**[Bank letterhead]**

**[INSERT DATE]**

**VIA Electronic Delivery Only**

Michael Mosier, Acting Director,  
Financial Crimes Enforcement Network,

P.O. Box 39,

Vienna, VA 22183

[administrative.rulings@fincen.gov](mailto:administrative.rulings@fincen.gov)

**Re: Request for an Administrative Ruling Pursuant to 31 CFR Part 1010 Subpart G to Exempt Regulated Financial Institutions from CTR Filing for Fulfillment of Institutions’ Own Cash Order Needs**

Dear Acting Director Mosier,

**[Introduce your bank - Asset size, footprint, primary federal regulator, business model, etc.]**

**[Introduce the issue. If you have experienced a recent exam related to CTR filing requirements for cash delivery services, include this fact here. Otherwise, describe how and why bank is currently filing CTRs for its own cash order shipments to provide context for the request for exemption. The following is presented as an example to use or modify accordingly:**

**[Bank name]** has been made aware of recent bank examination findings made by the Federal Deposit Insurance Corporation (“FDIC”) related to the filing requirement of the Financial Crimes Enforcement Network’s (“FinCEN’s”) currency transaction reports (“CTRs”) by banks in connection with the bank’s own cash order shipments. FDIC has referred banks to seek instruction or exemption from FinCEN regarding the matter. **[Bank name]** is an FDIC-supervised institution.**]**

**Request for Administrative Ruling***Question to be Answered*

Pursuant to 31 CFR Part 1010 Subpart G, **[bank name]** requests FinCEN issue an administrative ruling providing an exemption for a federally-regulated financial institution (“FRFI”) from completing CTR filings for its own cash order and cash pick-up shipments when the FRFI’s shipment is performed by a registered money services business (“MSB”) providing armored car services (“ACS”) that complies with its own CTR filing of the FRFI’s cash shipments and has created and follows its own robust Bank Secrecy Act (“BSA”) and anti-money laundering (“AML”) policies.   
  
To the best of **[bank name’s]** knowledge and belief, this request is not applicable to any ongoing state or Federal investigation, litigation, grand jury proceeding, or proceeding before any other governmental body involving either the requestor, any other party to the subject transaction, or any other party with whom the requestor has an agency relationship.

*Description of the Situation for Ruling*

**[Describe the bank’s cash order shipments/process the bank currently files CTRs for which it requests an exemption. The following is presented as an example to use or modify accordingly:  
  
“FRFIs enter into agreements with vendors for the purchase and sale of cash and coin. Pursuant to the agreement, FRFIs pay for their currency purchased through wire drawdowns from an account designed by each FRFI. Also, each FRFI’s account is credited for currency sales through automated clearinghouse (“ACHs”) transactions. The agreement also provides for the delivery and pickup of cash or coin order and armored car support.”]**

**Justification for Administrative Ruling**

**[bank name]** requests that FinCEN issue a new exemption to CTR filing for the situation described in the subject situation for administrative ruling given the fact that the transactions outlined are structured differently from transactions outlined in past rulings.

**[Provide further context for why bank is requesting the exemption. For example, include any justification based upon the fact that the vendor might file CTRs pursuant to its own robust BSA/AML programs. How the described situation presents little to no money laundering risk. Describe the burdens and difficulties that bank faces if it is required to file CTRs in the bank’s cash order situation as described.]**

**Conclusion**

FRFIs and registered MSBs are regulated entities subject to state and federal supervisory scrutiny and examination for compliance with BSA and AML laws and regulations. Additionally, FRFIs face the same robust standards for their selection of third-party service providers and their management thereof.

Because of the various layers of supervisory oversight and regulation, **[bank name]** requests FinCEN issue an administrative ruling exempting FRFIs from completing CTR filings for its own cash order and cash pick-up shipments when the FRFI’s shipment is performed by a registered MSB that complies with its own CTR filing of the FRFI’s cash shipments and has created and follows its own robust BSA and AML policies. If FinCEN declines to provide such an exemption, **[bank name]** requests FinCEN provide full instruction for completion of the CTR form as the scenario for placing and shipping an institutions own cash shipment is not neatly accommodated for within the form itself or its instructions, nor are the filings able to be completed electronically, as FinCEN’s own reporting system does not accommodate the filings.

Furthermore, should FinCEN decline to provide an exemption, **[bank name]** requests that FinCEN not require back filing of past CTRs for the transactions as described in the subject situation of this request. These transactions provide no money laundering risk nor safety or soundness risk to the financial institution, and the registered MSB has actively filed CTRs for all reportable transactions it conducted on behalf of the federally-regulated financial institutions’ cash order needs.

**[bank name]** appreciates your consideration of this matter.

Sincerely,

**[signature block,**

**Name, title]**