

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

Date Mailed	July 6, 2006
First Name	Garad
Last Name	Nor
Organization Name	Dar al Tawakul General Trading

**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: The banks have required that we provide them with extensive information. For example, they require background information on owners &amp; employees, copies of the company's audited financials, copies of the company's AML Procedural manual. They also have required that the company have an independent audit of the AML 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: The following banks have closed the company's account despite the fact that the company complied with their information request: Wells Fargo, U.S. Bank, Commerce Bank, UMB Bank, Bank of America &amp; Associated 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No All the bank listed above said that the new BSA laws made it too costly &amp; risky to maintain MSB accounts.</p> <p>Comments:</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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No Either the BSA laws should be changed to reduce the cost &amp; risk to banks OR banks should be required to maintain MSB accounts when the MSB is in compliance with the law.</p> <p>Comments:</p>

5	Would additional guidance or clarification of your Bank Secrecy Act banking responsibilities be helpful to you? If yes, describe.
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Comments: <i>See answer to question 4</i>
6	What steps could Bank Secrecy Act regulators take to reduce risks posed by MSBs as perceived by banks?
Comments:	
7	Since April 2005, has there been an increase or decrease in banking services provided (or available) to MSBs? Why do you think this has occurred?
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Comments: <i>See answer to question 3</i>

**Mail to:**  
Financial Crimes Enforcement Network  
P.O. Box 39  
Vienna, VA 22183