

## Two Lectures on the Doctrine of a Millennium



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## TWO LECTURES ON THE DOCTRINE OF A MILLENNIUM



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RareBooksClub. Paperback. Book Condition: New. This item is printed on demand. Paperback. 78 pages. LC Number: KF26 . B39 2004s OCLC Number: (OCoLC)70133987 Subject: Money laundering -- United States -- Prevention. Excerpt: . . . 11 AML and BSA exams on these MSBs. It is important that the State regulators know what they are being trained to find. It is critical that the BSA be interpreted by the proper Federal authority which is FinCEN. FinCEN has made great strides in providing guidance for BSA examination and interpretation on the banking side. What we need is a similar process through FinCENs new compliance unit on what is now largely a blank slate, which is the MSBs. Third, and just as important, we believe that under New York banking law our department has the authority to make sure that its licensees are in compliance with all State and Federal laws including the BSA. Other States do not see themselves as so empowered. Congress should make it clear through an amendment to the BSA that State MSB regulators do have the authority to enforce the BSA AML laws for MSBs in their States if they wish to do so. Absent that unambiguous message you have a hodgepodge of activity on the States parts that runs the gamut from aggressive to anxious anticipation. And what happens is something is amiss. We have the power to punish, either publicly or privately. Your State regulators should be looked to as a big part of the solution to move BSA AML compliance forward with respect to MSBs. But in order to do this we need open communication channels, guidance, training, and a clear signal through an amendment to the BSA that you want our help. We have the responsibility to protect our people, our businesses, and our...



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