

Received July 9 from:

J.R.'s Auto Sales, Inc.
Memphis, TN

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: 1) Financial information about company and customers including financial statements and tax returns 2) Explanation of source of funds going in or out of business 3) Copy of MSB Registration 4) Copy of anti-money laundering procedures, policies and controls. 5) Copies of all business licenses 6) Increase in bank services charges.

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: Our bank of 18 yrs sent letter stating they could no longer service the account. Then they said they could keep the account open if the above information was supplied. The above information was supplied. About 9 months later the bank said they could not service our check cashing during tax refund season. We had to find another bar

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: yes -- the bank cited the Bank Secrecy Act caused too much paperwork and attention had to be given the account. The bank said their auditors said to close all MSB accounts.

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: I think the bank feels like they are responsible for any and all actions of the MSB and that these accounts are too costly and cause too much liability for the bank.

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: - yes -- maybe a monthly or quarterly newsletter of recent changes to Bank Secrecy Act would be beneficial. The MSBs want to comply but they must be kept aware of current policy

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: To educate the banks and public that MSBs serve a vital part of the nation's financial structure. The unbankable customer needs the services the MSB provide MSBs must follow stringent guidelines to stay in business

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: decrease -- the banks are afraid to keep the MSB accounts because of the scrutiny that must be placed on these accounts. MSBs have become too much trouble for the banks to handle