

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

| | |
|-------------------|-------------------------------------|
| Date Mailed | July 3, 2006 |
| First Name | TAM |
| Last Name | TRAN |
| Organization Name | VINA TRANSFER EXPRESS CORP. (A MSB) |

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: Bank of America asked us to submit reports deposits, transfers to Vietnam, compliance report with FINCEN, OFAC. we did submit all these reports. Bank of AMERICA <u>arbitrarily</u> closed accounts of many MSB'S saying it's risky.</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: We did provide <u>all</u> the required reports but Bank of America (MSB central office) <u>arbitrarily</u> closed accounts of <u>all</u> MSB'S in the Seattle area without giving any reasons.</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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Comments: Please clearly <u>spell out all requirements</u> of Bank Secrecy Act vis-a-vis MSB'S in simplified and concise form so that we can easily understand the requirements - MSB mostly are small businesses owned by immigrants who do not have resources of big banks to hire experts or lawyers.</p> |

| | |
|---|--|
| 5 | <p>Would additional guidance or clarification of your Bank Secrecy Act banking responsibilities be helpful to you? If yes, describe.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Comments: Please ask banks to clearly spell out all their specific requirements in their opinion so that we can satisfy the Bank Secrecy Act.</p> |
| 6 | <p>What steps could Bank Secrecy Act regulators take to reduce risks posed by MSBs as perceived by banks?</p> <p>Comments: Please inform us by mail or e-mail all the <u>new</u> requirements so that we can be kept abreast of new developments or new regulations.</p> |
| 7 | <p>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?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Comments: Banks have a <u>preconceived idea</u> that all MSB'S have risk for them!</p> |

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