

**CASH** ~~USA~~

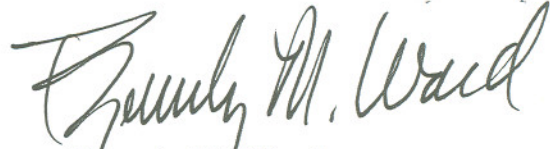
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July 6, 2006

Robert W. Werner, Director  
Financial Crimes Enforcement Network (FinCEN)  
Department of the Treasury  
P. O. Box 39  
Vienna, VA 22183

**RE: FinCEN's Advance Notice of Proposed Rulemaking**

Enclosed is the input you requested from MSBs regarding the impact of the Bank Secrecy Act.



Beverly M. Ward  
VP & General Manager

**Cc: Stephen Henley  
Ardmore TN Branch, Cash USA**

1. What requirements have banking institutions imposed on money services businesses to open or maintain account relationships since the issuance of the joint guidance by FinCEN and the Federal Banking Agencies in April 2005?

**RESPONSE:** Bank required documentation that we were registered as an MSB.

2. Describe any circumstances under which money services businesses have provided or have been willing to provide the information specified in the guidance issued by FinCEN to money services businesses in April 2005, concerning their obligations under the Bank Secrecy Act, and yet have had banking institutions decline to open or continue account relationships for the money services businesses.

**RESPONSE:** No problems encountered with our bank.

3. Have Bank Secrecy Act-related grounds been cited for why banking institutions have decided not to open, or have decided not to continue to maintain, account relationships for money services businesses since the issuance of the guidance to money services businesses and to banking institutions in April 2005?

**RESPONSE:** No problems encountered with our bank.

4. Would additional guidance (including, if applicable, clarification of existing guidance) to the banking industry regarding the opening and maintenance of accounts for money services businesses within the Bank Secrecy Act regulatory framework be beneficial? If so, what specifically should such guidance address?

**RESPONSE:** Probably, but I'm not sure what issued need to be addressed.

5. Would additional guidance (including, if applicable, clarification of existing guidance) to money services businesses regarding their responsibilities under the Bank Secrecy Act as it pertains to obtaining banking services be beneficial? If so, what specifically should such guidance address?

**RESPONSE:** May be helpful. At the present time, we don't need further guidance.

6. Are there steps that could be taken with regard to regulation and oversight under the Bank Secrecy Act that could operate to reduce perceived risks presented by money services businesses?

**RESPONSE:** I'm not aware of anything that can be done to reduce our risks. Adequate steps have already been taken.

7. Since the March, 2005, hearing and the issuance of guidance in April 2005, to banks and to money services businesses, has there been an overall increase or decrease in the provision of banking services to money services businesses? Please offer any thoughts as to why this has occurred.

**RESPONSE:** Although I am aware some businesses have had problems with banking services, Cash USA has not.