

**MEMO# 20254**

August 7, 2006

## **AML Subgroups Formed; Initial Conference Calls Being Scheduled**

©2006 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. [20254] August 7, 2006 TO: AML COMPLIANCE WORKING GROUP No. 20-06 TRANSFER AGENT ADVISORY COMMITTEE No. 51-06 RE: AML SUBGROUPS FORMED; INITIAL CONFERENCE CALLS BEING SCHEDULED On a recent AML Working Group conference call and at a recent Transfer Agent Advisory Committee meeting, we decided to form subgroups to discuss implementation issues with the 312 rule on correspondent accounts<sup>1</sup> and the suspicious activity reporting (SAR) rule.<sup>2</sup> The 312 Subgroup will discuss the questions that firms might ask to determine whether a new account is held by a "foreign financial institution" as defined in the new 312 rule. 42 people have signed up for the 312 Subgroup. The SAR Subgroup will discuss the types of monitoring procedures that might be useful in monitoring suspicious activity, particularly in the contexts of omnibus accounts and Fund/SERV. 51 people have signed up for the SAR Subgroup. Current rosters for each subgroup are attached. If you are not on a roster, but still interested in participating on a subgroup, please send an email to Ruth Tadesse at [rtadesse@ici.org](mailto:rtadesse@ici.org). The first subgroup conference calls are currently being scheduled. Members of the subgroups will receive emails directly with the time and dial-in information for the calls. Robert C. Grohowski Senior Counsel - International Affairs Attachment (in .pdf format) 1 See Memorandum no. 19580, dated January 6, 2006 and Memorandum no. 19883, dated March 24, 2006. 2 See Memorandum no. 20009, dated May 4, 2006.