

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

Date Mailed	July 6, 2006
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**Comments: If you need more space to comment, add additional pages.**

1	<p>Since April 2005, what requirements have banks imposed on your MSBs to open or maintain bank accounts?</p> <p>Comments: Aside from Regulatory Requirements such as Licenses and FINCEN Registration the banks have asked for certain company equity requirements and Financial Statements periodically, to prove that equity, these amounts may vary depending on the bank.</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: Our company was conducting most of their operations through Bank of America and BOFA decided to close all existing accounts including Certificates of Deposit placed as Collateral for Bonds, credit cards, savings accounts, etc.</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 Bank Of America explained that because of Bank Secrecy Act requirements, they had to close all MSBs accounts and relations.</p> <p>Comments:</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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No Additional guidance would definitely help us understand</p> <p>Comments: Bank Secrecy Act requirements in order to understand our banking responsibilities and understand and explain these to our local banks. We have found that all banks have different explanations and requirements.</p>

5	<p>Would additional guidance or clarification of your Bank Secrecy Act banking responsibilities be helpful to you? If yes, describe.</p> <p><input checked="" type="checkbox"/> Yes   <input type="checkbox"/> No A Guide on BANKINS Responsibilities would aide us in  Comments: maintaining all requirements and in providing the adequate information to our bankins institution. This will help our banks feel more comfortable knowing that we are aware and complying with all Bank Secrecy Act responsibilities.</p>
6	<p>What steps could Bank Secrecy Act regulators take to reduce risks posed by MSBs as perceived by banks?</p> <p>Comments: Providing. the banks with the same guide that would be provided to all MSBs on responsibilities and requirements. And a guide as to what information is required from the MSBs for their accounts.</p>
7	<p>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?</p> <p><input checked="" type="checkbox"/> Yes   <input type="checkbox"/> No There has been a decrease in BANKINS Services provided  Comments: to MSBs, mainly because the banks are concerned or affraid of the risks involved as perceived by them. There has been much confusion by the banks regarding requirements and regulations.</p>

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