



June 27, 2020

The Honorable James Inhofe  
Chairman, U.S. Senate Committee on Armed Services  
205 Russell Senate Office Building  
Washington, DC 20510

The Honorable Jack Reed  
Ranking Member, U.S. Senate Committee on Armed Services  
728 Hart Senate Office Building  
Washington, DC 20510

Dear Chairman Inhofe and Ranking Member Reed:

We write to encourage the Senate to act swiftly to pass meaningful legislation to end the abuse of anonymous shell companies and modernize anti-money laundering (AML) controls and expectations. Passage of the Anti-Money Laundering Act of 2020 is a top priority for the organizations listed below and we applaud the bipartisan efforts that have led to the bill's consideration in the 2021 National Defense Authorization Act. This bill includes critical provisions for law enforcement investigations into organized transnational criminal operations, human trafficking, terrorism financing and other unlawful activity that threatens our national security.

Members of the Senate Banking Committee have worked in good faith with the Department of the Treasury, law enforcement, non-profit groups, and the financial services sector to find consensus on procedures that will close a massive loophole in our anti-money laundering framework. The resulting legislation to create a secure beneficial ownership registry of legal entities, held at the Financial Crimes Enforcement Network, a bureau of the Treasury Department, represents the best path forward to provide law enforcement with needed information to pursue criminals looking to exploit our financial system. The bill strikes the right balance between imposing minimal requirements on small businesses and providing critical information to law enforcement and financial institutions. In addition, if enacted prior to the COVID outbreak, the bill could have assisted financial institution efforts to serve new customers under the Small Business Administration's Paycheck Protection Program.

The legislation also modernizes anti-money laundering controls and processes, which we believe will allow financial institutions to better assist law enforcement in its efforts to detect and deter financial crime and terrorism. Given the signs of increased illicit financial activity around COVID-19, Congress should act now to pass the Anti-Money Laundering Act as it will have a profound impact on preventing money laundering, human trafficking, drug smuggling, terrorism financing, fraud and other illicit activity.

We come together to support this legislation across the political spectrum, representing law enforcement, national security, district attorneys, and financial institutions, and encourage the leaders of both parties to support inclusion of the Anti-Money Laundering Act in S 4049. We thank Congress for its dedication to improving the AML/CFT structure.

Sincerely,

American Bankers Association  
Bank Policy Institute  
Consumer Bankers Association  
Credit Union National Association  
Financial Services Forum  
Independent Community Bankers of America  
Institute of International Bankers  
Institute of International Finance  
Mid-Sized Bank Coalition of America  
National Association of Federally-Insured Credit Unions  
Securities Industry and Financial Markets Association

cc:

The Honorable Mitch McConnell, Majority Leader, United States Senate  
The Honorable Charles Schumer, Minority Leader, United States Senate  
The Honorable Mike Crapo, Chairman, Committee on Banking, Housing and Urban Affairs  
The Honorable Sherrod Brown, Ranking Member, Committee on Banking, Housing and Urban Affairs