



**FINANCIAL INTELLIGENCE UNIT (FIU)  
Sint Maarten**

**PROCEDURES  
FOR  
REPORTING  
UNUSUAL TRANSACTIONS**

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## 1 Introduction

This instruction manual is intended for everyone who renders financial services<sup>1</sup> by virtue of his profession or in the ordinary course of his business. Pursuant to the National Ordinance Reporting Unusual Transactions<sup>2</sup>, these providers of financial services are obliged to report unusual transactions to the Financial Intelligence Unit (hereinafter to be referred to as “FIU ST MAARTEN”, from the Dutch name “Meldpunt Ongebruikelijke Transacties). The provider of financial services who reports an unusual transaction is hereinafter referred to as “reporting party”.

Whether a Transaction<sup>3</sup> is unusual, is determined on the basis of established indicators. These indicators and their explanation have been annexed to this manual.

The reporting procedure to be followed for unusual transactions and the disclosure are described in chapter 2. The reporting forms, the remaining documents and tables, which are related to the reporting procedure and the feedback, have all been provided with an explanation and inserted as annexes.

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<sup>1</sup> In conformity with article 1a of the National Ordinance of February 10, 1996 N° 21 (National Ordinance Reporting of Unusual Transactions) this concerns: “in or from the FIU St Maarten:

- 1° to take into custody securities, paper currency, coins, currency notes, precious metals and other valuables;
- 2° to open an account, on which a balance may be kept in money, securities, precious metals or other valuables;
- 3° to rent a safe-deposit box;
- 4° to effect payment in connection with the cashing in of coupons or comparable documents of bonds or comparable securities;
- 5° to enter into a life insurance contract as referred to in article 1, first paragraph, sub a., of the National Ordinance Supervision of the Insurance Industry, as also to render mediation in connection therewith;
- 6° to make a distribution on account of a life insurance contract as referred to sub 5°;
- 7° to credit or debit an account, or to cause this to be done, on which account a balance may be kept in money, securities, precious metals or other valuables;
- 8° to exchange guilders or foreign currency;
- 9° to provide other services to be designated by national decree, containing general measures”.

<sup>2</sup> In conformity with article 1d of abovementioned National ordinance this concerns: “a transaction that, based on the indicators laid down pursuant to article 10, must be regarded as such”.

<sup>3</sup> In conformity with article 1c of abovementioned National Ordinance this concerns: “an act or a set of acts of or in favor of a customer in connection with the taking of one or more financial services”.

## **2 Reporting procedure of unusual transactions**

### **2.1 General**

The reporting procedure comprises the following stages, whereby use is made of various standard forms:

- the Manual reporting file/form;
- the (re)confirmation letter;
- the request for additional information;
- the correction to the reported transaction;
- the statement of disclosure.

The financial service provider who determines that a transaction carried out or intended to be carried out in his/her institution is unusual, is obliged to report this to FIU ST MAARTEN. Reporting parties that do not have the electronic reporting form, can still report using the “manual” reporting form and confirmation letter.

A website has been created for FIU Sint Maarten the url is [www.fiu-sxm.net](http://www.fiu-sxm.net) . From within the website the new online reporting tool called SERT can be accessed.

Reporters need only to have access to the internet and the computer of laptop must properly secured with the latest antivirus scanners. Detailed information of SERT will be given further in the document. Names of subjects at no time should be mentioned by facsimile, phone or email.

FIU ST MAARTEN acknowledges receipt of the reported data, by returning the received confirmation letter stamped, signed and dated, by facsimile (reconfirmation).

This letter will confirm that the reports have been recorded in the FIU ST MAARTEN Register and also serves as an indemnification for the reporting party in a civil or criminal procedure.

FIU ST MAARTEN can request additional information concerning a reported unusual transaction.

Article 12 letter allows FIU Sint Maarten to request reporter to make corrections to the reported unusual transaction. A reporter can also authorized the FIU to make changes to already reported transaction.

The reporting party receives a statement of disclosure from FIU ST MAARTEN if, with regard to a report, data has been provided to the authorities in charge of the investigation and prosecution of crimes.

## **2.2 Reporting file/form**

*The purpose of the reporting file/form is for the reporting party to furnish FIU ST MAARTEN with information concerning an unusual transaction and the pertaining natural persons and legal entities.*

Three ways to deliver reports to FIU ST MAARTEN is via the online reporting tool SERT, Sint Maarten Reporting Tool. SERT can be accessed by first accessing the website [www.fiu-sxm.net](http://www.fiu-sxm.net) Please find the “manual” reporting form in annex. In the event that the SERT is temporary out of service then FIU Sint Maarten will allow reporters use of the manual reporting form.

All mandatory data, must be completed in the SERT, if the field are not entered then the unusual transaction will not be submitted to the FIU Database.

## **2.3 Confirmation letter**

*The purpose of the confirmation letter is to provide the reporting party and FIU ST MAARTEN with information as to the quantity of reports received/filed. This method is also used as a control mechanism, to verify transmission and registration of reports.*

All “electronic” or “manual” reporting forms should be accompanied by a confirmation letter. Data that the reporting party furnishes to FIU ST MAARTEN as per sections 2.5 and/or 2.6 of this manual, should be accompanied by a separate confirmation letter.

The confirmation letter returned by facsimile or email to the reporting party will serve as the confirmation of **registration** and **indemnification** for the reporting party in a civil or criminal procedure.

## **2.4 Reporting to FIU ST MAARTEN**

The delivery of reports to FIU ST MAARTEN should be done on-line using the SERT online reporting tool

As soon as you have completed the confirmation letter, you will send it immediately by facsimile to FIU ST MAARTEN. With a view to data protection, **do not** state information concerning the transaction information, other than the transaction number(s), and **do not** send completed manual report forms to FIU ST MAARTEN by facsimile!

Upon registration of the reports, FIU ST MAARTEN will return to you a stamped, signed and dated confirmation by facsimile as an acknowledgment of receipt.

## **2.5 Correction of the reported transaction**

*Transfer of additional information to FIU ST MAARTEN can include a correction of an error or additional information requested by FIU ST MAARTEN.*

A correction of a report should be done through via the use of an Article 12 letter which indicates corrections which needs to be performed in the transaction

The reference should indicated “Request pursuant Art. 12 of the National Ordinance of Unusual Transactions”

## **2.6 Request for additional information by FIU ST MAARTEN**

*The purpose of the request for additional information is to supplement and/or clarify previously obtained information concerning an unusual transaction in the interest of the financial analysis by FIU ST MAARTEN.*

By means of the Article 12 letter additional information can be requested,

The reference should indicated “Request pursuant Art. 12 of the National Ordinance of Unusual Transactions”.

## **2.7 Statement of Disclosure**

*The purpose of the statement of disclosure by FIU ST MAARTEN is to inform the reporting party that data about (a) certain transaction(s) deemed to be suspicious has/have been provided to the authorities in charge of the investigation and prosecution of financial crimes.*

The statement of disclosure comprises the transaction number(s) of the unusual transaction(s) which has/have been disclosed by FIU ST MAARTEN to the authorities and officials who are in charge of the investigation and prosecution of crimes.

## **3 SERT Online Reporting Tool Web Portal Instructions**

### **3.1 Introduction**

The new SERT Portal is a web application that allows users to easily and securely report unusual transactions through a regular web browser with an Internet connection.

The users will report unusual transaction through the SERT Web Portal and will receive a physical confirmation (on paper) that the specific transactions were received by FIU.

FIU will also inform the reporting organization whenever a reported transaction is forwarded to the authorities for further investigation.

### **3.2 Security**

The protection of information is of the highest importance and therefore the SERT Web portal is highly secured. The SERT Web Portal utilizes so-called two factor authentication with Virtual Tokens and the transmission is protected through an encrypted SSL channel.

Users are only allowed to access the portal through one device (computer). The system identifies the user with his login information and the unique characteristics of his device.

User access will be organized by the SERT Portal Support Team through the organization's intermediary contact person.

### **3.3 Logging in**

The log in process differs depending on your situation:

#### **- New user, first time login**

Two factors are needed when a login session is executed to the SERT Portal.

A unique user id and password and an code created automatically by the SERT.

SERT will send the code to you email address. Once received enter the code in the login screen.

You will be asked to save the information as a bookmark on your web-browser.

At this point the user will be requested to register the computer, and the user will be asked to save the information as a bookmark.

This procedure is a simple procedure where the user is fully guided through the process.

To recap:

First the user has to login the portal using the credentials provided. Next the user will have to register the device and an email address which completes the login procedure for new users.

#### **- Returning user, regular log in**

If the user has previously logged in the SERT Portal the login procedure is simple.

Each time thereafter, the user will be required to use the bookmark to login to SERT. The user will have to enter his user id and password and after the system correctly identifies the device/computer , generation of the token will be done automatically.

**- Returning user, new system characteristics**

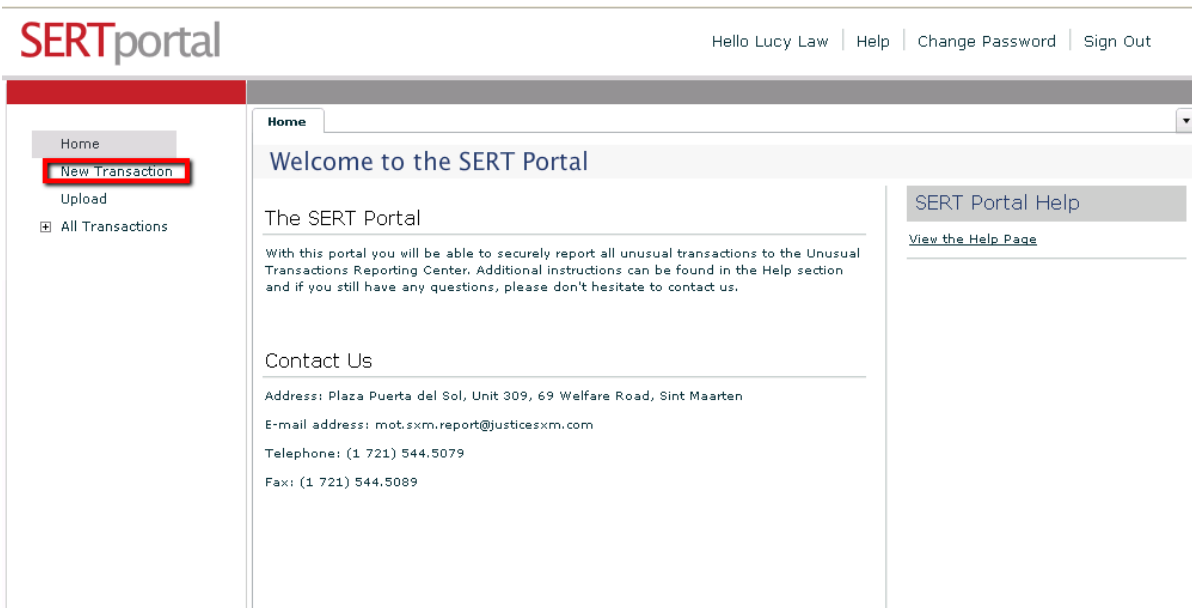
In the case where the user's situation has changed, for example, the user moved to a new computer or the browser has changed, he will have to re-register his device.

This is a simple procedure where the system will automatically send a token number to the user's email address



## 4 Reporting a new Unusual Transaction

To report a new unusual transaction to FIU, click on 'New Transaction' in the left menu.



Upon successful login , a blank copy of the unusual transaction form will appear:

### 4.1 General Information

The Unusual transaction form has been split in different section. The first section describes general information.

The screenshot shows the 'Unusual Transaction Report' form. At the top, there are tabs for 'Home' and 'New Transaction'. The main heading is 'Unusual Transaction Report'. Below this, there is a status indicator 'Status: New' and a creation timestamp 'Created on 13-12-2011 by Lucy Law'. The form is divided into sections. The first section is 'General Information'. It contains the following fields: 'Transaction Number:' (empty), 'Transaction Type:' (a dropdown menu), 'Stage:' (radio buttons for 'Executed' and 'Intended'), 'Date/Time:' (a date field with '13/12/2011' and a time field with '12:10'), 'Location:' (a text field with 'Great Bay'), and 'Island:' (a dropdown menu with 'St Maarten').

In this section the user will have to specify the type of transaction and whether the transaction actually took place and was executed or that it was only intended. Furthermore the date, time and location need to be filled in.

## 4.2 Indicators

The following section requires the specification of the FIU indicators.

Indicators

<b>Indicator 1:</b>	<b>Sub 1:</b>
<input type="text"/>	<input type="button" value="Select.."/>
<b>Indicator 2:</b>	<b>Sub 2:</b>
<input type="text"/>	<input type="button" value="Select.."/>
<b>Indicator 3:</b>	<b>Sub 3:</b>
<input type="text"/>	<input type="button" value="Select.."/>

## 4.3 Transaction Detail

The next section requires the user to provide details on the transaction like the amount, currency and the accounts involved.

Transaction Detail

<input type="button" value="Add Transaction"/>	<input type="button" value="Delete"/>					
Account From	Amount	Currency	Account To	Amount	Currency	ANG Equivalent

## 4.4 Subject Information

The next section allows for specification of the subject information and their roles in the transaction.

Subject Information

<input type="button" value="Add Subject"/>	<input type="button" value="Delete"/>	
Type	Name	Subject Type

## 4.5 Description

It is required to provide FIU with a description of the situation.

## Unusual Activity Narrative

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**Description of the situation:**

#### 4.6 Attachments

Optionally the user can upload one or more attachments in order to provide more detailed information to FIU

Attachments

File Name	Size

#### 4.7 Submit

Finally, the user can submit the report to FIU for further processing or can save it for a submission at a later stage.







Melderscode : .....

Transactienummer: ...../.....

Pagina ... van ... :...../.....

## Rechtspersoon 1

Subjecttype:    -Opdrachtgever    -Begunstigde

Statutaire naam: .....

Handelsnaam: .....

Straatnaam: .....

Huisnummer: .....                      Toevoeging: .....

Kavelnummer: .....                      Plaats: .....

(Ei)Land: .....

Rechtsvorm: .....

Rekeningnr: .....

Aktiviteit: .....

### Kamer van Koophandel:

Registratie nr: .....

Plaats: .....

(Ei)land: .....

## Rechtspersoon 2

Subjecttype:    -Opdrachtgever    -Begunstigde

Statutaire naam: .....

Handelsnaam: .....

Straatnaam: .....

Huisnummer: .....                      Toevoeging: .....

Kavelnummer: .....                      Plaats: .....

(Ei)Land: .....

Rechtsvorm: .....

Rekeningnr: .....

Aktiviteit: .....

### Kamer van Koophandel:

Registratie nr: .....

Plaats: .....

(Ei)land: .....

Attachment: .....





## 5.1 Explanation of the Reporting Form

The following explanation regards the input fields of the Reporting Forms, as found in the Manual- as in the Electronic (MVM) Reporting forms.

### Transaction data

FIELD	MANDATORY (Y/N)	REMARKS
Reporter's code MAARTEN (Melderscode)	Y	This is the code given to the Reporter by FIU ST Verify if this code is yours.
<u>Status:</u> 1. Ingevoerd door melder 2. Gereed voor melden 3. Gemeld aan FIU ST MAARTEN	Y	Status of the transaction: 1. Data entered by reporter 2. Ready to report 3. Reported to FIU ST MAARTEN
Transaction Island (Transactie-eiland)	Y	Island where transaction took place. See table 4.1
Transaction type code (Transactiesoort)	Y	State the code from table 4.2 representing the manner in which the transaction took place.
Indicator 1 (Indicator 1)	Y	Code that represents the indicator. Only the first indicator is mandatory. The first letter indicates the commercial sector. (B=Bank, L=Insurance, M=Credit Card, T=Money Transfer, C=Casino).
Indicators 2 and 3 (Indicatoren 2 en 3)	N	Code that represents the indicators 2 and 3.
Sub 1, Sub 2, Sub 3	N	Sub-indicator: State the letter, under which criteria the indicator was chosen.
Stage (Stadium)	Y	The unusual transaction can be: Intended (Voorgenomen) or Executed (Uitgevoerd). The default is set to "Executed".
Date (Datum)	Y	State the date on which the transaction took place. Use English notation for the month abbreviation. Example: 22 Oct 2000.

**Transaction data****(Continued...)**

<b>FIELD</b>	<b>MANDATORY (Y/N)</b>	<b>REMARKS</b>
Place <u>(Plaats)</u>	Y	State here in which branch (location) the unusual transaction was carried out. Use consistently the same name for the branch.
Time <u>(Tijdstip)</u>	Y	State the time of the transaction by indication of hour and minutes, consisting of 5 positions: 2 digits (hour indication), followed by a "colon" (":") and 2 digits for the minute indication. Example: 14:30 = half past two in the afternoon.
From Account number (Van rekening nr.)	N	Account from which the amount was withdrawn.
Currency (Valuta)	N	Currency of the amount.
Amount (Bedrag)	N	Amount of money withdrawn. For the "electronic" form, do not use comma's, dots or cents in the amount.
To Account number (Naar rekening nr.)	N	Account in which the amount was deposited.
Currency <u>(Valuta)</u>	Y	Currency of the amount.
Amount <u>(Bedrag)</u>	Y	Amount of money deposited. For the "electronic" form, do not use comma's, dots or cents in the amount.
Equivalent in NAF <u>(Tegenwaarde in NAF.)</u>	Y	Amount in Netherlands Antillean Guilders. <u>Note:</u> There are 4 rows that can be filled in, if the transaction was divided into smaller transactions. If there are more than 4 possibilities, enter in the fourth row the total difference, and explain briefly in the situation description.
Situation description <u>(Situatiebeschrijving)</u>	Y	Concised description of the transaction.

**SUBJECT (NATURAL PERSON 1 + 2) DATA: (Continued...)**  
**(Subject (Natuurlijke Persoon 1 + 2) gegevens:)**

**Important note:** Mandatory fields apply here **ONLY** if the "Subject type" for this subject was filled in.

<b>FIELD</b>	<b>MANDATORY (Y/N)</b>	<b>REMARKS</b>
Subject type: <u>(Subjecttype)</u>	Y	State here the subject's role during the transaction. In Example 6.1 you will find a detailed example (principal, beneficiary, executor, intermediary, companion).
Name <u>(Eigennaam)</u>	Y	The last name. In the case of a married woman state maiden name.
Prefixes (Voorvoegsels)	N	Part of the last name. Example: "de los" in Spanish names, "van den" in Dutch names, etc.
Married name (Gehuwde naam)	N	The last name, obtained by marriage.
Prefixes (Voorvoegsels)	N	Idem as indicated above.
First name(s) <u>(Voornamen)</u>	Y	If known, all first names in full.
Street name (Straatnaam)	N	Name of the street where the natural person (subject) lives.
House number (Huisnummer)	N	Number of the house.
Parcel number (Toevoeging)	N	The number of the parcel.
Dwelling place (Plaats)	N	Neighbourhood.
Island/Country (Ei)land)	N	State island from table 4.4 where the dwelling place of the natural person is located.
Sex <u>(Geslacht)</u>	Y	Indicate male or female.

**SUBJECT (NATURAL PERSON 1 + 2) DATA:** (Continued...)  
**(Subject (Natuurlijke Persoon 1 + 2) gegevens:)**

<b>FIELD</b>	<b>MANDATORY (Y/N)</b>	<b>REMARKS</b>
Date of birth ( <u>Geboortedatum</u> )	Y	Use English notation for the month abbreviation. Example: 28 May 1957.
Place of birth ( <u>Geboorteplaats</u> )	N	The place of birth of the person involved.
Nationality ( <u>Nationality</u> )	N	State the nationality from table 4.5 of the person.
Account number ( <u>Rekeningnummer</u> )	N	The bank/giro account number of the person involved.
<b>Identification</b> ( <u>Identificatie</u> )		
Type ( <u>Soort</u> )	Y	Indicate what I.D. was shown at the moment of the transaction.
Number ( <u>Nummer</u> )	Y	State I.D. number.
Place of issue ( <u>Plaats van uitgifte</u> )	Y	The place where the I.D. was issued.
Island/country of issue ( <u>(Ei)land van uitgifte</u> )	Y	Choose from table 4.4 the name of the island/country where the I.D. was issued.
Date of issue ( <u>Datum van uitgifte</u> )	N	Use English notation for the month abbreviation. Example: 12 May 1999.

**SUBJECT (LEGAL ENTITY 1 + 2) DATA:** (Continued...)  
(Subject (Rechtspersoon 1 + 2) gegevens:)

<b>FIELD</b>	<b>MANDATORY (Y/N)</b>	<b>REMARKS</b>
Subject type (Subjecttype)	Y	Indicate here in what role the reported legal entity acts in this transaction. Please find a detailed example in annex 6.1. (principle, beneficiary).
Statutory name (Statutaire naam)	Y	The name under which the legal entity is registered in the commercial register at the Chamber of Commerce.
Trade name (Handelsnaam)	N	The name under which the legal entity participates in the commercial traffic.
Street name (Straatnaam)	N	The name of the street where the legal entity is established.
House number (Huisnummer)	N	The number of the premises where the legal entity is established.
Addition to house number (Toevoeging)	N	The addition to the number of the premises where the legal entity is established.
Lot number (Kavelnummer)	N	The parcel number of the premises of the legal entity.
Place of residence (Plaats)	N	The place of residence where the legal entity is established.
Island/country (Ei)land)	N	Choose the name from table 4.4 representing the island/country of the place of residence of the legal entity.
Legal form (Rechtsvorm)	N	Choose from table 4.7 the present legal form of the legal entity.
Account number (Rekeningnummer)	N	The bank/giro account number of the legal entity.

**SUBJECT- (LEGAL ENTITY 1 + 2) DATA:** (Continued...)  
(Subject (Rechtspersoon 1 + 2) gegevens:)

<b>FIELD</b>	<b>MANDATORY (Y/N)</b>	<b>REMARKS</b>
Activity (Aktiviteit)	N	State the “Major Group” from table 4.6 representing the business activity under which the party concerned can best be classified in connection with the transaction at hand.
<b><u>Chamber of Commerce</u></b> (Kamer van Koophandel)		
Registration number (Registratienummer)	N	The number under which the legal entity is registered with the Chamber of Commerce.
Place (Plaats)	N	The place where the Chamber of Commerce is established.
Island/country (Ei)land)	N	Choose from table 4.4 the name of the island/country where the Chamber of Commerce is established.
Attachment	N	If you have any documents you want to include, you can insert it through the attachment.

**NOTE :**

- Fill-in as many fields as possible.
- Remember that in the date fields, months should be written in English (e.g. **May, Oct**)
- In the “Subject type” and “Sex”, please mark box in front of the item that is applicable.
- Give a usable, sensible description of the transaction activity situation.
- In the electronic Reporting Form, some mandatory field information might not be available. In these exceptional cases and after informing FIU ST MAARTEN by telephone, use the alternative information method (that is data entered into the field, so the transaction can be saved, but is in reality, fictitious data. This procedure should then be explained by the reporter in the “Situation description” field).
  - For dates, enter **DD MMM YYYY** format (e.g. 01 Jan 2005 - Year the transaction took place)
  - For numbers, enter **999999**.
- Until further notice, if you have detected an unusual activity of transactions over a period of time made by a client on his/her account and would like to report this, enter in the field “Transaction place”, the name “Compliance Office” and give a brief activity explanation in the field “Situation description” for each day of occurrence.

## **6 Confirmation letter**

RECONFIRMATION FAX #: (.....) .....

Re.: Unusual Transaction Report

This confirmation letter indicates that reported unusual transaction(s) numbers .....,  
were recorded into the FIU Sint Maarten's Data base

Sincerely,

---



**6.1 Confirmation letter layout**

**{USE THIS LETTER FORMAT ONLY}  
(see previous page)**

(Sender .....1\*)

(Date .....2\*)

RECONFIRMATION FAX #: (.....) ..... 9\*)

FIU St Maarten  
Plaza Puerta del Sol  
Welfare Road 68  
Cole Bay Lagoon,  
St Maarten

Re.: Unusual Transaction Report

This confirmation letter indicates the amount of (number.....3\*) unusual transaction(s) reported, using the following transaction number(s):

(Transaction number .....4\*) e.g. 2001/0250  
(Transaction number .....4\*) 2001/0251  
(Transaction number .....4\*) 2001/0252

etc. etc.

**OR:** 2001/0250 – 2001/0252

With kind regards,

(Signature.....5\*)

(Name .....6\*)

(Function .....7\*)

(Empty Space..... 8\*)

**PLEASE LEAVE THIS  
AREA EMPTY  
FOR STAMP**

## 6.2 *Explanation of the Confirmation letter*

<b>Field</b>	<b>Remarks</b>
1. Date	Date of dispatch of the confirmation letter.
2. Sender Info Fax/phone no.	Only in case they are not present in your letterhead.
3. Number	State the number of transactions that you are reporting.
4. Transaction no.	State according to ascending consecutive number(s) the unique transaction number(s) of the reported transaction(s).
5. Signature	Signature of the person who is responsible for the reports.
6. Name	Name of the person who signs the confirmation letter.
7. Function	Function of the person who signs the confirmation letter.
8. Empty Space	Space where FIU ST MAARTEN personnel will stamp, sign, date and batch-number for receipt and registration of the transaction(s).
9. Fax #	Please state the facsimile number you would like the reconfirmation to be faxed to.

## **7 Statement of Disclosure**

### **7.1 Statement of Disclosure layout**

(Addressee .....1\*)

(Date .....2\*)

Subject: Statement of Disclosure

Our Ref.:

We would like to inform you that your unusual transaction report(s) has/have been disclosed to the authorities referred to in article 6 of the National Decree on reporting unusual transactions (National Gazette 1996, no. 21) with the following transaction number(s).

(Transaction number .....3\*)

(Transaction number .....3\*)

etc. etc.

With kind regards,

(Signature .....4\*)

(Name .....5\*)

(Function .....6\*)

## **7.2 Explanation of the Statement of Disclosure**

<b>Field</b>	<b>Remarks</b>
1. Addressee	Name and address of the reporting party.
2. Date	Date of the dispatch of the statement of disclosure.
3. Transaction no.	The unique transaction number of the registered unusual transaction(s) reported to the Public Prosecutor's Office.
4. Signature	The signature of the person authorized to sign this notice.
5. Name	Name of the person who signs this notice.
6. Function	Function of the person who signs this notice.

## 8 Tables

**Table 8.1 Island**

**Island:**

St. Maarten

**Table 8.2 Transaction Type**

<b><u>Code:</u></b>	<b><u>Transaction type</u></b>
CHAR	Cash
CHEQ	Cheque
CSNA	Cash deposit into NAF account
CSUS	Cash deposit into USD account
WTI	Wire transfer international (into and from the account of the client)
ITF	Internal transfer of funds (between different accounts at same bank or between accounts at different banks)
CCD	Credit Card deposit
CCT	Credit Card transaction
CPFI	Withdrawal from financial institution
CPGA	Withdrawal from automatic teller machine

**Table 8.3 Currency**

**Consequence**

**: Most used currencies**

<b><u>Code:</u></b>	<b><u>Country name</u></b>	<b><u>Currency</u></b>
AWG	Aruba	Aruban Florin
CAD	Canada	Canadian Dollars
DEM	Germany	German Mark
ECU	European Common Market	European Currency Unit
FRF	France	French Franc
ITL	Italy	Lire
JPY	Japan	Yen
NLG	The Netherlands	Dutch Guilder
VEB	Venezuela	Bolivar
GBP	United Kingdom	Pound Sterling
USD	United States	US-Dollar

**Table 8.4 Country**

**: Most current countries**

**Country name**

Netherlands Antilles	Belgium	Suriname
Bonaire	Brazil	Venezuela
Curaçao	Canada	United States
Saba	Germany	The Netherlands
St. Eustatius	France	
St. Maarten	Jamaica	
Aruba	Great-Britain	

**Table 8.5 Nationality**

**: Most current nationalities**

**Nationality:**

American Citizen	Canadian
American Subject	Chinese
Belgian	French
Brazilian	Jamaican
British Citizen	Dutch
British National (Overseas)	Suriname
British Subject	Venezuelan
British Overseas Subject	
Citizen of the Federal Republic of Germany	

**Table 8.6 Activity**

You will find a survey of the activities codes on the following pages.

E.g.: Mention the activity “Activities not adequately defined” in case a subject (natural person/legal person) cannot be categorized under one of the remaining activities in connection with an executed transaction.

**Table 8.7    Legal Form**

**Description of legal form:**

**PROPRIETARY BUSINESS**

Eenmanszaak

**PARTNERSHIP**

Maatschap

**LIMITED PARTNERSHIP**

Commanditaire Vennootschap

Kommandit Gesellschaft

Société en Commandite Simple

**JOINT STOCK LIMITED PARTNERSHIP**

Comm. Vennootschap op aandelen

Société en Commandite par actions

**LIMITED LIABILITY COMPANY**

Naamloze Vennootschap

Naamloze Vennootschap/Société Anonyme (S.A.)

Sociedad Anónima de Capital Autorizado (SACA)

Aktiengesellschaft

Société Anonyme

Incorporated

Limited (Liability Company)

Incorporated

**FIRM**

Vennootschap onder Firma

Vennootschap onder Firma (Société en Nom Collectif)

Société en Nom Collectif

**PRIVATE LIMITED COMPANY**

Besloten Vennootschap

Besloten Vennootschap (Société responsabilité limitée (S.R.L.))

Société à responsabilité limitée

**COOPERATIVE (SOCIETY)**

Coöperatie

**FOUNDATION**

Stichting

**ASSOCIATION**

Vereniging

**Note: Please find the remaining codes in their respective code books.**

## **9 Examples**

### **9.1 Subject Types**

The following examples serve as an illustration of which subject types can be distinguished in an unusual transaction:

1. A subject A, being a natural person, in connection with a forthcoming vacation abroad, makes a cash purchase of NAF. 25,000 worth of traveler's checks at bank X. This transaction concerns an unusual transaction based on indicator B9710134.

Here subject A is both principal, beneficiary and executor at the same time.

2. Subject A in the first example buys the traveler's checks cash by order and for the benefit of another subject being legal person B. This transaction concerns an unusual transaction based on indicator B9710134.

Now subject A is the executor and subject B is the principal and beneficiary.

3. Notary C has called bank X with the information that he is sending D to make a cash deposit on behalf of subject E, a natural person, of AFL. 300,000.-- (Aruban Florin) in the account of subject F, a legal person. Subject D reports at the counter accompanied by subject G and effects the transaction. The personalia of abovementioned subjects are known at the bank. Moreover subject D identifies himself with a valid passport during the transaction. This transaction concerns an unusual transaction based on indicators B9710131 and B9710136.

Now subject C is the intermediary, subject D the executor, subject E is the principal, subject F the beneficiary and subject G the companion.