



# OCC ADVISORY LETTER

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Comptroller of the Currency  
Administrator of National Banks

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Subject: U.S. Department of Treasury  
FinCEN Advisories 20A, 22A, and 25A

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**TO:** Chief Executive Officers and Compliance Officers of National Banks and Federal Branches, Department and Division Heads, and All Examining Personnel

This advisory letter revises the list of countries detailed in OCC Advisory Letter (AL) 2002-7, "U.S. Department of Treasury FinCEN advisories 17A, 18A, and 26A," dated October 10, 2002 (see also AL 2002-5, AL 2002-2, AL 2001-7, and AL 2000-8).

In July 2000, the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) issued a series of advisories identifying 15 countries with serious deficiencies in their counter-money-laundering systems.<sup>1</sup> Since then, FinCEN has issued additional advisories eliminating or revising some of those original advisories<sup>2</sup>.

The attached FinCEN advisories 20A, 22A, and 25A supersede and withdraw FinCEN advisories 20, 22, and 25, issued July 2000, regarding the jurisdictions of the Marshall Islands, Niue, and the Russian Federation. Enhanced scrutiny of transactions with these jurisdictions is no longer necessary due to the enactment of significant reforms to their counter-money-laundering systems and the concrete steps taken to bring these reforms into effect. The FinCEN advisories are consistent with the October 11 Financial Action Task Force on Money Laundering decision to remove the Marshall Islands, Niue, and the Russian Federation from its list of countries that are noncooperative in the fight against money laundering.

FinCEN advisories remain in effect for the following jurisdictions<sup>3</sup>:

- The Arab Republic of Egypt,
- Burma,
- The Cook Islands,
- Dominica,
- The Federal Republic of Nigeria,
- Grenada,
- Nauru,
- The Philippines,
- St. Vincent and The Grenadines,
- The Seychelles, and
- Ukraine.

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<sup>1</sup> See FinCEN advisories 13 - 27 (July 2000). The FinCEN advisories are available at [[www.treas.gov/fincen](http://www.treas.gov/fincen)] and additional guidance is provided in OCC AL 2000-8.

<sup>2</sup> See OCC advisories 2001-7, 2002-2, 2002-5, and 2002-7; or FinCEN advisories 11A, 13A, 14A, 17A-23A, 25A, and 26A.

<sup>3</sup> See FinCEN advisories 2, 15, 16, 21, 21A, 24, and 27-32.

The FinCEN advisories on the above jurisdictions emphasize the need for enhanced scrutiny of certain transactions and banking relationships in these jurisdictions to ensure that appropriate measures are taken to minimize risk for money laundering. Please refer to OCC AL 2000-8 for additional information on banking relationships in the subject jurisdictions. Also, refer to the Bank Secrecy Act/Anti-Money Laundering booklet in the *Comptroller's Handbook* and OCC advisory letter, AL 2000-3, for guidance on controlling risk of money laundering. Copies of the booklet and the OCC advisory letters are available at [[www.occ.treas.gov/handbook/bsa.pdf](http://www.occ.treas.gov/handbook/bsa.pdf)] and [[www.occ.treas.gov/Advlst00.htm](http://www.occ.treas.gov/Advlst00.htm)].

If you have any questions or need copies of the new FinCEN advisories, please contact your supervisory office or the Compliance Division at (202) 874-4428.

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David G. Hammaker  
Deputy Comptroller for Compliance

Attachments

Can also be found electronically at:  
[\[http://www.fincen.gov/pub\\_main.html\]](http://www.fincen.gov/pub_main.html)