

STR narrative template

Structure based on the CBUAE Guidance on Suspicious Transaction Reporting, section 3.3 (who, what, when, where, why, how). Adapt it to your FIU's form and your internal procedure.

Internal reference	
Report type	STR / SAR / other
Reason for reporting	
Alert or suspicion date	
Latest filing date	
Prepared by / approved by	

Who

Subjects: conductor, beneficiary, account holders. Identifiers (ID or passport number, address, occupation). For entities: beneficial owners, directors, signatories. Each party's role, and how the parties are related.

What

Instruments and channels used (card, bank transfer, e-wallet, crypto on-ramp, trading account). Source or use of the funds. Every affected account, including accounts at other institutions where known.

When

Date first observed and duration. Transactions listed one by one in date order, with amounts; state whether each was completed or attempted.

Where

Offices, platforms and servers involved. Foreign jurisdictions, institutions and accounts in the chain, up to the ultimate originator and beneficiary where known.

Why

Why this is unusual for this customer: expected activity, products held, stated purpose. The rule or scenario that raised the alert, if automated.

How

The method, step by step: how money or positions moved between the parties.

Evidence references

Ref	Record	Source system	What it shows
E1			
E2			
E3			
E4			
E5			

Red flags observed**Actions taken**

Holds, restrictions, EDD requested, relationship decision, notifications (never to the customer).

Review

Analyst (maker)	
MLRO (checker)	
Decision and reason code	
Date and time	

Filled example

SYNTHETIC EXAMPLE: fictional clients, accounts and figures. Not a real case.

Internal reference	CASE-2609-014
Report type	STR
Reason for reporting	Market manipulation / wash trading (map to the FIU's current RFR list)
Alert date	26 Sep 2026 (automated, rule WASH-01)
Latest filing date	13 Nov 2026 (35 business days, CBUAE)
Prepared by / approved by	Analyst A. / MLRO B.

Who

Client A, individual, MT5 login 40917, retail account opened 3 Aug 2026, declared occupation sales manager [E1]. Client B, individual, MT5 login 41203, opened 5 Aug 2026 [E2]. Both accounts were opened with the same passport number and share one login device [E3]. Both were introduced by IB partner P-118 [E4].

What

Both accounts were funded from the same foreign bank account ending 4471 on 19 Sep 2026: USD 25,000 to login 40917 and USD 24,500 to login 41203 [E5]. The flagged activity is on the firm's MT5 platform in EURUSD and XAUUSD.

When

Between 22 and 25 Sep 2026 the two logins opened 58 pairs of opposite trades of identical size, each pair within 2 seconds, all closed within 90 seconds [E6]. Listed in date order in the attached deal extract [E7].

Where

Trading on the firm's MT5 server in the UAE. Funding originated from a bank outside the UAE [E5]. Withdrawal WR-88213 of USD 31,800 requested from login 41203 to the same foreign account on 26 Sep 2026 [E8].

Why

The trades carry no market risk between the two accounts; login 40917 lost USD 18,900 and login 41203 gained USD 18,650 [E6]. IB P-118 earned USD 6,300 in rebates on this volume [E4]. The declared income of both clients does not explain the transfers.

How

Funds were deposited into two accounts under common control, moved from one to the other through matched losing and winning trades, and withdrawn from the winning account to the original funding source, generating rebates for the introducer on the way.

Evidence references

Ref	Record	Source system	What it shows
E1	KYC record, login 40917	CRM	Identity, occupation, declared income
E2	KYC record, login 41203	CRM	Identity, same passport number as E1
E3	Login log 19–25 Sep	MT5 / web portal	Same device fingerprint on both logins
E4	Rebate ledger, IB P-118	Back office	USD 6,300 on the flagged volume
E5	Deposit records 19 Sep	PSP statement	Common funding account ending 4471
E6	Matched-trade report	Rule WASH-01 output	58 pairs, P&L per login
E7	Deal extract 22–25 Sep	MT5 Manager	All deals, tickets and timestamps
E8	Withdrawal request WR-88213	Back office	Amount, destination, time

Red flags observed

- Two accounts with the same passport number and device
- Opposite trades of equal size within seconds, repeated 58 times
- Consistent one-way P&L transfer between linked accounts
- Common third-country funding source
- Rebates earned by the introducer on non-economic volume
- Withdrawal from the winning account soon after the activity

Actions taken

- Withdrawal WR-88213 held on 26 Sep 2026 pending the MLRO decision.
- Both logins restricted to close-only; IB P-118 rebate payment for the period suspended.
- Review of other clients introduced by P-118 opened (CASE-2609-015).
- No contact with the clients about the review or the report.

Review

Analyst (maker)	Analyst A., 27 Sep 2026 10:12
MLRO (checker)	MLRO B., 28 Sep 2026 16:40
Decision and reason code	File STR · reason code RC-02 (evidence sufficient)
Date and time	Approved 28 Sep 2026

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