

# ANTI-MONEY LAUNDERING EXPRESS GUIDE

The first point of contact with potential money launderers is through the staff dealing directly with the public. WE ARE COUNTING ON YOU!

## BEFORE YOU START

Before processing any transaction you should:

- Read your Anti-Money Laundering (AML) compliance manual
- Receive AML training
- Know how to identify suspicious activity or transactions
- Know the thresholds for requesting additional information
- Know how to complete the MoneyGram forms
- Know all the information you are required to record
- Know who to alert in case you detect a suspicious transaction
- Know which identification documents you are allowed to accept

## IDENTIFICATION REQUIREMENTS

The best identification documents are issued by government authorities, as they are difficult to obtain illicitly, and include:

- Passport
- Driver's license
- National ID card
- Voter's identification card
- Temporary or permanent resident card
- Employment authorization card

Positive identification should be obtained from documents that are valid, current, and contain:

- First and last name
- Address
- Photograph
- Signature
- ID number
- Issue/expiration date
- Date of birth

If you are unsure of the validity of a document do not process the transaction.

## STRUCTURING AND SUSPICIOUS ACTIVITY

Structuring is breaking large transactions into smaller ones to avoid record keeping and reporting requirements. If you help a customer structure transactions to avoid AML regulations, you or your company may lose their license, be fined, and/or face imprisonment.

Structuring to avoid recordkeeping and reporting requirements is suspicious activity and illegal.

Suspicious activity includes, but is not limited, to the following examples:

- Funds received from illegal activity or that have no business or lawful purpose
- Multiple customers that seem to be working together, sending similar transactions
- The use of low denomination notes to send large money transfers
- Initiating multiple money transfers to the same receiver over several days
- Customers that present different identification documents each time a transaction is conducted
- Customers receiving multiple transfers from the same or multiple senders within the same day
- Customers who provide different personal information each time they send or receive a transaction
- Frequent customers who appears to reside locally but shows a foreign identification document
- Customers repeatedly conducting transactions just below the relevant thresholds
- Repeated visits/transactions that don't make sense
- Transactions that are unusually large or occur more frequently than normal
- Anything that involves bribes, tips, threats, or something obviously illegal
- Customers that visit other Money Transfer Businesses conducting similar transactions

## REPORTING

The compliance officer is responsible for reporting suspicious transactions and high currency amount transactions that pass a certain threshold to the government. If your company does not file these reports they may lose their license, be fined, and/or face imprisonment.

**You are required to identify and alert your supervisor or compliance officer if you:**

- Detect suspicious activity
- Identify transactions that are above the threshold limits set by your AML policies

**NEVER INFORM A CUSTOMER THAT SUSPICIOUS ACTIVITY HAS BEEN DETECTED OR REPORTED! Reporting suspicious activity is not accusing someone of committing a crime. It is only a report of activity that appears suspicious.**

## RECORD KEEPING AND MONEYGRAM FORMS

**You must record information on the FRONT and BACK of the MoneyGram money transfer form and within the MoneyGram system anytime a customer sends or receives a money transfer. You must record:**

- Valid identification information for the sender/receiver
- Identification information and other details for the sender/receiver of a third party, if involved

**You must also follow your government's and your company's requirements for collecting and recording information.**

**Although it may not be indicated on the MoneyGram forms or requested by the MoneyGram system you may be required to record:**

- Identification information for all transactions
- Occupation, date of birth, and source of funds information at lower thresholds
- Any other required information

**MoneyGram requires your company to obtain and retain this information for at least five (5) years. Your government may require your company to retain records for a longer period of time.**

You must record all required information on the forms BEFORE you process the transaction, which includes:

### SEND FORMS

#### Front:

- Transaction date
- Receive country, city, and state
- Sender's name and address
- Sender's signature
- Receiver's name
- MoneyGram reference #
- Transfer amount
- Consumer fee
- Total cash collected
- Agent employee name and operator #

#### Back:

- US\$900 and greater
  - Type of ID provided, ID #, and ID issuer
- US\$3000 and greater
  - Customer's social security # or tax #
  - Customer's date of birth
  - Customer occupation

### RECEIVE FORMS

#### Front:

- MoneyGram reference #
- Receiver's name and address
- Sender's phone number
- Sender's name
- Receive amount
- Country, city, and state of origin
- Receiver signature and date
- Receiver ID # and type
- Agent employee name and operator #

#### Back:

- US\$3000 and greater
  - Customer's social security # or tax #
  - Customer's date of birth
  - Customer occupation

**REMEMBER! – RECORD THIS AND ANY OTHER INFORMATION FOR SMALLER AMOUNTS AS REQUIRED BY YOUR BUSINESS' ANTI-MONEY LAUNDERING POLICIES**