



FINANCIAL INTELLIGENCE UNIT OF LIBERIA

Congo Town back road behind the Ministry of Health
(Old LACC building) Monrovia - Liberia



Circular/Public Notice

Number: 003/FIU/04/01/RL

Enhanced Due Diligence and Instant Reporting of Suspicious Transactions from and to High-Risk Jurisdictions in Eastern Europe

Attention:

**Financial Institutions, Non-Financial Institutions,
Designated Non-Financial Business and Professions
(DNFBPs) inclusive of Lawyers, Real Estate Agents,
Notary Public, Dealers in Precious Stone and the General
Public**

April 1, 2022

Background

The Financial Intelligence Unit of Liberia (FIU), pursuant to the authority vested in it by sections 67.3, 67.4, and 67.5 of the Financial Intelligence Unit Act, 2012 (FIU, Act), hereby prescribes and set forth this notice to the general public, in particular to financial and non-financial institutions as well as Designated Non-Financial Businesses and Professions (DNFBPs) of Liberia.

Given the National Risk Assessment (NRA) found that Liberia's financial system is exposed to high risks of money laundering at different degree, it goes with saying that Liberia is vulnerable to exploitation by money launderers and terrorist financiers. Notwithstanding, in order to mitigate the high risks posed by money laundering to our financial system, a National Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) Strategy and Action Plan has been developed, validated by relevant stakeholders, approved by the Inter-Ministerial Committee (IMC) on AML/CFT, and implementation approval by the Executive Branch of Liberia.

Objective of the Circular:

The Primary objective of this Circular is Risk Mitigation and prevention of abuse of the Liberian financial system.

Given the recent reported high volume or movement of illicit funds and activities from Eastern Europe, corrupt actors themselves and or with the help of gatekeepers and enablers are laundering illicit funds to weaker jurisdictions and safe havens. In this light, Financial Action Task Force (FATF) has directed state parties to increase monitoring, preventive measures and combating abilities to avert or mitigate abuse of their financial systems. Consistent with FATF standards, several preventive measures including effective reporting of suspicious activities to authorities, enhance customer screening and due diligence, [targeted] sanctions, freezing and confiscation are being implemented by countries to help mitigate and prevent identified ML risks, thereby protecting the integrity of their financial and non-financial systems from use for laundering and hiding of proceeds generated from crimes or other illegal activities.

Given that Liberia is a FAFT/ Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) member state under the scope and authority of FATF recommendations/standards, the FIU is recognized by law as the central national agency of Liberia responsible for disseminating information and preventive measures against Money Laundering, Terrorist Financing and Crime Proceeds.

Mandates for Enhanced Due Diligence and Reporting of Suspicious Transaction:

Considering the aforementioned, the FIU **mandates** financial institutions, non-financial institutions and designated non-financial businesses and professions including lawyers, accountants, real estate agents, dealers in precious metals and stones to take the following actions on incoming and outgoing transactions/transfers and or activities from and to Eastern Europe for AML/CFT prevention purposes:

1. Conduct enhanced customers screening and due diligence check prior to onboarding any customer from the above-mentioned geography and jurisdictions. File Suspicious Transaction Report (STR) or Cash Transaction Report (CTR) to the FIU within the statutory period based on all transactions emanating from or to the above-mentioned high-risk geography and jurisdictions on reasonable grounds to suspect that any property is a proceed of crime(s) or cash deposits above statutory thresholds.
2. Identify all natural and legal persons or arrangements relating to transactions by business entities or subsidiaries from the above-mentioned geography and jurisdictions.
3. Ensure that attempted transactions related to the above-mentioned geography and jurisdictions which are cancelled or retracted for reasons suspected to include avoiding or evading reporting obligations or other laws be reported to the FIU.

The FIU applauds ongoing actions by the Government of Liberia in strengthening the country's AML/CFT legal framework to include the prohibition of Financing Proliferation of Weapons of Mass Destruction, all for the purposes of combatting money laundering and financing of terrorism.

These actions are prudent for compliance with FATF standards and increased monitoring of financial crimes and money laundering through financial and non-financial institutions in Liberia. All have to take due note and act accordingly.

Signed



Edwin W. Harris, Jr

Director General