

MEMO# 19009

July 8, 2005

FINCEN AND FEDERAL BANKING AGENCIES RELEASE ANTI-MONEY LAUNDERING EXAMINATION MANUAL

© 2005 Investment Company Institute. All rights reserved. Information may be abridged and therefore incomplete. Communications from the Institute do not constitute, and should not be considered a substitute for, legal advice. [19009] July 8, 2005 TO: BROKER/DEALER ASSOCIATE MEMBERS No. 11-05 COMPLIANCE MEMBERS No. 7-05 INTERNAL AUDIT ADVISORY COMMITTEE No. 4-05 MONEY LAUNDERING RULES WORKING GROUP No. 7-05 RE: FINCEN AND FEDERAL BANKING AGENCIES RELEASE ANTI-MONEY LAUNDERING EXAMINATION MANUAL Last week, a group of federal banking agencies and the Financial Crimes Enforcement Network (FinCEN) released the Bank Secrecy Act/Anti-Money Laundering Examination Manual. Although the manual is specifically geared towards the application of the Bank Secrecy Act to banking organizations, it may provide useful guidance to mutual funds and broker-dealers in assessing their own AML compliance programs. In particular, the Manual includes an overview of BSA requirements, an overview of the federal banking agencies' supervisory expectations in this area, and core examination procedures to be used by bank examiners. The Manual (which is 331 pages long) and related documents can be found at the following links: • The Manual: http://www.ffiec.gov/pdf/bsamanual.pdf • A related Q&A: http://www.fincen.gov/ffiecga.pdf • FinCEN's press release: http://www.fincen.gov/bsaamlmanualnr.pdf • Information on a regional outreach program where the Manual will be explained: http://www.fincen.gov/ffiec.pdf Robert C. Grohowski Associate Counsel

Copyright © by the Investment Company Institute. All rights reserved. Information may be abridged and therefore incomplete. Communications from the Institute do not constitute, and should not be considered a substitute for, legal advice.