



## NEW MONEY LAUNDERING GUIDANCE

FIL-6-2001  
January 22, 2001

TO: CHIEF EXECUTIVE OFFICER

SUBJECT: *Guidance on Enhanced Scrutiny for Transactions That May Involve the Proceeds of Foreign Official Corruption*

Together with the Federal Reserve Board, the Office of the Comptroller of the Currency, the Office of Thrift Supervision, the Department of the Treasury and the Department of State, the Federal Deposit Insurance Corporation (FDIC) is issuing the attached guidance to banks on accounts held by senior foreign officials and closely related persons or entities that may involve proceeds from corruption.

The guidance is neither a rule nor a regulation, and should not be interpreted as such. It is advice that banks are encouraged to implement as part of their routine anti-money laundering and risk-management practices. The guidance is intended to assist banks in ensuring that they do not unwittingly become involved in money laundering schemes conducted by foreign officials, their immediate family members or their close associates.

However, as part of the FDIC's Bank Secrecy Act examination program, examiners may inquire about the bank's procedures concerning accounts held by foreign officials. If serious deficiencies are noted that would have been minimized or eliminated had the recommendations in this guidance been followed, the FDIC may, if appropriate, require that this guidance be incorporated into the bank's risk-management procedures.

The guidance defines a "covered person" and includes recommendations to banks on procedures that may be incorporated into their existing practices for account opening and maintenance. It also contains a list of 14 questionable or suspicious activities that, when present, often will warrant enhanced review of transactions involving such persons. Finally, the document contains a listing of independent sources available to banks to assist them in making decisions about conducting business with particular persons or entities.

For additional information, please contact Carol Mesheske in the FDIC's Division of Supervision at 202-898-6750. For your reference, all FDIC Financial Institution Letters published since January of 1995 may be found on the FDIC's Web site at [www.fdic.gov](http://www.fdic.gov) under "News, Events & FOIA."

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Attachment: [Guidance on Enhanced Scrutiny](#)

Distribution: FDIC-Supervised Banks (Commercial and Savings)

NOTE: Paper copies of FDIC financial institution letters may be obtained through the FDIC's Public Information Center, 801 17th Street, NW, Room 100, Washington, DC 20434 (800-276-6003 or (703) 562-2200).

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