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Sent: Wednesday, May 03, 2006 12:09 PM
To: Comments, Regulation
Subject: RIN 1506-AA85

Issues for Comment

5. Would additional guidance to MSBs regarding their responsibilities....

MSBs are not taking this seriously. They expect the bank to do the work for them. We are closing MSB accounts when and because they will not fulfill BSA requirements. They do not understand that the "Bank Secrecy Act does not require....banking institutions to serve as the de facto regulator of the money services business industry." Banks struggle enough to find time to train employees on BSA. We certainly cannot make time to train MSBs. They have GOT to accept accountability and responsibility to comply.

7. Since the March, 2005, hearing and the issuance of guidance.....

We have no desire to do business with MSBs due to BSA. We do not plan to bend over backwards nor make extra efforts to acquire their business. If they don't take it upon themselves to comply, we let them walk.