



## Department of the Treasury Financial Crimes Enforcement Network

### Ruling

**FIN-2006-R005**

**Issued: December 21, 2006**

**Subject: Administrative Ruling**

**Completion of TIN on FinCEN Form 107 for Inclusion on  
FinCEN's Posted MSB Registration List**

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Dear [ ]:

This letter responds to your letter dated [ ] to the Internal Revenue Service (IRS) [Enterprise Computing Center - Detroit], which was referred to the Financial Crimes Enforcement Network ("FinCEN") for response on [ ]. In your letter, you ask why [your business] is not listed on FinCEN's posted MSB Registration List since your business is a currently registered MSB and has received as proof of registration an acknowledgement letter from the IRS [Enterprise Computing Center - Detroit] dated [ ].

Regulations under the Bank Secrecy Act generally require MSBs that have already registered as such to renew their registrations every two years. (*See* 31 C.F.R. § 103.41(b)(2) and (b)(3).) After an MSB completes its initial registration, the [form] to renew its registration must be filed by December 31 of the second calendar year preceding the 24-month renewal period and is accomplished by filing the Registration of Money Services Business Form, FinCEN Form 107 (copy enclosed). According to our records, [your business] has submitted its renewal and is currently registered with FinCEN. However, in preparing the form to renew [your business's] registration, you have omitted your business's Taxpayer Identification Number ("TIN"), which is currently in Item 9 of Part II (Registrant Information) on FinCEN Form 107. A computer-generated copy of the form you submitted to renew your registration on [ ] and indicating your missing TIN is also enclosed.

FinCEN uses an MSB's TIN as reported on the form to identify the most recent registration filed by that MSB. As a consequence of not reporting your business's TIN, your registration renewal was not captured by our data retrieval system. Therefore, your business has not been included on the MSB Registration List that FinCEN currently updates and posts monthly on our website at: [www.msb.gov](http://www.msb.gov).

In order for [your business] to appear on the posted MSB Registration List, [your business] must file a corrected FinCEN Form 107. To do so, follow the instructions found on FinCEN Form 107 under “When to Register: Correction.” When filing a correction to FinCEN Form 107, please report the appropriate TIN on Item 9 and check Box 1c, labeled “CORRECTION.” Then, complete Part I of the form in its entirety and only those other entries that are being added or changed. Next, staple a copy of the form that you are correcting (or a copy of your acknowledgement letter, if received, from the IRS [Enterprise Computing Center - Detroit] to the corrected form. Mail these documents to the: IRS Enterprise Computing Center - Detroit, Attn: Money Services Business Registration, P.O. Box 33116, Detroit, MI 48232-0116. Please remember to keep a copy of all forms and acknowledgement letters for five years from the date of filing. To obtain additional copies of FinCEN Form 107, you may go to the “Forms” section of our website at: [www.msb.gov](http://www.msb.gov).

If you have any questions about this matter, please contact our Regulatory Helpline at 1-800-949-2732.

Sincerely,

//signed//

Thomas D. Fleming  
Assistant Director  
Regulatory Policy & Programs Division  
Financial Crimes Enforcement Network

Enclosures