
MINISTRY OF ECONOMY
AND FINANCE

NATIONAL FINANCIAL INTELLIGENCE
PROCESSING UNIT

**ORDER ON THE MODEL FOR REPORTING SUSPICIOUS
TRANSACTIONS**

The Minister of State for Economy and Finance,

Considering Article 43 of the Constitution;

Considering Law n° 2004-09 of 06 February 2004 on the fight against money laundering;

Considering decree 2004-561 of 21 April 2004 on the appointment of the Prime Minister;

Considering decree 2004-1150 of 18 August 2004 on the institution, organisation and operationalisation of the National Financial Intelligence Processing Unit;

Considering decree 2005-410 of 18 May 2005 appointing new Ministers and setting the composition of Government,

HAS ORDERED THAT

Article One: To enforce the provisions of article 26 of Law 2004-09 of 06 February 2004 on the fight against money laundering, the National Financial Intelligence Processing Unit's annexed model report on suspicious transactions shall be a three-page (03) form presented as follows:

Page One: Introductory page

Page Two: Page for detailed analysis of the facts and key elements of the report on suspicious transactions

Page Three: Page for identifying the person or persons suspected

Article 2: The lay-out shall be as follows:

Introductory page

- fill in the section on ‘‘Agency / Declarant’’ in order to provide information on the reporting agency and the person authorized to sign reports on suspicious transactions;
- give information useful for processing the report (date and internal reference, reference in the case of an additional report);
- indicate any background evidence supporting the report, and that could be used to back the suspicions, and point out if the documents are attached to the report on suspicious transactions.

Analysis page

- provide information on the key motive for filing the report;
- give the main characteristics of the transactions or operations;
- list the natural persons or legal entities directly involved in the suspicious transactions;
- describe the evidence of money laundering, including:
 - a) how transactions are carried out (factual elements);
 - b) analysis and conclusions that led to the suspicion;
 - c) suspicious characteristics of the situation and the content.

Identification page

- provide all the necessary elements for individual identification, including identification papers and addresses;
- provide information on the business relations between the suspect and the reporting party;
- provide information on the medium used for the suspicious transactions (bank account, contract or document, etc ...);
- an additional sheet may be used to provide additional information.

Article 3: The signature of the declarant shall be that of the Authority of the reporting agency or his proxy.

Article 4: The report on suspicious transactions shall be transmitted to ‘‘CENTIF’s’’ exact address in writing to ensure there is a piece of evidence. It may also be transmitted by telephone or electronic mail with confirmation in writing within forty eight (48) hours from the date the information was received.

Article 5: The form for reporting suspicious transactions may be obtained by making a simple request to ‘‘CENTIF’’ or by downloading it from ‘‘CENTIF’s’’ secured extranet system.

Article 6: The Head of ‘‘CENTIF’’ and all the institutions and individuals specified by Article 5 of the above Law shall all be in charge of applying this order.

Done in Dakar, on

Abdoulaye DIOP