

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

Date Mailed	7/3/06
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Organization Name	CANADIAN CURRENCY & COIN EXCHANGE, INC

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: WE HAVE FURNISHED UPON REQUEST THE FOLLOWING INFO TO OUR BANK CLIENTS: (1) COPY OF CORP LICENSE (2) " " CURRENCY EXCHANGE LICENSE (3) " " REGISTRATION AS A MSB (4) " " OUR WRITTEN ANTI-MONEY LAUNDERING PROGRAM.</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: WE HAD ONE ACCT CLOSED AND WERE GIVEN NO EXPLANATION AS TO WHY. UPON REQUEST WE WILL OR HAVE FURNISHED ALL OF THE ABOVE LISTED INFO TO OUR BANK CLIENTS. PLUS ANY ADDITIONAL INFO THEY MIGHT ASK FOR. WE STILL PURCHASE CANADIAN FUNDS FROM ABOVE MENTIONED BANK.</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Comments: SEE QUESTION #2</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Comments: WE HAVE A VERY GOOD AND LONG STANDING RELATIONSHIP WITH OUR "LOCAL" BANK. ANY DECISION MADE BY HEADQUARTERS BACK EAST COULD VERY EASILY OVERRIDE ANY DECISION MADE LOCALLY. THIS GREATLY CONCERNS ME!</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 type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Comments:</p> <p>I'M NOT SURE.</p>
6	<p>What steps could Bank Secrecy Act regulators take to reduce risks posed by MSBs as perceived by banks?</p>
	<p>Comments: BE DUE DILIGENCE, UPON ALL REQUIRED STATE/FEDERAL COMPLIANCE BY AN MSB, PERHAPS ISSA COULD PROVIDE AN "EXEMPTION" LIST TO BANKS. I WOULD LIKE TO SEE DECISIONS ABOUT BANK ACCOUNTS MADE LOCALLY AS OPPOSED TO HEADQUARTERS BY SOMEONE WHO IS COMPLETELY UNFAMILIAR WITH THE MSB OR INDIVIDUAL.</p>
7	<p>Since April 2005, has there been an increase or <u>decrease</u> 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 "DECREASE"</p> <p>Comments: SEE #6</p>

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