

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

Date Mailed	JUNE 2006
First Name	ANTONIO
Last Name	GATO
Organization Name	ESPIRITO SANTO E COMERCIAL DE LISBOA INC.

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: AN ANTI-MONEY LAUNDERING AFFIDAVIT AND COPY OF OUR INTERNAL PROCEDURES</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: TWO BANKS HAVE CLOSED OUR ACCOUNTS (AT OUR R. ISLAND AND CONNECTICUT OFFICES) NOT UNDERSTANDING THAT THE TOTAL DAILY CASH DEPOSITS WERE FROM SEVERAL DIFFERENT TRANSACTIONS AND THAT OUR CLIENTS ARE PROPERLY IDENTIFIED AND IN COMPLIANCE WITH STATE AND FEDERAL REGULATIONS AND OUR COMPANY REQUIREMENTS.</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No</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 type="checkbox"/> Yes <input type="checkbox"/> No Comments:
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 type="checkbox"/> Yes <input type="checkbox"/> No Comments:

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