

Comment letter received April 22, 2005

Attention: PRA Comments-SAR-MSB Form

Office of Chief Counsel  
Financial Crimes Enforcement Network  
Department of Treasury  
Virginia, Virginia 22183 USA

According to request for comments to reviewed:  
"Suspicious Activity Report by Money Services Businesses"  
FinCEN Form 109a

In: "Instructions"

C. General Instructions

#15 Addresses, general. ...

..."If the address is in a foreign country, enter the city, province or state if Canada or Mexico, and the name of the country."...

Comment.

In Mexico, Mexico City is also called "Distrito Federal" or abbreviated "D.F.", and the title is used similar to a state. (It is a very big and populated city 8 million people)

The "Distrito Federal" is divided in what is called "Delegacion" abbreviated "Deleg.". Also the "Delegación" and most cities in Mexico are divided in what is called "Colonia" or abbreviated "Col.". Many times Downtown for many cities including Mexico City, do not have a "Colonia" and when someone insists on knowing or filling the space in a format for the "Colonia" they say or write "Centro" (Which means center of the city or downtown but not a "Colonia").

All the states of the country are divided in what is called "Municipio" or abbreviated "Mpio.," the "Municipio" can have cities.

We also have a Postal Code similar to Zip called "Codigo Postal" or "C.P.", but the number structure is the same that in the USA. And when correspondence is from the USA to Mexico automated mail systems sends it to some town or city in the USA with that same number, but not to Mexico.

To facilitate interpretation:

States have:

Municipio

Ciudad

Colonia

"Distrito Federal" has:

Delegacion  
Colonia

### Recommendation

I suggest include in paragraph #15, the titles "Municipio", "Delegacion", and "Colonia".

And to replace the before mentioned part of the text to say:

..."If the address is in a foreign country, enter the city, province (example Canada) or state, and the name of the country. For Mexico also include the municipio or delegacion, colonia (if any), city and state."...

Mr. Carlos Serrano C., C.P.A.  
Tel. 011 52 (81) 8 345 7576  
Cellular (81) 8 099 6629  
Email: cserrano@divisassanjorge.com.mx  
and cserrano@intercable.net

Address:  
Cuauhtemoc Norte # 455  
Monterrey, N.L.  
Mexico