



# BANGKO SENTRAL NG PILIPINAS

## CIRCULAR LETTER NO. CL-2021-098

### OFFICE OF THE DEPUTY GOVERNOR FINANCIAL SUPERVISION SECTOR

**To : All BSP-Supervised Financial Institutions (BSFIs)**

**Subject : Anti-Money Laundering Council (AMLC) Advisory dated 16 November 2021 on the List of Uncooperative Covered Persons under the Anti-Money Laundering Act of 2001 (AMLA), as amended**

This is to disseminate to all BSFIs the latest AMLC advisory<sup>1</sup> on the updated list of uncooperative covered persons under the AMLA, as amended, posted in the AMLC website on 16 November 2021 (copy attached), as follows:

Philippine Offshore Gaming Operators (POGOs):

- (1) MG Universal Link Limited (MG Universal);
- (2) Inner Strong Limited (Inner Strong); and
- (3) Smarc Group International Limited (Smarc).

The advisory also informs that various covered persons failed or refused to cooperate with the AMLC in the conduct of its compliance-checking. Thus, the AMLC resolved to revoke the registration of those covered persons. In this regard, the AMLC advises the public to be cautious and to observe appropriate protocols in dealing with the identified uncooperative POGOs.

The first two POGOs cited above were included in the initial advisory<sup>2</sup> issued by the AMLC on 07 October 2021 and disseminated through Circular Letter No. CL-2021-079<sup>3</sup>. Said Circular Letter reminded BSFIs to strictly observe the requirements under Part Nine of the Manual of Regulations (MOR) for Banks and MOR for Non-Bank Financial Institutions, particularly on customer due diligence, ongoing monitoring, and reporting of suspicious transactions, as well as BSP Memorandum No. M-2018-002<sup>4</sup> and Circular Letter No. CL-2021-012<sup>5</sup>. These provide, among others, that BSFIs shall deal only with gambling and/or online gaming businesses that are authorized/licensed by or registered with the Appropriate Government Agency duly empowered by law or its charter to license or authorize entities or businesses to engage in such activities. Also, Section 3.2, Rule 4 of the Revised Implementing Rules and Regulations of the AMLA, as amended, requires all covered persons to register with the AMLC, which the Supervising Authorities shall prescribe as a requirement for continued licensing and/or operations of covered persons, and, when necessary, transacting with other covered persons.

For information and strict compliance.

Digitally signed by Chuchi  
G. Fonacier  
Date: 2021.12.07 10:46:32  
+08'00'

**CHUCHI G. FONACIER**  
Deputy Governor

07 December 2021

<sup>1</sup> [www.amlc.gov.ph/16-news-and-announcements/331-list-of-uncooperative-covered-persons?tmpl=component&print=1&page=](http://www.amlc.gov.ph/16-news-and-announcements/331-list-of-uncooperative-covered-persons?tmpl=component&print=1&page=)

<sup>2</sup> <http://www.amlc.gov.ph/16-news-and-announcements/323-list-of-uncooperative-covered-persons-under-the-amlc-as-amended>

<sup>3</sup> <https://www.bsp.gov.ph/Regulations/Issuances/2021/CL-2021-079.pdf>

<sup>4</sup> <https://www.bsp.gov.ph/Regulations/Issuances/2018/m002.pdf>

<sup>5</sup> <https://www.bsp.gov.ph/Regulations/Issuances/2021/CL-2021-012.pdf>

## **List of Uncooperative Covered Persons under the AMLA, as amended**

### **ADVISORY**

Supervising Authorities are informed that various covered persons under their respective supervisions failed or refused to cooperate with the AMLC in the conduct of its compliance-checking.

Supervising Authorities are further informed that the AMLC resolved to revoke the registration of those covered persons who failed or refused to cooperate with the AMLC.

Similarly, the public is hereby advised to be cautious and to observe appropriate protocols in dealing with the following uncooperative covered persons:

Philippine Offshore Gaming Operators (POGOs)

1. MG Universal Link Limited (MG Universal)
2. Inner Strong Limited (Inner Strong)
3. Smarc Group International Limited (Smarc)

As of 16 November 2021.