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**From:** Dave Adelman [Dave@jerryspawn.com]  
**Sent:** Monday, May 08, 2006 6:50 PM  
**To:** Comments, Regulation  
**Subject:** RIN 1506-AA85 - Advanced Notice of Proposed Rulemaking on MSB's

Robert W. Werner  
Director  
Financial Crimes Enforcement Network  
P.O. Box 39  
Vienna, Virginia 22183

Via email to [regcomments@fincen.treas.gov](mailto:regcomments@fincen.treas.gov)

Re: RIN 1506-AA85 – Advanced Notice of Proposed Rulemaking  
On Money Service Businesses

Dear Mr. Werner:

I am the Vice President of the National Pawnbrokers Association and also operate my own pawn stores, Jerry's Pawn, in Atlanta, Georgia. My average loan amount is \$55.61 and 75.15% of my pawn customers in 2005 repaid their loans and redeemed their collateral. Less than 1/10 of 1 per cent of the items securing loans or sold to us are claimed to be stolen property over the past several years.

I support the comment filed by the National Pawnbrokers Association. Pawn transactions carry little risk of being vehicles for money laundering or terrorism support for the reasons explained in the NPA's comment. For this reason, I frankly was surprised when pawnbrokers started experiencing bank discontinuance problems following the post-9/11 announcements by the Office of the Comptroller of the Currency.

My business was one of the pawn businesses affected by bank discontinuance. The bank representative made it clear to me that both my credit standing and my store's credit standing were strong, but that a decision had been made by senior management in another city not to continue relationships with pawnbrokers. Given the nature of my banking relationship at the time, both he and I were surprised.

Over the past several months, I have been leading an effort by the NPA to establish a relationship with a major nationwide bank for merchant credit card processing for NPA members. The willingness of this bank to enter into these negotiations is the first significant change in attitude towards our industry I have seen since NPA members started experiencing discontinuance more than two years ago. We are hopeful that this new relationship will be finalized and that the bank and industry members will enjoy the best working relationships possible.

Please contact me if you have questions about our industry or about our comments. We appreciate the opportunity to comment.

Sincerely,

5/10/2006

David T. Adelman  
President, Jerry's Pawn Stores  
Vice President, National Pawnbrokers Association