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**From:** Rita McKinney [rmckinney@bankofparagould.com]  
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**To:** Comments, Regulation  
**Subject:** RIN 1506-AA85

Most of our customers that end up being MSBs end up being Mom & Pop businesses that cash tax refund checks on the side for the first few months of the year. It is difficult for these folks to understand the requirements. These people are not accustomed to suggestions for policies. They need specific examples of documents and procedures for these businesses. They do not want to be out the expense and time for an accountant or lawyer to assist with these requirements. These merchants hear this "new information requirement" from us the bank. They haven't heard about this from the media or from the government. I've tried finding an example Anti Money Laundering policy for MSBs. It's not out there. Banks are reviewed by regulatory agencies that we can turn to when we have questions, maybe this needs to be approached the same way. Have banks to supply contact information on MSBs and the IRS or other government agency contact them and assist them on the requirements for their programs. Banks should not have to assist MSBs with the BSA programs and since we are the ones telling them they have to do this they look to us for guidance. Banks do not have the time for this process. It would help banks to have the MSB registration List updated. If FinCen doesn't have time to update their Registration List how can banks be expected to have time to set BSA programs for each one of their businesses?

Thank you,  
Rita McKinney  
Bank Secrecy Officer  
First Security State Bank