

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

| | |
|-------------------|-------------------------------|
| Date Mailed | 7/6/06 |
| First Name | Adam |
| Last Name | WARSAWA |
| Organization Name | NORTH AMERICAN MONEY TRANSFER |

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: Banks close or deny to open an account without any reason(s)</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: Some Banks close or deny to open account to MSBs by making their policy not deal MSBs</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: Some Banks refer MSBs high risk therefore they do not deal with MSBs</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</p> <p>Comments: I think Banks should know that they are not regulators. State and federal regulators should do that job.</p> |

| | |
|---|--|
| 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: Federal/state are regulators |
| 6 | What steps could Bank Secrecy Act regulators take to reduce risks posed by MSBs as perceived by banks? Comments: I think if MSB has state license, registered with IRS, has AML program, banks should treat MSB then as any other business |
| 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No Comments: Banking services decreased for MSBs because banks act as regulators and they branded MSBs as high risk business. |

Mail to:
Financial Crimes Enforcement Network
P.O. Box 39
Vienna, VA 22183