

Comments received via email Jun 16, 2005

The company I work for is a Retail Jewelry of finished jewelry and watches. We do business with many foreign vendors, all of whom have offices within the United States. The vast majority of payments to these vendors are mailed to their U.S. based offices. For a few vendors, even though they do have offices in the U.S., payment is wired or mailed to their overseas main office. I need clarification if these few vendors still qualify as 'U.S. Based Dealers' or would my company, as a retailer, be required to establish the anti-money laundering program?

Thank You,

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