

Financial Crimes Enforcement Network

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

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FinCEN Issues Ruling on Armored Car Service Transactions

Addresses CTR Filings When Customers Use Armored Cars

VIENNA, Va. – In an effort to provide law enforcement authorities with needed information, while also considering operational practicality for both financial institutions and their customers, the Financial Crimes Enforcement Network (FinCEN) today issued the following exceptive administrative ruling, <u>Treatment of Armored Car Service Transactions Conducted on Behalf of</u> <u>Financial Institution Customers for Currency Transaction Report Purposes</u>.

The ruling was prompted by practical issues that arose in obtaining some of the information required for proper Currency Transaction Report (CTR) completion. It addresses circumstances when the armored car service, operating under instructions of a person other than the financial institution, transports currency to or from locations for the benefit of a customer's account. FinCEN's ruling ensures that law enforcement will continue to receive information that is important for criminal investigations, while it mitigates some of the problems reporting institutions were having in filing complete and timely CTRs. Financial institutions that are ready to submit CTRs in accordance with this Administrative Ruling may start taking advantage of this relief immediately. Those financial institutions that may need to modify systems to file CTRs appropriately will be expected to do so no later than September 30, 2013.

The ruling is accompanied by a list of specific examples that show the proper completion of CTRs for certain basic transactions involving armored car services acting under instructions of different parties. On a different, but related topic, FinCEN also issued revised <u>technical</u> <u>specifications</u> for the automated filing of CTRs that contain minor changes to the report completion instructions.

Financial institutions with questions about this ruling should contact FinCEN's Regulatory Helpline at (800) 949-2732.

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.