



Financial Crimes Enforcement Network
U.S. Department of the Treasury

Washington, D.C. 20220

June 5, 2024

Jason Newman
Lexington-Fayette Urban County Government
200 East Main Street
Lexington, KY 40507
jhnewman@lexingtonpolice.ky.gov

via Electronic Mail

Re: Revised Bank Secrecy Act Access Memorandum of Understanding

Dear Mr. Newman,

As part of the Financial Crimes Enforcement Network's (FinCEN's) ongoing commitment to safeguard the sensitive information reported to the Treasury Department pursuant to the Bank Secrecy Act (BSA), FinCEN has updated the Memoranda of Understanding (MOUs) that govern external agency access to BSA Information (as that term is defined in the MOU). This effort is a priority for FinCEN.

As part of that effort, I am writing regarding access to BSA Information by the Lexington-Fayette Urban County Government (Kentucky) (Agency) through FinCEN Query and any related systems. With this letter, FinCEN is providing an updated MOU and accompanying documents, which will replace the existing MOU in place between FinCEN and the Agency and will set forth the terms, conditions, and standards for your Agency's continued access to and use of BSA Information moving forward. Attached please find the following documents:

- (1) Revised BSA Access Memorandum of Understanding
- (2) Re-dissemination Protocols for Bank Secrecy Act Information-November 2023
- (3) Information Access Security Protocols for Bank Secrecy Act Information-November 2023

We ask that you and the appropriate officials from the Agency review these documents carefully. These documents represent FinCEN's current practices regarding safeguarding of BSA Information, consistent with the BSA.

The attached MOU must be signed by an authorized official of the Agency within 30 days of the date of this letter and returned to FinCEN. The signatory from the Agency must be an official at the appropriate level who is authorized to bind the Agency to this MOU. This

Jason Newman
Lexington-Fayette Urban County Government (Kentucky)
June 5, 2024

document should be electronically signed. If you are unable to do so, please let us know. The MOU should be **returned to FinCEN by replying all to the original transmittal email**. Once FinCEN receives a signed MOU, FinCEN will promptly sign and return a fully executed copy of the document to you.

If you have questions about this requirement or any other questions or concerns regarding these updated documents, please contact FinCEN immediately. Once executed, this MOU will supersede and replace any and all prior MOUs and accompanying documents regarding the Agency's access to BSA Information and will govern the Agency's access to BSA Information going forward.

FinCEN values our partnership with the Agency and also takes its obligation to safeguard BSA Information extremely seriously. Accordingly, failure to respond to this letter within 30 days may result in FinCEN disabling the Agency's access to BSA Information. We look forward to hearing from you and would be happy to discuss any questions you may have.

Sincerely,

Lynda K. Gammon
Office Director
Operational Information and Development
FinCEN Strategic Operations Division

cc: Katherine Ford, Associate Director, FinCEN Strategic Operations Division

Attachments:

1. Revised BSA Access Memorandum of Understanding
2. Re-dissemination Protocols for Bank Secrecy Act Information-November 2023
3. Information Access Security Protocols for Bank Secrecy Act Information-November 2023