



Financial Crimes Enforcement Network

A bureau of the U.S. Department of the Treasury

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Michigan MSB Shuts Down Following FinCEN Penalty For Sending Thousands of Wire Transmissions to Yemen Without Anti-Money Laundering Controls

VIENNA, Va. – The Financial Crimes Enforcement Network (FinCEN) today announced the [assessment](#) of a civil money penalty against Saleh H. Adam, doing business as Adam Service, a money services business (MSB). A FinCEN investigation determined that, since November 2007, Adam Service committed serious and willful violations of the Bank Secrecy Act's (BSA) program, recordkeeping, and reporting requirements. Adam Service admitted the facts alleged in FinCEN's enforcement action and admitted that its conduct violated the Bank Secrecy Act. Adam Service and Saleh H. Adam also agreed to cease operating as a money services business and immediately surrender the MSB's registration to FinCEN.

Adam Service admitted to failing to implement any anti-money laundering program. During its operation, the MSB transmitted approximately 1,400 wires per year to Yemen, a high-risk country for terrorist activity and money laundering. Adam Service failed to review any of these or other transactions for suspicious activity. Mr. Adam admitted to deliberately ignoring his BSA obligations because he would lose customers if he asked them for identification or asked questions about their transactions. Mr. Adam also admitted that he knew that his customers deposited funds on behalf of others, and would pool funds to transmit a lump sum. In summary, Mr. Adam conducted his money services business and repeatedly wired funds to a high-risk jurisdiction with reckless disregard for anti-money laundering requirements. Adam Service further admitted that it failed to continuously register as an MSB with FinCEN for approximately eight months in 2010 while it continued to conduct business as an MSB.

“When Mr. Adam chose to own and operate a money services business, transmitting funds abroad on behalf of the public, he had an obligation to do so responsibly,” stated FinCEN Director Jennifer Shasky Calvery. “It is unacceptable for an owner to refuse to comply with his anti-money laundering and counter-terrorist financing obligations simply because he believes he

will lose business. FinCEN will act under such circumstances to protect the integrity and transparency of the U.S. financial system.”

In addition to the closure of the MSB itself, the owner of the company, Mr. Saleh Adam, also agreed to immediately cease engaging directly or indirectly in conduct and transactional activities related to money transmission, as well as any other money services that require registration with FinCEN. Mr. Adam further agreed to pay the \$12,000 civil money penalty. The Director of FinCEN accepts the surrender of Adam Service’s registration effective immediately.

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FinCEN’s mission is to safeguard the financial system from illicit use and combat money laundering and promote national security through the collection, analysis, and dissemination of financial intelligence and strategic use of financial authorities.