

U.S - Latin America TBML Master Class FAQ

Data and Analysis Questions

What is a network typology, and how can we use it to identify TBML-related risk?

Network typology focuses on identifying and tracing the individuals and entities behind illicit activity, rather than the activity itself. Most of the TBML discussion today focuses on examining trade and transaction typologies; this can be challenging, given the complexity and rate of change of those typologies, as well as lack of consistent access to the information you need (e.g. full transparency into trade transactions). Considering a network typology can identify otherwise hidden risk or add valuable context to what you're seeing in suspect trade and/or transaction patterns.

Here are three key indicators for a network typology of TBML, all of which can be identified using public data:

- 1) **Geography:** Is the exporter, importer and/or third party financial facilitator based in a jurisdiction that is at higher risk for money laundering, including "major money laundering countries" [listed](#) by the U.S. State Department?
- 2) **Business Purpose:** Does the stated business purpose of the import/exporter align with the Financial Action Task Force's (FATF) [list](#) of industries vulnerable to TBML?
- 3) **Proximity to Known TBML Targets:** Does the importer/exporter/third-party financial facilitator have any relationship to known or alleged money launderers and/or TBML facilitators? If so, what is the nature and proximity of that relationship?

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Where can I go to find more information on specific TBML trade and/or transaction typologies?

The Financial Action Task Force (FATF) is among the best sources of information regarding TBML trends, including trade and transaction typologies and red flags. In December 2020, FATF published its most recent [report](#) covering all things TBML. Other sources of information include U.S. government reports from the [Government Accountability Office \(GAO\)](#), and the annual [International Narcotics Control Strategy Reports](#) published by the U.S. State Department.

What sources of public information did you use to track this cross-jurisdictional network?

In the U.S., we used publicly available corporate data from the New York Department of State, Delaware Division of Corporations, and the Florida Secretary of State. In one case, a company of interest that was originally registered in Delaware – a known secrecy jurisdiction with very minimal corporate information – registered to do business in both New York and Florida. When the company registered to do business in Florida, it disclosed one of its officers, thus highlighting how you can use company registrations in different jurisdictions to glean insight into the natural persons behind entities registered in secrecy jurisdictions.

In the Tri-Border Area, we used corporate data from Paraguay's tax authority (*Subsecretaría de Estado de Tributación, SET*) and Brazil's Special Department of Federal Revenue (*Receita Federal do Brasil*).

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To what extent are corporate records published by the Paraguayan government reliable?

We have found government-published corporate records to be generally reliable in Paraguay. It's important to remember that these records aren't just used for due diligence and other external investigations. They serve important business functions that require accurate disclosures, such as attracting investors, applying for credit, and applying for contracts.

That said, the U.S. State Department in its 2021 [International Narcotics Control Strategy Report](#), highlighted "the use of false information to register businesses," in Paraguay. Additionally, we've seen cases where records from the SET are blocked. Therefore, analysts should always attempt to corroborate data from multiple sources of official and/or unofficial information.

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Beyond the SET, what other sources of public corporate information are available to investigate illicit networks in the Tri-Border Area?

Paraguay

Beyond the SET, Paraguay has other sources of public corporate records such as Paraguay's Official Gazette (*Gaceta Oficial*) and the National Intellectual Property Directorate (*Dirección Nacional de Propiedad Intelectual, DINAPI*). Like trademark registries in other jurisdictions, such as Mexico, we've found DINAPI to be very useful in identifying links between individuals/legal entities and "doing business as" names. Oftentimes, a company's online profile (website, social media pages, etc) will use the dba/trademark name, as opposed to the legal entity's name.

Brazil

Brazil, like Paraguay, also consists of a variety of different sources of publicly available corporate information. In our experience, the most reliable source for accessing company data, including related party information, is the Receita Federal CNPJ (*Cadastro Nacional da Pessoa Jurídica*) registry. While the registry can only be searched using a legal entity's CNPJ number (akin to an IRS EIN), simply searching the company of interest in the open web will often yield a variety of different third-party data aggregators that provide the CNPJ number. You can then verify this information by going back into the official CNPJ registry and entering the number. [Sayari Graph](#) users have access to corporate information published by the Receita Federal CNPJ registry.

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Additionally, Brazil also has an industrial property registry that is run by the National Industrial Property Institute (*Instituto Nacional da Propriedade Industrial, INPI*).

Argentina

Information on entities registered in Argentina can largely be found in either the federal Official Bulletin (*Boletín Oficial de la República Argentina*) or with the Ministry of Justice and Human Rights (*Ministerio de Justicia y Derechos Humanos*). It is important to note, however, that as far as we know, company information in the Ministry of Justice and Human Rights, which can include related parties, is only found in bulk files and is not generally searchable. The Official Bulletin, on the other hand, allows users to search by company name, individual name, tax ID (CUIT), and personal ID (DNI). [Sayari Graph](#) users have access to corporate information from Argentina's Ministry of Justice and Human Rights, the Official Bulletin, and identifying information from the Argentina federal revenue service's (*Administración Federal de Ingresos Públicos, AFIP*) CUIT (tax ID) registry.

Additionally, sources of company information in Argentina can occasionally be found in provincial bulletins, such as those in Buenos Aires or Santa Cruz, for example. Shareholder and director information for publicly traded companies can be found at the financial site (BOLSAR) of the Buenos Aires Stock Exchange (BCBA).

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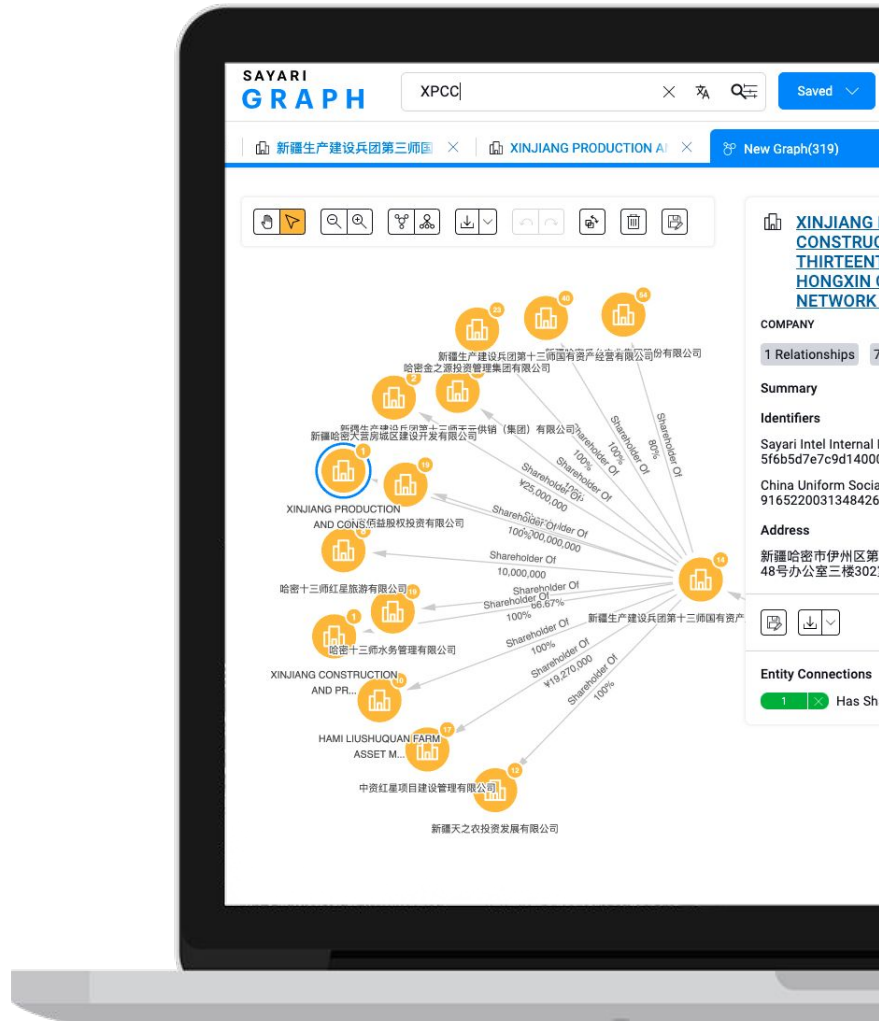
Data and Analysis Questions

How does Sayari enrich transaction data for improving identification of trade-based money laundering activity?

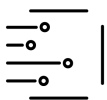
Sayari is able to enrich transaction data by shedding detailed light on the individuals and entities behind the transactions. As we demonstrated in the master class, there's a lot of public data out there that you can use to fill gaps in how you are assessing money laundering risk through transaction data. For example, public corporate records will often tell you what a company's business purpose is; you can then compare this information with trade data to determine whether what a company is purportedly importing/exporting aligns with the company's stated economic activity. In the same vein, related party information from tax registries, contractors registries, or corporate registries, can also provide insight into who is behind a suspicious third-party wire transfer. Finally, Sayari applies graph technology to enriched public data to better understand the broader corporate network associated with an entity/individual involved in a transaction, thus providing additional context and the ability to identify risk at varying degrees from the subject itself.

Sayari for Financial Services

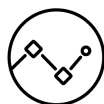
The world's largest specialized database of companies, their key people, and their most important relationships. Designed for express determination of ownership & related entity risk.



Sayari powers investigative and analytical workflows across the financial crime compliance and risk management enterprise. Our mission is to put instant global corporate transparency directly into the hands of practitioners, maximizing visibility and minimizing the need for customer contact.



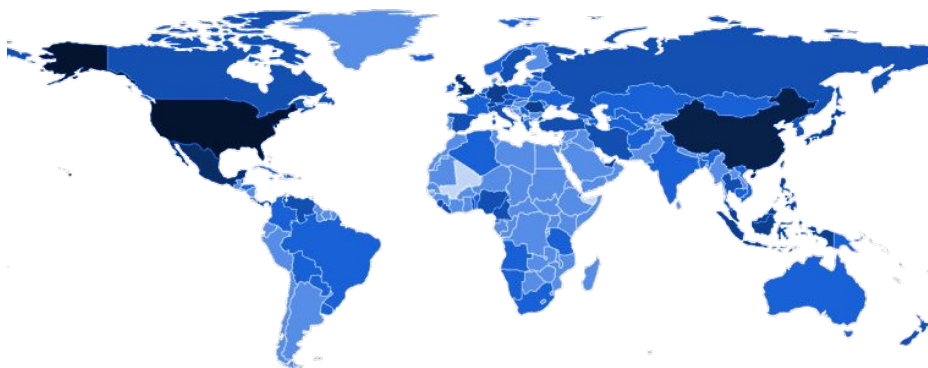
**KYC, CDD
& EDD**



**AML, FIU &
Investigations**



**Sanctions &
Embargoes**



[Check out our Coverage List](#)

Sayari Global Data

Sayari provides instant access to authoritative business information worldwide, covering 391 million companies and 435 million of their key personnel in over 200 jurisdictions, all linked and resolved together into pre-built networks of ownership and control relationships. Sayari is available via cloud-hosted [User Interface](#), [API](#), or [Data Subscriptions](#).

1.3B

documents

462M

key people

200+

jurisdictions

717M

relationships

401M

companies

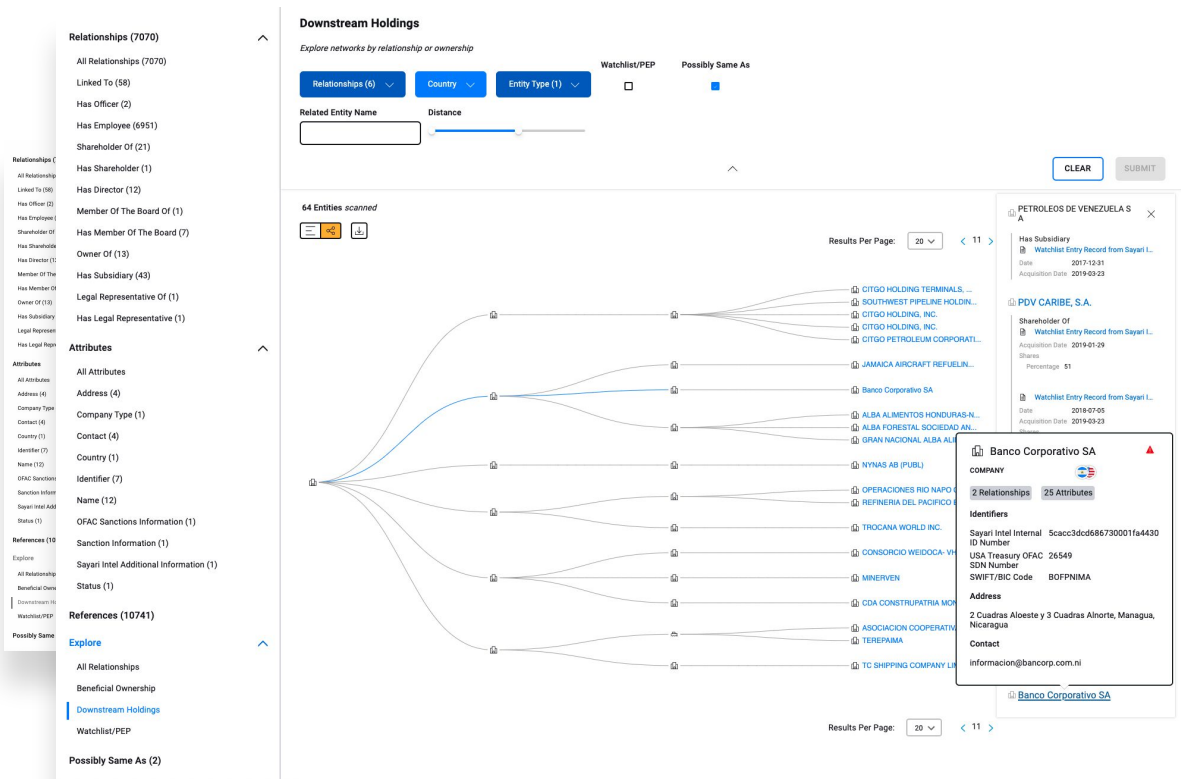
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deployment
options

Sayari data is also available via pre-built partner integrations:

NICE - ACTIMIZE

ORACLE



Sayari Graph Platform

Visualization & Search

Hundreds of millions of pre-built profiles, corporate hierarchies, and network visualizations, searchable globally.

Financial Crime Graph Analytics

Preset and customizable financial crime graph analytics, powered by the most scalable database technology on the market.

Documentation & Sourcing

Full data provenance available in-app, with millions of exportable original source documents.



SAYARI GRAPH

	BUREAU VAN DIJK	dun&bradstreet	SAYARI GRAPH
Entities	365M	360M	401M
Individuals	325M	100M	462M
Developed Markets	●	●	●
High-Risk, Emerging & Offshore Markets			●
Financial Crime Graph Analytics			●
In-App Official Documents			●
Direct Refresh from Official Sources			●
Rapid Contracting & Licensing			●
Cloud-Native Scale & APIs		●	●
Investigator User Interface	●	●	●