



ECONOMIC AND FINANCIAL CRIMES COMMISSION

SPECIAL CONTROL UNIT AGAINST MONEY LAUNDERING

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CIRCULAR TO ALL DESIGNATED NON-FINANCIAL BUSINESSES AND PROFESSIONS

DESIGNATION OF TEN INDIVIDUALS AND THREE ENTITIES BY THE NIGERIA SANCTIONS COMMITTEE AND ADDITION TO THE NIGERIA SANCTIONS LIST

Pursuant to Section 54 of the Terrorism (Prevention and Prohibition) Act, 2022, the Economic and Financial Crimes Commission (Anti-Money Laundering, Combating the Financing of Terrorism and Proliferation of Weapons of Mass Destruction for Designation of Non-Financial Businesses and Professions and other Related Matters) Regulation, 2022, your attention is hereby drawn to an update on the Nigeria Sanctions List.

Below are entries to the Nigeria Sanctions List of individuals and entities subject to assets freeze, travel ban and arms embargo:

1. Abdurrahaman Musa Ado
2. Bashir Ali Yusuf
3. Ibrahim Ali Alhassan
4. Muhammad Ibrahim Isah
5. Salihu Yusuf Adamu
6. Surajo Abubakar Mohammad
7. Fannami Alhaji Bukar
8. Muhammed Musa
9. Sahabi Ismail
10. Mohammed Saleh Buba
11. Alin Yar Yaya General Enterprises
12. K. Are Nigeria Limited
13. Suhallah Bashir General Enterprises

Accordingly, all DNFBPs are directed to adopt the attached potential measures in addition to other measures considered to safeguard their systems. Furthermore, you are directed to visit the Nigeria Sanctions Committee's website (<https://nigsac.gov.ng>) for updates on the sanctions list.

You are also required to file a suspicious transaction report with the NFIU immediately.

This circular takes immediate effect.


DCE Daniel Isei, FSI
Director, SCUML

PROCEDURES FOR IMPLEMENTATING TARGETED FINANCIAL SANCTION ON TERRORIST INDIVIDUALS AND ENTITIES

If relationship exists you are required to:

- i. Immediately, identify and freeze, without prior notice, all funds, assets, and any other economic resources belonging to the designated persons and entities in their possession and report same to the Secretariat of the Nigeria Sanction Committee;
- ii. Report to the Secretariat of the Nigeria Sanctions Committee, any assets frozen or actions taken in compliance with the designation, including attempted transactions;
- iii. Immediately file a suspicious transactions report to the NFIU for further analysis on the financial activities of such an individual or entity; and
- iv. Report in a suspicious transactions report to the NFIU, all cases of name matching in financial transactions prior to or after receipt of the Nigeria Sanctions List;
- v. Subsequently prohibit dealings with the designated persons and entities and to continue to check for transactions relating to the designated person or entity and the actions to be taken if funds or other assets or suspect transactions are discovered;
- vi. Note that the freezing obligation extends to:
 - a. All funds or other assets that are owned or controlled by the designated persons or entity and not just those that can be tied to a particular act, plot, or threat of terrorism or terrorist financing;
 - b. Those funds or other assets that are wholly or jointly owned or controlled directly or indirectly, by designated persons or entities;
 - c. The funds or other assets derived or generated from funds or other assets owned or controlled directly or indirectly by designated persons or entities; and
 - d. Funds or other assets of persons and entities acting on behalf of, or at the direction of designated persons or entities.

PROCEDURES FOR IMPLEMENTING TARGETED FINANCIAL SANCTION ON TERRORIST INDIVIDUALS AND ENTITIES

If a relationship exists you are required to:

- i. Immediately, identify and freeze, without prior notice, all funds, assets, and any other economic resources belonging to the designated persons and entities in their possession and report same to the Secretariat of the Nigeria Sanction Committee;
- ii. Report to the Secretariat of the Nigeria Sanctions Committee, any assets frozen or actions taken in compliance with the designation, including attempted transactions;
- iii. Immediately file a suspicious transactions report to the NFIU for further analysis on the financial activities of such an individual or entity; and
- iv. Report in a suspicious transactions report to the NFIU, all cases of name matching in financial transactions prior to or after receipt of the Nigeria Sanctions List;
- v. Subsequently prohibit dealings with the designated persons and entities and to continue to check for transactions relating to the designated person or entity and the actions to be taken if funds or other assets or suspect transactions are discovered;
- vi. Note that the freezing obligation extends to:
 - a. All funds or other assets that are owned or controlled by the designated persons or entity and not just those that can be tied to a particular act, plot, or threat of terrorism or terrorist financing;
 - b. Those funds or other assets that are wholly or jointly owned or controlled directly or indirectly, by designated persons or entities;
 - c. The funds or other assets derived or generated from funds or other assets owned or controlled directly or indirectly by designated persons or entities; and
 - d. Funds or other assets of persons and entities acting on behalf of, or at the direction of designated persons or entities.