



**Federal Deposit Insurance Corporation**  
550 17th Street NW, Washington, D.C. 20429-9990

**Financial Institution Letter**  
**FIL-63-2008**  
**July 8, 2008**

## **BANK SECRECY ACT**

### **Suspicious Activity Reporting on Proceeds of Foreign Corruption**

**Summary:** The Financial Crimes Enforcement Network (FinCEN) has issued the attached guidance to financial institutions on filing Suspicious Activity Reports (SAR) regarding the proceeds of foreign corruption.

**Distribution:**

FDIC-Supervised Banks (Commercial and Savings)

**Suggested Routing:**

Chief Executive Officer  
BSA Compliance Officer

**Related Topics:**

Bank Secrecy Act/Anti-Money Laundering Programs

**Attachment:**

"Guidance to Financial Institutions on Filing Suspicious Activity Reports regarding the Proceeds of Foreign Corruption"

[http://www.fincen.gov/Foreign\\_Corruption\\_SAR\\_Guidance.html](http://www.fincen.gov/Foreign_Corruption_SAR_Guidance.html)

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**Note:**

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Paper copies of FDIC FILs may be obtained through the FDIC's Public Information Center, 3501 N. Fairfax Drive, Room E 1002, Arlington, VA 22226 (1-877-275-3342 or 703-562-2200).

**Highlights:**

- In order to assist law enforcement in its efforts to target foreign corruption and related money laundering, FinCEN requests that financial institutions include the term "foreign corruption" in the narrative portions of all SAR(s) filed in connection with such activity.
- The term "senior foreign political figure" is defined as a current or former senior official of a foreign government or of a major foreign political party; a current or former senior executive of a foreign government-owned commercial enterprise; a corporation, business or other entity that has been formed by, or for the benefit of, any such individual; the immediate family members of any such individual; and the widely and publicly, or actually, known close associates of any such individual.
- The term "proceeds of foreign corruption" means any asset or property that is acquired by, through or on behalf of such corrupt public figures through misappropriation, theft or embezzlement of public funds, the unlawful conversion of property of a foreign government, or through acts of bribery or extortion, and includes any property into which any such assets have been transformed or converted.