

**MEMO# 24220**

April 7, 2010

## **Follow-Up Member Call on FinCEN Guidance on AML Programs and Beneficial Ownership Information**

[24220]

April 7, 2010

TO: AML COMPLIANCE WORKING GROUP No. 4-10  
OPERATIONS COMMITTEE No. 6-10  
TRANSFER AGENT ADVISORY COMMITTEE No. 16-10  
BANK, TRUST AND RECORDKEEPER ADVISORY COMMITTEE No. 8-10  
BROKER/DEALER ADVISORY COMMITTEE No. 11-10  
SMALL FUNDS COMMITTEE No. 3-10 RE: FOLLOW-UP MEMBER CALL ON FINCEN  
GUIDANCE ON AML PROGRAMS AND BENEFICIAL OWNERSHIP INFORMATION

On March 22nd the ICI held a call to discuss the Guidance on Obtaining and Retaining Beneficial Ownership Information issued by the Financial Crimes Enforcement Network, along with the Securities and Exchange Commission and other federal agencies, on March 5th (the "Guidance"). [\[1\]](#) Participants in the March 22nd call expressed a desire for the ICI to hold a follow-up call on which members could discuss in more detail the steps that they have taken or propose to take in order to implement the Guidance.

We have, therefore, scheduled a call for Thursday, April 22nd at 2 p.m. (EST) to further discuss the Guidance. To participate in the call, dial 1-888-282-1747, and enter passcode 59634. If you intend to participate in the call, please RSVP to Ruth Tadesse at [rtadesse@ici.org](mailto:rtadesse@ici.org) before the call. We encourage members participating in the call to come prepared to discuss whether and, if so, how the Guidance has impacted (or will impact) their procedures and/or operations.

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**endnotes**

[1] The Guidance is available at [http://www.fincen.gov/statutes\\_regs/guidance/pdf/fin-2010-g001.pdf](http://www.fincen.gov/statutes_regs/guidance/pdf/fin-2010-g001.pdf). See also, Policy Statement on Obtaining and Retaining Beneficial Ownership Information for Anti-Money Laundering Purposes, SEC Rel. No. 34-61651 (Mar. 5, 2010), available at <http://www.sec.gov/rules/other/2010/34-61651.pdf>.

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