



GOVERNMENT OF THE REPUBLIC OF TRINIDAD AND TOBAGO

FINANCIAL INTELLIGENCE UNIT
MINISTRY OF FINANCE



FIU REFERENCE: N/03/2020

NOTICE TO ATTORNEYS-AT-LAW FOR REGISTRATION WITH THE FIU

The purpose of this Notice is to remind Attorneys-at-Law, who perform certain specified activities, of their legal obligation to register with the FIU and comply with the anti-money laundering/counter financing of terrorism/counter proliferation financing (AML/CFT/CPF) laws of Trinidad and Tobago for the effective detection and prevention of money laundering and financing of terrorism activities.

The **First Schedule** of the Proceed of Crime Act, Chap 11:27 defines which individuals, businesses and organisations **must** register with the FIU in accordance with **Section 18B** of the FIU Act, Chap 72:01. Thus, Attorneys-at-Law engaging the following activities **must** register with the FIU:

- a. Buying and Selling of Real Estate;
- b. Managing client's money, securities or other assets;
- c. Management of banking, savings or securities accounts;
- d. Organization of contributions for the creation, operation or management of companies, legal persons or arrangements; and
- e. Creation, operation or management of companies, legal persons or arrangements; and buying or selling of business entities.

Attorneys-at-law are considered to be performing these specified activities if they participate in a transaction, assist in the planning or execution of the transaction, or otherwise act for or on behalf of a client in the transaction involving the specified activity.

If you are an employee of a sole practitioner or firm or partnership engaged in the aforesaid activities, these requirements are the responsibility of your employer.

Please note that the requirement for registration does not apply to Attorneys-at-law employed by a public authority¹ or in-house counsel who are conducting activities in the course of their employment.

Further, the FIU's List of Registrants and De-Registrants can be found on the FIU's website at: <https://www.fiu.gov.tt/compliance/supervised-entities/registration/>

Attorneys-at-law are advised to consult FIU publications on the AML/CFT obligations that can also be found on the FIU's website at:

- <https://www.fiu.gov.tt/wp-content/uploads/AML-CFT-Obligations-for-Registered-Supervised-Entities.pdf>
- https://www.fiu.gov.tt/wp-content/uploads/Attorneys-at-Law-revd-24_May_13.pdf

Dated: October 27th 2020

Nigel Stoddard
Deputy Director
Financial Intelligence Unit

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¹ As defined at section 2(1) of the Financial Intelligence Unit of Trinidad and Tobago Act, Chap. 72:01