

**Comments on FinCEN's Advance Notice of Proposed Rulemaking RIN 1506-AA85
Agency: Department of the Treasury**

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| Date Mailed | July 6-06 |
| First Name | Mohamed Nor |
| Last Name | NOR |
| Organization Name | Dahab-Shul INC |

Comments: If you need more space to comment, add additional pages.

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| 1 | <p>Since April 2005, what requirements have banks imposed on your MSBs to open or maintain bank accounts?</p> <p>Comments: The banks have required that we provide them with extensive information, for example, they required background information on owners and employees. Copies of the Companies audited financial, Copies of the Companies AML procedural manual, and independent Audit of the AML Program</p> |
| 2 | <p>Since April 2005, describe circumstances when banks denied services (declined to open new accounts or closed existing accounts) to your MSBs even when you provided (or offered to provide) the information they required.</p> <p>Comments: The following banks have closed the Company's accounts, despite the fact the company complied with their information required. U.S. BANK, BREMER BANK</p> |
| 3 | <p>Since April 2005, has a bank referred to the Bank Secrecy Act as grounds to deny services (or declined to open new accounts or closed existing accounts) to your MSBs?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Comments: The bank listed above said that the new BSA laws make it too costly or risky to maintain MSB accounts.</p> |
| 4 | <p>Would additional guidance or clarification of the requirements of the Bank Secrecy Act regarding MSB accounts be helpful? If yes, describe.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Comments: Either the BSA laws should be changed to reduce the cost and risk to banks. or banks should be required to maintain MSB accounts whether MSB is in compliance with the law</p> |

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| 5 | Would additional guidance or clarification of your Bank Secrecy Act banking responsibilities be helpful to you? If yes, describe. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Comments: <p style="text-align: center;">See answers to questions 4</p> |
| 6 | What steps could Bank Secrecy Act regulators take to reduce risks posed by MSBs as perceived by banks? Comments: |
| 7 | Since April 2005, has there been an increase or decrease in banking services provided (or available) to MSBs? Why do you think this has occurred? <input type="checkbox"/> Yes <input type="checkbox"/> No Comments: <p style="text-align: center;">See answers to question 3</p> |

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