

## FINANCIAL MONITORING UNIT (FMU) GOVERNMENT OF PAKISTAN

2<sup>ND</sup> FLOOR, SBP MAIN BUILDING, I.I. CHUNDRIGAR ROAD, KARACHI 4400

FMU-Circular No. 06 of 2020

July 23, 2020

DNFBPs (Lawyers, Notaries and Independent Legal Professionals)

Dear Sirs/Madams,

## Red Flags Indicators for Lawyers, Notaries and Independent Legal Professionals

In terms of Section 7 (1) of Anti-Money Laundering Act, 2010, the reporting entities are required to promptly report Suspicious Transactions Reports (STRs) to Financial Monitoring Unit for potential Money Laundering (ML) / Terrorism Financing (TF) related activities. The reporting entities also includes designated non-Financial Business Professions (Lawyers, Notaries and Independent Legal Professionals) as per Section 2 (u) read with Section 2 (m) of AML Act 2010.

- 2. In order to identify a suspicion that could be indicative of Money Laundering (ML) or Terrorism Financing (TF), FMU has prepared the red flags indicators that are specially intended as an aid for Lawyers, Notaries and Independent Legal Professionals, which are attached as "Red Flags Indicators for Lawyers, Notaries and Independent Legal Professionals".
- 3. These red flags may appear suspicious on their own; however, it may be considered that a single red flag would not be a clear indicator of potential ML / TF activity. However, a combination of these red flags, in addition to analysis of overall financial activity and client profile may indicate a potential ML / TF activity.

Encl: Red Flags Indicators for Lawyers, Notaries and Independent Legal Professionals.

Yours truly,

Sd/-(Sumera Baloch) Additional Director

## Distributed to:

The Secretary Ministry of Law and Justice The Attorney General Office of Pakistan