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Proposal and Comment Information

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I worked in Banking for 40 years and I saw more results in stopping criminal activity when I started working than from when I left. Also, when I started working I saw my employer being penalized and fellow employees fined and fired and sent to jail for non compliance. In my last 10 years I saw none of that and my employer and fellow employees in my opinion were guilty of willful blindness and felt no fear of not complying with BSA. At the end of my career, I even filed a complaint with the OCC about my manger requesting me to falsify a CTR and that I reported it to our AML department who did nothing about it because they are still employed and I heard no follow up from the OCC. To sum it up: you can come up with numerous measures to help stop the criminals, but if you are hoping that financial institutions and their employees will assist without accountability you will not see reults.