

Saatja: RAB rahapesu <info@fiu.ee>

Saadetud: 20.10.2023 12:08

Adressaat: <info.ptlbsolutions@gmail.com>

Teema: The response letter to the information request dated 22.09.2023 and 02.10.2023

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Dear Alex Tomlin,

Section two, which you have referred to in your 22. September 2023 letter, in the Money Laundering and Terrorist Financing Prevention Act merely lists persons and fields of activity the act applies to and that must follow the regulation in their profession. This section does not, however, list the types of operating licenses provided overall.

As we have stated in our previous correspondence, operating licenses granted by the Estonian Financial Intelligence Unit (hereafter FIU) are listed in the Money Laundering and Terrorist Financing Prevention Act § 70 (1). You are only able to apply for operating licenses listed there. If your business model does not fit any of the activities listed, you will not be able to apply for an operating license with the FIU. The FIU can give out operating licenses only to persons who are required to have one by law. If you believe your company does require an operating license, we kindly ask you to present a comprehensive legal analysis, in which you explain why your business plan needs a specific operating license.

Furthermore, in response to your additional question in your 02. October 2023 letter, the FIU does not provide registrations nor membership numbers to companies, as that is not a part of the FIU's tasks. Also, such registrations do not exist in Estonia. We are sorry that we are unable to assist you in this matter. We hope this clarifies any confusion about operating licenses.

Best regards,



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