



MRIESS@MAT-MGT.COM

We have been serving the precious metals and jewelry industries for 25 years.

We will be here for ongoing advice and to update our AML programs... free of charge.



Where do we stand regarding Government examinations of our AML programs?

At a July 30 gathering, a speaker from the Internal Revenue Service had some interesting observations on anti-money laundering programs that I thought I'd share with you. (The investigatory arm of IRS is the enforcement agency covering precious metals.) In a nutshell:

1. The AML regulations were finalized in mid-2005, so covered companies have had ample time to establish their programs.
2. IRS assumes the forms of compliance—a risk assessment and written plan—are in place.
3. It will also be checking the substance of compliance—training, proper customer identification and verification, checking customers against Government lists, systems testing (audit), detecting and dealing with suspicious activity, etc.
4. Documenting the steps you take in your AML program will be the key to comfortable investigations.

In sum, IRS expects us to have operative programs; not just policy manuals gathering dust on a shelf.

When asked when IRS would complete its examination manual and begin conducting investigations, the answer was fiscal 2008. The Government begins fiscal '08 in October, 2007.

Questions? Do you need to know more about how to set up or improve your anti-money laundering program? We can help. And our precious metals and jewelry industry professionals are also accredited by the Association of Certified Anti-Money Laundering Specialists (ACAMS). Call me, Mike Riess, at: (203)661-6715 or reach me by e-mail at: MRIESS@MAT-MGT.COM

To find out more about the Patriot Group of Materials Management Co. and about our AML programs and services, visit our website at: WWW.MATERIALSMANAGEMENT.NET. There you'll also find the final regulations and a wealth of background information.

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Watch for future issues of the AML Advisor!
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