

[BSP CIRCULAR LETTER, June 16, 2005]

AMLC RESOLUTION NO. 59 DATED 29 APRIL 2005

Pursuant to the request of the Anti-Money Laundering Council (AMLC), through its Resolution No. 59 dated 1 June 2005, copy attached, listed hereunder are suspicious transaction indicators or "red flags" to serve as your guide in the submission to the AMLC of reports of suspicious transactions relating to potential or actual financing of terrorism:

1. Wire transfers between accounts, without visible economic or business purpose, especially if the wire transfers are effected through countries which are identified or connected with terrorist activities.
2. Sources and/or beneficiaries of wire transfers are citizens of countries which are identified or connected with terrorist activities.
3. Repetitive deposits or withdrawals that cannot be explained or do not make sense.
4. Value of the transaction is over and above what the client is capable of earning.
5. Client is conducting a transaction that is out of the ordinary for his known business interest.
6. Deposits being made by individuals who have no known connection or relation with the account holder.
7. An individual receiving remittances, but has no family members working in the country from which the remittance is made.
8. Client was reported and/or mentioned in the news to be involved in terrorist activities.
9. Client is under investigation by law enforcement agencies for possible involvement in terrorist activities.
10. Transactions of individuals, companies or non-governmental organizations (NGOs) that are affiliated or related to people suspected of being connected to a terrorist group or a group that advocates violent overthrow of a government.
11. Transactions of individuals, companies or NGOs that are suspected as being used to pay or received funds from revolutionary taxes.
12. The NGO does not appear to have expenses normally related to relief or humanitarian efforts.