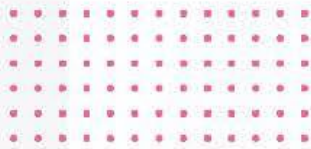




GUIDANCE NOTES

BANKS AND CREDIT UNIONS



VERSION 2.0

PUBLISHED – MARCH 2026



FINANCIAL INTELLIGENCE AGENCY BERMUDA

SECTOR SPECIFIC GUIDANCE NOTES FOR BANKS AND CREDIT UNIONS FOR FILING A GOOD QUALITY SUSPICIOUS ACTIVITY REPORT (SAR) AND SUSPICIOUS TRANSACTIONS REPORT (STR)

The Financial Intelligence Agency (FIA) was established by the [Financial Intelligence Agency Act 2007](#) to act as an independent agency authorized to receive, gather, store, analyse and disseminate information relating to suspected proceeds of crime and potential financing of terrorism received in the form of Suspicious Activity Reports (SARs) and Suspicious Transaction Reports (STRs). The FIA only accepts SARs and STRs that have been submitted electronically via the FIA's designated platform (currently goAML) using the online submission form or XML transmission. In exceptional circumstances, an alternative method can be provided.

This document contains information that will assist persons with their reporting obligations pursuant to the [Proceeds of Crime Act 1997](#) (POCA) Sections 46 and 47, and [Anti-Terrorism \(Financial and Other Measures\) Act 2004](#) Sections 9, 10 and 10A. This guidance does not represent legal advice. If you are unsure about your obligations in a specific case, please seek independent legal advice.

Bermuda Personal Information Protection Act (PIPA) and SAR/STR Reporting

The Bermuda Personal Information Protection Act 2016 (PIPA) establishes a framework governing the collection, use, and disclosure of personal information by organisations operating in Bermuda. PIPA requires that personal data be handled in accordance with established privacy principles, including obtaining consent and limiting disclosure to purposes for which the information was originally collected. Financial institutions and other reporting entities must be mindful of their obligations under PIPA when handling client data in the ordinary course of business.

However, obligations arising under Bermuda's anti-money laundering and anti-terrorist financing regime — including the duty to file SARs and STRs pursuant to the Proceeds of Crime Act 1997 and the Anti-Terrorism (Financial and Other Measures) Act 2004 — take precedence over the privacy protections afforded by PIPA. Section 55 of PIPA expressly provides for exemptions where disclosure is required or authorised by law, which encompasses the statutory obligation to report suspicious transactions to the Financial Intelligence Agency (FIA). Accordingly, reporting entities must not allow PIPA considerations to impede or delay the filing of a SAR/STR, and no client consent is required — nor should it be sought — when making such a report. The tipping-off provisions further underscore this point: notifying a client that a SAR/STR has been filed is itself a criminal offence, reinforcing that the duty to report operates independently of, and overrides, any data privacy obligations under PIPA.

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1. PURPOSE OF A SAR AND STR REPORT

The purpose of the Suspicious Activity Report (SAR) and Suspicious Transaction Report (STR) is to alert the FIA that certain client/customer or related business activity is in some way suspicious and might indicate money laundering or financing of terrorism. The information provided in these reports plays a vital role in aiding law enforcement in combating money laundering (ML), terrorist financing (TF) or proliferation financing (PF) investigations and assisting with identifying emerging trends and patterns connected to financial crimes. The information about those trends and patterns is vital to law enforcement agencies and provides valuable feedback to stakeholders. Reporters are required to submit reports that are complete, accurate, and filed promptly. Therefore, it is crucial that Money Laundering Reporting Officers (MLROs) and/or Nominated Officers (filers) provide narratives that are clear and comprehensive. The failure to adequately describe the indicators making the transaction or activity suspicious, delayed reporting and absence of supporting documentation undermines the purpose of the SAR/STR and minimises its usefulness to law enforcement. Reports are reviewed and analysed by FIA Analysts, who then disseminate the relevant intelligence / information, if warranted, to the relevant law enforcement agencies, whether domestic or foreign to initiate potential investigations.

Reports filed with incomplete data will be rejected.

Individuals filing or reporting SAR/STRs to the FIA are guided to PRINT or SAVE a copy of their SAR/STR prior to final submission. Once the SAR/STR has been approved, it will no longer be visible to the filer.

2. DEFINING SAR AND STR

A **SAR** details suspicious activity that does not currently contain any financial transactions. For example, declined business, dubious emails and requests, strange phone calls and the suspect compartment or associations of a subject or entity can be detailed in a SAR.

A **STR** details suspicious activity that involves a financial transaction. For example, unusual transactions that deviate from known client activity, unexplained large cash deposits, transactions which have no apparent lawful purpose and transactions to high-risk jurisdictions. Financial transactions are to be inputted into goAML to support the STR narrative along with the relevant supporting documentation.

3. QUALITY OF SARs/STRs

The FIA may reject the filing of a poor-quality or incorrectly filed report and advise the reporter to resubmit the report within five calendar days. The rejected report can be found in the draft section of the goAML platform. If a resubmission is not received before the end of five calendar days, the report will be archived, and a new SAR/STR will need to be submitted to the FIA. The FIA cannot interpret, assume, or infer what suspected money laundering, terrorist financing and/or predicate offence the

reporter believes may have been committed. The FIA may also refer the consistent reporting of poor-quality SARs/STRs to the relevant supervisory body for its attention and appropriate action.

4. TIPPING OFF

Bermuda legislation requires that a financial institution, its directors, officers, employees, and agents who, voluntarily or by means of a suspicious activity report/suspicious transaction report, report suspected, or known criminal violations or suspicious activity **may not** notify any person involved that the transaction has been reported.

5. DEVELOPING THE SAR/STR NARRATIVE

The SAR/STR report narrative should be provided in the 'REASON FOR SUSPICION' section of the submitted SAR/STR forms within the goAML platform. This narrative / reason acts as a summary of the suspicious activity or transaction being reported. It should contain enough information for the FIA to analyse alongside the supporting documentation. It is vital for the reporting party to bear in mind that the Analyst handling the disclosure may not be familiar with the specifics of your business or have an in-depth understanding of your client. Therefore, it is essential to clearly detail the relationship between your business and the named subjects within the report, and to include information on any services provided to these subjects. Without this information, it can be challenging for the Analyst to fully comprehend the reported matter.

If the reporting party has engaged with law enforcement prior to submitting a SAR/STR, this should be noted in the narrative, along with relevant contact details. The report should also include contact information for the primary and secondary contacts of the reporting party, specifying which individual is responsible for each report. *Please attach a copy of the internal SAR but ensure that your narrative is clearly stated in the "reasons for suspicion" section.*

Avoid acronyms and jargon – they may not be understood by the recipient and are open to misinterpretation. If describing a service provided or a technical aspect of your work, please provide a brief synopsis in your SAR/STR to aid the reader.

Previous SAR/STR reference should be included if the subject has been the subject of a prior SAR/STR.

As a basic guide, wherever you can, try to answer the following six questions to make the report as useful as possible:

5.1 WHO is involved?

Include the full legal name and address of the Subject or client being reported, and length of the business relationship (including date of initiation of the business relationship). For corporate clients, include both their registered office address and address (es) of operation, if different.

The following should be included when identifying involved parties:

- The full legal name and known aliases
- Date of birth of all individuals involved in the suspicious activity or transaction
- Their employer, occupation and title held
- Business and residential address (es)
- Indicate whether domestic or foreign Politically Exposed Persons are involved
- Outline the relationship between involved persons (i.e. business associates, colleagues, familial relationship).

If the reported subject (e.g. client/customer) has been the subject of a previous SAR/STR submitted by your organisation, please include previous FIA references numbers.

5.2 WHAT is the activity or transaction?

Describe the suspicious activity or transaction, the criminal property involved, its monetary value and source and ultimate use of funds. It is also important to note WHAT instruments or mechanisms were used to conduct / facilitate the suspicious activity e.g., bank account, wire transfer, companies, insurance policies, debit or credit cards, digital assets businesses services etc.

5.3 WHERE did the activity or transaction take place and where are funds involved held?

Provide the location of the activity or transaction. Indicate all local and international financial institutions involved, type of account (personal or corporate), and corresponding account numbers.

5.4 WHEN did the activity or transaction take place?

Indicate the date of the activity and duration. If the activity takes place over of period, clearly identify the date the suspicious activity was detected. If there are multiple transactions to report, please enter each in a chronological order with individual dates and amounts under the transactions section.

5.5 WHY are you suspicious?

Clearly identify WHY the activity is considered suspicious, and what are the reasons for reporting. Provide a brief description of the nature and purpose of the client account to which to the suspicious activity or transaction relates. Include reasons and indicators for suspicion outlining the inconsistency with the client's profile, normal behaviour, and business activity. Follow up actions such as intent to terminate business relationship and close client accounts should also be included.

5.6 HOW was the activity or transaction executed?

Provide details on how the activity or transaction occurred.

6. EXAMPLES OF COMPLETE AND INCOMPLETE REPORTS

6.1 Banks

Incomplete Bank SAR/STR

INCOMPLETE BANK SAR/STR

Reason For Suspicious Activity (Narrative)

This SAR is being submitted due to a large cash deposit and wire activity performed by banking client, Carmen Sofia Alvarez who is a citizen of Dominican Republic and Bermuda. At the time of account opening, the client was employed as a caregiver. Ms Alvarez has held a relationship with the bank since 2009. On January 11, 2023, Compliance was alerted by Retail Banking to a suspicious cash deposit initiated by the client for \$5,621.00 BMD at the St. George's Branch.

The client completed a source of funds stating that the funds were derived from savings, however she did not produce supporting documents/receipts. Additionally, it was observed that the cash deposit funded an outgoing wire which was sent to, Miguel Alejandro Garcia Sanchez in Santa Domingo. Review of the transactional history over the span of a year (January 2023 – January 2024) reveals additional cash deposits followed by outgoing wires to Fabiola Camilla Colon in Miami, Florida.

Screening of "Carmen Sofia Alvarez" via Lexis Diligence, open-source internet (Google) and OFAC produced no sanction or adverse media concerns against the client. This activity is deemed suspicious as the origin of cash cannot be verified, and the funds are subsequently sent to unrelated parties.

Action Taken by Reporting Entity

Account has been terminated

goAML Indicators Selected

- Source of funds
- Cash: In/Out International
- Wires

Supporting Documents

- Internal SAR
- Carmen Sofia Alvarez's passport
- Copy of Carmen Sofia Alvarez's customer profile
- Source of funds

Missing Information

- Copy of account activity described showing incoming and outgoing funds

Complete Bank SAR/STR

COMPLETE BANK SAR/STR

Reason For Suspicious Activity (Narrative)

Ms Tereza Rocio Branca DOS SANTOS was a bank customer from 6 February 2016 until 14 March 2023. DOB 24 August 1979, a Portuguese national from the Azores, passport no. I671948 and residing at 16 Cliffview Road, Smith's, Bermuda HS 02. According to bank records last updated on 14 March 2023, Ms DOS SANTOS is a Child Care Giver employed by Thomas and Jennifer Lines, with a stated weekly income of 975 BMD. She held one BMD savings account and one USD savings account.

Ms DOS SANTOS confirmed through previous investigations that the deposits noted in her accounts were mainly sourced from her boyfriend and cousin, which were then sent to their hometown in Azores, Portugal. Also, she advised that her involvement alongside another 16-18 participants in a club hand contributes to a substantial portion of the cash deposits. Ms DOS SANTOS was reminded of bank terms and conditions and that the account was for her sole use only, despite this the activity continued.

A review of Ms DOS SANTOS' accounts was conducted from 21 October 2022 to 2 March 2023.

The review has revealed excessive cash and third-party deposits being paid into her accounts, credits totalling approximately 136,000 BMD. 19,580 from BNTB and a returned payment, 49,751 BMD cash and 67,111 from various third parties, most of the payments have references such as 'remittance payment' or 'Jose to Tereza'. Most of the debit activity which is approximately 128,925 USD has been sent to two individuals in Portugal, Ana Victoria DOS SANTOS, and Aleixo Vitor DOS SANTOS. There is no debit card use or ATM withdrawals furthermore, there is a lack of utilities or general living costs noted suggesting this account has been used purely to receive funds from various sources and send the money to third parties in Azores.

On 13 January 2023, the process to exit Ms DOS SANTOS' banking relationship was initiated. A potential negative news match has since been identified suggesting Ms DOS SANTOS was arrested in Portugal in 2019 for selling prescription medication obtained fraudulently. The news articles relate to a person with the same name as our customer and

COMPLETE Bank SAR/STR (cont'd)

Ms DOS SANTOS is known to be a national of Portugal.

Based on this review, the customer's behaviour, and the potential negative news match, financial crime concerns remain. The accounts were closed on 14 March 2023 and the last transactions observed were on 8 March 2023.

Action Taken by Reporting Entity

Terminated business relationship with Tereza Rocio Branca DOS SANTOS and closed both accounts.

goAML Indicators Selected

- Adverse Media
- Cash Deposit – multiple/large single transaction
- Gift Clubs/Club hands
- Closed Account/Policy – suspected criminal activity
- Electronic Transfers
- Source of funds
- High Risk Country
- Money laundering
- Previous filings on Subject/Entity
- Third Party (sending on behalf of another)

Supporting Documents Provided

- Previous SAR filing reference
- Internal SAR
- Tereza Dos Santos' passport
- Spreadsheet of suspect domestic transfers and cash deposits.

6.2 Credit Unions

Incomplete Credit Union SAR/STR

INCOMPLETE CREDIT UNION SAR/STR
Reason for Suspicious Activity (Narrative)

Bermuda Credit Union member, Andre GIBBONS alerted the Credit Union on October 21, 2022, that he had reason to suspect that \$7,511.00 USD he transferred on October 18, to an individual in Washington State, Tanya SOLAK, regarding an investment, may be fraudulent. Mr. GIBBONS provided no information regarding source or use of funds.

Complete Credit Union SAR/STR

COMPLETE CREDIT UNION SAR/STR
Reason for Suspicious Activity (Narrative)

On June 14, 2023, Colin DeGRAFF made a cash deposit of \$500.00 to the account of Gladwin BARTRAM. Then on June 28, Mr. Bartram deposited \$950.00 cash. Mr. DeGRAFF made another cash deposit on July 17 in the amount of \$1,200 and when asked the reason for the deposit he claimed to be depositing on behalf of his uncle (Mr. BARTRAM) who was at home sick and needed the funds for an unexpected bill. Finally, on July 21, Mr. DeGRAFF attended with Mr. Bartram to make another deposit of

INCOMPLETE CREDIT UNION SAR/STR (cont'd)

Mr. Gibbons advised he had contacted Bermuda Police Service Financial Crime Unit. Mr. Gibbons claimed BPS advised him to continue investing with Ms. Solak and deposited an additional \$5,000.00 to be transferred to her. The Credit Union contacted FIA and were advised to submit a SAR. The Credit Union also contacted the beneficiary credit union in Washington State and advised them of the claim by Mr. Gibbons. National Credit Union Administration NCAU was also contacted and advised against sending further funds. Mr. Gibbons was contacted and refunded his \$5,000. deposit.

Action Taken

None

goAML Indicators Selected

- Money Transfer
- No Source of Funds
- Scams – Investment related

Supporting Documents Provided

- Copy of Transfers

Missing Information

- Andre Gibbons' photo identification
- Source of funds
- Copy of police correspondence, contact person
- Correspondence with other credit unions mentioned.

COMPLETE CREDIT UNION SAR/STR (cont'd)

\$1,350.00 then requested to transfer \$3,600.00 to an HSBC account. To our knowledge, Mr. Bartram is a retired senior with limited income, and we are concerned Mr. DeGRAFF is using his uncle's account to launder money from illegal activities.

Action

We have taken no further action outside of asking Mr. BARTRAM to provide source of funds for future cash deposits

goAML Indicators Selected

- Declined/ Refused business - suspected criminal activity
- No Source of Funds
- Elder Abuse
- Retired
- Money Laundering
- Structuring

Supporting Documents Provided

- Colin DeGRAFF's driver's licence
- Gladwin BARTRAM's voter's card
- Copies of the cash deposits
- Account statement.

7. SUPPORTING DOCUMENTS

All documents referenced in the submission, and which were crucial in forming your suspicion and creating the filing should be attached to the original submission. The following key documents should also be considered when submitting a SAR/STR to determine if they provide confirmation or clarification of the report and would reduce the need for the FIA to make formal requests minimising the time to complete the analysis. The FIA understands documentation may be limited depending on the relationship with the subject(s) being reported.

7.1 Natural Persons

- **MANDATORY** - Certified passport or other government issued identification for all citizenships held
- **MANDATORY** - Account initiation documents/ completed forms (account opening forms, loan application form, term deposit account application forms)
- **MANDATORY** - Certified proof of residential address
- Declaration of source of wealth/funds where available

7.2 Legal Persons/ Corporate Entities

Where the subject may be an entity, please provide the equivalent documentation.

- **MANDATORY** - Account initiation documents/ completed forms (account opening forms, loan application form, term deposit account application forms)
- Certificate of Incorporation
- Beneficial Ownership structure chart
- Directors & Officers Register
- Share Register
- **MANDATORY** - Confirmation of registered address, principal business address and mailing address (if different from the registered address)
- **MANDATORY** - Certified due diligence (Government issued identification showing full name; proof of residential address) for all named persons
- Most recent financials (list of all assets held)
- Source of wealth/funds
- Correspondence that contains supporting details, suspicious requests, incriminating statements
- Internal SAR

7.3 Legal Arrangements /Trusts and Foundations

- Certified extract of original Deed of Settlement detailing Settlor, Beneficiaries, Protector/Enforcer
- Supplemental Deeds showing any changes to the original Deed of Settlement

- **MANDATORY** - Certified Due Diligence (Government issued identification showing full name; proof of residential address) for all named persons
- Most recent financials (list of all assets held)
- Source of wealth/funds
- **MANDATORY** - Evidentiary correspondence that contains supporting details, suspicious requests, incriminating statements
- Internal SAR

7.4 Non-Profit Organizations

- Register of Directors or Trustees
- **MANDATORY** - Certified due diligence (Government issued identification showing full name; proof of residential address) for all named persons.
- Most recent financials (list of all assets held)
- Source of wealth/funds
- **MANDATORY** - Evidentiary correspondence that contains supporting details, suspicious requests, incriminating statements
- Internal SAR

8. RETENTION PERIOD

Financial institutions shall retain the following for five years from the date of the filing:

- A copy of all filed SARs/STRs
- The original or business record of any supporting documentation
- All supporting documentation for the benefit and/or use of the FIA and any other appropriate local law enforcement agency or regulatory authorities.

9. SEEKING CONSENT TO CONDUCT A TRANSACTION

For detailed guidance on seeking Consent, please refer to our standalone Consent Guidance document available on the FIA's website at <https://www.fia.bm/consent-regime/>.

10. RED FLAG INDICATORS

The following list is not exhaustive and may be updated as emerging money-laundering and financing of terrorism trends and patterns evolve. The existence of an indicator may not alone imply suspicion but combined with other indicators may suggest a suspicious transaction.

10.1 Red Flag Indicators for Banks and Credit Unions

1. New or prospective client is known to you as having a questionable reputation or criminal background
2. Client shows uncommon curiosity about internal systems, controls, and policies
3. Client provides false or misleading information
4. Unusual or suspect source of funds or refusal to provide source of funds information
5. Client is unwilling, unable or uncontactable to provide information for CDD purposes
6. Complex or layered ownership structure for no apparent economic or business purpose
7. Client linked to adverse media relating to a suspect activity or law enforcement investigation
8. Client resides in or the transaction involves a jurisdiction known to have inadequate anti-money laundering and counter financing of terrorism framework or a jurisdiction in which the FATF has called for countermeasures or enhanced client due diligence measures
9. Client is suspected to be conducting transactions on behalf of a third party without identity disclosure
10. Transactions in which assets are withdrawn immediately after being deposited, unless the customer's business activities furnish a plausible reason for immediate withdrawal
11. The use of Letters of Credit and other methods of trade finance to transfer funds between jurisdictions where such trade is inconsistent with the customer's business profile
12. Credit card payments from unrelated accounts, third parties or jurisdictions
13. Credit cards with large positive balances
14. Merchant refunding credit card payments where there is no indication of a previous purchase of goods or service
15. Using cash advances from credit card to make cash deposit to another account or to wire funds overseas
16. Unexpected or premature repayment of a loan with no plausible explanation or by a third party
17. Sudden activity on an inactive or dormant account with no plausible explanation particularly involving large deposits from third parties or overseas accounts
18. Transactions conducted at multiple branch locations over a brief period
19. Abnormal volume of cash deposits that individually are not of substantial value but cumulatively are substantial and with no plausible explanation
20. Customers who together, and simultaneously, use separate tellers to conduct large cash transactions or foreign exchange transactions
21. Transfer of company funds or deposit of company checks into an employee's account outside the normal payroll cycle
22. Large amount of cash is deposited and soon after used to secure financing facilities such as loans
23. Funds received from a religious or charitable organisation are utilized to purchase personal assets or is transferred out to another account within a relatively short period
24. Customer is always accompanied by a third party when making withdrawals
25. Indications of elder financial abuse such as sudden increase in debit card purchases or ATM withdrawals, abnormal cash transfers to a relative or other third party, new joint

account established, changes to account signatories or suspicious signatures, newly acquired credit card with accumulating debt, request for account statements to be mailed to a P.O. Box or address different from the customers

26. Banknotes are in small denominations and dirty; stains on the notes indicating that the funds have been carried or concealed or notice a musty or smoky smell on the notes; notes are packaged carelessly

For a more extensive list of red flags ML/TF indicators categorised, consult the FIA's Indicators list document located on its website [HERE](#).

11. REPORTING RESPONSIBILITIES

It is the responsibility of all Bermuda-supervised reporting entities to ensure that a Reporting Officer (Money Laundering Reporting Officer (MLRO)) is appointed or designated and is adequately trained, in accordance with section 17(1) and (3) of the Proceeds of Crime Act 1997.

The MLRO must be registered with, and have access to, the Financial Intelligence Agency of Bermuda's designated reporting platform in order to submit Suspicious Activity Reports (SARs) and Suspicious Transaction Reports (STRs) where the reporting officer knows, suspects, or has reasonable grounds to suspect that a person or entity is engaged in money laundering or terrorist financing.

It is strongly recommended that reporting entities establish internal policies and procedures to ensure that:

1. A Reporting Officer (MLRO or other designated reporting person) is appointed at all times.
2. An Alternate Reporting Officer is registered and authorised to submit reports in the absence of the Reporting Officer.
3. The Reporting Officer and/or Alternate Reporting Officer are adequately trained to use the FIA's reporting system, submit SARs/STRs, and receive and respond to additional requests from the FIA, including requests made pursuant to section 16 notices;
4. A group notification email address is maintained to ensure that the compliance department, or other designated personnel, receive all confirmations of receipt and follow-up communications issued by the FIA.
5. In the event of the departure, resignation, or termination of the MLRO or Alternate MLRO, the reporting entity must immediately appoint a suitably trained replacement and ensure continuity of reporting obligations through the FIA's designated reporting platform.

12. goAML SUPPORT CONTACT DETAILS

For assistance registering on goAML platform or with submitting SARs and STRs, the FIA can be contacted as follows:

Tel: 441-292-3422 (Option 3)

Email: goaml_support@fia.bm

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