

TECHNOLOGY CONSULTING

IN THE GLOBAL COMMUNITY

Final Consulting Report

Palau Financial Intelligence Unit

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Carnegie Mellon University



Financial Intelligence Unit – Republic of Palau

Executive Summary

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Community Partner, Nelson Jay Werner & Hussein ‘Boboy’ Derbai

I. About the Organization

The Financial Intelligence Unit (FIU) of the Republic of Palau is an autonomous organization which reports to the Governing Board of Commissioners of Financial Institutions Commission(FIC).

The mission statement of FIU is,

To detect, disrupt and deter money laundering and terrorists financing. To ensure that Palau anti money laundering regime complies with international standards. To that end, the financial intelligence unit collects, analyzes and stores financial data and intelligence for possible money laundering and terrorists financing prosecution.

The vision statement of FIU is,

For Palau to be free of money laundering and terrorist financing.

The Financial Intelligence Unit strives to achieve its mission by receiving and analyzing information from various sources to identify possible activities relating to money laundering or terrorist financing. The Financial Intelligence Unit currently uses Microsoft Access as database and is looking forward to utilize technology efficiently to enhance its investigations and to increase its prestige in the international community.

II. Upgrading Database Application

FIU is currently using the database application designed by TCinGC consultants during 2015. However, they wanted the application to be upgraded to fulfill their new requirements like generating monthly CTR and STR reports, store information like assistance received or provided by FIU Palau to other local / global organizations, a user-friendly search feature and more. The user-friendly search was an important requirement in order to efficiently perform evidence trail. With all the above specified requirements FIND (Financial Intelligence uNit Database), the second generation FIU database, was designed and developed with necessary customization for FIU Republic of Palau. FIND is designed from scratch and efficiently searches the stored data. The new architecture of the second generation FIU database has also reduced the startup time from 115 seconds to 2.4 seconds. The user-friendly search feature of FIND allows user to use multiple parameters to retrieve the exact record along with autocomplete feature for all the important fields in the form. Consequently, FIU users claim that the new search feature has increased their data search efficiency to 100%. Recommendation for future upgrade of FIND would be to implement new advanced reports and implement 3rd party charting tools to get better visualization for reports.

III. Improving Data Integrity

Financial Intelligence Unit receives information from the local retail banks and Bureau of Customs and Border Protection in the form of Currency Transaction Reports (CTR), Suspicious Activity Reports (SAR), and Suspicious Transaction Reports (STR). Analysis of the database contents revealed that there were a few anomalies and the data format was not same for all the records. This made it difficult for FIU users to retrieve the correct information and for the FIND application to generate correct information in the reports. To rectify the issue, standards for the data format stored in the database were established and documented. The records in the database were also formatted per the new standards. Currently all the searches and reports generated are found to be accurate. This activity is sustainable since the data cleaning process was performed by the staff themselves under supervision and were documented. Thus, in the future, even newly enrolled FIU staff can perform data cleanup and thus follow all the necessary steps.

IV. Visualizing Suspect Activity

Data visualization of the cases created by FIU was the one of the primary user requirements for FIND. The objective was to convert all the STR and CTR of a particular suspect into a network diagram. Data visualization is necessary to convince the FCIU as well as assist the investigator involved. Currently FIU makes visual network graphs manually using XMind tool. With the automated generation of network graph, FIU can easily find the pattern in the activity of their suspect and can explain this pattern to the FCIU and investigator conveniently. It has also reduced the time to design the graph by 75%. Overall, the efficiency of collecting evidence and connecting them has improved by leaps and bounds. However, current visualization is limited to wire and cash transactions. Recommendation for future upgrade would be to include other money transaction instruments like online wallet, bitcoins etc.

V. Additional Recommendations

The FIU is recommended to upgrade their Office package from Office 2007 to Office 2013 or 2016.

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Financial Intelligence Unit – Republic of Palau

Final Consulting Report

Student Consultant, Nirjhar Bera
Community Partner, Nelson Jay Werner

I. About the Organization

Organization

The Financial Intelligence Unit (FIU) of the Republic of Palau is an autonomous organization which reports to the Governing Board of Commissioners of Financial Institutions Commission(FIC). FIC is responsible for the oversight, supervision and regulation of the Republic of Palau's financial sector and the Governing Board members are appointed by the President of the Republic of Palau.

The mission statement of the FIU is,

To detect, disrupt and deter money laundering and terrorist financing. To ensure that Palau anti money laundering regime complies with international standards. To that end, the financial intelligence unit collects, analyzes and stores financial data and intelligence for possible money laundering and terrorists financing prosecution.

The vision statement of the FIU is,

For Palau to be free of money laundering and terrorist financing.

The Financial Intelligence Unit strives to achieve its mission by receiving and analyzing information from various sources to identify possible activities related to money laundering or terrorist financing. The current sources of information are the three retail banks in the country, i.e. Bank of Hawaii, Bank of Guam, and Bank Pacific, and the Bureau of Customs and Border Protection. All the three banks share their information with FIU by generating Currency Transaction Reports (CTR) and Suspicious Activity Report (SAR) or Suspicious Transaction Report (STR).

A Currency Transaction Report (CTR) is a report that financial institutions are required to file to the FIU for each deposit, withdrawal, exchange of currency, or other payment or transfer, by, through, or to the financial institution which involves a transaction in currency of more than \$10,000.¹

A Suspicious Activity Report (SAR) or Suspicious Transaction Report (STR) is a report made by a financial institution about the suspicious or potentially suspicious activity. The report must be made when any financial transaction that does not make sense to the financial institution, is unusual for that client or appears to be done only for hiding or obfuscating a transaction.²

The FIU, along with TCinGC program of Carnegie Mellon University, has successfully developed a sophisticated database for the electronic acquisition of financial data. In addition, for effective dissemination and investigation of money laundering, the FIU has created a Financial Crimes Investigations Unit (FCIU) with other relevant law enforcement agencies such as the Bureau of Customs and Border Police, the Office of Attorney General, the Office of Special Prosecutor, the

¹ <https://www.law.cornell.edu/cfr/text/31/1010.311>

² https://en.wikipedia.org/wiki/Suspicious_activity_report

Bureau of Revenue and Taxation Criminal Investigation Division, the Postal Inspector and the Bureau of Public Safety. The FIU identifies and analyzes suspicious or illegal activity and passes its amassed intelligence to the FCIU for further investigation.

Facilities

The following are excerpts from the Final Consulting Report written by Benjamin Junker for the Palau FIU during August 2016. Since there is no significant change of infrastructure, the following is still valid.

The Financial Intelligence Unit is located in an office on the second floor of the IA Meda Korner Building in Koror, Palau. It shares the second-floor facilities with the Financial Institutions Commission (FIC). To this end, the Financial Intelligence Unit and the Financial Institutions Commission work together to monitor financial activity in Palau. In terms of physical space and organization, the size, furnishings, and layout are adequate for the current operations of the Financial Intelligence Unit. There are three desks in the office, which are used by Nelson and Boboy for day-to-day work, as well as a larger conference table used for meetings. At one of the desks is a desktop computer; there are an additional five laptops in the office. The access to power at the Financial Intelligence Unit office is also satisfactory for its needs: there are sufficient power outlets in the office to power all of the electronic devices (i.e. – computers, phones, etc.) the Financial Intelligence Unit has, as well as those of guests, and sufficient power to provide climate control and lighting for the office. The security to the office is also ample, being that the door to the Financial Intelligence Unit office is locked at night, as is the door to the second floor that contains the Financial Intelligence Unit and Financial Institutions Commission offices.

Programs

The FIU receives information from the local retail banks and the Bureau of Customs and Border Protection and stores it for intelligence gathering. During analysis, this information is utilized to find any evidence trail of money laundering. Before 2015, the information was paper-driven. Searching and analyzing information was next to impossible. Therefore, the whole process was digitized during 2015. Currently, the FIU has a digital database in place and all the three retail banks send the CTRs and STRs in csv format. In between July 11, 2016 and June 9, 2017, Bank of Guam has sent 1470 CTR records and they are sent to the FIU every other day. In between April 28, 2016 and June 9, 2017, Bank of Hawaii has sent 2046 CTR records and they are received by the FIU every Monday. In between August 1, 2016 and June 9, 2017, Bank Pacific has sent 286 CTR records and they are received by the FIU every Friday. All these records are auto-deleted after 5 days from the date of transmission to the FIU. Thus, Hussein ‘Boboy’ Derbai, Senior Intelligence Analyst at the FIU, needs to retrieve the data from the bank-specific portal within the limited timeframe. Moreover, the CTRs and STRs transmitted by the bank have minor errors. Therefore, he goes through the data manually to check for such errors before importing it into the database.

Staff

Currently, there are two full-time employees in the Financial Intelligence Unit, Republic of Palau.

Mr Nelson Jay Werner is the Director of the FIU, Republic of Palau. He is responsible for the overall supervision of the FIU, which includes staff, contracts and public affairs. He is also responsible for implementing Anti-Money Laundering(AML) policies in the Republic of Palau i.e. develop, disseminate and verify compliance with policies to prevent money-laundering and terrorist financing. He also represents the FIU at international forums and conferences. Nelson uses computers for general office work, such as email, word processing, and research. His laptop is pre-loaded with Microsoft Office applications (i.e. – Microsoft Word, Excel, Access, etc.) and uses Microsoft Outlook for accessing email. His primary resource for technology training is the Internet.

Mr Hussein ‘Boboy’ Derbai is the Senior Intelligence Analyst of the FIU, Republic of Palau. His role is to support the Director in the process of implementing the AML policies. He recommends the dissemination of suspicious transaction reports (STRs) to the director and supervise the process of exchanging information with foreign FIUs. His access to and use of technology is largely like Nelson’s, except that he has more proficiency in using the Financial Intelligence Unit’s current Microsoft Access database. Boboy’s access to technology training is like Nelson’s.

Technology Infrastructure

The Financial Intelligence Unit has seven computers, whose processor specs vary from Core i3 Quad-core to AMD TurionX2 Dual-Core Mobile. Except selected laptops having 2GB RAM, all the other laptops have 4GB RAM.

All computers have Microsoft Office 2007 Package Suite pre-installed. Moreover, all the systems have access to the Internet via Wi-Fi (with the necessary web browser). In terms of non-computing technology, the Financial Intelligence Unit’s office is equipped with phones (“landlines”) and a scanner/printer that is accessible over the local network.

The Internet connections to Palau are via satellite. So Financial Intelligence Unit’s internet bandwidth goes up to 320 kbps for upload and download speed. The bandwidth is dependent on weather as well as the network usage in the area. Work is already underway to extend the undersea cables from Guam to Palau. Although the current internet bandwidth is enough to perform the daily email activities at FIU, the new cables will enable FIU to transfer large files within organizations.

Technology Management

Since the staff at the Financial Intelligence Unit involve only 2 members, the current technology management plan is ad-hoc. In addition, the technology infrastructure involves just 2 user systems, one network device and one printer. Therefore, technology management at the Financial Intelligence Unit is done on a largely ‘as needed’ basis. Since Boboy is more adept to the computer hardware technology, he is responsible for solving any system issues. Boboy’s current technical expertise, as it relates to technology management, largely consists of the ability to use computers, meaning he can perform tasks such as installing software or updating virus definitions through a graphical user interface. Beyond these tasks, the Financial Intelligence Unit relies on external limited services to manage its technology infrastructure. Furthermore, they currently do not have the

budget to permanently hire an external vendor like Conrad, who is a dedicated information technician for government organizations in Palau. Given this lack of external support and internal capacity, the technology management portion of the Financial Intelligence Unit's organizational practices is limited. All the systems have Avast Antivirus installed.

Technology Planning

Technology planning at the Financial Intelligence Unit is largely done by Boboy. However, the final decision of purchase is done by Nelson. There is no specific budget allocated for IT management. However, 5.7% of the overall budget is allocated for buying office equipment. Computer equipment is bought utilizing this budget. Regarding technology planning and best practices, Nelson and Boboy gain information about comparable international practices by attending conferences on money-laundering and terrorist financing prevention and dually observing the best practices showcased there. They also communicate with the other Financial Intelligence Units in attendance about their technology infrastructure.

The current technology plan, to first establish and then incrementally enhance the database, has been in place since Nelson created a technology plan for the Financial Intelligence Unit.

Communication

Internally, information at the Financial Intelligence Unit is shared verbally, using a flash drive, or through email. With external organizations, it is shared via email or phone conversation. As such, the Financial Intelligence Unit does have the capacity to share files, both internally and externally. Regarding the security of the files shared via email, the email accounts at the Financial Intelligence Unit are password-protected and have the capacity to be encrypted. Currently, bandwidth in Palau does not allow upload or download speeds above 256 kbps, which causes issues for the Financial Intelligence Unit when its employees need to communicate or share large files via the Internet. Other than a need to encrypt email and a general need for higher bandwidth Internet access, the one-to-one communication capacity of the Financial Intelligence Unit is appropriate for its needs.

Information Management

The main role of Financial Intelligence Unit is to store all the information regarding suspected money-laundering activities and analyze them. Therefore, it handles its information management needs using a Microsoft Access database. The database application was created by two consultants participating in the Technology Consulting in the Global Community (TCinGC) program during 2015. It was further enhanced by another consultant who participated in TCinGC program during 2016. The organizations that submit these reports to the Financial Intelligence Unit have transitioned to electronic submission now.

Business Systems

FIU reports to the Governing Board of Financial Institutions Commission (FIC). Therefore, the accounting and HR processes are taken care by the FIC.

II. Enhance FIU's Data Processing Capabilities

Motivation

FIU has been using the database designed by TCinGC consultants since 2015. However, they wanted the application to be upgraded to fulfil new requirements:

1. Generate reports of CTR and STR based on specific month
2. Store information like assistance received or provided by FIU Palau to other local/global organizations.
3. Store information like mutual, legal assistance, international cooperation – received, requested by FIU Palau.
4. Store information like STRs received & disseminated i.e. handed over to police, number of money laundering cases investigated, prosecuted or convicted and property frozen, seized or confiscated and its estimated value.
5. Enhance the search feature of the database to be more efficient and user-friendly.
6. Allow the user to break down the narrative STR separately into fields to make it easy to understand and analyze.

Outcomes

It was very important to understand the actual requirements of the client over and above the specified requirements. Consequently, interviewing the FIU staff and database users were essential. The interviews led to the conclusion that they did not want a database just to store data, but utilize it to reach conclusions and find evidence trail. To fulfil all the requirements, the database was needed to be overhauled as the prior design had performance bottlenecks. The old design worked fine until the amount of data stored in the tables started to increase. In a span of 1 year, approximately 11,000 stored records in database tables delayed the application execution time to 115 seconds. The search forms were not used by FIU staff since they found it easier to search data directly from the table, which is highly discouraged to avoid inadvertent data manipulation. Therefore, a new database application was necessary for FIU.

Since the new application would be designed from scratch, it was important to understand how the organization works and what more information needs to be tracked in the application which might not be in their requirement list. It was also essential to understand the technical knowledge of the current staff. Considering all these factors, the best database solution would be to continue using Microsoft Access. The other options include using JEE as frontend with PostgreSQL or MySQL as a database. The current FIU staff is adept at using Microsoft Access and prior experience in working with the old Access database made it the best choice. Consequently, any error during data import can be easily handled by the current staff.

The next objective was to create a prototype for each of the requirements and have it reviewed before implementing it. The Spiral Model was utilized for developing the application. The whole application was divided into 4 phases based on functionality- adding data, searching data, editing data and generating reports. Thus, for each phase different prototypes were made and its usability was tested with the FIU users. As with the spiral model, the form designs had to go through multiple iterations. In some cases, form visuals of the old database application were reused to

maintain convenience for current users. The most challenging part of this phase was to design a user-friendly search feature. The clients were okay with just the suspect name as a parameter for search. However, adding more search parameters like date range, transaction direction, institution name, currency range turned out to be invaluable since utilizing all the parameters during search easily zeroed in on the necessary information.

The final objective was to make sure the application generated useful reports. For this purpose, the generated CTR and STR reports also contained charts graphically displaying data. The FIU staff could also generate reports regarding the attended events like workshops, conferences etc. or any assistance provided to the local/global agencies.

With all the specified requirements FIND (Financial Intelligence uNit Database), the second generation FIU database was successfully designed and developed with necessary customization for the FIU. The FIND architecture has reduced the startup time from 115 seconds to 2.4 seconds. The user-friendly FIND search allows multiple parameters to retrieve the exact record and has an auto-complete feature for all the important fields in the form. This reduces the FIU user's effort to find the necessary records and they claim to have increased their data retrieval efficiency by 100%.

Recommendations

Although FIND application fulfils all the current requirements of FIU, the report section can be further enhanced. FIND should also be able to generate special reports like ranking the entities in the order of highest cumulative CTR currencies or cumulative CTR currencies involving a specific country. The advantage of such reports is that FIU users can get red flags regarding any entity who might not have been otherwise under their radar. Moreover, the graphs generated in the report are very basic since Microsoft has not updated its graph library. Third party graph tools can be utilized to generate more graphic rich reports. Currently, there is no provision to store details of companies involved in the cases or customs information regarding an individual. FIND can be further upgraded to store this information.

III. Improving Data Integrity

Motivation

The Financial Intelligence Unit receives information from the local banks and Bureau of Customs and Border Protection in the form of currency transaction report (CTR) and Suspicious Activity Report (SAR) or Suspicious Transaction Report (STR). Analysis of the database contents revealed that there were a few anomalies and the data format is not same for all the records. For example, account numbers in the records submitted by Bank of Hawaii are not delimited by “;”; rather, they are continuous numbers. The same goes for names where the Last Name field contains the full name. On further investigation, it was found out that the data format of CTR contents in the CSV file sent by different banks vary. This makes it difficult for the FIU users to retrieve the correct information. Consequently, FIND reported wrong numbers in CTR and STR reports because of inconsistent data and its format.

Outcomes

The first objective was to establish standards for the format of data which will be stored in the database. In this manner, we can have a single consistent format of data which the FIND application can easily search and retrieve. During client interviews, the FIU staff had already been informed

that banks cannot modify the current format since it involves extra charges for system modifications by their consultants. Thus, the FIU staff need to clean the data coming from the banks prior to importing it into FIND. Consequently, a standard was specified and documented. Since there are more than 11,000 records in PersonInTransaction table, the FIU staff decided to clean the data gradually and as necessary. Writing a script was not possible to clean the data since there were issues like names which required manual intervention. Currently, selected attributes of stored records are cleaned in the PersonInTransaction. However, the STR table was fully formatted as per the new protocol. As a result, the CTR and STR reports generated by the application reported correct values and allowed the user to search the database accurately with more parameters like last name, first name, date, currency and more. It is mandatory to perform the data cleanup process for any new information imported into the database. This is because inconsistent data will generate inconsistent reports and provide wrong information to the case investigators. The activity is sustainable since the data cleaning process was performed by the staff themselves under the supervision. However, a newly enrolled FIU staff may not be aware of the process. In order to minimize this risk, the data formats for both CTR and STR are documented in the user manual.

IV. Case Data Visualization

Motivation

Whenever concrete information regarding a suspected individual or organization is received via an STR, a case is created in the database and the FIU starts searching for additional evidence in its repository and from other organizations. After gathering and analyzing all the intelligence, the FIU presents the case to the FCIU. A best practice of FIUs globally is to build and present cases using visual network graphs. Previously, these graphs were created manually using XMind. During the interview session with the FIU staff, they expressed that this process was tiresome and time-consuming and desired an automated visualization technique within their budget and time constraints. Therefore an easier way to build visual network graphs of the cases was one of the primary requirements of the FIND.

Outcomes

Based on all the requirements, three tools were shortlisted to generate data visualization. They are Gephi, VUE and Cytoscape. All the selected tools are open-source to remain within budget constraint. They accept CSV as input data so that they can communicate with FIND application. Among these three open source tools, VUE was selected for implementation. This is because the merge maps feature of VUE makes it very easy for non-technical users to create network graphs by utilizing FIND. In addition, its minimal user interface and ease of use were also an advantage over the other tools. Unlike Gephi, it allowed users to make modifications to the automatically generated network graph.

The next objective was to analyze the input format required for VUE to generate the network graphs. After analysis, necessary modifications in the FIND was made so that it can generate csv files in the desired format. The prototype was tested with real data and beta tested by the FIU staff. For the next two weeks, multiple prototypes were built to consider the variety of cases possible and to make sure all necessary information was displayed in the graph. After successful implementation, the feature was immediately put into use and was used in two real cases within the next week. The

FIU staff was very satisfied with the implemented feature because it took less time to create case diagrams and it allowed them to perform detailed analysis of the suspect. The only shortcoming of the implemented visualization is that the user needs to manually change the color/ font of all the graphical elements in order to distinguish them visually. Although the process is very easy, it requires human intervention.

With the automated generation of network graph, FIU can easily find the pattern in the activity of their suspect. They can also explain this pattern to the FCIU and investigator easily. It has also reduced the amount of time necessary to invest in designing the graph manually. Overall, the efficiency of collecting evidence and connecting them has improved by leaps and bounds. The whole process is sustainable as long as the user follows the steps specified in User Manual. However, only cash and wire transactions details are considered for the visualization. The visualization won't be able to display any new kind of transaction instrument like online wallet. Currently, this instrument is not used in Palau but in future, the FIU user might need to add this information manually into the graph to display it.

Recommendations

Currently, FIND can display visualization for cash and wire transactions. However, there is no separate provision for check or other transaction instruments like online wallet, bitcoins etc. Therefore, this feature can be further enhanced to include all kinds of monetary transaction instruments.

V. Additional Recommendations

Upgrade Office package from Office 2007 to Office 2013/2016

Office 2007 package tools (like Word, Powerpoint) are being used at the FIU. It is highly recommended that the office package is upgraded to Office 2013 or 2016. The reason is that Office 2007 Mainstream Support and Extended Support has already expired. Office 2013 Mainstream Support will end on April 10, 2018 and Extended Support will end on April 11, 2023. It is very important for Office tools to be under support because Microsoft will issue security patches until extended support ends. After this, the software is vulnerable to various security attacks and Microsoft is not bound to provide protection for them. Therefore, the FIU is currently vulnerable to security attacks which might compromise their systems and leak confidential financial data to external unauthorized entities.

About the Consultant

Nirjhar Bera is a graduate student pursuing his Masters in Information Systems Management at Carnegie Mellon University. Formerly, he worked at TETCOS, Bangalore for 2 years as an Application Engineer.

VI. Appendix

- APPENDIX I: USER MANUAL for FIU, Republic of Palau
- APPENDIX II: Sample CTR Report
- APPENDIX III: Sample STR Report
- APPENDIX IV: Sample Data Visualization Graph

APPENDIX I: USER MANUAL for FIU, Republic of Palau

The User Manual provided to FIU, Republic of Palau starts from the next page

USER MANUAL

FOR

FINANCIAL INTELLIGENCE UNIT,

REPUBLIC OF PALAU

NIRJHAR BERA

TCINGC PROGRAM Carnegie Mellon University

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Chapter 1: Adding Data into the Database

Following are the steps to add data into the database

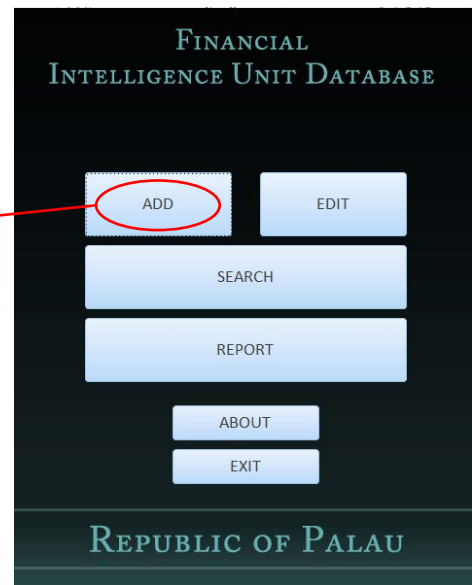
STEP 1:

Click on **ADD** Button
on the Main Menu

Following are the data which can be inserted into the database.

1. Currency Transaction Report (CTR): The local banks generate CTR whenever there is a transaction amounting above USD 10,000.
2. Person In Transaction Report (PIT): Each CTR is assisted with PIT which contains the details of the transaction.
3. Suspicious Transaction Report (STR): Whenever banks suspect an individual of performing structuring, money laundering etc, they create an STR specifying their reason to suspect along with available evidence and provide it to FIU.
4. Case information: The FIU users can create a case which is kind of a folder/repository to store all information regarding a suspect.
5. Assistance Provided Information: FIU users can keep a log regarding the assistance provided to other law enforcement agencies locally as well as globally.
6. Assistance Received Information: FIU users can keep a log regarding the assistance received from other agencies locally as well as globally.
7. Training Provided Information: FIU users can keep a log regarding the training provided to other agencies locally as well as globally.
8. Training Received Information: FIU users can keep a log regarding the events/training received from other agencies locally as well as globally.

CTR, PIT and STR information can also be imported using CSV/Excel files



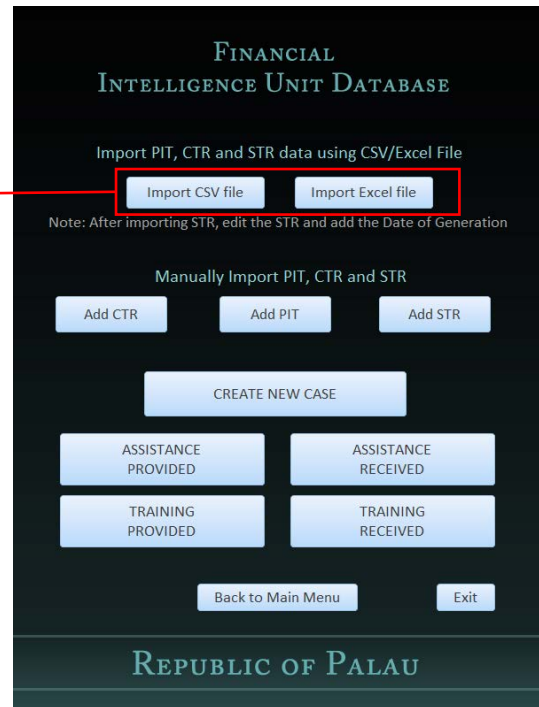
IMPORT CTR, PIT AND STR INFORMATION USING CSV/EXCEL FILE

STEP 2:

Click on **IMPORT CSV/Excel FILE**
Button depending on the file
available for importing

NOTE: While importing CTR and PIT, first import CTR information. Continue to PIT import only after importing all CTR.

Before STEP 3, make sure the csv files you want to import are cleaned and as per the necessary format as specified in Appendix A. For more information regarding Data cleaning, please refer to Appendix A.

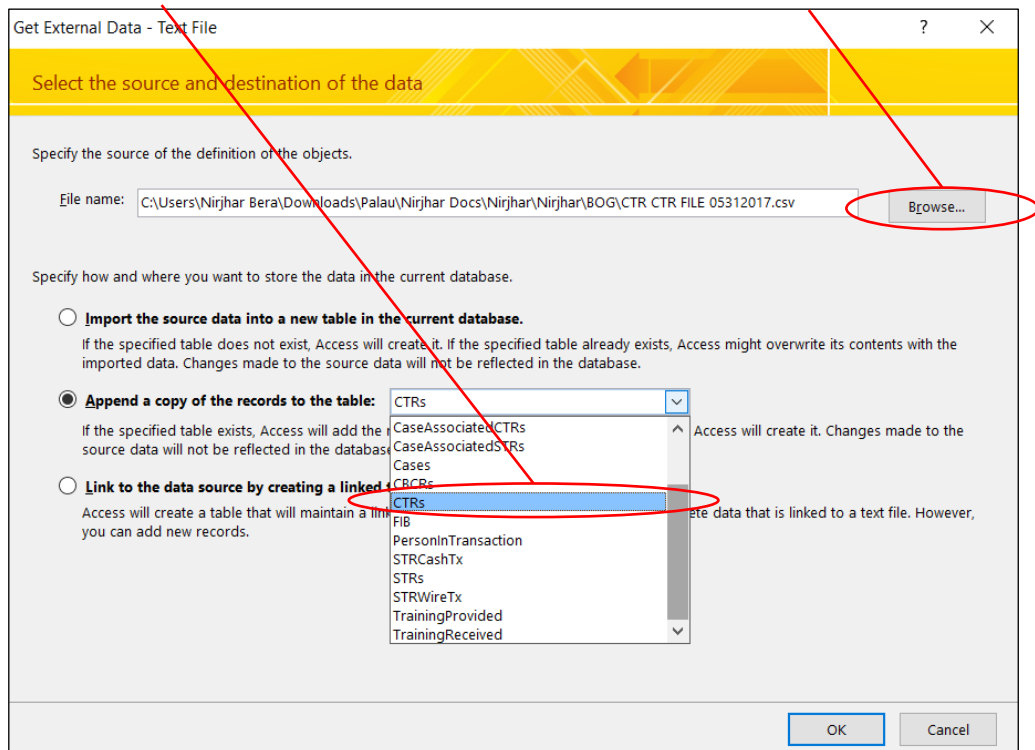


STEP 3:

Select the table where you want to import data and click OK

STEP 4:

Click on **BROWSE** Button and select the required CTR, STR or PIT File



STEP 5:
Select DELIMITED and click
NEXT

Import Text Wizard

Your data seems to be in a 'Delimited' format. If it isn't, choose the format that more correctly describes your data.

☒ Delimited - Characters such as comma or tab separate each field

☐ Fixed Width - Fields are aligned in columns with spaces between each field

Sample data from file: C:\USERS\NIRJHAR BERA\DOWNLOADS\PALAU\NIRJHAR DOCS\NIRJHAR\NIRJHAR\BOG\CTR

1	CTRID,dateOfTransaction,cashDirection, cashAmount ,typeOfFinancial
2	2.CTRB170010700065,5/31/2017,Withdrawal," \$10,200.00 ",Depository
3	2.CTRB170010700028,5/31/2017,Deposit," \$11,157.00 ",Depository In
4	2.CTRB170010700008,5/31/2017,Deposit," \$19,092.00 ",Depository In
5	2.CTRB170010700009,5/31/2017,Deposit," \$20,384.00 ",Depository In
6	2.CTRB170010700027,5/31/2017,Deposit," \$12,400.00 ",Depository In

STEP 6:
Select the following options as shown below and click FINISH

Import Text Wizard

What delimiter separates your fields? Select the appropriate delimiter and see how your text is affected in the preview below.

Choose the delimiter that separates your fields:

☐ Tab ☐ Semicolon ☒ Comma ☐ Space ☐ Other:

☒ First Row Contains Field Names

Text Qualifier:

CTRID	dateOfTransaction	cashDirection	cashAmount	typeOfFinancialInstituti
2.CTRB170010700065	5/31/2017	Withdrawal	\$10,200.00	Depository Institution
2.CTRB170010700028	5/31/2017	Deposit	\$11,157.00	Depository Institution
2.CTRB170010700008	5/31/2017	Deposit	\$19,092.00	Depository Institution

Repeat the steps for all the CSV files required to be imported for PIT, CTR and STR.

NOTE: Please remember to add the STR generation date manually (by editing the STR data using EDIT menu) after adding new STR information.

Also for STR, manually update the Cash Transaction Sub-form and Wire Transaction Sub-form (by editing the STR data using EDIT menu) since that information is not available in the csv file.

The steps are almost similar for importing using Excel files. The user can use the default settings and click Finish.

ADD CTR, PIT AND STR MANUALLY

STEP 1.1:

Click on **ADD CTR** Button to get Add CTR Form

STEP 2.1:

Click on **ADD PIT** Button to get Add PIT Form

STEP 3.1

Click on **ADD STR** Button to get Add STR Form

The screenshot shows the main menu of the Financial Intelligence Unit Database. At the top, it says 'FINANCIAL INTELLIGENCE UNIT DATABASE'. Below that, there are buttons for 'Import CSV file' and 'Import Excel file'. A note states: 'Note: After importing STR, edit the STR and add the Date of Generation'. Under the heading 'Manually Import PIT, CTR and STR', there are three buttons: 'Add CTR', 'Add PIT', and 'Add STR', each circled in red. Below these are buttons for 'CREATE NEW CASE', 'ASSISTANCE PROVIDED', 'ASSISTANCE RECEIVED', 'TRAINING PROVIDED', and 'TRAINING RECEIVED'. At the bottom, there are buttons for 'Back to Main Menu' and 'Exit'. The footer says 'REPUBLIC OF PALAU'.

ADD CTR

The screenshot shows the 'Add CTR Form' interface. It has a title bar 'Add CTR Form' and the 'FINANCIAL INTELLIGENCE UNIT DATABASE' logo. The form contains the following fields: 'CTRID' (text input), 'Transaction Date' (text input), 'Cash Direction' (dropdown menu), 'Cash Amount' (text input), 'Financial Institution Type' (dropdown menu), 'Name of Financial Institution' (dropdown menu), and 'Branch Office Agency Name' (dropdown menu). At the bottom, there are two buttons: 'EXIT WITHOUT SAVE' and 'SAVE AND EXIT'.

STEP 1.2: Fill up all the information in the CTR table and click SAVE AND EXIT.

ADD PIT

Add PIT Form

FINANCIAL
INTELLIGENCE UNIT DATABASE

PersonID	<input type="text" value="(New)"/>	Date of Birth	<input type="text"/>
Relationship to Transaction	<input type="text"/>	Contact Phone	<input type="text"/>
Last Name / Name of Entity	<input type="text"/>	Email	<input type="text"/>
First Name	<input type="text"/>	Id Type	<input type="text"/>
Middle Name	<input type="text"/>	Id Number	<input type="text"/>
Gender	<input type="text"/>	Id Country	<input type="text"/>
Occupation/ Type of Business	<input type="text"/>	Id Issuing Authority	<input type="text"/>
Street Address	<input type="text"/>	Account Number	<input type="text"/>
City	<input type="text"/>	Cash Direction	<input type="text"/>
State	<input type="text"/>	Cash Amount	<input type="text"/>
Zip Code	<input type="text"/>	CTRID	<input type="text"/>
Country	<input type="text"/>		

EXIT WITHOUT SAVE

SAVE AND EXIT

STEP 2.2: Fill up all the information in the PIT table and click SAVE AND EXIT.

NOTE: Please ensure to put the correct CTR ID with which the PIT is involved, else it will not sync. In addition, CTR information must be filled out first before PIT, in order to get the CTR ID of the CTR.

ADD STR

STEP 3.2: Fill up all the information in the STR table and click SAVE AND EXIT.

Add STR Form

**FINANCIAL
INTELLIGENCE UNIT DATABASE**

STR ID: (New)

Part I: Reporting Financial Institution Information
Name of Financial Institution:
Branch Office(s) where activity occurred:
Account Number(s) affected, if any:

Part II: Suspect Information
Last Name or Name of Entity:
First Name:
Middle Name:
Address:
City: State:
Zip Code: Country:
Phone Number - Residence:
Phone Number - Work:
Occupation/Type of Business:
Date of Birth:
Admission/Confession:
Disseminated:
STR Generation Date:

Form of Identification for suspect:
Number: Issuing Authority:
Relationship to Financial Institution:
Type of Insider Relationship:
Date of Suspension, Termination, Resignation:

Part III: Suspicious Transaction Information
Date or date range of suspicious transaction:
From: To:
Total dollar amount involved in transaction:
Summary characterization of suspicious transaction:

Part IV: Suspicious Transaction Information Explanation/Description

Wire Transaction Subform

Direction	Suspect Accn Number	Last Name/Entity Name	Middle Name	First Name
* <input type="text"/>				

Record: 1 of 1 No Filter Search

Cash Transaction Subform

Direction	Suspect Accn Number	Last Name/Entity Name	Middle Name	First Name
* Withdrawal <input type="text"/>				

Record: 1 of 1 No Filter Search

EXIT WITHOUT SAVE

SAVE AND EXIT

Record: 1 of 1 No Filter Search

NOTE: The information in Wire Transaction Subform and Cash Transaction Subform is derived from narrative section of the STR

ADD A NEW CASE

STEP 1:

Click on **CREATE NEW CASE**
Button to get Add Cases Form

FINANCIAL
INTELLIGENCE UNIT DATABASE

Import PIT, CTR and STR data using CSV/Excel File

Import CSV file

Import Excel file

Note: After importing STR, edit the STR and add the Date of Generation

Manually Import PIT, CTR and STR

Add CTR

Add PIT

Add STR

CREATE NEW CASE

ASSISTANCE
PROVIDED

ASSISTANCE
RECEIVED

TRAINING
PROVIDED

TRAINING
RECEIVED


Back to Main Menu

Exit

REPUBLIC OF PALAU

STEP 2:

Add the necessary basic information regarding the case

 Add Cases Form

FINANCIAL INTELLIGENCE UNIT DATABASE

Case ID(Auto-generate)

New

Case Name

Open Date

Close Date

Suspect First Name

Suspect Last Name/ Entity Name

Case Status

Investigated

Property Status

Value of Property

\$0.00

Type of Cases

Associated people/ Entity

SAVE AND EXIT

EXIT WITHOUT SAVE

STEP 3:

To add CTR information into the case, Click on SEARCH and find the necessary CTR → click on ADD CTR → then click on **ADD** button to connect CTR information with the case.

[illegible]

Repeat the same steps to add STR to the case. Click **SAVE AND EXIT** to create a new Case.

ADD ASSISTANCE PROVIDED INFORMATION

STEP 1:

Click on **ASSISTANCE PROVIDED** Button to get Add Assistance Provided Form

FINANCIAL INTELLIGENCE UNIT DATABASE

Import PIT, CTR and STR data using CSV/Excel File

Import CSV file Import Excel file

Note: After importing STR, edit the STR and add the Date of Generation

Manually Import PIT, CTR and STR

Add CTR Add PIT Add STR

CREATE NEW CASE

ASSISTANCE PROVIDED ASSISTANCE RECEIVED

TRAINING PROVIDED TRAINING RECEIVED

Back to Main Menu Exit

REPUBLIC OF PALAU

STEP 2:

Add the necessary information and click SAVE AND EXIT

Add Assistance Provided Form

FINANCIAL INTELLIGENCE UNIT DATABASE

ID (Auto-Assigned) (New)

Request Date

Requesting Agency Details Suspect Details

Name of Agency

Contact Name

Contact Number

Contact Email

Contact Designation

Local/Foreign Local

Country

SAVE AND EXIT EXIT WITHOUT SAVE

Add Assistance Provided Form

FINANCIAL INTELLIGENCE UNIT DATABASE

ID (Auto-Assigned) (New)

Request Date

Requesting Agency Details Suspect Details

Last Name/ Name of Entity

Middle Name

First Name

Information Shared

Date of Share

Comments(opt)

SAVE AND EXIT EXIT WITHOUT SAVE

ADD ASSISTANCE RECEIVED INFORMATION

STEP 1:

Click on **ASSISTANCE RECEIVED** Button to get Add Assistance Received Form

FINANCIAL INTELLIGENCE UNIT DATABASE

Import PIT, CTR and STR data using CSV/Excel File

Import CSV file Import Excel file

Note: After importing STR, edit the STR and add the Date of Generation

Manually Import PIT, CTR and STR

Add CTR Add PIT Add STR

CREATE NEW CASE

ASSISTANCE PROVIDED ASSISTANCE RECEIVED

TRAINING PROVIDED TRAINING RECEIVED

Back to Main Menu Exit

REPUBLIC OF PALAU

STEP 2:

Add the necessary information and click SAVE AND EXIT

Add Assistance Received Form

FINANCIAL INTELLIGENCE UNIT DATABASE

ID (Auto-Assigned) (New)

Request Date

Suspect Details Requested Agency Details

Last Name/ Name of Entity

Middle Name

First Name

Information Obtained

Date Received

Comments(opt)

SAVE AND EXIT EXIT WITHOUT SAVE

Add Assistance Received Form

FINANCIAL INTELLIGENCE UNIT DATABASE

ID (Auto-Assigned) (New)

Request Date

Suspect Details Requested Agency Details

Name of Agency

Contact Name

Contact Number

Contact Email

Contact Designation

Local/Foreign Local

Country

SAVE AND EXIT EXIT WITHOUT SAVE

ADD TRAINING PROVIDED INFORMATION

STEP 1:

Click on **TRAINING PROVIDED** Button to get Add Training Provided Form

FINANCIAL INTELLIGENCE UNIT DATABASE

Import PIT, CTR and STR data using CSV/Excel File

Import CSV file Import Excel file

Note: After importing STR, edit the STR and add the Date of Generation

Manually Import PIT, CTR and STR

Add CTR Add PIT Add STR

CREATE NEW CASE

ASSISTANCE PROVIDED ASSISTANCE RECEIVED

TRAINING PROVIDED TRAINING RECEIVED

Back to Main Menu Exit

REPUBLIC OF PALAU

STEP 2:

Add the necessary information and click SAVE AND EXIT

Add Training Provided Form

FINANCIAL INTELLIGENCE UNIT DATABASE

ID (Auto-Assigned) (New)

Training Location Attendee List

Event Name

Event Domain

Event Type

Conducting Agency

Funding Agency

Trainer Name

Trainer Expense \$0.00

Start Date End Date

Duration (days) 0

Comments(opt.)

EXIT WITHOUT SAVE SAVE AND EXIT

Make sure Attendee List is empty before exiting without save

Add Training Provided Form

FINANCIAL INTELLIGENCE UNIT DATABASE

ID (Auto-Assigned) (New)

Training Location Attendee List

Number of Attendee

Expense for Attendee \$0.00

Import Excel File

Training Attendee List

#	First Name	Last Name	Agency	Design
1				
2				
3				
4				
5				

Record: 1 of 1 No Filter Search

Comments(opt.)

EXIT WITHOUT SAVE SAVE AND EXIT

Make sure Attendee List is empty before exiting without save

FIU users can also load the training attendee list by creating an excel file with the following column names(firstName, lastName, agency, designation, dateAttended, trainingProvidedID), fill up the required data and use the **IMPORT EXCEL FILE** BUTTON.

trainingProvidedID contains the ID of the Training Provided session displayed on top of form.

ADD TRAINING RECEIVED INFORMATION

STEP 1:

Click on TRAINING RECEIVED Button to get Add Training Received Form

FINANCIAL INTELLIGENCE UNIT DATABASE

Import PIT, CTR and STR data using CSV/Excel File

Import CSV file Import Excel file

Note: After importing STR, edit the STR and add the Date of Generation

Manually Import PIT, CTR and STR

Add CTR Add PIT Add STR

CREATE NEW CASE

ASSISTANCE PROVIDED ASSISTANCE RECEIVED

TRAINING PROVIDED **TRAINING RECEIVED**

Back to Main Menu Exit

REPUBLIC OF PALAU

STEP 2:

Add the necessary information and click SAVE AND EXIT

Add Training Received Form

FINANCIAL INTELLIGENCE UNIT DATABASE

ID (Auto-Assigned) (New)

Event Start Date

Event End Date

Duration (days) 0

Training Location Attendee

Event Name

Event Type

Event Domain

Conducting Agency

Funding Agency

Trainer Name

Comments(opt.)

SAVE AND EXIT EXIT WITHOUT SAVE

Add Training Received Form

FINANCIAL INTELLIGENCE UNIT DATABASE

ID (Auto-Assigned) (New)

Event Start Date

Event End Date

Duration (days) 0

Training Location Attendee

Address

City

State

Zip 0

Country

Comments(opt.)

SAVE AND EXIT EXIT WITHOUT SAVE

Add Training Received Form

FINANCIAL INTELLIGENCE UNIT DATABASE

ID (Auto-Assigned) (New)

Event Start Date

Event End Date

Duration (days) 0

Training Location Attendee

Attendee First Name

Attendee Last Name

Travel Cost \$0.00

Training Cost \$0.00

Travel Start Date

Travel End Date

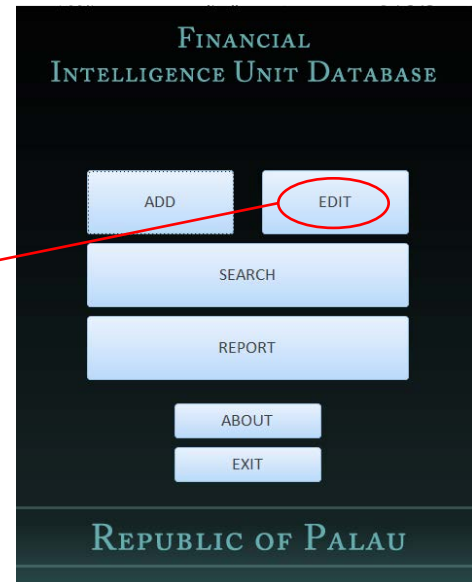
Comments(opt.)

SAVE AND EXIT EXIT WITHOUT SAVE

Chapter 2: Editing Data in the Database

Following are the steps to edit data into the database

STEP 1:
Click on **EDIT** Button
on the Main Menu



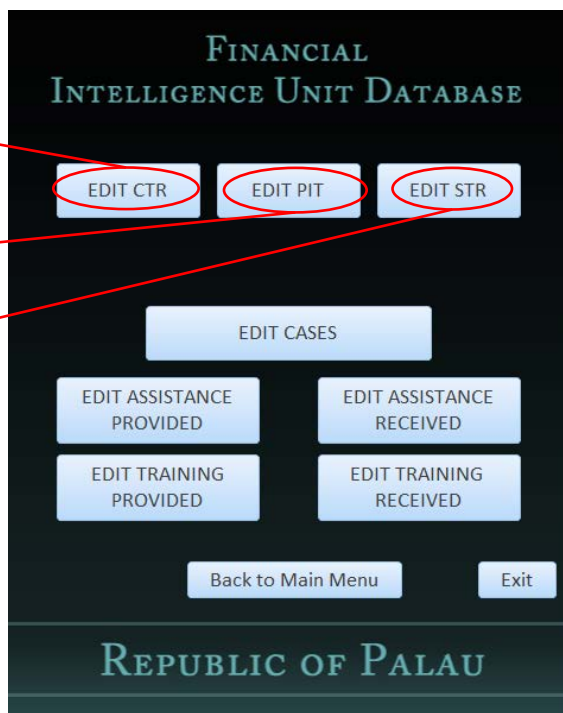
NOTE: Deletion of record is not allowed from the database forms. This is done to protect accidental deletion protection. FIU users can manually go to the tables and delete them.

EDIT CTR, PIT AND STR DATA

STEP 1.1:
Click on **EDIT CTR** Button to
get Add CTR Form

STEP 2.1:
Click on **EDIT PIT** Button to
get Add PIT Form

STEP 3.1
Click on **EDIT STR** Button to
get Add STR Form



EDIT CTR

Edit CTR Form

FINANCIAL INTELLIGENCE UNIT DATABASE

Last Name / Entity Name
 First Name
 Account Number
 Date of Birth
 Cash Direction

CTRID
 Minimum Cash Amount
 Maximum Cash Amount
 Transaction Start Date
 Transaction End Date

CTRID

Transaction Date Financial Institution Type
 Deposit / Withdrawal Financial Institution Name
 Cash Amount Branch Office Name

Record: 1 of 1 No Filter Search

STEP 1.2: We must search for the specific CTR we want to edit. Fill up necessary information in the Edit CTR form and click **SEARCH**

Edit CTR Form

FINANCIAL INTELLIGENCE UNIT DATABASE

Last Name / Entity Name
 First Name
 Account Number
 Date of Birth
 Cash Direction

CTRID
 Minimum Cash Amount
 Maximum Cash Amount
 Transaction Start Date
 Transaction End Date

CTRID

Transaction Date Financial Institution Type
 Deposit / Withdrawal Financial Institution Name
 Cash Amount Branch Office Name

Relationship to transaction:
 Individual's last name or entity's legal name:
 First name:
 Middle name:
 Gender:
 Occupation or type of business:
 Address:
 City:
 State:
 Country:

Date of birth:
 Contact Phone Number:
 E-mail address:
 Form of identification used to verify identity:
 Number:
 Country:
 Issuing State:
 Direction of cash transaction:
 Amount of cash:
 Account number:
 CTR id:

Record: 1 of 3 No Filter Search

STEP 1.3: There can be multiple CTR satisfying the search criteria. So, click on the **NAVIGATIONAL BUTTON** at the end and find out the specific CTR. Edit the CTR and click **SAVE AND EXIT** to save the edited data.

EDIT PIT

Edit PIT Form

FINANCIAL INTELLIGENCE UNIT DATABASE

Last Name/Name of Entity	<input type="text"/>	Account Number	<input type="text"/>	<input type="button" value="SEARCH"/> <input type="button" value="SAVE AND EXIT"/>
First Name	<input type="text"/>	Min Cash Amount	<input type="text"/>	
Date of Birth	<input type="text"/>	Max Cash Amount	<input type="text"/>	
City	<input type="text"/>	Direction of Transaction	<input type="text"/>	
Country	<input type="text"/>			

Relationship to transaction:	<input type="text"/>	Date of birth:	<input type="text"/>
Individual's last name or entity's legal name:	<input type="text"/>	Contact Phone Number:	<input type="text"/>
First name:	<input type="text"/>	E-mail address:	<input type="text"/>
Middle name:	<input type="text"/>	Form of identification used to verify identity:	<input type="text"/>
Gender:	<input type="text"/>	Number:	<input type="text"/>
Occupation or type of business:	<input type="text"/>	Country:	<input type="text"/>
Address:	<input type="text"/>	Issuing State:	<input type="text"/>
City:	<input type="text"/>	Direction of cash transaction:	<input type="text"/>
State:	<input type="text"/>	Amount of cash:	<input type="text"/>
Country:	<input type="text"/>	Account number:	<input type="text"/>
		CTR id:	<input type="text"/>

Record: 1 of 1 No Filter Search

STEP 2.2: We must search for the specific PIT we want to edit. Fill up necessary information in the Edit PIT Form and click SEARCH

Edit PIT Form

FINANCIAL INTELLIGENCE UNIT DATABASE

Last Name/Name of Entity	<input type="text"/>	Account Number	<input type="text"/>	<input type="button" value="SEARCH"/> <input type="button" value="SAVE AND EXIT"/>
First Name	<input type="text"/>	Min Cash Amount	<input type="text"/>	
Date of Birth	<input type="text"/>	Max Cash Amount	<input type="text"/>	
City	<input type="text"/>	Direction of Transaction	<input type="text"/>	
Country	<input type="text"/>			

Relationship to transaction:	<input type="text"/>	Date of birth:	<input type="text"/>
Individual's last name or entity's legal name:	<input type="text"/>	Contact Phone Number:	<input type="text"/>
First name:	<input type="text"/>	E-mail address:	<input type="text"/>
Middle name:	<input type="text"/>	Form of identification used to verify identity:	<input type="text"/>
Gender:	<input type="text"/>	Number:	<input type="text"/>
Occupation or type of business:	<input type="text"/>	Country:	<input type="text"/>
Address:	<input type="text"/>	Issuing State:	<input type="text"/>
City:	<input type="text"/>	Direction of cash transaction:	<input type="text"/>
State:	<input type="text"/>	Amount of cash:	<input type="text"/>
Country:	<input type="text"/>	Account number:	<input type="text"/>
		CTR id:	<input type="text"/>

Record: 1 of 4 No Filter Search

STEP 2.3: There can be multiple PIT satisfying the search criteria. So, click on the **NAVIGATIONAL BUTTON** at the end and find out the specific PIT. Edit the PIT and click **SAVE AND EXIT** to save the edited data.

EDIT STR

STEP 3.2: We must search for the specific STR we want to edit. Fill up necessary information in the Edit STR Form and click SEARCH. There can be multiple STR satisfying the search criteria. So, click on the **NAVIGATIONAL BUTTON** at the end and find out the specific STR. After editing the information, press **SAVE AND EXIT**.

Edit STR Form

**FINANCIAL
INTELLIGENCE UNIT DATABASE**

STR Number

Suspect Last Name/ Entity

Suspect First Name

STR Account involved

Start Date

Minimum amount involved

Maximum amount involved

Account involved in Cash Tx

Account involved in Wire Tx

End Date

SEARCH

CLEAR

SAVE AND EXIT

Part I: Reporting Financial Institution Information

Name of Financial Institution: #Name?

Branch Office(s) where activity occurred: #Name?

Account Number(s) affected, if any: #Name?

Part II: Suspect Information

Last Name or Name of Entity: #Name?

First Name: #Name?

Middle Name: #Name?

Address: #Name?

City: #Name? State: #Name?

Zip Code: #Name? Country: #Name?

Phone Number - Residence: #Name?

Phone Number - Work: #Name?

Occupation/Type of Business: #Name?

Date of Birth: #Name?

Admission/Confession: #Name?

STR ID: #Name?

Disseminated: #Name?

STR Generation Date: #Name?

Form of identification for suspect:

Number: #Name? Issuing Authority: #Name?

Relationship to Financial Institution: #Name?

Type of Insider Relationship: #Name?

Date of Suspension, Termination, Resignation: #Name?

Part III: Suspicious Transaction Information

Date or date range of suspicious transaction:

From: #Name? To: #Name?

Total dollar amount involved in transaction: #Name?

Summary characterization of suspicious transaction: #Name?

Part IV: Suspicious Transaction Information Explanation/Description

#Name?

Wire Transaction Subform

Direction	Suspect Acctn Number	Last Name/Entity Name	Middle Name	First Name
*				

Record: 1 of 1 No Filter Search

Cash Transaction Subform

Direction	Suspect Acctn Number	Last Name/Entity Name	Middle Name	First Name
Withdrawal				

Record: 1 of 1 No Filter Search

NOTE: The information in Wire Transaction Subform and Cash Transaction Subform is derived from narrative section of the STR

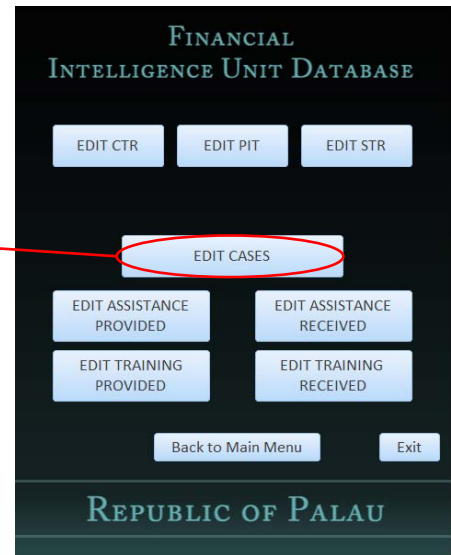
EDIT A NEW CASE

STEP 1:

Click on **EDIT CASES** Button to get Edit Cases Form

STEP 2:

We must search for the specific CASE we want to edit. Fill up necessary information in the Edit Cases Form and click SEARCH. There can be multiple Cases information satisfying the search criteria. So, click on the NAVIGATIONAL BUTTON at the end and find out the specific information. After editing the information, press SAVE AND EXIT.



Edit Cases Form

FINANCIAL INTELLIGENCE UNIT DATABASE

Case ID

Suspect First Name

Case Name

Case Status

Start Case Open Date

Property Status

End Case Open Date

Type of Cases

Suspect Last Name/ Entity Name

Associated people/ Entity

SEARCH

SAVE AND EXIT

CLEAR

Case Name Case ID(Auto-generated)

Case Status

Open Date Close Date

Property Status

Suspect Last Name/ Entity Name

Value of Property

Suspect First Name

Type of Cases

Associated people/ Entity

CTRs involved

Search

Add

Delete

CTRID	dateOfTrans	cashDirection	cashAmount	typeOfFinancialInstitution	full
#Name?	#Name?	#Name?	#Name?	#Name?	#N

Record: 1 of 1

Person in Transactions in CTRs

PersonID	relationshipToTransaction	lastNameOrNameOfEntity	firstName	middleName
#Name?	#Name?	#Name?	#Name?	#Name?

Record: 1 of 1

STRs involved

Search

Add

Delete

STRID	fullNameOfFinancialInstitution	nameOfBranchOfficeAgency	accountNumbers	lastNameOrNameOfEntity	full
#Name?	#Name?	#Name?	#Name?	#Name?	#N

Record: 1 of 1

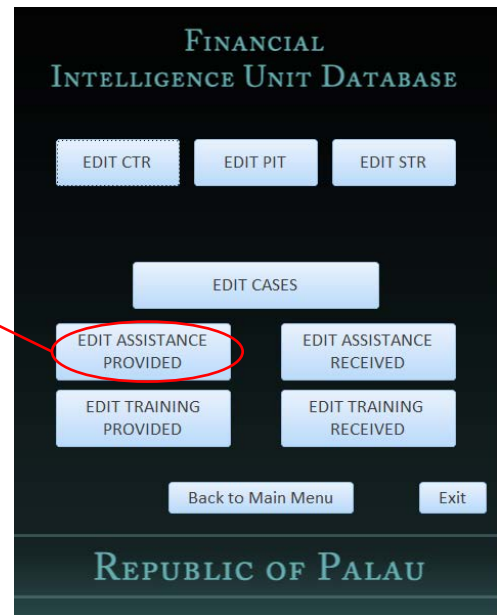
EDIT ASSISTANCE PROVIDED INFORMATION

STEP 1:

Click on **EDIT ASSISTANCE PROVIDED** Button to get Edit Assistance Provided Form

STEP 2:

We must search for the specific ASSISTANCE PROVIDED information we want to edit. Fill up necessary information in the Edit Assistance Provided Form and click SEARCH. There can be multiple Assistance Provided information satisfying the search criteria. So, click on the NAVIGATIONAL BUTTON at the end and find out the specific information. After editing the information, press SAVE AND EXIT.



Edit Assistance Provided Form

FINANCIAL INTELLIGENCE UNIT DATABASE

Agency Name

Last/Entity Suspect Name

Country Local/Foreign

First Name

ID

RequestDate

Requesting Agency Details | Suspect Details

Name of Agency

Contact Name

Contact Number

Contact Email

Contact Designation

Local/Foreign

Country

Record: 1 of 1 No Filter Search

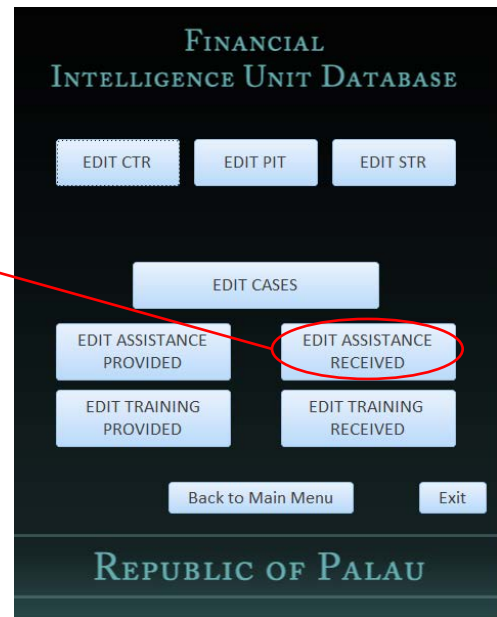
EDIT ASSISTANCE RECEIVED INFORMATION

STEP 1:

Click on **EDIT ASSISTANCE RECEIVED** Button to get Edit Assistance Received Form

STEP 2:

We must search for the specific ASSISTANCE RECEIVED information we want to edit. Fill up necessary information in the Edit Assistance Received Form and click SEARCH. There can be multiple Assistance Received information satisfying the search criteria. So, click on the NAVIGATIONAL BUTTON at the end and find out the specific information. After editing the information, press SAVE AND EXIT.



Edit Assistance Received Form

FINANCIAL INTELLIGENCE UNIT DATABASE

Agency Name

Last/Entity Suspect Name

Country Local/Foreign

First Name

ID

RequestDate

Suspect Details **Requested Agency Details**

LastName/
Name of Entity

Middle Name

First Name

Information
Obtained

Date Received

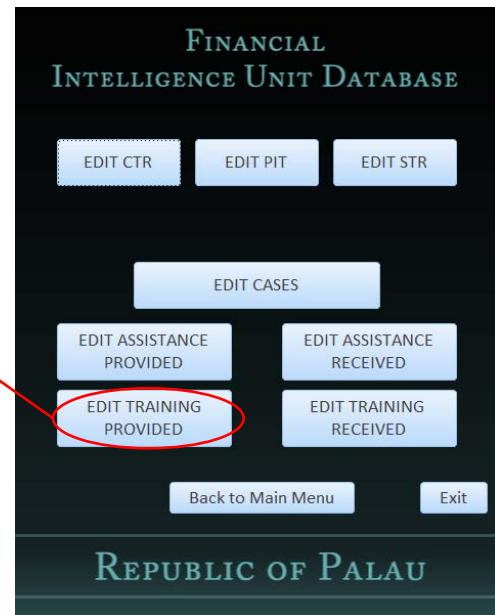
Comments(opt.)

Record: 1 of 1 No Filter Search

EDIT TRAINING PROVIDED INFORMATION

STEP 1:

Click on **TRAINING PROVIDED**
Button to get Edit Training
Provided Form

[illegible]

STEP 2:

We must search for the specific TRAINING PROVIDED information we want to edit. Fill up necessary information in the Edit Training Provided Form and click SEARCH. There can be multiple Training Provided information satisfying the search criteria. So, click on the NAVIGATIONAL BUTTON at the end and find out the specific information. After editing the information, press SAVE AND EXIT.

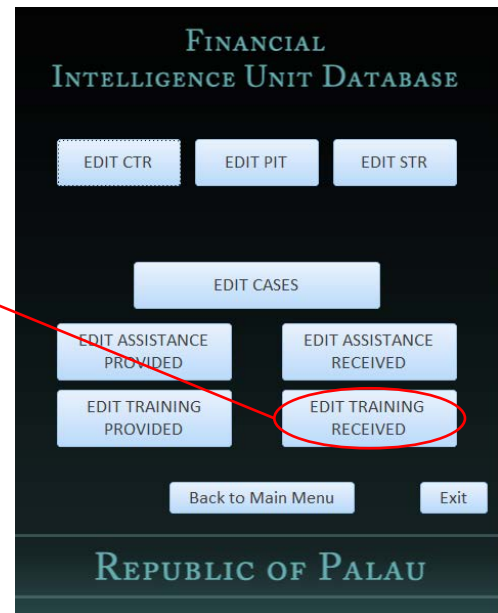
EDIT TRAINING RECEIVED INFORMATION

STEP 1:

Click on **TRAINING RECEIVED**
Button to get Edit Training
Received Form

STEP 2:

We must search for the specific TRAINING RECEIVED information we want to edit. Fill up necessary information in the Edit Training Received Form and click SEARCH. There can be multiple Training Received information satisfying the search criteria. So, click on the NAVIGATIONAL BUTTON at the end and find out the specific information. After editing the information, press SAVE AND EXIT.



Edit Training Received Form

FINANCIAL INTELLIGENCE UNIT DATABASE

Conducting Agency
Domain Country
Attended By(First Name)
Event Start Date Range Start
Event Start Date Range End

ID #Name? Event End Date #Name?
Event Start Date #Name? Duration #Name?

Training Location Attendee

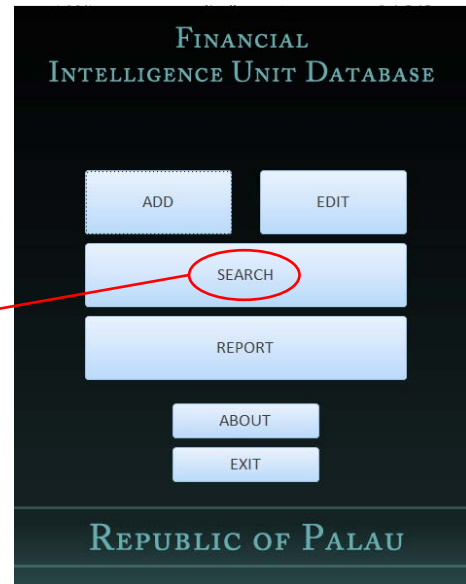
Event Name
Domain #Name?
Conducting Agency #Name?
Funding Agency #Name?
Trainer Name #Name?
Comments(opt.) #Name?

Record: 1 of 1 No Filter Search

Chapter 3: Searching Data in the Database

The procedure of Searching data in the database is same as Editing Data as explained above. However, data cannot be modified in Search form, unlike the Edit forms. This provides a safety net to the user from inadvertently modifying the confidential data.

Click on **SEARCH**
Button on the Main
Menu



Chapter 4: Printing Data in the Database

Search feature in the Database allows the user to print the data. Currently user can print CTR, STR and PIT data they have searched.

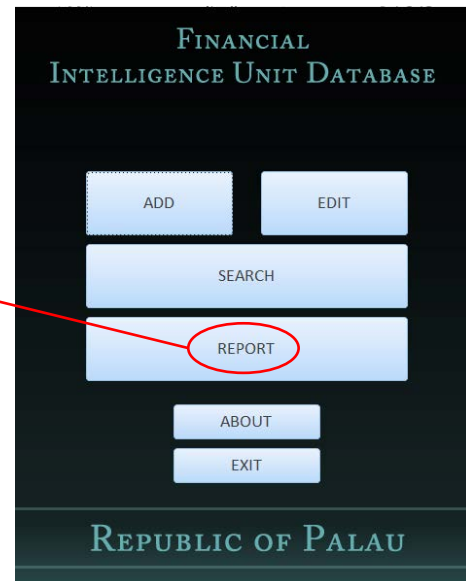
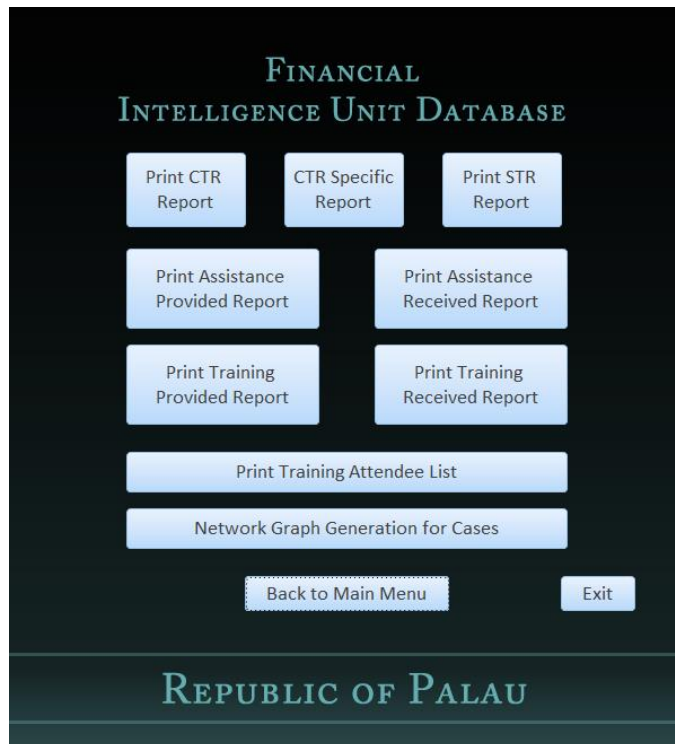
Users can also print the reports which are explained in the next section.

Chapter 5: Generating Report from the Database

Following are the steps to edit data into the database

STEP 1:

Click on **REPORT** Button
on the Main Menu



In every report (except CTR specific Report, Print Training Attendee List & Network Graph Generation for Cases), FIU user needs to provide the Start Date and End date to obtain the reports based on the information within that range.

The CTR Specific Report requires the date range and first name/Last name/direction

The Print Training Attendee List requires the ID of the Training Event to print the list of attendees.

The Network Graph Generation for Cases is explained in the next section.

Print CTR Report prints the Institution names along with number of CTR submitted & overall currency.

CTR Specific Report prints the overall currency value of the institutions searched

Print STR Report prints the Institution names along with number of STR submitted & overall currency.

Print Assistance Provided Report prints the list of assistance provided to various agencies

Print Assistance Received Report prints the list of assistance received from various agencies

Print Training Provided Report prints the list of training provided by FIU and its details

Print Training Received Report prints the list of training received by which staff and its details

Print Training Attendee List prints the list of attendee who attended the specific training.

Network Graph Generation for Cases is used to generate CSV files for data visualization of cases.

Chapter 6: Generating Visualization from Database

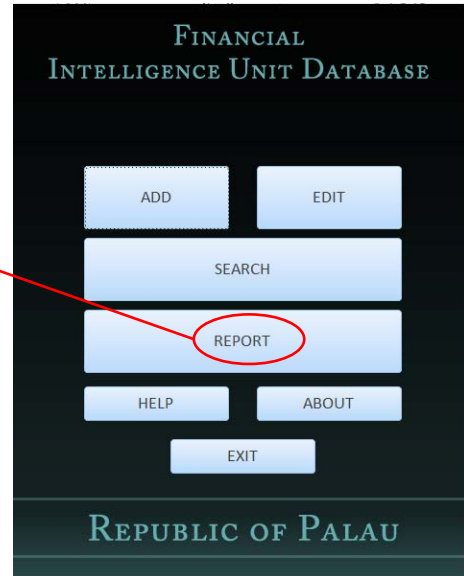
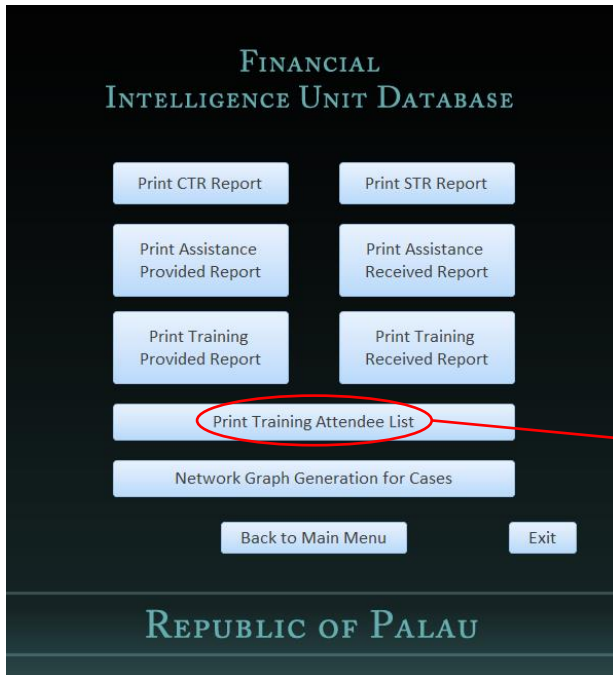
NOTE: Please perform Appendix B before generating visualization from the database

I. GENERATE DATASETS

Following are the steps to get data from the database

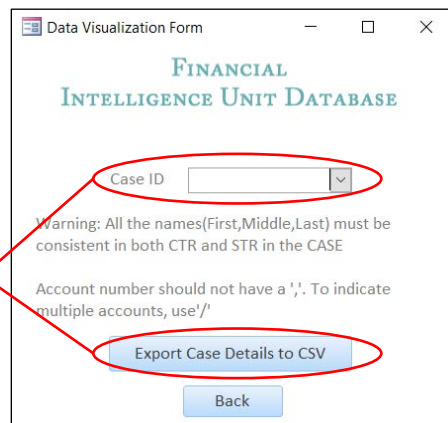
STEP 1:

Click on **REPORT** Button on the Main Menu



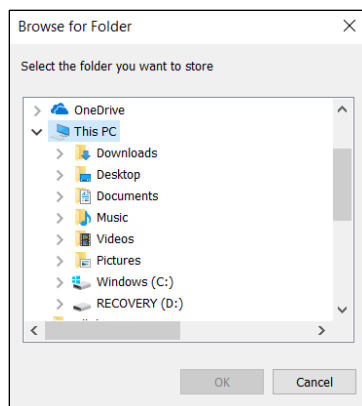
STEP 2:

Click on **NETWORK GRAPH GENERATION FOR CASES** Button on the Main Menu



STEP 3:

Enter the CASE ID and click on **EXPORT CASE DETAILS TO CSV**



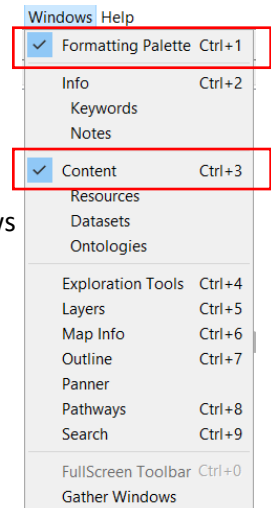
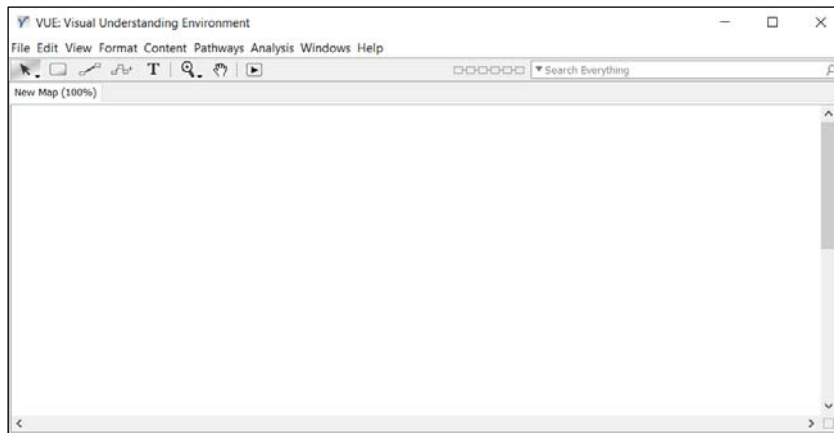
STEP 4:

Select the location where you want to save the 3 csv files generated by application and click OK. The 3 csv files are

1. FiuDBCashInfo.csv
2. FiuDBCTRInfo.csv
3. FiuDBWireInfo.csv

II. LOAD DATASETS IN VUE

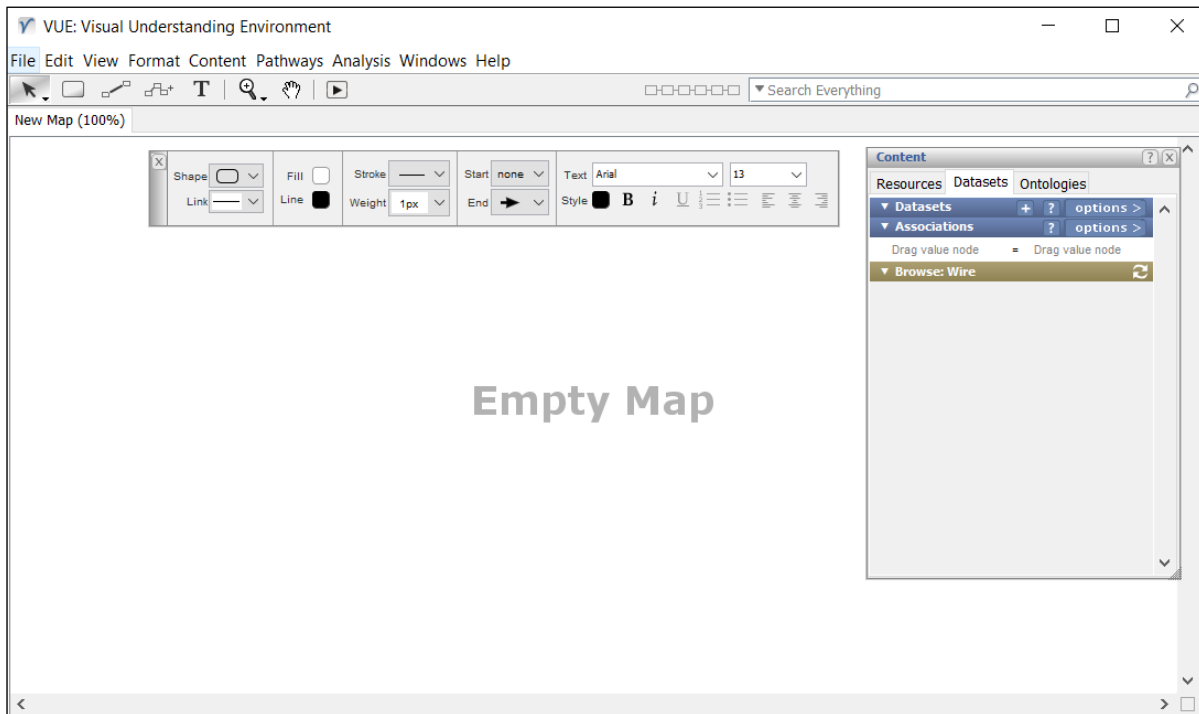
STEP 5: We will use the VUE tool to generate graphical network graphs. Install and open VUE: Visual Understanding Environment(<https://vue.tufts.edu/index.cfm>).



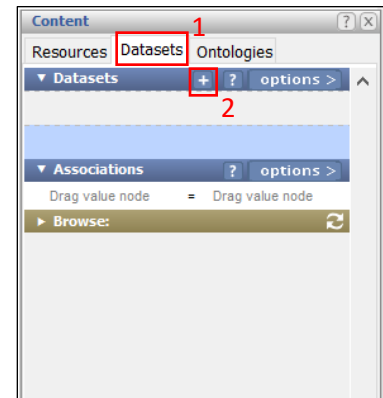
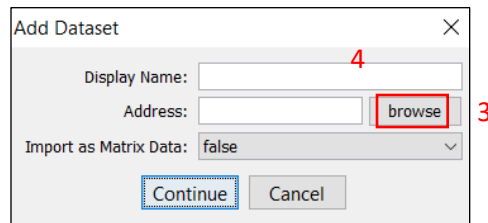
If your VUE environment looks like the above image, you need to enable 2 windows with it. They can be activated from the WINDOWS menu. The windows are

1. Formatting Palette
2. Content

The new environment will look similar as below



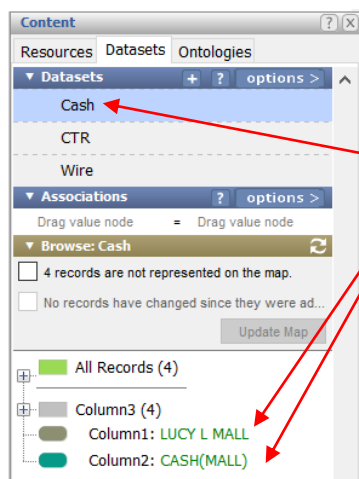
STEP 6: In the content window, select Datasets → click on the + button in the Dataset tab → click on the **BROWSE** button and select any one of the 3 csv files generated by application → Provide a name in the DISPLAY NAME field to indicate the file



Repeat the above step for all the three csv files.

You will notice that there are three new Datasets (Cash, CTR and Wire were the names provided in the Display Name during data import of the three csv files in the previous step)

III. CREATE BASIC GRAPHS FROM DATASET

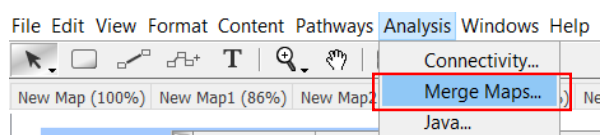


STEP 7: Select “Cash” (or whatever name is provided at the top) in the DATASETS tab. The BROWSE tab will display all the contents of the DATASET → Click on COLUMN 1 and drag it to the EMPTY MAP Space → Click on COLUMN 2 and drag it to the EMPTY MAP Space.

STEP 8: If there are more than 2 columns in the csv file, create a new Map by going to FILE → NEW. Drag COLUMN 2 and COLUMN 3 into the EMPTY MAP space. Repeat this step if there are more columns, like create another new Map and drag COLUMN 3 and COLUMN 4.

Repeat STEP 7 and STEP 8 for all the three datasets.

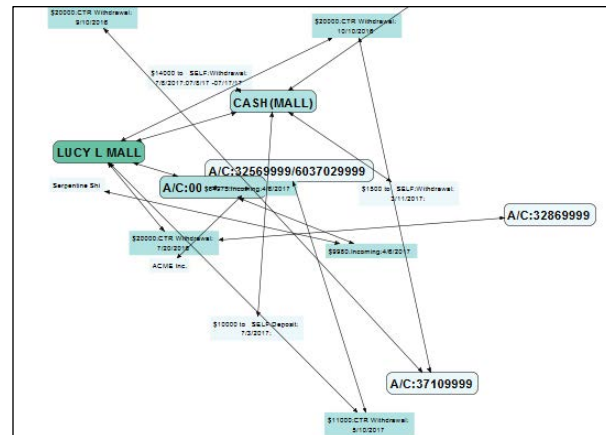
STEP 9: Click on Analysis → Merge Maps



The current network graph links and texts are much more distinguishable compared to previous one.

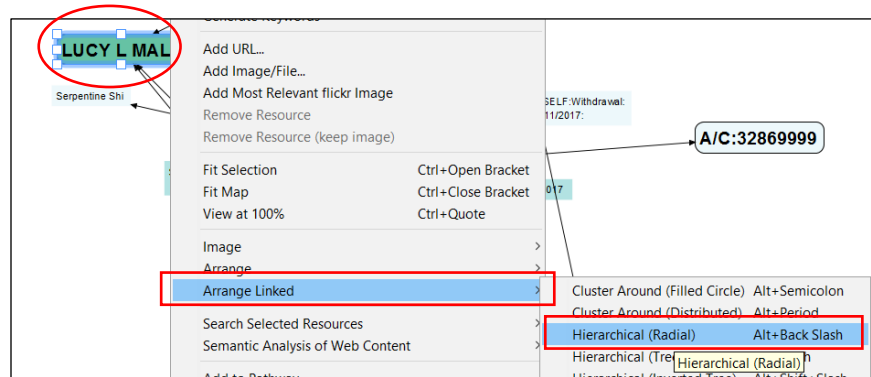
However, the graph is difficult to read since the nodes are not arranged and lot of links are overlapping on each other.

Therefore, in the coming steps, we will untangle all the nodes and make it convenient for the user to read.



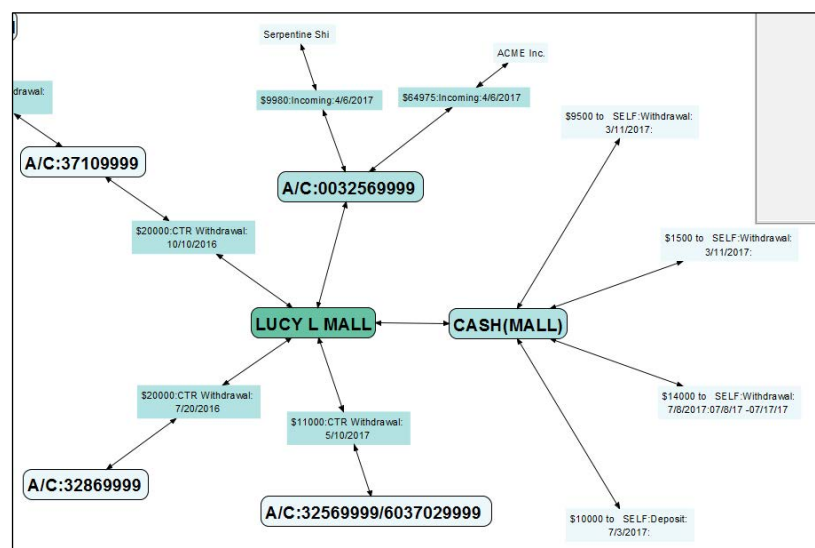
STEP 10: To arrange the nodes, perform the following steps:

1. Select the main suspect (in this case it is LUCY L MALL)
2. Right click on the node → click Arranged Linked → click Hierarchical (Radial)



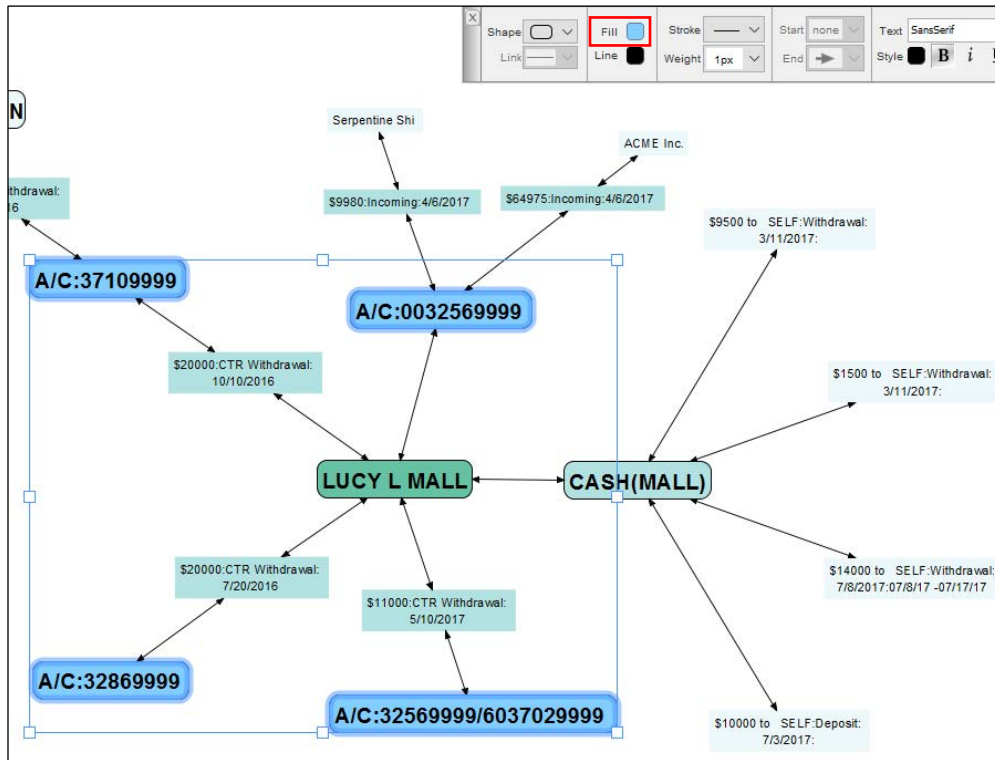
You will notice that all the nodes have been distributed radially with the suspect node in the center.

Since all the nodes are filled with similar color, we will modify them to make it easily distinguishable.



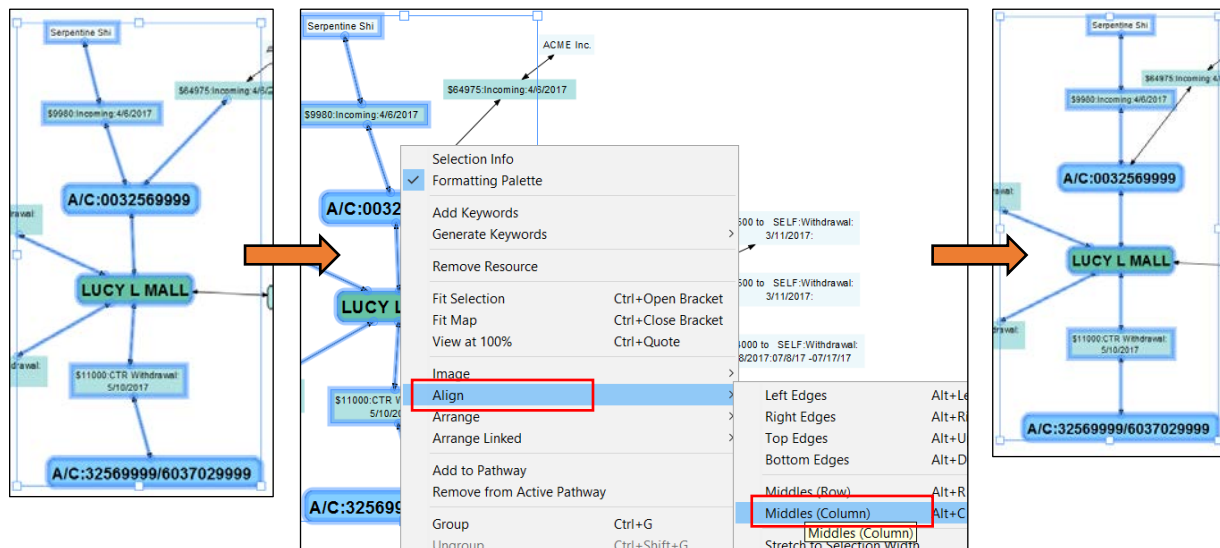
IV. ENHANCE GRAPH - I

STEP 11: To change the fill color, select the necessary nodes → Click on Fill and select the required color.



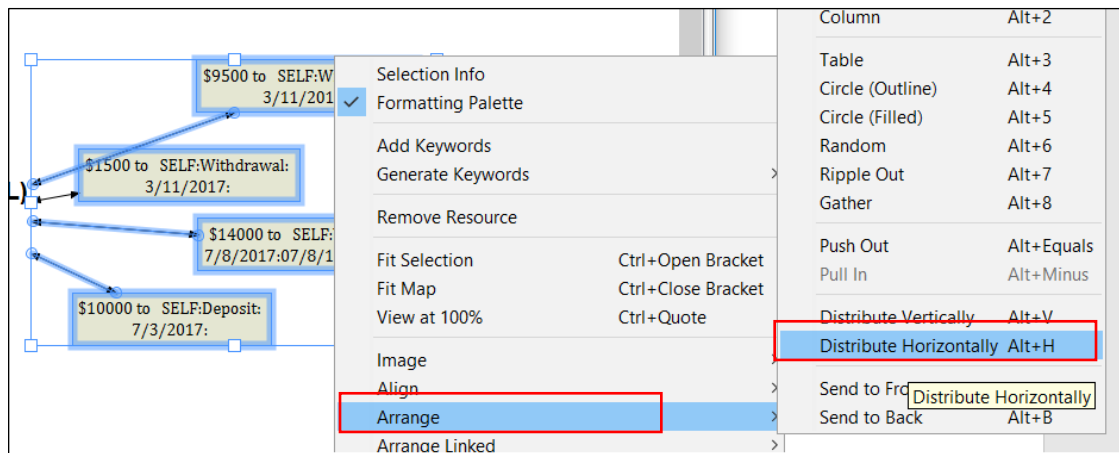
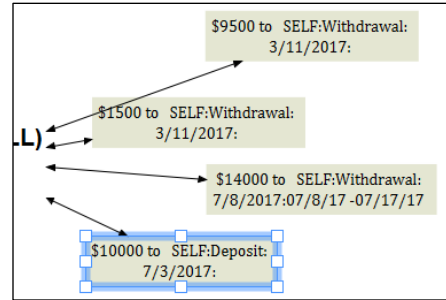
STEP 12: To further improve the alignment of nodes, perform the following steps.

1. Select the necessary nodes
2. Right Click → Align → Middles column ()

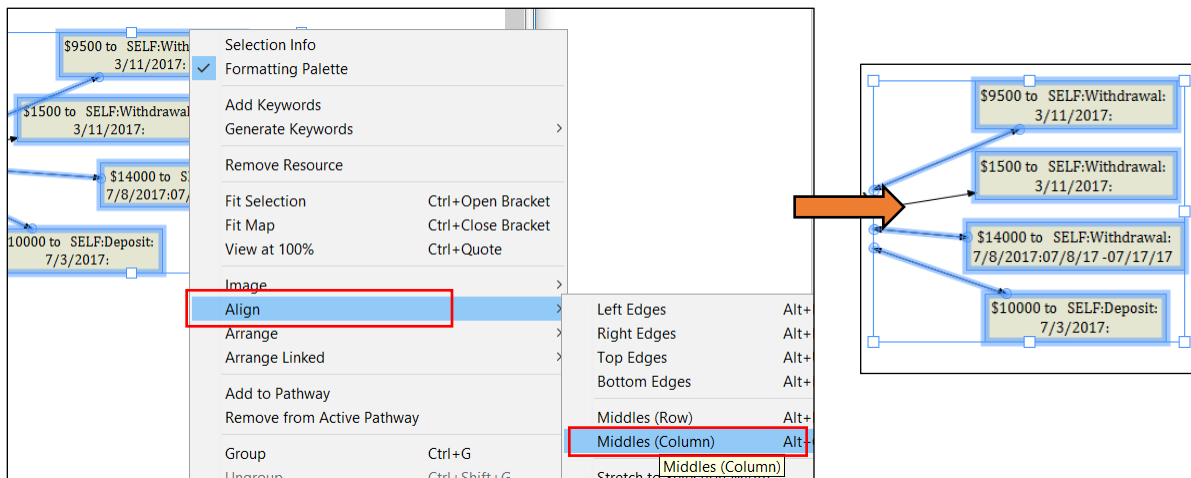


There may be cases where the nodes are not equally distributed or are overlapped one over the other. In those cases, perform the following steps:

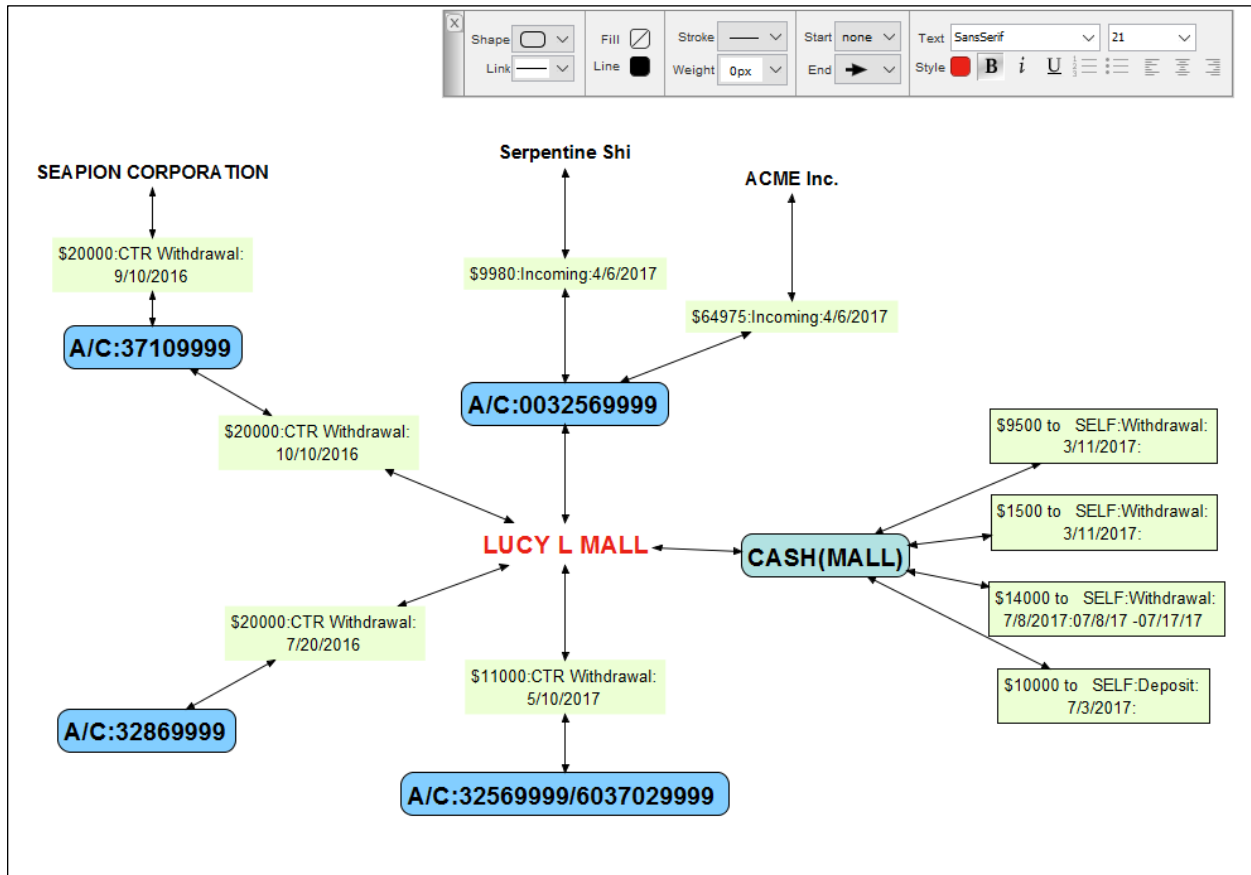
1. Select the first and last node and keep them at a distance away such that all the other nodes can be placed in between those two nodes
2. Select all the nodes (including the first and last node)
3. Right click → Select ARRANGE → Select DISTRIBUTE HORIZONTALLY



4. Now that the nodes are equally distributed in between the first and last node, we need to align the nodes as a column
5. Select the required nodes → Select ALIGN → Select MIDDLES (COLUMN)



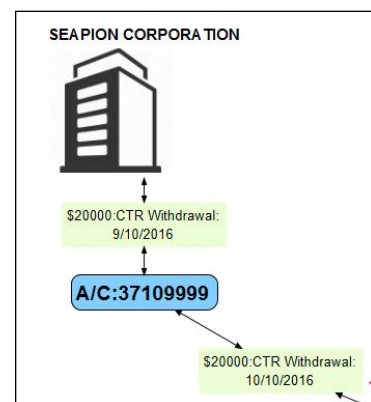
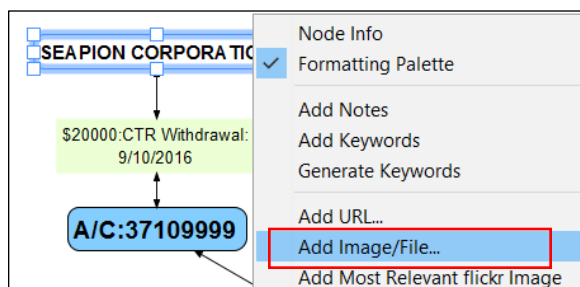
With all the necessary modification, the network diagram can be designed as follows



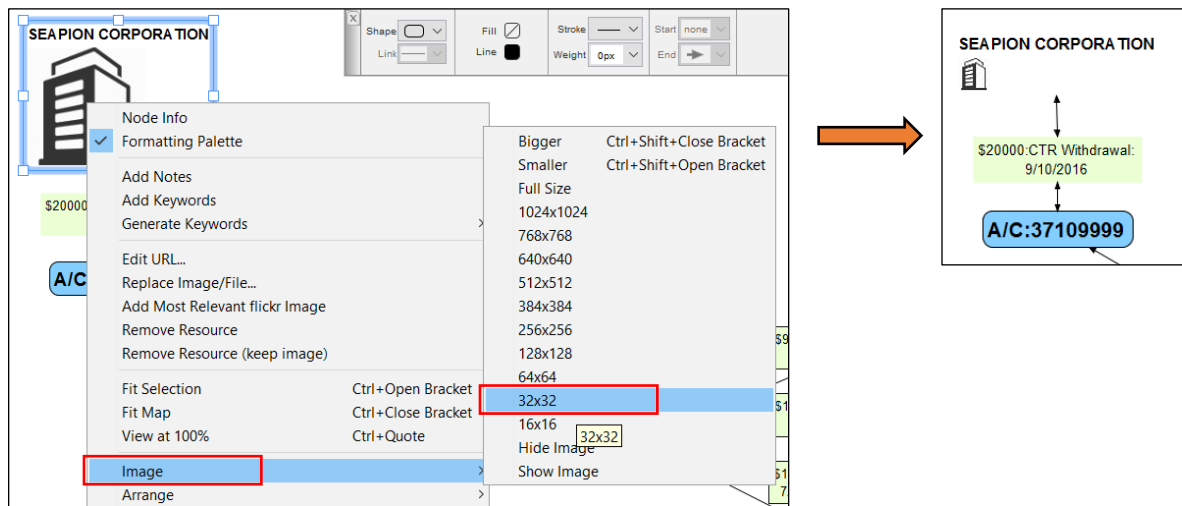
V. ENHANCE GRAPH - II

STEP 13: We can add images to distinguish the nodes between human actor and a company.

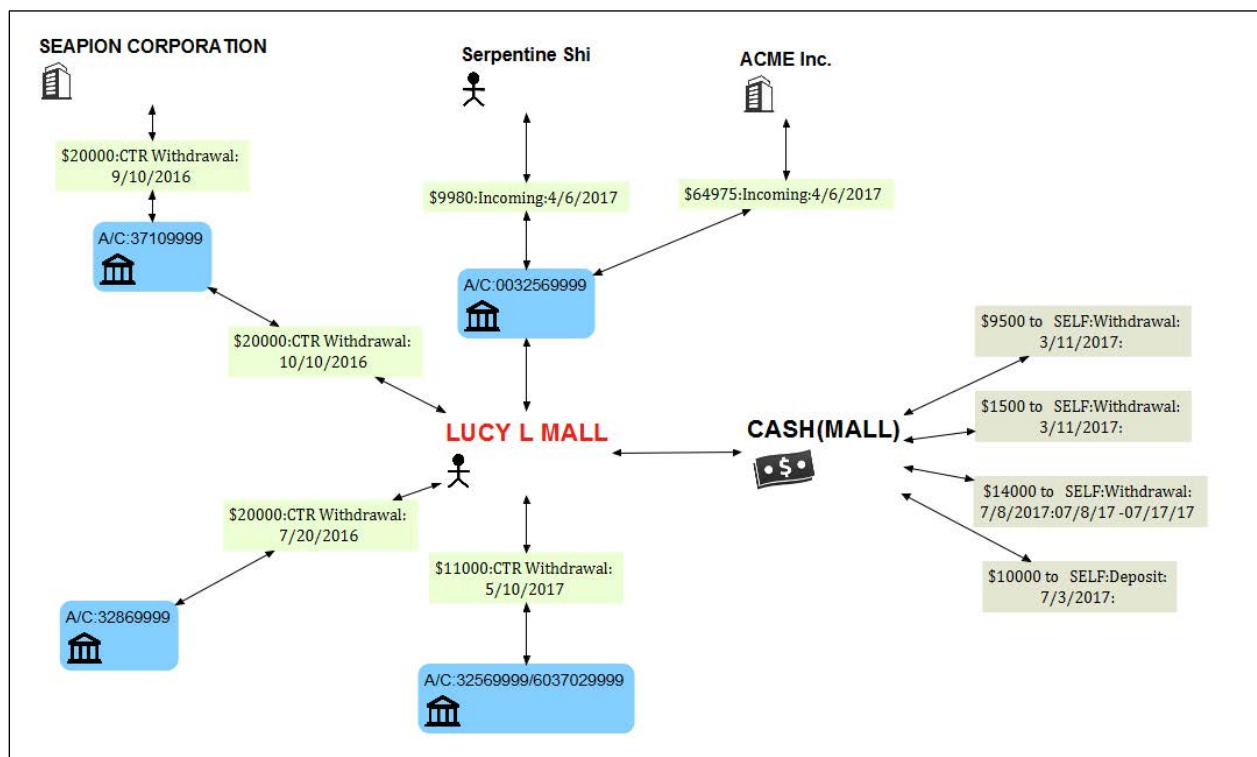
Right click on the node → Select ADD IMAGE/FILE → Choose the image file and select Okay



The image can be resized as per required pixel. In order to do that, Right click on the image → Select IMAGE → Select 32x32 or any other pixel size as preferred

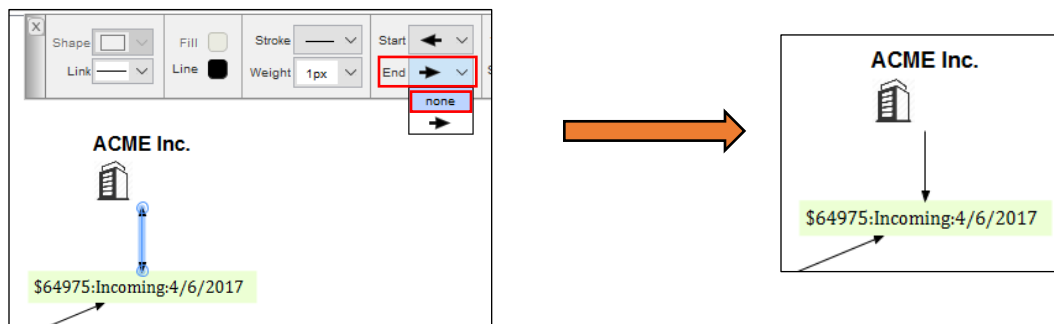


After adding all the images, the network diagram will look as follows

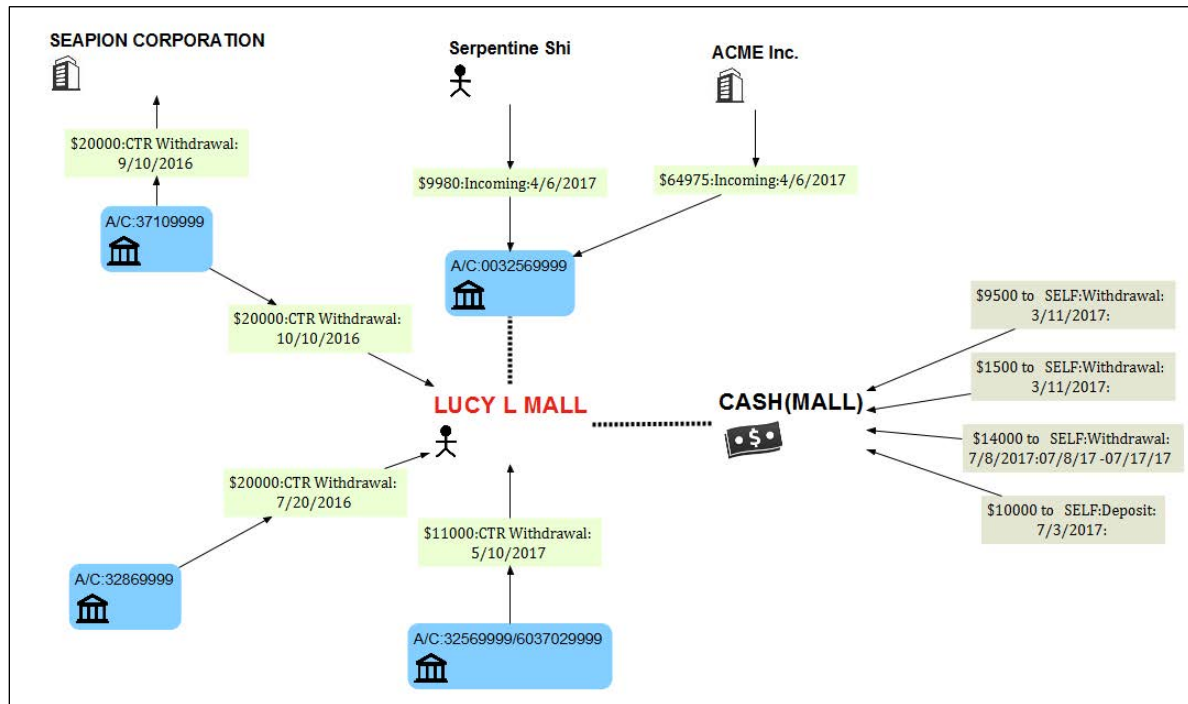


However, the links are bi-directional and does not assist in understanding the diagram. Therefore in the upcoming steps, we will modify the link direction.

STEP 13: To change the arrow direction of the link, select the link → click on the END or START and specify it as None. The arrow sign will be displayed as required

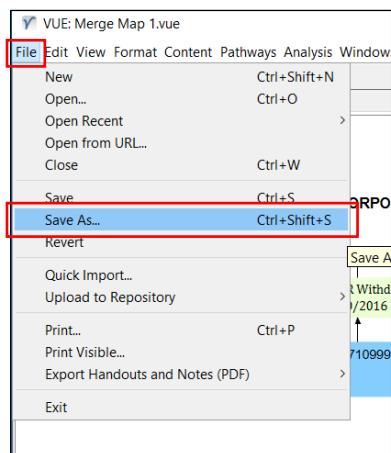


We can also modify the STROKE and WEIGHT (Thickness) of each links.

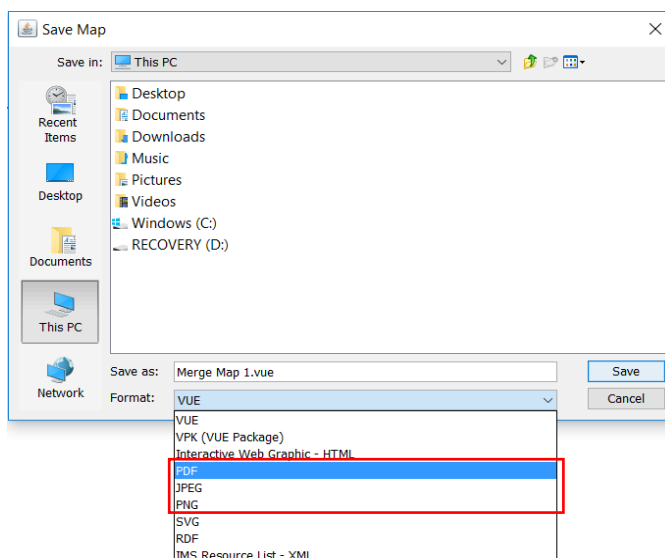


VI. SAVE GRAPH

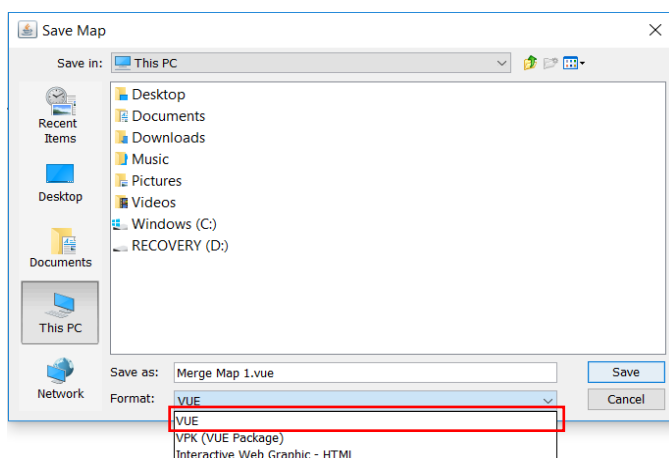
In order to save the final graph in a printable format, go to File → Save As...



In the Format type, select PDF/ JPEG/ PNG as per requirement → select the location where to save the file → click on Save



In order to save the final graph in vue format to be able to edit the graph in future, go to File → Save As... → In the Format type, select VUE → select the location where to save the file → click on Save

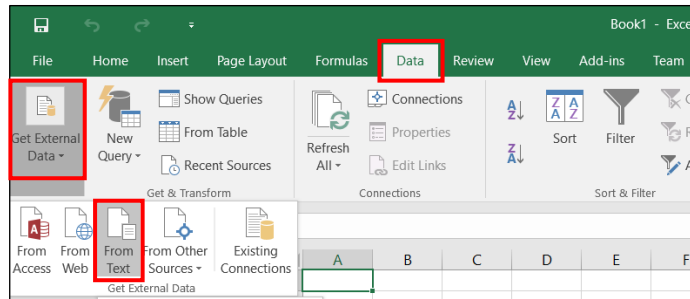


APPENDIX A

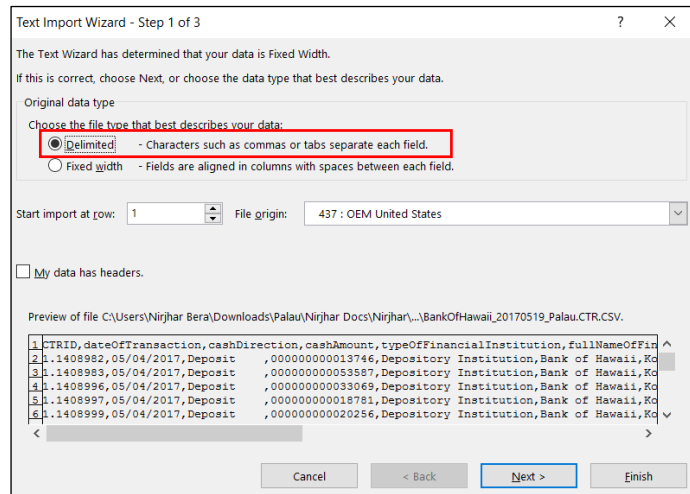
During import of CTR, PIT and STR csv files obtained from various banks, user must make sure that the data is cleaned and follows the format as specified below. The reason is to make sure the F.I.N.D. application can retrieve the correct data. Following are the steps to be followed(only for CTR and PIT file):

STEP 1: Open MS excel from Start Menu

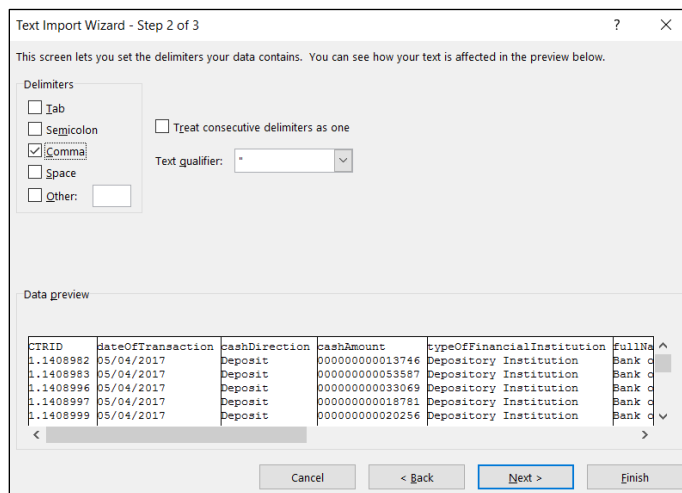
STEP 2: Go to DATA → External Data → From Text → Select the CTR or PIT file



STEP 3: Select “Delimited” and click Next



STEP 4: Select all the options as shown below and click Next.



STEP 5:

Select the CTRID column as shown below → Select column format as “Text” → Click Finish.

Select OK in the next window.

Text Import Wizard - Step 3 of 3

This screen lets you select each column and set the Data Format.

Column data format

☐ General
☒ Text
☐ Date: MDY
☐ Do not import column (skip)

'General' converts numeric values to numbers, date values to dates, and all remaining values to text.

Advanced...

Data preview

Text	General	General	General	General	General
CTRID	dateOfTransaction	cashDirection	cashAmount	typeOfFinancialInstitution	fullNa
1.1408982	05/04/2017	Deposit	00000000013746	Depository Institution	Bank of
1.1408983	05/04/2017	Deposit	00000000053587	Depository Institution	Bank of
1.1408986	05/04/2017	Deposit	00000000033069	Depository Institution	Bank of
1.1408987	05/04/2017	Deposit	00000000018781	Depository Institution	Bank of
1.1408989	05/04/2017	Deposit	00000000020256	Depository Institution	Bank of

Cancel < Back Next > Finish

STEP 6:

For CTR, make sure the format is as follows. Perform spell check for all the others:

CTRID: All IDs are of same length i.e. none of the trailing zeros are truncated.

dateOfTransaction: MM/DD/YYYY format must be maintained.

cashDirection: This column should be either Deposit or Withdrawal. Nothing else.

cashAmount: numeric value

typeOfFinancialInstitution:

fullNameOfFinancialInstitution: Maintain the same format i.e. if Bank of Guam is specified as “Bank of Guam”, then make sure all future CTR has it in the same format and not something else like “bank of guam”

nameOfBranchOfficeAgency:

For PIT, make sure the format is as follows. Perform spell check for all the others:

CTRID: All IDs are of same length i.e. none of the trailing zeros are truncated.

relationshipToTransaction: It must be one of these 4 values:

- Person on whose behalf transaction was conducted
- Person conducting transaction on own behalf
- Person conducting transaction for another

lastNameOrNameOfEntity: Make sure only last name of a human is entered or the full firm name

firstName:

middleName:

gender:

occupationOrTypeOfBusiness:

address:

addressCity:

addressState:

zipCode:

addressCountry: Country code is to be used. E.g. US, PW

dateOfBirth:
contactPhoneNumber: Must be divided indicating the different code. eg:680-779-3208
emailAddress:
idType:
idNumber:
idCountry:
idIssuingAuthority: Write the full name of the country
accountNumbers: Use '/' to distinguish multiple account numbers
cashDirection:
cashAmount:

For STR, make sure the format is as follows. Perform spell check for all the others:

accountNumbers: Use '/' to distinguish multiple account numbers
fullNameOfFinancialInstitution:
nameOfBranchOfficeAgency:
lastNameorNameOfEntity: Make sure only last name of a human is entered or the full firm name
firstName:
middleName:
address:
addressCity:
addressState:
zipCode:
addressCountry: Country code is to be used. E.g. US, PW
phoneNumberResidence: Must be divided indicating the different code. eg:680-779-3208
phoneNumberWork: Must be divided indicating the different code. eg:680-779-3208
occupationOrTypeOfBusiness:
dateOfBirth: Keep it blank if it is an invalid date like 1/1/1900
admissionOrConfession: It has to be either Yes or No
idNumber:
idIssuingAuthority: Write the full name of the country
relationshipToFinancialInstitution:
typeOfInsiderRelationship:
dateOfSuspensionTerminationResignation: Keep it blank if it is an invalid date like 1/1/1900
startDateOfSuspiciousActivity: Keep it blank if it is an invalid date like 1/1/1900
endDateOfSuspiciousActivity: Keep it blank if it is an invalid date like 1/1/1900
amountOfCash: Numeric value
summaryCharacterization:
narrative:

Step 7: After saving the CTR and PIT, open it using notepad and put the CTR Id in quotation. E.g. Make 1.1408982 as "1.1408982" We are doing it so that F.I.N.D identify the CTR ID as a text. Now Import this file into F.I.N.D.

APPENDIX B

The STR sent by the bank contains all the detail in a narrative form. It is very important that we break down this narrative form. This step is mandatory for all STRs stored in a case. Data Visualization cannot be performed without performing this step.

Any Transaction performed in Cash will be inserted into the STR Cash Transaction input sheet.

Suspect Accn Number*: Account number of the suspect as specified in narration

Direction*: Deposit/Withdrawal

Last Name/Entity Name: Specify as in narration. If self transaction, write "SELF"

Middle Name: Specify as in narration. If self transaction, keep blank

First Name: Specify as in narration. If self transaction, keep blank

Account Number: Destination account number

Transaction Date*: Date of transaction

Country: Full name of country like Palau or Philippines

Amount*: Numeric value

Details: Specify details like "Multiple transaction ranging from \$XX to \$XX,XXX" or "Transfer from BOH" or "Check from ABC inc."

Any Transaction performed through Wire will be inserted into the STR Wire Transaction input sheet.

Suspect Accn Number*: Account number of the suspect as specified in narration

Direction*: Deposit/Withdrawal

Last Name/Entity Name*: Specify as in narration. If self transaction, write "SELF"

Middle Name: Specify as in narration. If self transaction, keep blank

First Name: Specify as in narration. If self transaction, keep blank

External Account Number*: Account number of the 3rd party

Bank Name: Name of Bank from where the wire originated

Transaction Date: Date of transaction

Country: Full name of country like Palau or Philippines

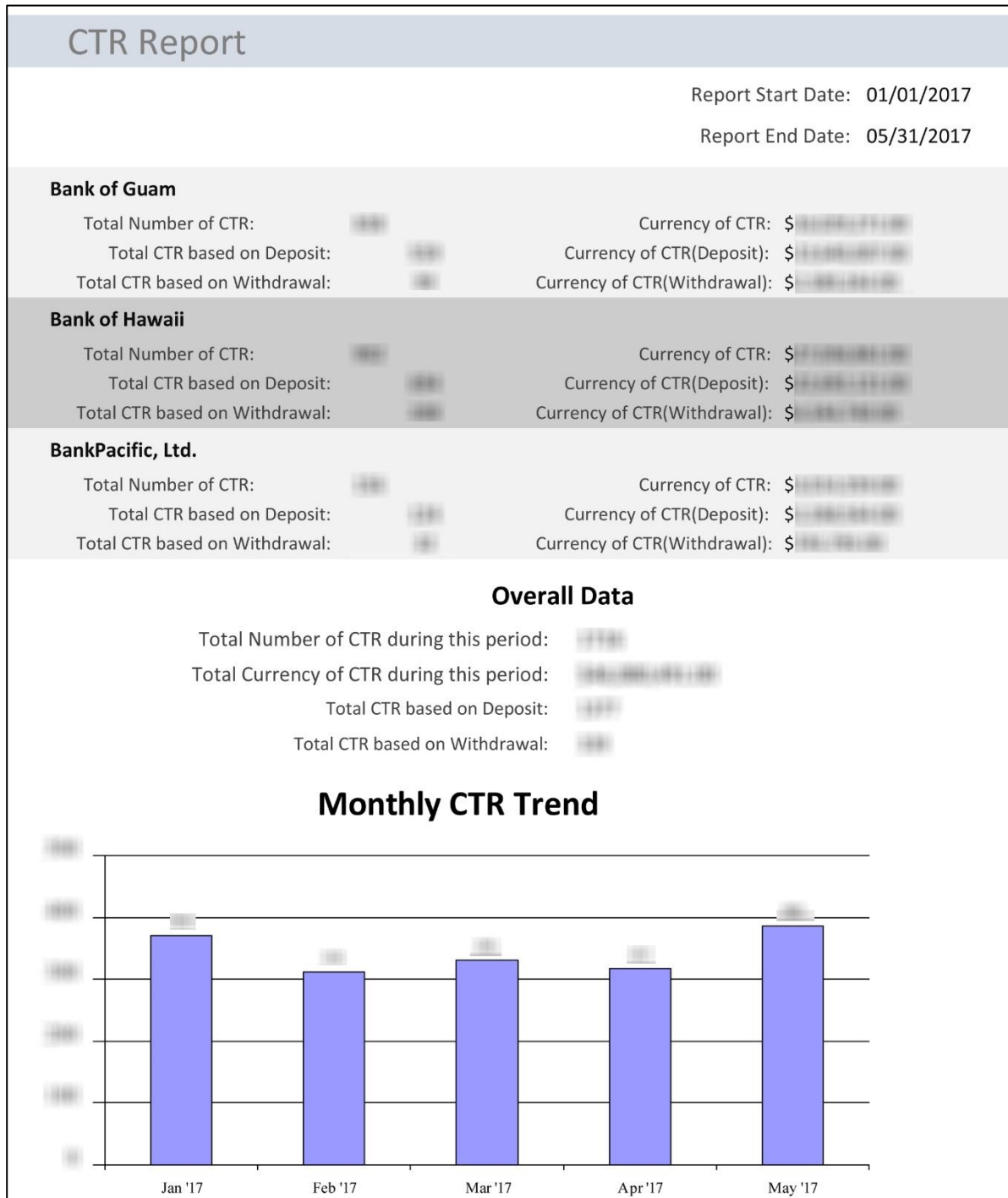
Amount*: Numeric value

Details: Specify details like "Relationship unknown" or any info regarding the transaction.

In addition to the above step, user must make sure all data are consistent everywhere. For example, if the A/C number is 34567, it should be the same in CTR and STR stored in the case. It should not be 0034567 or anything else anywhere. The same applies for other parameters like first name, last name, Transaction date and other parameters.

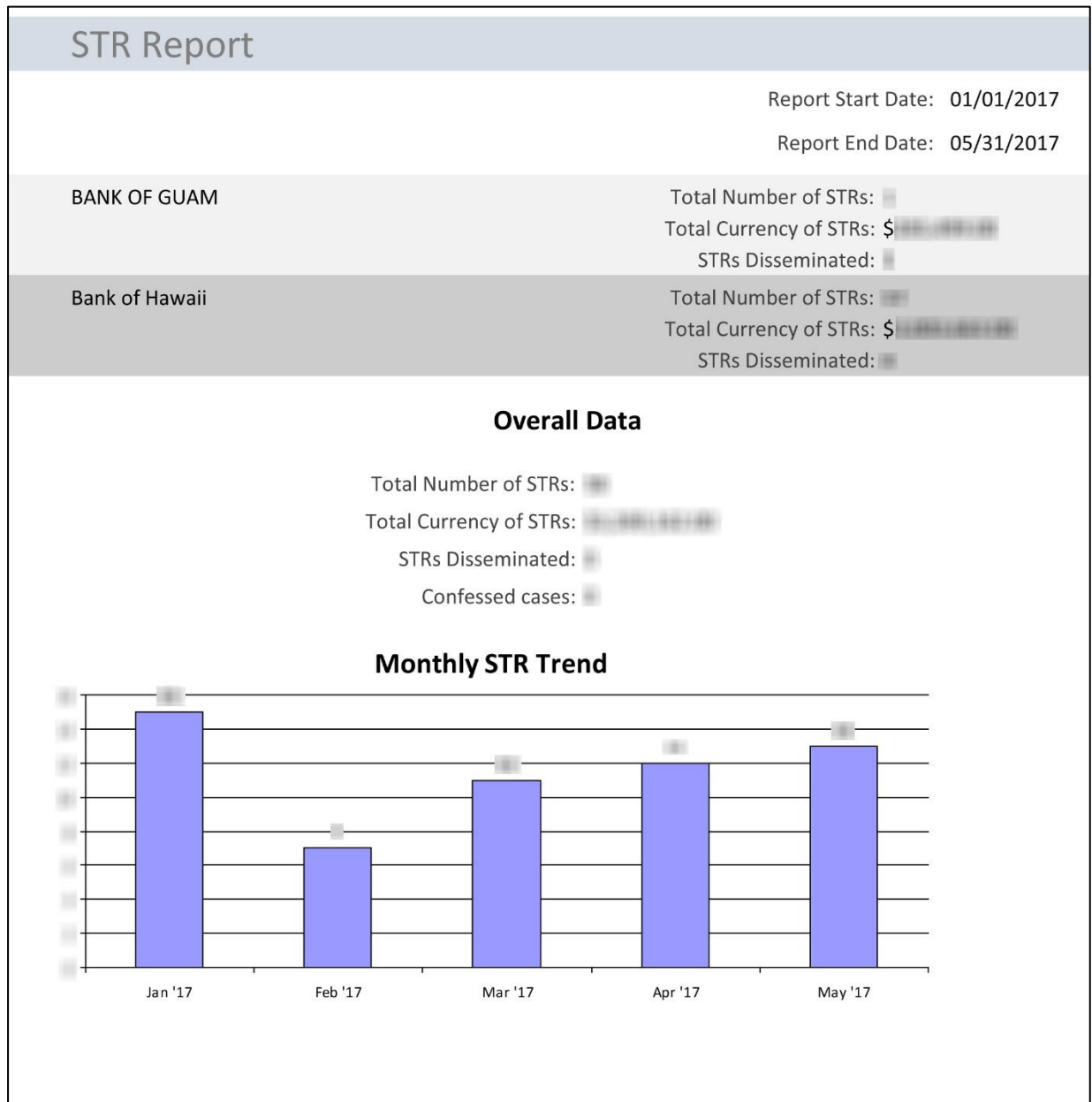
APPENDIX II: Sample CTR Report

CTR report generated by Financial Intelligence Unit, Republic of Palau for the 5-month duration from January to May



APPENDIX III: Sample STR Report

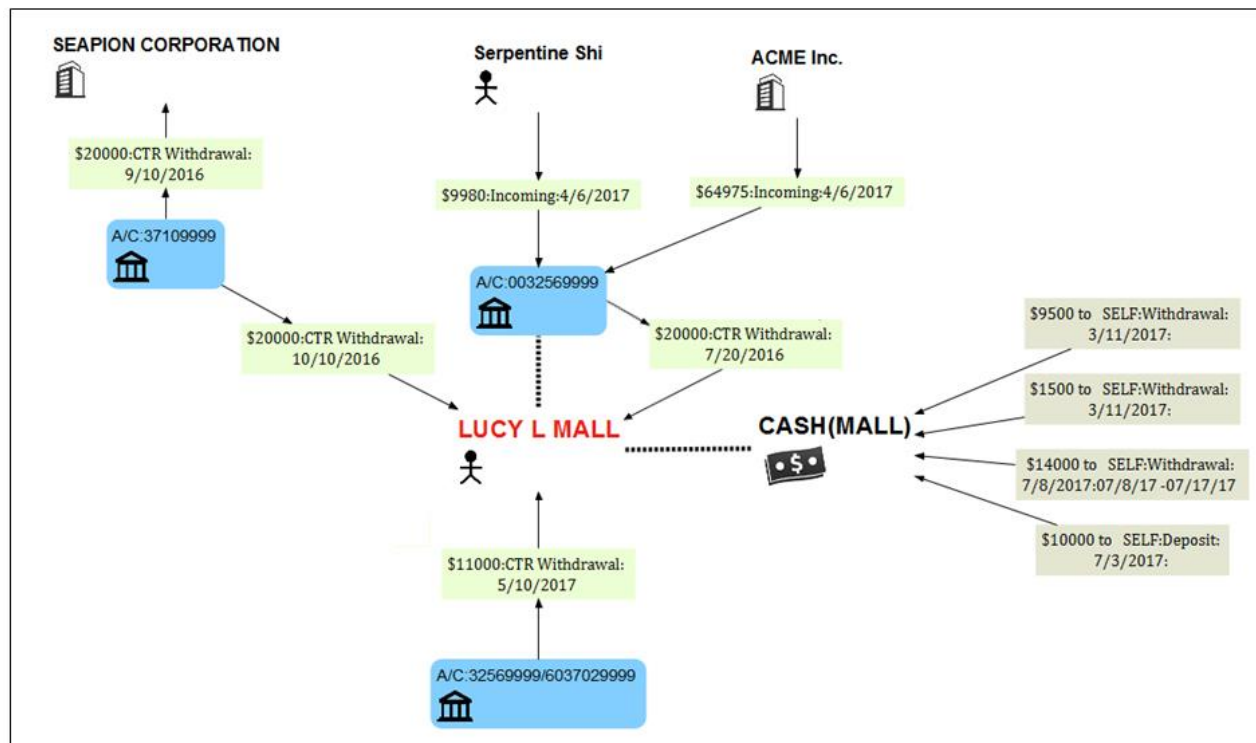
STR report generated by Financial Intelligence Unit, Republic of Palau for the 5-month duration from January to May



APPENDIX IV: Sample Data Visualization Graph

In the following Case Data Visualization of suspect Lucy L Mall (name changed), the investigator can easily analyze the flow of funds through Wire and Cash Transactions. All this information is retrieved from CTRs and STRs present in the F.I.N.D. application.

From the diagram, one can easily understand that Serpentine Shi (name changed) and ACME Inc. (name changed) had transferred funds to A/C 32569999(changed) and our suspect then withdrew money from that account. Furthermore, SEAPION CORP. (name changed) also withdrew money from the same A/C from where our suspect withdrew money. In addition to other wire transactions, there were many Cash Transactions involved.



This network graph assist the investigator to understand the whole case instead of going through multiple STRs and CTRs. Moreover, it also enables the investigator to analyze and ask more questions regarding the suspect. For example:

- Q) Why is SEAPION, ACME involved in the bank transaction?
- Q) Who is the owner of SEAPION & ACME & what is his/her relationship with suspect?
- Q) Who is Serpentine Shi and from where did he get \$9,980 that he/she transferred?
- Q) Huge Cash Transactions occurred during March and July. Why during this specific period? What did the suspect do with all the withdrawn cash?

In this way, the investigator can further delve deep into all the facts and easily find the pattern and flow of the money in the case.