

GUIDELINES ON INDICATOR REGULATION SINT MAARTEN

Based on Article 10 of the National
Ordinance Reporting Unusual Transactions

May 1st, 2016

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1. Introduction

The purpose of the underlying document is to provide an insight into the use of indicators. The unusual character of a transaction is determined on the basis of indicators¹. Indicators describe the situations in which money laundering and/or financing of terrorism can take place. A transaction must be reported as soon as this can be qualified as unusual. Unless explicitly stated otherwise, the same indicators apply for **all** financial and designated non-financial businesses and professions.

2. Definitions

Transaction

*A transaction is an action or **set of actions (1)** by or for a client in connection with the procurement or provisions of services, or of which a service provider has become aware **in relation to its service provision (2)** to a client.*

Set of actions (1)

*A transaction can consist of one action or several actions. If actions can be interrelated in any way, then it concerns a set of **actions**. It concerns actions where there is a reason to presume that these actions are interrelated. The unifying element may differ. Hereafter a few unifying elements are shown in a (non-exhaustive) list:*

- ✓ **time** (e.g.: actions taken in swift succession);
- ✓ **object** (e.g.: the purchase of an object in parts);
- ✓ **modus operandi** (e.g.: different persons simultaneously conduct over-the-counter transactions involving the same subject and/or address).

Cash transaction

Cash transaction: a payment with the aid of cash or a similar means of payment, in any event including a credit card or prepaid payment instrument (prepaid card), debit card, cheque, traveller's cheque, bank draft or money order;

¹ Article 10 of the National Ordinance Reporting Unusual Transactions, which can be viewed via *search engine laws database* at www.sintmaartengov.org/laws

Wire Transfers

Wire transfer: payment by means of the transfer of an amount of money to an account intended for cashless payments at a bank or a comparable financial institution;

In relation to its service provision (2)

*A transaction is an action or set of actions by or for a client in connection with the procurement or provision of services, or of which a service provider has become aware **in relation to its service provision** to a client.*

*With the terms printed bold, the legislator intend to express the fact that the reporting obligation is **not limited** solely to transactions involving the **service provider**, but applies to all transactions in which the client is involved. If a service provider becomes aware, as part of its service provision to a **client**, that the client has conducted or arranged to conduct an unusual transaction elsewhere, the service provider is required to report this.*

✓ *If a service provider has reported an unusual transaction, this does not relieve another service provider of its own responsibility to also make a report. Various service providers are involved in the sale of a home, for example, such as a bank, a civil-law notary and an estate agent. All service providers have an individual legal obligation to report unusual transactions.*

Intended transaction

*The reporting obligation relates to both conducted and **intended** transactions. An intended transaction is a transaction that has not (yet) been executed in full. However, the client's intention (expression of will) has been notified to the service provider. The reason why the transaction has not (yet) been executed in full, or which party (the client or the service provider) cancels the transaction is not relevant. Examples of intended transactions are:*

✓ *A client requests a bank employee to deposit a cash sum of NAf 27.500 in a third party account. At the moment when a request is made (to the client) to complete a form concerning the origins of the cash, the client cancels the plan for the execution of the transaction.*

✓ *The service provider informs the client that the latter has five days in which to submit a document that forms part of the client file. After the five-day term has expired, the client has still not submitted the requested document. The service provider cancels the transaction.*

2. Explanation of indicators and examples

This paragraph describes the indicators through examples. The aim of the FIU is to illustrate a number of common situations. The amounts shown in the indicators are denominated in NAF or their equivalent in a foreign currency.

Objective and subjective indicators

The indicators are divided into objective and subjective indicators. With objective indicators, reporting is mandatory. With subjective indicators, reporting is mandatory if the service provider takes the view that money laundering or financing of terrorism *may* be involved. **The service provider reports a transaction once only, subjectively (if the service provider suspects money laundering or financing of terrorism) or objectively (if the matter involves only a transaction for a sum in excess of the threshold amount and the service provider has no suspicions of money laundering or financing of terrorism). If a transaction to be reported is consistent with both subjective and the objective indicators, subjective reporting should be chosen.**

Objective indicators

Objective indicators describe certain specific situations in which the indicator applies, such as a specific threshold amount, where the service provider has no suspicion of money laundering or financing of terrorism. Every service provider must always report a transaction if the situation in the indicator applies.

An unusual transaction on the basis of an objective indicator must be reported immediately, and in any event within 48 hours.

Subjective indicators

If, as a service provider, you believe that money laundering or financing of terrorism may be involved, you must report this under the subjective indicator. The circumstances of a transaction that gives rise to suspicions of money laundering and/or financing of terrorism, such as 'a match with a (sanctions) list', a transaction consisting of uncounted cash or one or more transaction(s) that are deliberately kept below the threshold amount, are of decisive importance for the decision on whether to make a report.

As a service provider, you are familiar with the customs and practices in your sector. Whether a transaction is qualified as unusual depends largely on your professional judgement. However, you cannot determine with certainty that money laundering or financing of terrorism is involved, because you do not have access to all sources of information. The Reporting Centre and the Detection Service will have this and will conduct a more detailed analysis of the transactions reported. There need be only one assumption/suspicion at the service provider that the transaction could be related to money laundering or financing of terrorism.

An unusual transaction on the basis of a subjective indicator must be reported immediately after the unusual nature of the transaction has been shown, and in any event within 48 hours.

3.1 Objective indicators:

160101	A transaction reported to the police or the judicial authorities;
Explanation	<p>This indicator covers all transactions reported to the police or the judicial authorities: in other words:</p> <ul style="list-style-type: none"> ✓ all transactions reported at the reporters own initiative (using a statement or witness statement); ✓ all transactions reported on the orders of a court or examining magistrate. <p>Reporting of such transactions does not require that they are related to money laundering and/or financing of terrorism. It is enough that transactions can be connected to a criminal offence.</p>
Examples	<p>Transactions reported to the police or the judicial authorities;</p> <ul style="list-style-type: none"> ✓ on discovery of the use of a false identity by the client. ✓ on the use of a forged credit card, debit card or prepaid card. ✓ in the case of an order to deliver documents. ✓ on detection of fraud, theft or corruption.

160102	A transaction performed by or for a natural person, legal entity, group or entity appearing on a list established pursuant to the ² <i>Sanctions Act</i> ;
Explanation	<p>With reference to the Sanctions Regulation, all transactions must be reported to the Reporting Centre if a natural person, legal entity, group or entity appears on a list established by the United Nations or the European Union.</p> <ul style="list-style-type: none"> ✓ The sanctions lists of the United Nations and the European Union can be viewed at the website of the Sint Maarten Unusual Transactions Reporting Centre at www.fiu-sxm.net and at the website of the Central Bank of Curaçao and Sint Maarten at www.centralbank.cw. ✓ The Head of the Reporting Centre assigns a reporting code for each indicator and publishes this on the website of the Reporting Centre: www.fiu-sxm.net.

160103	A wire transfer for NAf 500.000 or more
Explanation	<p>A wire transfer is an order issued by the client to the service provider to transfer a particular amount to an account that the beneficiary holds with another or the same service provider.</p> <p>Interbank transactions need not be reported, as this involves transactions that are not conducted on the instructions of or for a client of the bank but solely for the bank itself.</p>
Examples	<ul style="list-style-type: none"> ✓ A transfer from one account to another on the instructions of a client. ✓ The crediting of funds from a foreign account to a client's account.

160104	A cash transaction for NAf 25.000 or more
Explanation	This indicator relates to cash transactions of NAf 25.000 or more (for other cash transactions, see reporting codes 160105, 160106 and 160107).

² For further information, see *search engine laws database* at www.sintmaartengov.org/laws

Examples	<ul style="list-style-type: none"> ✓ the exchange from small to large denominations or vice versa or exchange of foreign currency amounts of NAf 25.000 or more. ✓ Cash purchases of cheques for an amount of NAf 25.000 or more. ✓ A cash deposit for a car of NAf 25.000 or more into the bank account of the car dealer must be reported by both the car dealer and the bank. ✓ A client makes a cash deposit of NAf 25.000 or more into the escrow account of a civil-law notary. Reporting obligation for the civil-law notary and the bank. ✓ A cash repayment of a loan of NAf 25.000 or more.
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160105	A cash transaction or wire transfer at a casino, online casino or lottery for NAf 5.000 or more
Explanation	This indicator applies if the client conducts a transaction of NAf 5.000 or more at a casino, online casino or lottery.
Examples	<ul style="list-style-type: none"> ✓ the exchange of small denominations for large ones or vice versa or the exchange of NAf 5.000 or more to another currency or more. ✓ The purchase of gaming chips or the exchange of gaming chips or tokens for cash of NAf 5.000 or more. ✓ The deposit of a sum of NAf 5.000 or more at the cash desk or into the account of the casino, online casino or lottery.

160106	Sending cash of NAf 5.000 or more via a Money Remittance Company office
Explanation	This indicator applies if the client conducts a transaction of NAf 5.000 or more at a foreign currency exchange office.
Examples	<ul style="list-style-type: none"> ✓ Sending cash amounts of NAf 5.000 or more to foreign destinations or the receipt of cash amounts of NAf 5.000 from foreign locations.

160107	The deposit of a sum of NAf 5.000 or more on a credit card or prepaid card
Explanation	This indicator applies if the client deposits cash worth NAf 5.000 or more on a

	credit card or prepaid card.
Examples	<ul style="list-style-type: none"> ✓ The deposit of a cash amount of NAf 5.000 or more on a personal credit card or prepaid card, or on a third party credit card or prepaid card.

3.2 Subjective indicator:

160201	A transaction that differs from the service provider's profile of the client
160202	A transaction giving rise to the assumption that this <i>could</i> relate to money laundering or financing of terrorism
Explanation	<p>If a situation arises as described in the examples below (red flags), this will be a reason to consider whether the transaction may be related to money laundering and/or financing of terrorism. The examples below are not exhaustive! Further information in this regard is available on the website of the Financial Action Task Force (FATF) http://www.fatf-gafi.org/ and the website of the Egmont Group of Financial Intelligence Units http://www.egmontgroup.org/.</p> <p>Every service provider should assess for itself whether it qualifies a transaction as unusual and if so, describe it clearly and report it.</p>
Examples	<p>Red flags - identification and verification</p> <ul style="list-style-type: none"> ✓ The client makes use of (potentially) forged or fake identity documents. ✓ It is problematic to determine the identity of the client or the ultimate beneficial owner. ✓ The client provides information suspected of being incomplete or incorrect. ✓ The client has an unclear or changing establishment address/ the correspondence address differs from the regular address. ✓ The client cancels the transaction because the service provider asks for his or her identity documents. ✓ A person other than the buyer makes his or her identity available for the purchase. ✓ The client makes use of a straw man.

Red flags - relationship between client and service provider

- ✓The service that the client requires does not fit with the service provider's normal pattern.
- ✓The client shows exceptional knowledge of anti-money laundering or financing of terrorism rules or policy.
- ✓For no clear reason, the client is nervous or is unwilling or unable to give specific or logical answers concerning him/herself, the origins or destination of the money and/or the parties involved in the transaction.
- ✓The usual reasons for deploying the service provider do not appear to be present
- ✓The client is willing to pay a fee for the service provider's services that is substantially higher than is customary.
- ✓The client proves to have changed service provider (civil-law notary, lawyer, tax consultant or accountant) a number of times in swift succession, when no acceptable reason can be given for this.
- ✓A relationship between the client and a former adviser proves to have been refused or terminated, when no acceptable reason can be given for this.
- ✓The client is itself subject to the reporting obligation of the National Ordinance Reporting of Unusual Transactions, but deliberately makes no reports or refuses to provide information on this.
- ✓The client is involved in transactions that are not consistent with its normal professional practice or business operations, when no acceptable reason can be given for this.
- ✓The client is involved in transactions that are unusual due to their scale, nature, frequency or execution.
- ✓The client, the intermediary or third party is unwilling, or is only willing after strong urging, to provide the requested information, such as information on the origin of funds.
- ✓The order relates (solely) to the custody of documents or other goods, or keeping large amounts on deposit.
- ✓An object is traded several times within a short space of time.

- ✓ (Cash) purchases of assets quickly followed by loans with these assets as collateral.
- ✓ Improper mingling of commercial and private use.
- ✓ The client requests the service provider to cooperate in apparently fraudulent transactions.

Red flags - concerning financial transactions

- ✓ The client has a preference for assets that leave no trace, such as cash, bearer documents and bearer policies.
- ✓ Purchases or sales at prices that differ significantly from the market prices.
- ✓ Payments follow an unusual pattern. The funds at the client's disposal originate from unclear sources or the sources given by the client are improbable or insufficiently documented.
- ✓ Large lump-sum payments, from foreign countries or otherwise and unusual (currency) transactions, such as for cash, bearer cheques, bearer documents or for money transfers.
- ✓ The service provider receives funds from the client with a request to pay these funds to a third party, when there is no documentary evidence verified by the service provider that legitimises the on-payment.
- ✓ Payment by means of an (unknown) third party or transfers of money when the identity of the account-holder, the right-holder of the account and/or the future investor (for which the money is transferred) are not the same.
- ✓ Loans for which surety is obtained from a foreign (legal) entity with which the client's relationship is unclear.
- ✓ The client makes use of financing outside the regular financial sector (e.g. foreign cash loans).
- ✓ The client has foreign bank accounts.

- ✓The client makes use of an unnecessarily complex legal corporate structure (e.g. foreign companies or trusts).
- ✓The client has equity, the origins of which are unclear.
- ✓The client comes from outside the region, without any explanation for this.
- ✓The client requests cash payments to be made in foreign currency.

Red flags - concerning legal entities and structures

- ✓The client makes use of, or wishes to make use of one or more intermediate foreign or acquired legal entities or companies, with no apparent legitimate fiscal, legal or commercial reason for this.
- ✓In a short space of time, the client wishes to form different legal entities or companies for another person, with no apparent legitimate fiscal, legal or commercial reason for this.
- ✓The client wishes to form or acquire a legal entity or company with a dubious (envisaged) description of objectives or a description of objectives that appears to bear no relationship to the client's normal professional practice or business operations, or with a description of objectives requiring a licence, when the client does not intend to acquire such a licence and no explanation acceptable to the service provider can be given for this.
- ✓The client makes use of legal entities or companies in which the control structure is not transparent or that are suitable, in terms of character or organisation, to disguise the identity of the ultimate beneficiary owner (UBO) (e.g. bearer shares, trusts, foreign legal entities), when no explanation acceptable to the service provider can be given for this.

- ✓ Frequent changes in legal structures and/or frequent changes of managing directors of legal entities or companies. There is a complex legal structure that does not appear to serve any realistic purpose.

- ✓ Legal entities or companies remain in formation for long periods.

Red flags - concerning real estate and other registered property

- ✓ Transactions concerning registered property financed by means of a (mortgage) loan of an amount that lies significantly above or below that consideration to be paid, when no explanation acceptable to the service provider can be given for this.
- ✓ The registered property is traded on several occasions in a short space of time with unusually high profit margins, when no explanation acceptable to the service provider can be given for this.
- ✓ Transactions concerning registered property by or via residents or companies of the countries or states that do not comply adequately with the recommendations of the FATF³.
- ✓ Transactions without mortgage financing, in particular where the origin of the funds is unclear or no underlying loan agreement is available where differing loan conditions are used (e.g. differing interest rates or provision of surety).
- ✓ Transactions concerning registered property with several mortgages established on the same property for no demonstrable reason.
- ✓ With property transactions: the agent is asked to draft an IOU in which the seller lends part of the purchase price to the buyer.

³ For more information in this regard, please see the FATF website (<http://www.fatf-gafi.org/countries/#high-risk>)

Red flags - Attorneys, independent legal advisers

- ✓ There are reasons to doubt the origin of the title under which funds are made available to companies. The client or intermediary is not willing to provide information on the origin of the title to the funds, or is only willing to do so after strong urging.
- ✓ The receipt or payment of funds to third parties, with no reason for the role for a lawyer.
- ✓ The client is not resident or employed in the lawyer's field of work and does not form part of the lawyer's clientele, makes use of an intermediary not known to the lawyer or engages the lawyer for a service for which a lawyer from the client's region could have been engaged, while no explanation acceptable to the lawyer can be given for this.
- ✓ With ABC transactions: AC agreements or BC sale agreement is contracted earlier than AB.
- ✓ With property transactions: the lawyer is asked to draft an IOU in which the seller lends part of the purchase price to the buyer.
- ✓ With property transactions: a foreign company acts as the mortgagee, while the origin of the financing is unclear to the lawyer.
- ✓ With share transactions: the sale price is settled between the buyer and seller and is not paid via the lawyer's escrow account.

Red flags - Civil-law notaries

- ✓ The client is not resident or employed in the civil-law notary's field of work and does not form part of the civil-law notary's clientele, makes use of an intermediary not known to the civil-law notary or engages the civil-law notary for a service for which a civil-law notary from the client's region could have been engaged, while no explanation acceptable to the civil-law notary can be given for this.

- ✓ The client is a potential front man (a 'front man', like a straw man, is a person who acts under his or her own name in the deed. This person does hold ownership of the acquired property, but in practice, often does not hold the actual rights of use to it. A front man offers no possibility of recourse).
- ✓ The client continually makes use of the same appraiser, financier, mortgage adviser or agency for the structural survey.
- ✓ The BC agreement is contracted before the AB.
- ✓ Seller B appears to arrange everything for buyer C.
- ✓ With ABC transactions: AC agreements.
- ✓ Buyer C is not required to make a deposit for the purchase of a property.
- ✓ With property transactions: the civil-law notary is asked to draft an IOU in which the seller lends part of the purchase price to the buyer.
- ✓ The property is sold in the condition in which it is delivered at a later date, while the refurbishment or renovation has not yet taken place and the contract of sale makes no mention of a refurbishment or renovation.
- ✓ The appraisal report contains data that are not consistent with the actual course of events.
- ✓ The client buys the registered property from its own resources (without funding), while there is no economic or legitimate explanation for the origin of the funds.
- ✓ The purchase price or deposit is funded by a party other than the client/mortgager, without the relationship between the financier and the client being known.
- ✓ Use of suspected false documents.
- ✓ The payment is arranged between the seller and the buyer, i.e. not via the civil-law notary's escrow account.

Red flags - Tax consultants, public auditors, trust offices, business consultants

- ✓ A transaction in which a client is involved leads to a result that is clearly higher or lower than could reasonably be expected, or to an unusually high result in comparison with similar companies in the sector in which the client works, in particular if a significant part of the revenue consists of cash sales.
- ✓ The buyer remains liable for part or all of the purchase price with the seller acting as the mortgagee or otherwise.
- ✓ There is an inexplicable discrepancy between the cash and the goods flow. A client realises unusually high revenue and/or profits, while the activities to which these relate is unclear.
- ✓ A transaction in which a client is involved takes place on clearly poorer terms than can reasonably be expected, without any acceptable explanation for the failure to choose better structuring.
- ✓ The actual view presented by the financial statements is not consistent with underlying documents. Unauthorised transactions or incorrectly registered transactions. Administrative systems that (due to their design or set-up) provide no adequate possibilities for tracking transactions or providing adequate evidence.
- ✓ Payments for services rendered appear to be excessively high in relation to the services provided. Commissions etc. that appear to be excessively high. Payments for unspecified services or loans to advisers, affiliated parties, employees or government personnel.
- ✓ Non-compliance with any publication obligation or the statutory obligation, if present, to obtain an auditors' report on the financial statements.

- ✓there is a negative cash balance.
- ✓False invoices are used.
- ✓Payments are made without invoices.
- ✓Payments are made without a written agreement.
- ✓The cash balance at the start and end of the year is not consistent with the cash ledger.
- ✓Funds are deposited in the cash fund when there is already a high cash balance according to the administration.
- ✓The balance of the client's private account is low or negative.
- ✓The origin of the financing of cash expenditure cannot be established.
- ✓The reported revenue is not in proportion to the assets used, stocks or procurement. There are indications that the reported revenue originates from other (criminal) sources.
- ✓The receipt or payment of bribes.
- ✓The client has a mortgage, but does not deduct mortgage interest from tax. As a result, it appears as if there are no possibilities of recourse.

4. Exceptions to the reporting obligation on the basis of the objective indicators.

Articles 4 and 5 of the Regulation on Indicators of Unusual Transactions provide for a number of exceptions to the reporting obligation with regard to the objective indicators included in Article 2. The transactions described in Articles 4 and 5 need not, therefore, be reported on the grounds of an **objective indicator**. The character of these transactions is such that there is no risk or a minimal risk of money laundering or financing of terrorism, or that no violation of the legal order exists for other reasons.

If the service provider nevertheless suspects that exempted transactions may be related to money laundering or financing of terrorism, these unusual transactions must be reported on the basis of the **subjective indicator**.

Article 4, preamble and sub-paragraph (a)

Transactions relating to compliance with pension liabilities of the employer to employees of the company, through insurance policies contracted by the employer with an insurer that holds the licence required pursuant to Article 9(1) of the Insurance Supervision⁴ Act;

This refers to the transfers made by an employer for the pension insurance for its employees.

Example:

The quarterly transfer of deducted pension premiums by an entrepreneur to an insurance company or pension fund.

Article 4, preamble and sub-paragraph (b)

Transactions, as referred to in sub-paragraph (a), conducted by the employee in person, who is partially or fully enabled to do so by the employer;

This relates to the same transfer by the employer for the pension insurance for employees, as referred to in sub-paragraph (a). The difference with the situation referred to in sub-paragraph (a) is that this employee has contracted the pension agreement independently.

⁴ For further information, see search engine laws database at www.sintmaartengov.org/laws

Article 5

The indicators referred to in Article 2 of the Regulation on Indicators of Unusual Transactions do not apply with regard to the contracting of insurance agreement as referred to in Article 9 of the Corporate Pension Funds Act ⁵.

This concerns the reinsurance or transfer of the risk of contracted liabilities by a corporate pension fund to a (re)insurer, as referred to in Article 4(1)(a).

Article 6

The Head of the Unusual Transactions Reporting Centre assigns a reporting code to each indicator and publishes this on the website.

The Head of the Reporting Centre assigns reporting codes to the objective and subjective indicators and publishes these on the website of the Reporting Centre (www.fiu-sxm.net).

⁵ For further information, see search engine laws database at www.sintmaartengov.org/laws

5. Help Desk

If you have any questions concerning the operation of the system of indicators, please contact the Unusual Transactions Reporting Centre. You will speak with an analyst who is aware of the operation of the indicators for all professional groups.

Tel: (+1721) 542 3025 / 543 0826 / 543 0827

Fax: (+1721) 542 0828

E-mails: analyst.department@fiu.gov.sx

Website: www.fiu-sxm.net

Annex I

Indicator reporting codes

A full list of the indicators and the accompanying reporting codes is presented below. When reporting an unusual transaction, the service provider must record the correct code in the (digital) report form.

Code	Objective indicators
160101	A transaction reported to the police or the judicial authorities;
160102	A transaction performed by or for a natural person, legal entity, group or entity established in countries or regions appearing on a list established pursuant to the Sanctions Decree;
160103	A wire transfer for an amount of NAf 500.000 or more
160104	A cash transaction for an amount of NAf 25.000 or more
160105	A cash transaction at or wire transfer to a casino, online gaming site or lottery for NAf 5.000 or more
160106	A transaction of NAf 5.000 or more carried out at a money remittance office.
160107	The deposit of cash of NAf 5.000 or more on a personal credit card or prepaid card, or on a third party credit card or bank/money order
Code	Subjective Indicators
160201	A transaction that deviates from the profile of the client at the service provider
160202	A transaction that gives rise to the suspicion that it could be related to money laundering or financing of terrorism

Annex II

The following codes are assigned to the providers of the various services referred to in Article 1(1)(a) of the Reporting of Unusual Transactions Act. Reports of the customs authority to the MOT are subject to Article 4(2) and 4(3) of International Money Transportation Act.

Code	Article 1(1)(a)(1)^o, 1(1)(a)(2)^o, 1(1)(a)(3)^o, 1(1)(a)(4)^o, 1(1)(a)(5)^o, 1(1)(a)(6)^o, 1(1)(a)(7)^o, 1(1)(a)(8)^o, 1(1)(a)(9)^o and 1(1)(a)(10)^o Financial institutions etc.
BA	Banks
CB	Central Bank of Curaçao and Sint Maarten
MR	Money Remittance Companies
CC	Credit Card Companies
IA	Insurers and Insurance Agents
FS	Providers of Factoring Services
MS	Providers of Management Services
II	Investment Institutions
AI	Administrators of Investment Institutions
RT	Representatives of a Trust
Code	Article 1(1)(a)(11)^o, 1(1)(a)(12)^o, 1(1)(a)(13)^o, 1(1)(a)(14)^o, 1(1)(a)(15)^o Non-Financial Institutions
TC	Trust Companies
AL	Attorneys at Law
NO	Civil-law notaries and junior civil-law notaries
JW	Jewellers
AC	Accountants
CD	Car Dealers
AO	Administration Offices
RE	Real Estate Agents
TA	Tax Advisors
LO	Lotteries
CA	Casinos
OG	Online Gaming



**MELDPUNT
ONGEBRUIKELIJKE TRANSACTIES**
Ministerie van Justitie - Sint Maarten

Backstreet #65
P.O. Box 5095
Philipsburg, Sint Maarten
Tel. No. (+1721) 542 3025 / 543 0826 / 543 0827
Fax no. (+1721) 543 0828
Email: analyst.department@fiu.gov.sx
Website: www.fiu-sxm.net