



## **Financial Crimes Enforcement Network Department of the Treasury**

### **Notice to All Financial Institutions**

As FinCEN works to continue to improve the 314(a) system, the following information is provided to all financial institutions and is based on comments FinCEN has received through its Regulatory Help Line and from the federal regulatory agencies.

The batch transmission sent the week of March 17, 2003, included a consolidated index of all the names that were being requested in a tab-delimited format. FinCEN recognizes that this format may not be ideal for every addressee; however, it is the most compatible to the needs of the majority of addressees. Although a programming problem prohibited the inclusion of all aliases on the index, that problem has been rectified. Future indexes should include all subjects and aliases requested in the individual subject information forms. Feedback received by FinCEN indicates that the consolidated index is a major timesaving improvement to the process.

Be assured that FinCEN is carefully vetting all requests from law enforcement through senior levels in the requesting agencies. In turn, law enforcement is verifying that all requests being forwarded to financial institutions represent only the most significant investigations, primarily terrorist related, and that the corresponding need for the requested information is critical.

In the last batch transmission, several law enforcement officials requested a records search beyond the general search requirements for 314(a). If your institution is unable to conduct this expanded search electronically, the expanded search is not required at this time. However, law enforcement may issue a subpoena for this information at a later date.

Our goal is to maximize the effectiveness of the system by providing law enforcement with the information it needs while, at the same time, minimizing the burden on financial institutions. We know you may have additional concerns about the 314(a) process, including the requirement to manually search records of cash purchases of monetary instruments, and we are currently working with law enforcement to review this requirement.

Again, we appreciate the support and input we have received, as we all continue to comply with this new requirement. If financial institutions have additional concerns or questions, they should contact their primary federal regulator or FinCEN as follows:

Financial Crimes Enforcement Network (FinCEN)

Contact Information:

e-mail: [sys314a@fincen.treas.gov](mailto:sys314a@fincen.treas.gov)

fax: (703) 905-3660

Questions:

Telephone: FinCEN Regulatory Help Line at 1-800-949-2732

The Board of Governors of the Federal Reserve System

Contact Information:

e-mail: [patriotact@frb.gov](mailto:patriotact@frb.gov)

fax: (202) 736-5641

Questions:

Telephone: Laurie A. Bender, Senior Special Anti-Money Laundering Examiner at (202) 452-3794 or Pamela J. Johnson, Senior Anti-Money Laundering Coordinator at (202) 728-5829.

Federal Deposit Insurance Corporation

Contact Information:

e-mail: [fdicadvisory@fdic.gov](mailto:fdicadvisory@fdic.gov)

fax: (202) 898-3627

Questions:

Telephone: Special Activities Section at (202) 898-6750

Office of the Comptroller of the Currency

Contact Information:

e-mail: [nationalbankinfo@occ.treas.gov](mailto:nationalbankinfo@occ.treas.gov)

fax: (202) 874-5301

Questions:

Telephone: James Vivenzio, Special Assistant to the Deputy Chief Counsels at (202) 874-5200

Office of Thrift Supervision

Contact Information:

e-mail: [usap.contact@ots.treas.gov](mailto:usap.contact@ots.treas.gov)

fax: (202) 906-6326

Questions:

Telephone: Timothy Leary, Senior Project Manager at (202) 906-7170

National Credit Union Administration

Contact Information:

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Questions:

Telephone: John K. Ianno, Senior Trial Attorney at (703) 518-6540