIUTT</b>																
No. of incoming requests from Foreign Authorities	1	0	6	1	0	0	0	1	2	0	0	0	0	0	11	2021
	3	1	2	4	5	1	1	5	0	0	0	0	0	0	22	2020
<b>OUTGOING REQUESTS FROM FIUTT</b>																
No. of outgoing Requests to Foreign Authorities	12	3	3	1	3	0	0	1	2	0	0	0	3	0	28	2021
	14	2	3	7	8	0	0	0	5	0	0	1	0	1	41	2020



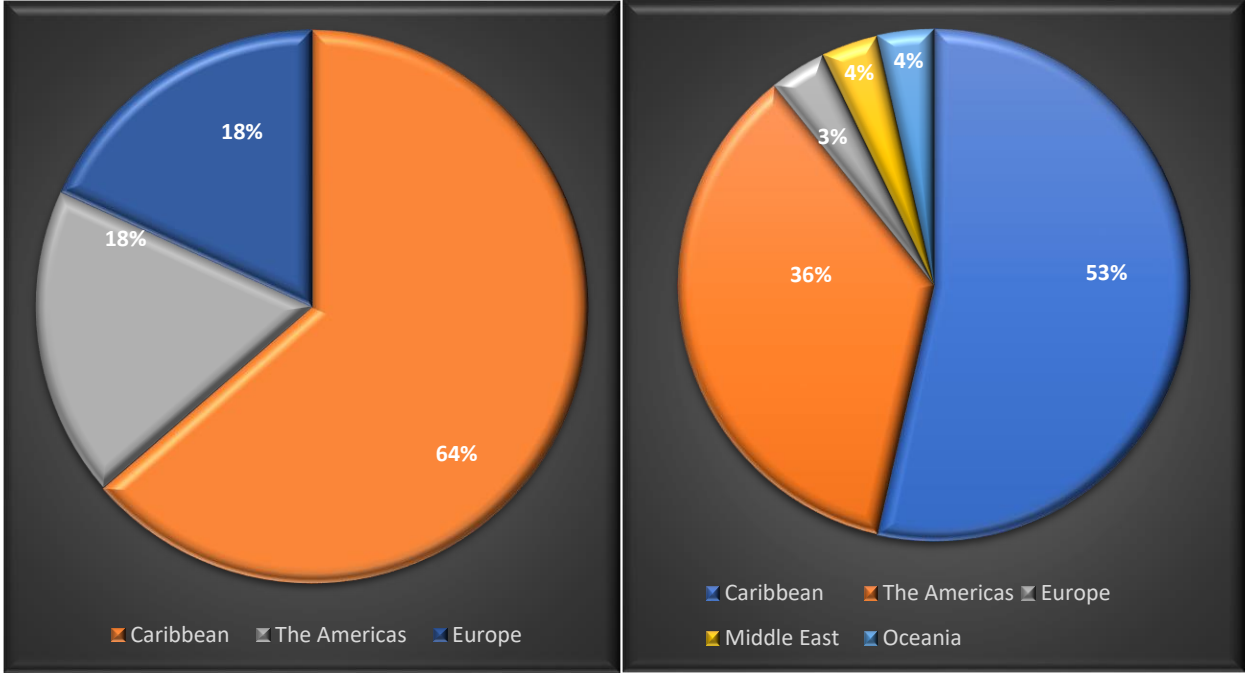
Requests received from foreign authorities originated from the Caribbean, followed by Europe and the Americas. Similarly, the FIUTT sent the majority of requests to foreign authorities in the Caribbean and the Americas.

Diagram 28 illustrates the international exchange of information.

**DIAGRAM 28**  
**INTERNATIONAL EXCHANGE OF INFORMATION**

**REQUESTS RECEIVED FROM FOREIGN AUTHORITIES**

**REQUESTS SENT TO FOREIGN AUTHORITIES**



## **ii. Spontaneous Disclosures of Information to Foreign Authorities**

Timely and spontaneous disclosure of relevant information may help fight ML/FT/PF and other criminal conduct more effectively, provide better and more comprehensive intelligence to foreign authorities while simultaneously reinforcing the integrity of the financial system and preventing its abuse by criminals.

The FIUTT disseminated six Spontaneous Disclosures to foreign FIUs and LEAs as compared with 14 in the previous reporting period. This represented a decrease of 57%, which can be attributed to fact that in several cases, the analysis would not have been linked to foreign jurisdictions. The spontaneous dissemination of intelligence was linked to the suspected criminal conduct related to FT, Fraud, ML and Tax Evasion. FT and Fraud accounted for 33% each of the total number of spontaneous intelligence reports disseminated, while ML and Tax Evasion accounted for 17% each.

#### **4. MOUs SIGNED WITH FOREIGN FIUs**

Similar to other FIUs around the world, the FIUTT can exchange information and intelligence with 167 Egmont FIUs to support the investigation of ML/FT/PF or related crimes. The FIUTT is authorised to exchange information with foreign FIUs freely without the necessity of having an MOU or formal agreements. Notwithstanding this, the FIUTTA also authorises the FIUTT to enter into MOUs with a foreign FIU, if the Director considers it necessary. This enables the FIUTT to facilitate those FIUs where their domestic legislation makes it obligatory to enter into MOUs with other FIUs to accommodate such exchanges. Information and Intelligence is exchanged between FIUs via the ESW.

The FIUTT ratified one MOU with a foreign FIU during this reporting. The total number of MOUs signed between the FIUTT and foreign FIUs is now 35. Negotiations are ongoing with the Superintendent of Banks through the Special Verification Intendancy (IVE) of the Republic of Guatemala. It is expected that this MOU will be finalised in the next reporting period.

Table 10 below lists MOUs signed with foreign FIUs.

**TABLE 10  
MOUs WITH FOREIGN FIUs**

<b>No.</b>	<b>COUNTRY</b>	<b>COUNTERPARTS</b>	<b>DATE OF SIGNING DD/MM/YYYY</b>
1.	JAMAICA	FINANCIAL INVESTIGATIONS DIVISION	13/11/2012
2.	ST. VINCENT AND THE GRENADINES	FINANCIAL INTELLIGENCE UNIT	22/05/2013
3.	GUYANA	FINANCIAL INTELLIGENCE UNIT	28/05/2013
4.	MONTSERRAT	MONTSERRAT REPORTING AUTHORITY	28/05/2013
5.	SINT MAARTEN	FINANCIAL INTELLIGENCE UNIT	19/11/2013
6.	SURINAME	FINANCIAL INTELLIGENCE UNIT	19/11/2013
7.	BERMUDA	FINANCIAL INTELLIGENCE AGENCY	04/02/2014
8.	CANADA	FINANCIAL TRANSACTIONS AND REPORTS ANALYSIS CENTRE OF CANADA (FINTRAC)	06/02/2014
9.	BANGLADESH	FINANCIAL INTELLIGENCE UNIT	03/06/2014
10.	TAIWAN	ANTI-MONEY LAUNDERING DIVISION, INVESTIGATION BUREAU, MINISTRY OF JUSTICE, REPUBLIC OF CHINA (TAIWAN)	05/06/2014
11.	GRENADA	FINANCIAL INTELLIGENCE UNIT	26/05/2015
12.	DOMINICA	FINANCIAL INTELLIGENCE UNIT	26/05/2015
13.	DOMINICAN REPUBLIC	FINANCIAL ANALYSIS UNIT	26/05/2015
14.	ANTIGUA AND BARBUDA	OFFICE OF NATIONAL DRUG AND MONEY LAUNDERING CONTROL POLICY (ONDCP)	10/06/2015
15.	TURKS AND CAICOS	FINANCIAL INTELLIGENCE AGENCY	10/06/2015
16.	SOUTH AFRICA	FINANCIAL INTELLIGENCE CENTRE	08/07/2015
17.	BARBADOS	FINANCIAL INTELLIGENCE UNIT	26/11/2015
18.	AUSTRALIA	AUSTRALIAN TRANSACTION REPORTS AND ANALYSIS CENTRE (AUSTRAC)	18/01/2016
19.	REPUBLIC OF TOGO	FINANCIAL INTELLIGENCE UNIT	29/07/2016

<b>No.</b>	<b>COUNTRY</b>	<b>COUNTERPARTS</b>	<b>DATE OF SIGNING DD/MM/YYYY</b>
20.	PANAMA	FINANCIAL ANALYSIS UNIT (UAF)	08/08/2016
21.	COLOMBIA	LA UNIDAD DE INFORMACION Y ANALISIS FINANCIERO (UIAF)	19/09/2016
22.	LIBERIA	FINANCIAL INTELLIGENCE UNIT	09/12/2016
23.	JAPAN	FINANCIAL INTELLIGENCE CENTRE	02/02/2017
24.	BELIZE	FINANCIAL INTELLIGENCE UNIT	28/05/2017
25.	ZAMBIA	FINANCIAL INTELLIGENCE CENTRE	12/07/2017
26.	LEBANON	SPECIAL INVESTIGATION COMMISSION	02/08/2017
27.	BAHAMAS	FINANCIAL INTELLIGENCE UNIT	04/08/2017
28.	SRI LANKA	THE FINANCIAL INTELLIGENCE OF SRI LANKA	26/10/2017
29.	CUBA	LA DIRECCIÓN GENERAL DE INVESTIGACIÓN DE OPERACIONES FINANCIERAS (DGIOF)	02/11/2017
30.	VENEZUELA	LA UNIDAD NACIONAL DE INTELIGENCIA FINANCIERA (UNIF)	12/11/2017
31.	CHINA	THE CHINA ANTI-MONEY LAUNDERING MONITORING AND ANALYSIS CENTRE (CAMLMAC)	15/05/2018
32.	UKRAINE	THE STATE FINANCIAL MONITORING SERVICE OF UKRAINE	08/10/2018
33.	EL SALVADOR	THE FINANCIAL INVESTIGATION UNIT OF EL SALVADOR	20/11/2018
34.	PHILIPPINES	THE ANTI-MONEY LAUNDERING COUNCIL (AMLC), THE FINANCIAL INTELLIGENCE UNIT OF THE REPUBLIC OF THE PHILIPPINES	29/01/2020
35.	TANZANIA	FINANCIAL INTELLIGENCE UNIT	09/09/2021

## **5. PARTICIPATION IN INTERNATIONAL FORA**

In this reporting period, the FIUTT continued to participate in and contributed to events and activities of regional and international bodies tasked with combatting ML/FT/PF. The FIUTT participated in activities, such as conferences, workshops, meetings and training sessions.

### **i. The Egmont Group of FIUs**

Since the FIUTT gained membership to the Egmont Group of FIUs on July 3, 2013, the FIUTT continues to provide strong support to the work of the Egmont Centre of FIU Excellence & Leadership (ECOFEL)<sup>12</sup>. The goal of the Egmont Group is to provide a forum for FIUs around the world to improve co-operation in the fight against ML/FT/PF and to facilitate the rapid and secure exchange of information between FIUs. The current membership of the Egmont Group is now 167 FIUs.

Currently, the Egmont Group of Financial Intelligence Units and the World Customs Organization have embarked on a project to develop a Training Compendium for personnel of FIUs and Customs, around the world. This Compendium will be geared towards:

- Promoting cooperation between FIUs and Customs services to effectively disrupt cross-border ML/FT and TBML activities;
- Stressing the importance of marrying suspicious Financial Transaction Data (FIUs) with Suspicious Customs Data (Customs).

The FIUTT has been tasked with the development of the Strategic Analysis Module, which is one of the six modules in the Training Compendium. For the Strategic Analysis Module, a case example will be used in which joint work was undertaken by the FIUTT and the Trinidad and Tobago's Customs and Excise Division.

### **ii. The Financial Action Task Force**

The FATF is an inter-governmental body established in 1989 to develop standards for combatting ML/FT/PF. FATF continuously monitors and assesses the progress made by its member countries as it relates to ML/FT and the proliferation of weapons of mass destruction. In February 2012, FATF adopted the Revised 40 Recommendations and have continued to make amendments.

The Revised 40 Recommendations seek to clarify and strengthen existing measures, as well as, address new and emerging threats. The adoption of the risk-based approach allows countries to utilise their resources more effectively and apply countermeasures, which are commensurate with the nature of risks.

---

<sup>12</sup> [ECOFEL - Brief Introduction - The Egmont Group](#)

The FATF Plenaries were held virtually in October 2020 and February 2021. The member jurisdictions, the FSRBs and their members would all have participated in the meetings.

The FIUTT publishes a list of countries identified by FATF with weak measures to combat ML/FT/PF in two FATF public documents; (i) High-Risk Jurisdictions subject to a Call for Action and (ii) Jurisdictions Under Increased Monitoring (often externally referred to as the 'grey list'). These jurisdictions are required to address their identified significant strategic deficiencies and strategic deficiencies respectively. See [www.fiu.gov.tt](http://www.fiu.gov.tt) or [www.fatf-gafi.org](http://www.fatf-gafi.org)

### **iii. The Caribbean Financial Action Task Force**

The CFATF, one of eight FSRBs is responsible for promoting consistency in the application of the FATF Recommendations within countries of the Caribbean and Central America. The CFATF comprises 25 member states of the Caribbean Basin, which have agreed to implement common countermeasures to address the problem of ML/FT/PF. Its main objective is to achieve effective implementation of FATF's Recommendations within the region. The CFATF Secretariat is hosted by the Government of Trinidad and Tobago. See [www.cfatf-gafic.org](http://www.cfatf-gafic.org)

In this reporting period the FIUTT made contributions to the work of CFATF, notably:

- contributions to the CRTMG projects on, Financial Flows of Human Trafficking/Smuggling of Migrants project and the VA and VASPs project;
- sharing of Trends/Typologies/Alerts to CFATF member FIUs with particular focus on those that were prominent during the COVID-19 period;
- continued participation as Co-Chair to the CRTMG.

### **iv. The CICAD**

The Inter-American Drug Abuse Control Commission (CICAD) focuses on strengthening human and institutional capabilities and channelling the combined efforts of its member states to reduce the production, trafficking and use of illegal drugs. The sub-committee of CICAD, (GELAVEX), is a hemispheric forum to discuss, analyse and draft policies to deal with ML/FT. Trinidad and Tobago was represented during this reporting period by FIUTT's personnel. FIUTT is also the Country Co-ordinator for the GELVAEX project. In this reporting period, the discussions entailed:

- Presentation - Topic: Typologies of money laundering associated with illegal mining.
- Presentation – Topic: EUROPOL's new European Financial and Economic Crime Centre (EFECC).
- Presentation on Open-Source Project.
- Panel – Topic: Challenges with due diligence and compliance procedures during the pandemic.
- Progress Report: Presentation: Creation of a hemispheric Illicit Assets Administration Network.
- Progress Report: Creation of a model for sharing forfeited assets as a reference document for OAS member states.



- Progress Report: Study on identification of cases from a perspective of criminal investigation involving crypto assets.
- Progress Report: Study on the laundering of the proceeds of crimes of political corruption, illicit drug and arms trafficking, and tax fraud.

**v. Sharing experiences with Foreign FIUs**

The FIUTT continues to support its global and regional partners with technical assistance and the opportunity to strengthen capacity at fellow FIUs. The FIUTT continues to give mentorship support to the Barbados FIU. The mentorship focused on Strategic Analysis Development and case management during this reporting period with the support of the Analysis Division and the IT Division of the FIUTT. This collaborative and unique opportunity of mentoring a fellow FIU sets the stage for FIUTT to share experiences and knowledge in FIU's operations. The FIUTT also facilitated a virtual training session for new Analysts at the British Virgin Islands-Financial Investigations Agency (BVI-FIA). This facilitation aims to strengthen capacity as it relates to operational and strategic analysis functions within the BVI-FIA.

## **CHAPTER V - RESOURCES AND INFRASTRUCTURE**

### **1. RESOURCES**

The FIUTT is managed by the Director who leads a cadre of specially trained professionals in the field of AML/CFT/CPF. The Deputy Director assists the Director with the management and operations of the FIUTT. The core technical functions of the FIUTT are performed by the Analysis, Compliance and Outreach and Legal Divisions, respectively. The Information Technology and Administrative Support Divisions together with the Public Affairs Officer provide critical operational support services to ensure the efficiency and effectiveness of the FIUTT.

The staff complement of the FIUTT consists of 60 approved positions, which represents 14 (or 23%) established offices and 46 (or 77%) contract positions. During this reporting period, 18 contract vacancies were filled in the divisions of the FIUTT. Short-term employment also addressed the FIUTT's immediate human resource needs. Three staff members exited the organisation for other employment opportunities. Unfortunately, within this period, the FIUTT lost one of its long-standing employees who died suddenly.

Attracting and retaining employees remains a challenge. In this reporting period, the FIUTT, in collaboration with the Human Resource Management Division of the Ministry of Finance, commenced the recruitment for vacant positions in the Analysis and Compliance and Outreach Divisions. It is anticipated that the recruitment process will be completed early in the next reporting period, due to the adverse impact of the COVID-19 pandemic.

The FIUTT acknowledges the continuing support given by the Permanent Secretary and the Human Resource Management Division of the Ministry of Finance in strengthening the organisational structure of the FIUTT.

### **2. INFORMATION SYSTEMS AND TECHNOLOGY**

#### **i. Major Information, Communication and Technology (ICT) Achievements**

ICT continues to play an important role in support of the daily, operational and strategic objectives of the FIUTT. In this reporting period, the FIUTT saw its secure online Reporting Solution, called FIUConnect, being utilised to a greater extent by Reporting Entities for the submission of STRs/SARs. This solution is targeted for enhancements in the next reporting period.

The COVID-19 pandemic has impacted the FIUTT's ability to provide ICT resources and solutions for use by its staff to operate more efficiently in a work from home environment. The ongoing shortage in the global supply of semiconductor chips required in the manufacture of electronic devices has made the acquisition of such equipment very challenging.

## **ii. FIUTT Online**

The FIUTT website continues to be a learning resource for Reporting Entities, foreign FIUs, Competent Authorities and the general public.

In this reporting period, the following updates were published and made available for access and free download on the FIUTT's website ([www.fiu.gov.tt](http://www.fiu.gov.tt)).

Diagram 29 represents the updates to the website.

## DIAGRAM 29 UPDATES TO THE FIUTT WEBSITE

Notices	Statements	Advisories	Legal Framework	Other Updates
<ul style="list-style-type: none"> <li>• Notice to FIs on reporting of QTRs</li> <li>• Notice to FIs and LBs to freeze terrorist funds</li> <li>• Notice to FIs and LBs to unfreeze terrorist funds</li> <li>• Notice of temporary operational arrangements for Supervised Entities.</li> <li>• Notice of change of FIU acronym to FIUTT and FIUTT Logo change.</li> </ul>	<ul style="list-style-type: none"> <li>• FATF statement following unauthorised disclosure of confidential FinCEN documents</li> <li>• Updates to FATF Call to Action updates to CFATF Public Statements</li> <li>• Notice of appointments of Justices of the Peace</li> </ul>	<ul style="list-style-type: none"> <li>• Advisories to FIs and LBs</li> <li>• Romance SCAM Advisories</li> <li>• Overpayment Scam Advisories</li> <li>• Advisories to Jewelers and other FIs</li> </ul>	<ul style="list-style-type: none"> <li>• Legal Notice No. 356 of 2019 -Proceeds of Crime (Large Transactions) Order 2019;</li> <li>• Legal Notice No. 386 of 2019- Financial Obligations (Amendment) Regulations, 2019;</li> <li>• Miscellaneous Provisions (Proceeds of Crime and Central Bank) Act, No. 22 of 2019</li> <li>• E-Money Issuer Order, 2020</li> </ul>	<ul style="list-style-type: none"> <li>• Updated quarterly statistics on the number and monetary value of STRs/SARs received and Intelligence Reports sent by the FIUTT to LEAs;</li> <li>• Joint Regulatory Guidance on Complying with AML/CFT</li> <li>• Verification requirements in light of COVID-19 measures</li> <li>• Updates to the Trinidad and Tobago Consolidated List of Court Orders;</li> <li>• Updated list of Registrants and De-Registrants;</li> <li>• Updated Outreach and Awareness training events;</li> <li>• Annual Report 2020;</li> <li>• FIUTT Guidance Notes on: Procedures for Reporting Terrorist Funds, Financial Institutions and Listed Businesses on Sanctioned Entities, Reporting Entities on Proliferation Financing Orders, Non-Regulated Financial Institutions and Listed Business on Independent Testing of Compliance Programme</li> </ul>

### iii. Information and Communication Technology (ICT) Key Initiatives

In this reporting period, the IT Division focused on the following key initiatives:

- **Upgrade of PBX solution**

FIUTT embarked on activities for the procurement of an upgraded PBX solution, which will replace its dated PBX system. When implemented, the solution will provide greater flexibility to allow for employee and stakeholder communication from both the office and work from home, particularly given the pandemic. Implementation is targeted for early in the next reporting period.

- **Refresh of Local Area Network (LAN) switches**

All of FIUTT's outdated LAN switches have been upgraded and an additional LAN switch added to cater for future growth.

- **Enhancements to security posture**

The FIUTT is continually aware of the need to proactively assess and enhance its security posture. Globally, the current pandemic has seen an exponential growth in cyberattacks as the surface area of devices connected to the Internet has grown significantly. The FIUTT focused on activities to enhance its security posture, given the evolving changes regarding work from home. Tweaking of its current posture is in progress and additional enhancements will be implemented in the next reporting period to support advances in underlying technological security protocols and features.

- **Upgrade of Data Centre cooling system**

The FIUTT pursued procurement activities for a more reliable and modern cooling system for its Data Centre.

- **Upgrade of FIUConnect® secure online Reporting Solution**

The FIUTT continued with activities to facilitate upgrade of its secure online Reporting Solution with implementation being targeted for the next reporting period.

### 3. ORGANISATIONAL DEVELOPMENT

In this reporting period, the FIUTT continued to develop an atmosphere that positively grew the value of its staff through the effectiveness of well-structured training programmes. The worth of the organisation's human resource capital is immeasurable to the success of the Unit.

The continued presence of the COVID-19 pandemic further emphasised the need for training that offered staff the tools to persistently provide AML/CFT/CPF supervision in a more dominant digital environment.

Practical training increases adaptability to unexpected challenges, which sometimes interrupt the business processes of the FIUTT.

The staff of the FIUTT in this reporting period participated in 49 online training and webinar programmes, the most in the history of the FIUTT. The online training and webinar programmes were facilitated by organisations such as FATF, CFATF, UNODC, INTERPOL, ECOFEL/Egmont Group Secretariat and the Public Service Academy. The FIUTT exposes its staff to AML/CFT/CPF and staff development best practices, which continue to be the FIUTT standard.

All of the aforementioned, assist the FIUTT in meeting the needs of our stakeholders. Training contributes significantly to an even more effective and efficient AML/CFT regime.

Table 11 provides a listing of staff training undertaken during this reporting period.

**TABLE 11  
STAFF TRAINING**

<b>NO.</b>	<b>PLACE OF TRAINING</b>	<b>DESCRIPTION OF COURSE/PROGRAMME</b>	<b>ORGANISER/PRESENTER</b>	<b>PARTICIPANTS FROM FIUTT</b>
1.	Port of Spain	Capacity Building in Procurement Workshop	Office of the Procurement Regulation	Network Administrator and Clerical Assistant
2.	Port of Spain Trinidad	Webinar U.S. SEC Virtual Technical Assistance Program with the Caribbean Group of Securities Regulators	TTSEC	Legal Officer I and Compliance and Outreach Officer
3.	Port of Spain Trinidad	Webinar Freedom of Information workshop	Public Service Academy (PSA)	Director Legal Division and Legal Officer II
4.	Port of Spain Trinidad	Webinar Creative Problem Solving and Analytical Thinking	UWI- Arthur Lok Jack Global School of Business	Supervisor Compliance and Outreach and Compliance and Outreach Officers
5.	Port of Spain Trinidad	Webinar AML and FCP Professional Certification	UWI- Arthur Lok Jack Global School of Business	Supervisor Compliance and Outreach and Compliance and Outreach Officers
6.	Port of Spain Trinidad	Webinar Tech AML 2021: Caribbean AML Virtual conference: AML – a strategic priority	NEMLC	Compliance and Outreach Officers
7.	Port of Spain Trinidad	Training in Public Service Records Management	Ministry of Finance – General Accounts Division	Administrative Staff, BOA II Legal and Public Affairs Officer

<b>NO.</b>	<b>PLACE OF TRAINING</b>	<b>DESCRIPTION OF COURSE/PROGRAMME</b>	<b>ORGANISER/PRESENTER</b>	<b>PARTICIPANTS FROM FIUTT</b>
8.	Port of Spain Trinidad	Records Management-general principles, archiving of records and development of a record.	Ministry of Finance – General Accounts Division	Administrative Staff, BOA II Legal and Compliance and Outreach
9.	Port of Spain Trinidad	Webinar AML-FCP Fundamentals	The Central Bank of Trinidad and Tobago	Compliance and Outreach Officers
10.	Port of Spain Trinidad	Webinar Discipline in the Public Service	Public Service Academy (PSA)	Director Legal Division
11.	Port of Spain Trinidad	Webinar The Central Bank of Trinidad and Tobago on Payment Service Policy	The Central Bank of Trinidad and Tobago	Director Legal Division, Legal Officer II, Legal Officer I and Legal Officer (OJT)
12.	Port of Spain Trinidad	Invitation to a Live Webinar: Mergers and Acquisitions of Financial Institutions	Central Bank of TT	Director Legal Division, Legal Officer II, Legal Officer I and Legal Officer (OJT)
13.	Port of Spain Trinidad	Webinar Tackling illicit Trade in Trinidad and Tobago	British High Commission Port of Spain, Department for International Trade	Director Legal Division, Legal Officer II, Legal Officer I and Legal Officer (OJT)
14.	Port of Spain	U.S. SEC Virtual Technical Assistance Program with the Caribbean Group of Securities Regulators	Trinidad and Tobago Securities and Exchange Commission	Legal Officer 1
15.	Port of Spain	Leadership Webinar- “Freedom of information and the role of decision makers”	Ministry of Public Administration, Public Service Academy	Director Legal Division and Legal Officer II



NO.	PLACE OF TRAINING	DESCRIPTION OF COURSE/PROGRAMME	ORGANISER/PRESENTER	PARTICIPANTS FROM FIUTT
16.	Port of Spain	Coaching Skills Training	Public Service Academy	Director Legal Division
17.	Port of Spain	TTIFC Public Sector Engagement Session: Digitalisation of payments Now, Next, Beyond	Trinidad and Tobago International Financial Centre	Director Legal Division
18.	Port of Spain Trinidad	Webinar on Financial Crimes Case Café- Pyramid and Ponzi Schemes	INL/NCSC Regional Financial Team	Director Legal Division, Legal Officer II, Legal Officer I and Legal Officer (OJT)
19.	Port of Spain Trinidad	Regional Asset Recovery In-Practice Workshop	CARICOM IMPACS	Analyst
20.	Port of Spain Trinidad	Online 2 <sup>nd</sup> International Research Conference on Empirical Approaches to AML and Financial Crime Suppression	The Central Bank of the Bahamas	Legal Officer I and Legal Officer (OJT)
21	Port of Spain Trinidad	INTERPOL webinar	INTERPOL Financial Crimes Unit (FCU)	Legal Officer I
22.	Port of Spain Trinidad	Online 2 <sup>nd</sup> International Research Conference on Empirical to AML And Financial Crime Suppression	The Central Bank of the Bahamas	Legal Officer II Legal Officer I and Legal Officer (OJT)
23.	Port of Spain	Virtual seminar on National Risk Assessment on money laundering for Latin America and the Caribbean	Organisation of American States, Department against transnational organized crime	Legal Officer (OJT)

NO.	PLACE OF TRAINING	DESCRIPTION OF COURSE/PROGRAMME	ORGANISER/PRESENTER	PARTICIPANTS FROM FIUTT
24.	Port of Spain Trinidad	Webinar Combatting Cash Smuggling	UNODC CARICOM IMPACS	Director (Ag), Deputy Director (Ag), Senior Analysts, Analysts, Director Compliance and Outreach, Compliance and Outreach Officers and Legal Officer
25.	Port of Spain Trinidad	"RUSI Webinar on Countering Proliferation Finance CFATF (Zoom)"	Royal United Services Institute (RUSI)- London, UK	Director Legal Division, Legal Officer II and Legal Officer (OJT)
26.	Port of Spain Trinidad	Webinar Malta workshops for small International Financial Centres	Ministry for Foreign and European Affairs of Malta (CFATF Secretariat)	Director Legal Division, Legal Officer II, Legal Officer I and Legal Officer (OJT)
27.	Port of Spain Trinidad	FATF Webinar-Risk Based Supervision	FATF Secretariat	Director Legal Division
28.	Port of Spain Trinidad	Webinar Regional Asset Recovery In-Practice Workshop	CARICOM IMPACS	Analyst

NO.	PLACE OF TRAINING	DESCRIPTION OF COURSE/PROGRAMME	ORGANISER/PRESENTER	PARTICIPANTS FROM FIUTT
29.	Port of Spain Trinidad	Webinar 2 <sup>nd</sup> International Research Conference on Empirical Approaches to AML and Financial Crime Suppression	The Central Bank of the Bahamas	Legal Officer I and Legal officer II
30.	Port of Spain Trinidad	INTERPOL webinar	INTERPOL Financial Crimes Unit (FCU)	Legal Officer I
31.	Port of Spain Trinidad	Webinar 3 <sup>rd</sup> International Research Conference on Empirical Approaches to AML And Financial Crime Suppression	The Central Bank of the Bahamas	Legal officer II
32.	Port of Spain Trinidad	Webinar 4 <sup>th</sup> International Research Conference on Empirical Approaches to AML and Financial Crime Suppression	The Central Bank of the Bahamas	Legal Officer (OJT)
33.	Port of Spain Trinidad	Webinar Combatting Cash Smuggling	UNODC CARICOM IMPACS	Director (Ag), Deputy Director (Ag), Senior Analysts, Analysts, Director Compliance and Outreach, Compliance and Outreach Officers and Legal Officer

NO.	PLACE OF TRAINING	DESCRIPTION OF COURSE/PROGRAMME	ORGANISER/PRESENTER	PARTICIPANTS FROM FIUTT
34.	Port of Spain Trinidad	Virtual seminar on National Risk Assessment on money	OAS DTOC	Legal Officer and Legal Officer I
35.	Port of Spain Trinidad	Webinar FATF Private Sector Consultative Forum: Virtual Assets	FATF	Legal Officer (OJT)
36.	Port of Spain Trinidad	Webinar CFATF Supervision Training	CFATF	Compliance and Outreach Officers
37.	Port of Spain Trinidad	Webinar Trade-Based Money Laundering	FATF Secretariat	Compliance and Outreach Officers
38.	Port of Spain Trinidad	Webinar CPF Training for CFATF member jurisdictions	Royal United Services Institute (RUSI)- London, UK	Compliance and Outreach Officers
39.	Port of Spain Trinidad	Webinar Malta workshops for small International Financial Centres	Ministry for Foreign and European Affairs of Malta (CFATF Secretariat)	Director Legal Division, Legal Officer II, Legal Officer I and Legal Officer (OJT)
40.	Port of Spain Trinidad	FATF Webinar-Risk Based Supervision	FATF Secretariat	Director Legal Division
41.	Port of Spain Trinidad	AML/CFT and Financial Crimes Prevention Certificate	AMLFC Institute	Compliance and Outreach Officers
42.	Port of Spain Trinidad	Online Course: Introduction to FIU Communications	ECOFEL/Egmont Group Secretariat	Director (Ag.) and Public Affairs Officer
43.	Port of Spain Trinidad	Online Course: ECOFEL FIU Communication Strategy and Planning	ECOFEL/Egmont Group Secretariat	Public Affairs Officer

NO.	PLACE OF TRAINING	DESCRIPTION OF COURSE/PROGRAMME	ORGANISER/PRESENTER	PARTICIPANTS FROM FIUTT
44.	Port of Spain Trinidad	Webinar Improving STR Quality	ECOFEL/Egmont Group Secretariat	Public Affairs Officer
45.	Port of Spain Trinidad	Online Course: Countering Terrorist Financing	ECOFEL/Egmont Group Secretariat	Director (Ag.)
46.	Port of Spain Trinidad	Virtual course: Program on Countering Transnational Organized Crime (CTOC 21-18)	George C. Marshall European Center for Security Studies	Director (Ag.)
47.	Port of Spain	Reflections on Assessing National Exposure to Proliferation Financing Risk.	RUSI	Legal Officer (OJT)
48.	Port of Spain	Sanctions: the need for agility in a shifting landscape	International Compliance Association	Legal officer I
49.	Port of Spain	SOW/SOF-regulatory expectations and best practice	International Compliance Association	Legal officer I

## **CHAPTER VI – STRATEGIC PRIORITIES 2022: BUILDING ON STRENGTHS**

### **1. WORKFORCE EXCELLENCE**

The optimal performance of the FIUTT is dependent on the employment of a full complement of trained and experienced staff with the right competencies. The FIUTT will continue to ensure a stimulating and responsible working environment that promotes employee engagement, productivity, teamwork/collaboration and shared morals and values.

In this next reporting period, the FIUTT will focus on the following initiatives:

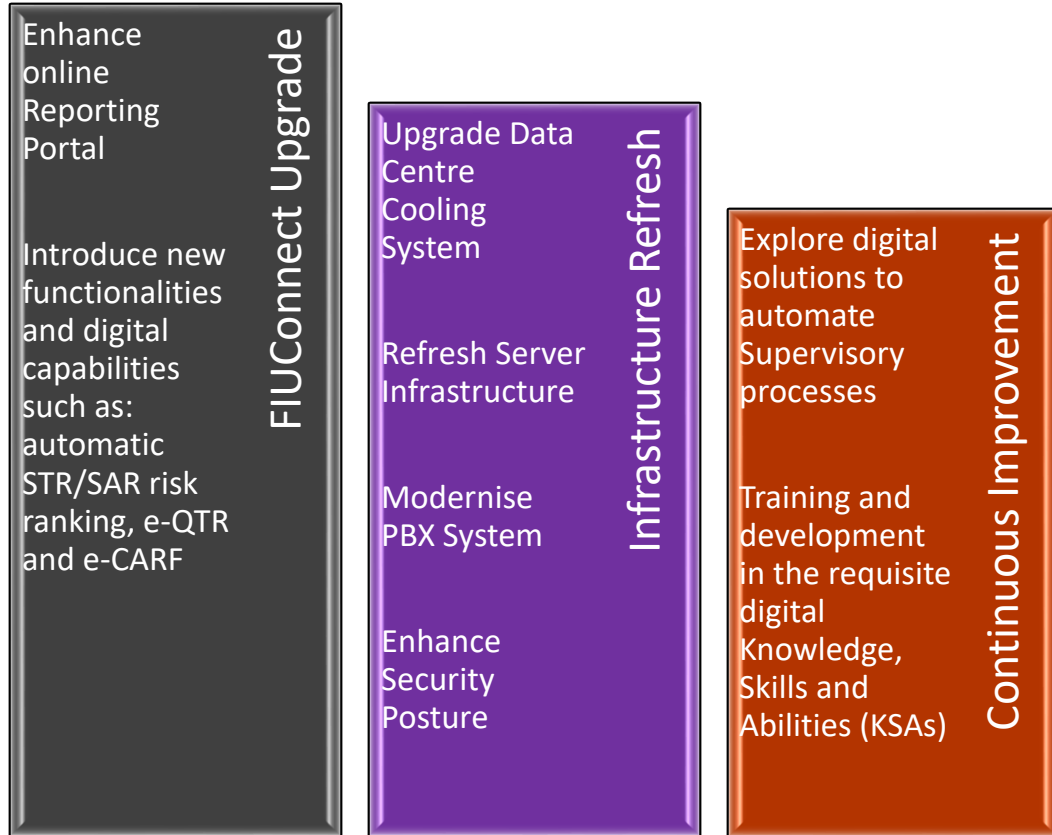
- the recruitment of staff in the Compliance and Outreach, Legal and Analysis Divisions;
- the provision of adequate, comfortable accommodation to ensure the safety and well-being of the staff, in keeping with the OSHA and COVID-19 protocols;
- the participation of the staff in relevant training and development programmes; and
- the promotion of a continuous learning environment to create professionals in their fields with more focus on emerging technologies (e.g., VASPs).

### **2. INFORMATION TECHNOLOGY INFRASTRUCTURE**

In the next reporting period, the FIUTT will continue its digitalisation initiatives in keeping with Government of the Republic of Trinidad and Tobago's (GORTT) thrust for digital transformation and a digital Public Service. Some projects already under way are targeted for completion in the next reporting period. The organisation will further its digitalisation efforts to support evolving norms in the way businesses operate and communicate.

Diagram 30 summarises the digital initiatives targeted for the next reporting period:

**DIAGRAM 30**  
**DIGITAL INITIATIVES**



### 3. LEGAL AND POLICY PROJECTIONS

Following the completion of the 4<sup>th</sup> MER, Trinidad and Tobago has made significant advancements in addressing our technical compliance deficiencies and continues to make strides towards improvement. The results of the 3<sup>rd</sup> FUR in 2019 evidence the closing gaps and strengthening of our AML/CFT/CPF regime. Despite the constraints posed by the COVID-19 pandemic, the additions to our AML/CFT/CPF legislative framework over this reporting period further supports the country's continued commitment to becoming fully compliant in the FATF's 40 Recommendations.

As we move forward, it is anticipated that further legislative amendments will be introduced in the following key areas:

- extending the range of sanctions to include administrative fines in the AML/CFT/CPF regime;
- providing a clearer understanding of CFT/CPF obligations for NPOs operating within Trinidad and Tobago to ensure these entities can continue to conduct their good works while mitigating against the risk of being misused;
- amendments to the FIUTTA to promote effective supervision and to further ensure criminals and their associates are prevented from having ownership or control over listed businesses and non-regulated financial institutions; and
- legislative amendments to include the regulation, supervision and monitoring of Fintechs, including virtual assets and VASPs for AML/CFT/CPF.

### 4. CHALLENGES



Challenges are faced by all organisations and the FIUTT is not immune or an exception to challenges. In this reporting period, the COVID-19 pandemic and its related and necessary restrictions severely disrupted the operations of the FIUTT. However, the FIUTT is confident to meet and address its challenges through communication and policy changes that can create opportunities for organisational growth.

#### • Analysis Division



In this reporting period, the Analysis Division faced a major loss. The sudden passing of a key and leading Analysis Division's team member, Senior Analyst, Rennie Rishi Lakhani. He was one of the main contributor and developer of the Divisions' Strategic Analysis products. He was also lead on major operational analysis products.



Due to the high skill level of the Analysts in the FIUTT, other foreign FIUs and international agencies continue to target and successfully hire FIUTT's Analysts. The undue delay in resolving matters related to employee engagement between contracts continue to be one of the major catalyst in the taking up other employment opportunities.

Also, an employment opportunity for the Business Operations Coordinator in the Analysis Division saw the move of this critical officer to another Division of the FIUTT. As a consequence, the technical staff of the Analysis Division also managed the administrative functions. This impacted the output and overall functioning of the Division.

- **Compliance and Outreach Division**



The Compliance and Outreach Division continues to ensure that the 4,060 Supervised Entities under the FIUTT's risk based supervision, comply with the AML/CFT/CPF laws of Trinidad and Tobago. However, there exists a constant challenge with balancing the continued increase of Supervised Entities and new entities being placed under the remit of the FIUTT's AML/CFT/CPF supervision minus a corresponding increase in resources. In order to maintain and improve the quantity and quality of the supervision function, a continuing and concerted effort to accelerate the following is needed:

- technological resources to support AML/CFT/CPF risk surveillance and supervision;
- more office accommodation to accommodate allocated resources;
- development and implementation of an advanced digital infrastructure;
- continue capacity building and relevant staff training; and
- timely resolution of matters related to employee engagement.

- **Legal Division**



Over this reporting period, COVID-19 restrictions impeded the Division's efforts to initiate third level enforcement action as some LBs remained subject to mandatory closure. Notwithstanding the postponement of enforcement hearings, the Legal Division has continued to provide support to all other divisions of the FIUTT in the form of legal advice, opinions and other legal services. The provision of such support services, being heavily dependent on the respective portfolios of the other divisions, has become increasingly complex in the ever-evolving technological environment. In order to keep abreast of these changes, focus should be placed on improving the Legal Division's knowledge of the impact of digital transformation on AML/CFT, as well as enhancing the technological resources available to the Legal Division to improve its efficiency and accuracy in carrying out its functions.

- **Administrative Support Division**



The Administrative Support Division meets all of the needs that would facilitate the optimal performance of the FIUTT. The impact of the COVID-19 pandemic has been significant. However, the staff of the FIUTT have been extremely resilient despite many challenges, such as:

- The non-assignment of an Administrative Officer V, to manage the Administrative Support Division of the FIUTT is affecting the performance of the procurement, accounts, administration and human resource management functions;
- The delay in the recruitment of staff in core divisions of the FIUTT has meant increased responsibility for staff members in order to achieve the FIUTT's objectives;
- The undue delay in acquiring additional accommodation to facilitate recruitment of new staff and provision of a comfortable, safe and secure environment; and
- COVID-19 protocols as well as flexible work arrangements have limited interpersonal relationships, teamwork and the collaborative culture of the FIUTT.

- **Information and Technology Division**



The evolving norms in business operations due to the current pandemic and GORTT's digital transformation thrust for a digital public service highlights the need for an acceleration of ICT initiatives to support the strategic and operational levels of the FIUTT. While the FIUTT has successfully implemented some ICT initiatives, for example, its secure online reporting system, further digital initiatives are required to support the exponential growth in the volume of data collected, stored and analysed by the FIUTT over the years. In addition, the supervisory functions of the FIUTT have increased, particularly as a result of the addition of the supervision of the NPO and EMI sector.

To support this acceleration of ICT services, the human capital of the IT Unit must be increased with appropriately skilled resources, in addition to retooling of existing staff, to adequately provide and support new digital initiatives.

In this reporting period, the pandemic has significantly delayed the delivery of ICT resources to be provided to staff to operate more efficiently in a work from home environment. As well, the procurement of services from some of its service providers have been significantly delayed due to the inability of these providers to source required equipment.

## **5. THE WAY FORWARD**

As we move forward into 2022, the FIUTT remains faithful to its vision and mission. As such, the FIUTT has taken a proactive approach to continually meeting and surpassing FATF Recommendation 29 and Immediate Outcome 6 in particular. Together with the other FATF Recommendations and Immediate

Outcomes which fall within the purview of the FIUTT's functions (financial intelligence analysis and compliance supervision). Particular focus will be on the following:



Continuing to provide timely reports on existing and emerging trends, patterns and red flags alerts of financial crimes affecting stakeholders in Trinidad and Tobago.



The FIUTT will continue to produce operational and strategic analysis products to LEAs and Competent Authorities.



Actively promoting AML/CFT/CPF compliance, awareness, supervision and enforcement to Supervised Entities, NPOs and EMIs.



Continuing to implement IT solutions that would improve the AML/CFT/CPF supervision process between the FIUTT and the Supervised Entities.



Strengthening the co-operation and collaboration with our domestic and international stakeholders to further improve our analysis products in the fight against ML/FT/PF.



Seeking to further obtain and have access to the widest possible range of financial, administrative, law enforcement and commercially held data to effectively and efficiently perform our functions.

## APPENDIX A – LIST OF REPORTING ENTITIES

The FIUA identifies the entities which fall under the supervisory remit of the FIUTT as Non-Regulated Financial Institutions (NRFIs) and Listed Business (LBs), collectively referred to as Supervised Entities.

The FIUA also identifies the entities responsible for reporting suspicious transactions or activities to the FIUTT as Financial Institutions (FIs) and Listed Business (LBs), collectively referred to as Reporting Entities.

The list of FIs is identified under Section 2(1) of the POCA, the list of NRFIs is identified at Section 2(1) of the FIUA and the types of business which are categorised as LB are identified in the First Schedule to the POCA.

The FIUA was amended by the Miscellaneous Provisions (Proceeds of Crime, Anti-Terrorism and Financial Intelligence Unit of Trinidad and Tobago) Act, 2014. In addition, the Schedule of the NPOA amended the First Schedule of POCA by including NPO. Per the amendments and the NPOA, the categories of Supervised and Reporting Entities are as follows:

LISTED BUSINESS (LBs)	SUPERVISED ENTITIES	REPORTING ENTITIES
• Real Estate	✓	✓
• Motor Vehicle Sales	✓	✓
• Gaming House	✓	✓
• Pool Betting	✓	✓
• National Lotteries On-Line Betting Games	✓	✓
• Jewellers	✓	✓
• Private Members' Club	✓	✓
• Accountants	✓	✓
• Attorneys-at-Law or persons performing the functions of an accountant or other independent legal professional. Such persons are accountable when performing the respective functions specified in the first schedule of the POCA.	✓	✓

<b>LISTED BUSINESS (LBs)</b>	<b>SUPERVISED ENTITIES</b>	<b>REPORTING ENTITIES</b>
<ul style="list-style-type: none"> <li>• Art Dealers</li> </ul>	✓	✓
<ul style="list-style-type: none"> <li>• Trust and Company Service Providers</li> </ul>	✓	✓
<ul style="list-style-type: none"> <li>• Non-Profit Organisations</li> </ul>	✓	✓
<b>FINANCIAL INSTITUTIONS (FIs)</b>	<b>SUPERVISED ENTITIES</b>	<b>REPORTING ENTITIES</b>
<ul style="list-style-type: none"> <li>• A bank licensed under the Financial Institutions Act</li> </ul>		✓
<ul style="list-style-type: none"> <li>• A Financial Institution licensed under the Financial Institutions Act</li> </ul>		✓
<ul style="list-style-type: none"> <li>• An insurance company, agent or broker registered under the Insurance Act</li> </ul>		✓
<ul style="list-style-type: none"> <li>• A person licensed under the exchange control act to operate an exchange bureau</li> </ul>		✓
<ul style="list-style-type: none"> <li>• A person licensed under the Securities Act as a broker-dealer, underwriter or investment adviser</li> </ul>		✓
<ul style="list-style-type: none"> <li>• Development banks, trust companies, mortgage companies</li> </ul>		✓
<ul style="list-style-type: none"> <li>• Any other person declared by the minister by order, subject to negative resolution of parliament to be a Financial Institution for the purpose of the POCA</li> </ul>		✓
<b>NON-REGULATED FINANCIAL INSTITUTIONS (NRFIS)</b>	<b>Supervised Entities</b>	<b>Reporting Entities</b>
<ul style="list-style-type: none"> <li>• A society registered under the Co-operative Societies Act</li> </ul>	✓	✓
<ul style="list-style-type: none"> <li>• A person who carries on money or value transfer services: <ul style="list-style-type: none"> <li>○ E-Money Issuers</li> </ul> </li> </ul>	✓	✓
<ul style="list-style-type: none"> <li>• A building society registered under the Building Societies Act</li> </ul>	✓	✓

## APPENDIX B – GENERAL ML/FT SUSPICIOUS INDICATORS

GENERAL SUSPICIOUS INDICATORS	ML	FT
<ul style="list-style-type: none"> <li>• Transactions take place for which there appears to be no logical business or other economic purpose, particularly when this is through or from countries known or suspected to facilitate money laundering or terrorism activities.</li> </ul>	✓	✓
<ul style="list-style-type: none"> <li>• The client cannot provide satisfactory evidence of identity.</li> </ul>	✓	✓
<ul style="list-style-type: none"> <li>• Situations where the source of funds cannot be easily verified.</li> </ul>	✓	
<ul style="list-style-type: none"> <li>• Situations where it is difficult to verify customer information.</li> </ul>	✓	
<ul style="list-style-type: none"> <li>• Frequent change of ownership of the same property in an unusually short time with no apparent business, economic or other legitimate reason and between related persons.</li> </ul>	✓	
<ul style="list-style-type: none"> <li>• Client wants to <b>re-sell property shortly after purchase</b> at a significantly different purchase price, without corresponding changes in market values in the same area.</li> </ul>	✓	✓
<ul style="list-style-type: none"> <li>• Client wishes to form or purchase a company whose <b>corporate objective is irrelevant</b> to the client's normal profession or activities, without a reasonable explanation.</li> </ul>	✓	
<ul style="list-style-type: none"> <li>• The client sets up shell companies with nominee shareholders and/or directors.</li> </ul>	✓	
<ul style="list-style-type: none"> <li>• The client has companies with capital in the form of bearer shares.</li> </ul>		✓
<ul style="list-style-type: none"> <li>• Client <b>repeatedly changes attorneys</b> within a short time without any reasonable explanation.</li> </ul>	✓	
<ul style="list-style-type: none"> <li>• Client <b>purchases property in names of other persons</b> or uses different names on offers to purchase, closing documents and deposit receipts.</li> </ul>	✓	
<ul style="list-style-type: none"> <li>• Client deposits a large amount of cash with you to make payments and investments on his behalf.</li> </ul>	✓	
<ul style="list-style-type: none"> <li>• Client negotiates a purchase but wants to <b>record a lower value on documents</b>, paying</li> </ul>	✓	

GENERAL SUSPICIOUS INDICATORS	ML	FT
the difference “under the table” (inadequate consideration).		
<ul style="list-style-type: none"> <li>Client’s documents such as identification, income statements or employment are provided by <b>an intermediary</b> who has no apparent reason to be involved (intermediary may be the real client).</li> </ul>	✓	✓
<ul style="list-style-type: none"> <li>Client gives power of attorney to a non-relative to conduct large transactions (same as above).</li> </ul>	✓	✓
<ul style="list-style-type: none"> <li>Transaction involves legal entities and <b>no relationship seen between the transaction and the business activity</b> of the buying company, or the company has no business activity (Shell Company).</li> </ul>	✓	✓
<ul style="list-style-type: none"> <li>Client <b>requests the firm to act as his agents</b> 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 bank or FIs (anonymity).</li> </ul>	✓	
<ul style="list-style-type: none"> <li><b>Divergence</b> from the type, volume or frequency of transactions expected in the course of the business relationship.</li> </ul>	✓	✓

# APPENDIX C – ROMANCE SCAM/FRAUD ALERT



GOVERNMENT OF THE REPUBLIC OF TRINIDAD AND TOBAGO  
FINANCIAL INTELLIGENCE UNIT OF TRINIDAD AND TOBAGO  
MINISTRY OF FINANCE



## ROMANCE SCAM/FRAUD

Alert/005/2021

*The FIUTT has recorded STR/SAR submissions with approximately 100 victims of suspected Romance Scam/Fraud. This represents a loss of over TTD 2.3 Million to vulnerable citizens in 18 months.*



### INDICATORS OF ROMANCE SCAM/ FRAUD...?

**Persons who:**

- promised **RELATIONSHIPS**;
- promised **GIFT**'s;
- promised to **VISIT T&T** to engage or get married;
- instructs you to **PAY FUNDS** into a **3rd party personal savings account** (in T&T) for foreign shipping payments;
- claim to be sending cash with a gift and **Customs has held it until you PAY a FEE**;
- persons who claim you have to **PAY FEES for anti-money laundering clearance**;
- persons who claim that your personal gift and cash is being **shipped through Diplomatic channels**.



### WHAT YOU SHOULD DO...?

- **Stop communicating** with the person immediately!
- **Never transfer money** from your bank account or wire money to that 'love interest'! You will never get it back!
- **Contact your bank** immediately if you believe you sent or deposited money to a scammer!
- **Talk to someone you trust**. If your friends or family say they are troubled about your new 'love interest', then take heed...pay attention!
- **Do your own internet searches** on the person/who they claim to be! You can also browse the comments on blogs about romance scams to hear other stories.
- **Do a reverse image search** of the person's profile picture. That way you will see if it's linked to another person name or details that don't match! Those are signs of a scam.

**DON'T BECOME A VICTIM OF ROMANCE SCAM/FRAUD!!!**

### How to Report Romance Scam/Fraud...?

If you are a victim or you believe that your family or friend is a victim of a Romance Scam/Fraud, please call the **Trinidad and Tobago Police, Fraud Squad** at Telephone: **1(868) 625-2310; 1(868) 623-2644** and **1(868) 652-8594** or Email: [fraud@ttps.gov.tt](mailto:fraud@ttps.gov.tt). You may also send a disclosure to the **FIUTT** at [fiutt@gov.tt](mailto:fiutt@gov.tt). Provide all the details of your communication with the fraudster.

## DON'T GET CAUGHT!!!

Take Action



## APPENDIX D – Overpayment Scam/Fraud Alert



GOVERNMENT OF THE REPUBLIC OF TRINIDAD AND TOBAGO

**FINANCIAL INTELLIGENCE UNIT  
OF TRINIDAD AND TOBAGO**

MINISTRY OF FINANCE



FIU Reference: ALERT/007/2021

OVERPAYMENT SCAM/FRAUD



### GENERAL INFORMATION

The FIUTT has noticed cases whereby a **fraudulent cheque**, in particular a **mailed-in cashier's cheque**, is credited to a hotel's bank account for alleged bookings and subsequently the "issuer" of the cheque would contact the payee/hotel requesting a partial or full refund of the cheque amount. The request for a partial or full refund is usually made before the clearing period for the cheque is completed. This appears to be an **emerging trend within the tourism sector**.



### HOW THE OVERPAYMENT SCAM/FRAUD WORKS

An email is sent to a hotel in Trinidad and Tobago from a 'potential customer' who may be residing abroad, or who purports to be living abroad. The email is for a booking on behalf of a client (**usually the name of a known/popular person is used** and if an internet search is done, the name will be found) for stay at the hotel, for approximately a two-week period. A quotation is provided by the hotel, to the email by which the booking was made. When the hotel/business provides the bank details for the payment to be remitted via a wire transfer, the booking is confirmed via email by the 'potential customer'.

Next, the local financial institution with whom the hotel holds an account, receives a mailed-in cashier's cheque from the 'potential customer', drawn in foreign currency from a foreign financial institution. For the most part, the cheque would look authentic - complete with watermarks, stamps and signatures. **The amount on the cheque exceeds the quotation given for the booking.**

The 'potential customer' then emails the hotel detailing that due to an oversight, **the reservation was overpaid**. The 'potential customer' explains that it is now too late to cancel the entire payment and requests that the difference be refunded urgently. The 'potential customer' may have other convincing reasons why the amount on the cheque is more than the quoted cost.

The hotel receives the banking details **to refund the overpayment which is now to a third-party account as opposed to the issuer of the cheque**. As the cheque is drawn on a foreign bank, the local bank would not normally make the amount on the cheque available before it is cleared (which may take up to 28 days). Unsuspecting hotels, who may be under pressure from the customer would not wait for the cheque to be cleared and remit the difference to the 'potential customer'. **Unknowing that the cheque sent for clearing is counterfeit, the hotel has been scammed into remitting monies that cannot be recovered.**

DANGER

### RED FLAG/INDICATORS

- Pay attention to the type of payment.
- Pay attention to requests to return excess funds urgently.
- Fraudsters tend to insist on wire or online banking transfers to return the excess amount.
- Take note if you are asked to return the excess funds to a third party — not the entity or person with whom you have been communicating.
- Clients will not mistakenly overpay you.

CAUTION

In order to protect businesses from overpayment scams, always make sure that any funds paid into the account are irrevocable before making a refund. Ensure that the **cheque is cleared before returning excess funds**.

Resist pressure to **"act now,"** if the issuer/customer is legitimate, the refund can be made when the cheque clears.

Any transaction/activity suspected to be fraudulent, should be reported to **Fraud Squad of the Trinidad and Tobago Police Service (TTPS) at Telephone numbers: 1(868) 625-2310 or 1(868) 623-2644 or; Fraud Squad South office at 1(868) 652-8594; or by Email: fraud@ttps.gov.tt.**



## **GLOSSARY**

### **BENEFICIAL OWNER**

Beneficial owner refers to the natural person(s) who ultimately<sup>13</sup> owns or controls a customer<sup>14</sup> and/or the natural person on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement.

Source: [Glossary of the FATF Recommendations](#)

### **FINANCING OF TERRORISM**

Financing of Terrorism may involve funds raised from legitimate sources, such as personal donations and profits from businesses and charitable organisations, as well as from criminal sources, such as the drug trade, the smuggling of weapons and other goods, fraud, kidnapping and extortion. Therefore, funds derived from legitimate, as well as illegal activities, can be used for or to facilitate terrorist activities.

### **FINTECH**

Fintech refers to advances in financial technology that have the potential to transform the provision of financial services, spurring the development of new business models, applications, processes, and products.

Source: *IMF Policy Paper 'The Bali Fintech Agenda'*

### **INNOVATION HUB**

An Innovation Hub is an innovation facilitator set up by supervisory agencies that provide support, advice or guidance to regulated or unregulated firms in navigating the regulatory framework or identifying supervisory policy or legal issues and concerns.

Source: *Basel Committee on Bank Supervision*

---

<sup>13</sup> Reference to “ultimately owns or controls” and “ultimate effective control” refer to situations in which ownership/control is exercised through a chain of ownership or by means of control other than direct control.

<sup>14</sup> This definition should also apply to beneficial owner of a beneficiary under a life or other investment linked insurance policy.

## **MONEY LAUNDERING**

Money Laundering is the process by which illegally obtained funds are given the appearance of having been legitimately obtained. The process may involve one or more of the following methods:

- **Placement**

Illegal funds or assets are first brought into the financial system. This 'placement' makes the funds more liquid using a variety of techniques, which include depositing cash into bank accounts and using cash and other instruments to purchase assets.

- **Layering**

To conceal the illegal origin of the placed funds and thereby make them more useful, the funds must be moved, dispersed, and disguised. The process of distancing the placed funds from their illegal origins is known as 'layering'. These include using multiple banks and accounts, having professionals act as intermediaries and transacting through corporations and trusts. Funds may be shuttled through a web of many accounts, companies and countries in order to disguise their origins.

- **Integration**

Once the funds are layered and distanced from their origins, they are made available to criminals to use and control as apparently legitimate funds. The laundered funds are made available for activities such as investment in legitimate or illegitimate businesses, to fund further criminal activity or spent to enhance the criminal's lifestyle.

At this stage, the illegal money has achieved the appearance of legitimacy.

## **POLITICALLY EXPOSED PERSONS**

- i. Foreign PEPs are individuals who are or have been entrusted with prominent functions by a foreign country, for example, Heads of State or government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations and important political party officials.
- ii. Domestic PEPs are individuals who are or have been entrusted with prominent functions in Trinidad and Tobago, for example, Heads of State or government, senior politicians, senior government, judicial or military officials, senior executives of state-owned corporations and important political party officials.
- iii. Persons who are or have been entrusted with a prominent function by an international organisation refers to members of senior management such as directors and members of the board or equivalent functions.
- iv. Family members are individuals who are related to either a Foreign or Domestic PEP either directly (consanguinity) or through marriage or similar (civil) forms of partnership.

- v. Individuals who are closely connected to or associated with a PEP as defined in i, ii and iii above, either personally or professionally.

Source: [Glossary of the FATF Recommendations and FIUTT](#)

## **PROLIFERATION OF WEAPONS OF MASS DESTRUCTION AND ITS FINANCING**

The FATF Recommendation 7 requires Countries should implement targeted financial sanctions to comply with United Nations Security Council resolutions relating to the prevention, suppression and disruption of the proliferation of weapons of mass destruction and its financing.

### **What is the proliferation of weapons of mass destruction?**

Proliferation is the manufacture, acquisition, possession, development, export, transshipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual-use goods used for non-legitimate purposes), in contravention of national laws or, where applicable, international obligations. It includes technology, goods, software, services or expertise.

## **REGULATORY SANDBOX**

A Regulatory Sandbox usually refers to live testing of new products or services in a controlled environment. Sandboxes may be considered to be more than just a dialogue or an informal exchange, as they engage a supervisor's active corporation during the test period. Sandboxes also imply the use of legally provided discretions by the supervisory agency. Their use depends on the jurisdiction.

Source: *Basel Committee on Bank Supervision*

## **REPORTING ENTITIES**

Reporting Entities are FIs and certain businesses and professionals (the "Listed Business") which are designated to detect and deter ML and FT. These obligations include the development and implementation of a compliance programme which includes policies, procedures and controls such as the appointment of a Compliance Officer, reporting suspicious transactions, customer due diligence, retention of records and training for staff.

## TARGETED FINANCIAL SANCTIONS

The term *targeted financial sanctions* means both asset freezing and prohibitions to prevent funds or other assets from being made available, directly or indirectly, for the benefit of designated persons and entities.

Source: [Glossary of the FATF Recommendations](#)

## TERRORIST

The term **terrorist** refers to any natural person who:

- i. commits a terrorist act by any means, directly or indirectly, unlawfully and wilfully;
- ii. participates as an accomplice in terrorist acts or Financing of Terrorism;
- iii. organises or directs others to commit terrorist acts or the Financing of Terrorism; or
- iv. contributes to the commission of terrorists' acts or the Financing of Terrorism by a group of persons acting with a common purpose. The contribution is made internationally, with the aim of furthering the terrorist act or the Financing of Terrorism, with the knowledge of the intention of the group to commit the terrorist act or the Financing of Terrorism.

Source: [Glossary of the FATF Recommendations](#)

## TERRORIST ORGANISATION

The term **terrorist organisation** means a Legal Entity or group of terrorists that:

- i. commits a terrorist act by any means, directly or indirectly, unlawfully and wilfully;
- ii. participates as an accomplice in terrorist acts or the Financing of Terrorism;
- iii. organises or directs others to commit terrorist acts or the Financing of Terrorism; or
- iv. contributes to the commission of terrorist acts or the Financing of Terrorism by a group of persons acting with a common purpose. The contribution is made internationally, with the aim of furthering the terrorist act or the Financing of Terrorism, with the knowledge of the intention of the group to commit the terrorist act or the Financing of Terrorism.

Source: [Glossary of the FATF Recommendations](#)

## **VIRTUAL ASSET**

A virtual asset is a digital representation of value that can be digitally traded, or transferred, and can be used for payment or investment purposes. Virtual assets do not include digital representations of fiat currencies, securities and other financial assets that are already covered elsewhere in the FATF Recommendations.

Source: [Glossary of the FATF Recommendations](#)

## **VIRTUAL ASSET SERVICE PROVIDER**

Virtual asset service provider means any natural or legal person who is not covered elsewhere under the Recommendations, and as a business conduct one or more of the following activities or operations for or on behalf of another natural or legal person:

- i. exchange between virtual assets and fiat currencies;
- ii. exchange between one or more forms of virtual assets;

## **VIRTUAL ASSET SERVICE PROVIDER**

- iii. transfer<sup>1</sup> of virtual assets;
- iv. safekeeping and/or administration of virtual assets or instruments enabling control over virtual assets; and
- v. participation in and provision of financial services related to an issuer's offer and/or sale of a virtual asset.

*[1.] In this context of virtual assets, transfer means to conduct a transaction on behalf of another natural or legal person that moves a virtual asset from one virtual asset address or account to another.*

Source: [Glossary of the FATF Recommendations](#)

## **VOLUNTARY INFORMATION REPORTS (VIRs)**

If any member of the public would like to provide information about suspicions of money laundering or the financing of terrorist activities, a Voluntary Information Report (VIR) can be submitted via post or email to the FIUTT. If you believe that the information you provide is serious and requires an immediate law enforcement response, then you may also wish to provide this information directly to your local law enforcement agency.







Enquiries relating to this report should be addressed to:

The Director  
Financial Intelligence Unit  
of Trinidad and Tobago

Level 25, Tower D  
International Waterfront Complex  
1A Wrightson Road  
Port of Spain.

 + (868) 625-8351

 + (868) 627-7018

 [fiufeedback@gov.tt](mailto:fiufeedback@gov.tt)

 [www.fiu.gov.tt](http://www.fiu.gov.tt)