#3 Received via Email

I have just read an article wherein it was stated that Life Assurance Companies will soon be subjected to SAR requirements.

I do not live in the US so I am a bit ignorant of the types of life assurance products which are being sold and, hence, which might be vulnerable to be used as part of a money laundering operation. Nor am I conversant with the US Law.

I am a Maltese Citizen working with a Life Assurance Company in Malta (Europe). Ant-Money Laundering Legislation has been in place since 1994 .Life Assurance Companies were always obliged to submit Suspicious Transaction Reports.

Clearly life assurance policies can be and have been used by money launderers. The most types of life assurance products that are prone to be used by money launderers are Single Premium polices and , to a small extent, high regular premium policies.

Life Insurers are used to establishing the identity of the client and his/her financial means (in particular the source of the funds) as part of their Underwriting procedures (to be more exact- the Financial Underwriting aspects).

In setting any threshold for SARs it should be stipulated , in my opinion, whether this is a cumulative amount e.g. in any 6 or 12 months.

I am attaching a copy of a list of potential suspicious transactions which I had incorporated in our Prevention of Money Laundering Internal Guidelines which you might find useful.

Mark