

MASAK Publishes Suspicious Transaction Reporting Guide for Lawyers



On 16.06.2025, the Financial Crimes Investigation Board ("**MASAK**") published the Suspicious Transaction Reporting Guide for Lawyers ("**Guide**") on the official website of MASAK.

The Guide includes explanations on the following issues:

Article 4 of the Law No. 5549 on Prevention of Laundering Proceeds of Crime ("**Law**") is regulated as follows:

ARTICLE 4 - (1) *In the event that there is any information, suspicion or suspicion that the assets subject to the transactions made or attempted to be made before or through the obliged persons are obtained illegally or used for illegal purposes, these transactions must be notified to the Presidency by the obliged persons.*

(2) *The obliged persons shall not disclose the fact that a suspicious transaction notification has been made to the Presidency to anyone, including the parties to the transaction, except the audit staff assigned for liability audit and the courts during the proceedings.*

(3) *For which activities and according to which procedures and principles the obligees shall report suspicious transactions shall be determined by a regulation*

Pursuant to the relevant provision, the regulations in the Guide shall be taken into account when reporting any suspicious transaction by lawyers.

- Suspicious transaction notifications shall be sent electronically by obligors, except in mandatory cases. In mandatory cases where electronic submission is not possible, they shall be prepared on paper and submitted to the Presidency.
- The notification can be made electronically through the MASAK.Online system.
- A notification form regarding the suspicious transaction must be prepared and all information, documents and other issues related to the suspicious transaction and the person or persons performing the suspicious transaction must be included in the form, and a single form must be prepared for multiple real and/or legal persons related to the same subject.
- Pursuant to subparagraph (d) of paragraph 1 of Article 5 of the Regulation on Measures to Prevent Laundering Proceeds of Crime and Financing of Terrorism titled Identification, in cases requiring suspicious transaction notification, identification is required regardless of the amount.
- Information on suspicious transactions or transactions that are subject to suspicious transaction notification and have a monetary value should be included.
- The suspicious transaction that causes a suspicious transaction report may be a single transaction or multiple transactions realized within a certain date range. In this case, it should be reported as multiple transactions at a single time.
- When making a notification, at least one and at most three of the values in the "Suspicion Categories Table" should be selected and specified in the notification.

Finally, "Suspicious Transaction Types" are published to assist obligors in assessing whether there is a reasonable ground for suspicion or suspicion and are intended only to assist obligors. In identifying suspicious transactions, obligors should not limit themselves to the types of suspicious transactions identified in this guide; they should report suspicious transactions even if the suspicious transaction does not fit any of the types listed.

The full text of the Guide is available at this [link](#).