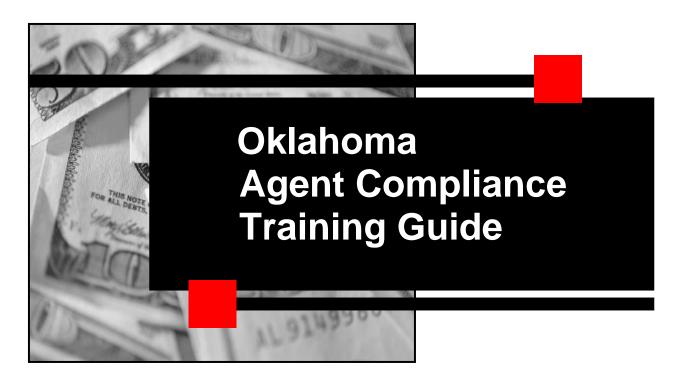
Anti-Money Laundering Compliance Guide

**USA PATRIOT Act** 

Prevention of Terrorism Financing



Reporting Requirements

Recordkeeping

FinCEN Resources

**Employee Training** 



Why you need to read this Manual and create an anti-money laundering compliance program:

- It is the law
- You could lose your business
- You could go to jail for up to 10 years
- You could personally be fined as much as \$500,000
- Your business could be victimized by criminals
- Banks may not do business with you and close your bank accounts

## What you need to do:

- Establish a written anti-money laundering compliance program
  - Use the materials in this book, which are also available at <u>www.moneygram.com</u> (click the link to *Compliance*)
  - Use the Money Services Business materials available from the federal government at <u>www.fincen.gov</u> (select *Information for Money Services Businesses*)
  - o Call 1-800-328-5678 extension 3385 for help on money orders
  - o Call 1-800-642-8050 extension 4899 for help on money transfers
- Designate, in writing, a Compliance Officer for your business
- Train your employees, at least annually, on anti-money laundering compliance
- Report suspicious activity to the federal government
- Maintain the records you are required by law to keep
- Have an independent review performed at least annually

# Protect yourself and your business!!!

## **Dear Oklahoma MoneyGram Agent:**

The purpose of this Guide is to help you and your employees:

- Detect and prevent money laundering and terrorist financing;
- Comply with the Bank Secrecy Act (BSA) recordkeeping and reporting requirements;
- Comply with the USA PATRIOT Act;
- Comply with State of Oklahoma Requirements;
- Identify and report suspicious activity; and
- Comply with the requirements of the Office of Foreign Assets Control (OFAC) and other anti-money laundering regulations.

Your knowledge of the information in this Guide may help prevent your business from being victimized by money launderers and help you comply with the law. In addition, your compliance with these requirements may help law enforcement agents in their efforts to track down and capture terrorists who illegally launder money.

It is MoneyGram's policy to follow the spirit, as well as the letter of the law. We do not want our money transfer services to be used for illegal purposes. We will not do business with anyone who knowingly violates the law. Although we cannot take responsibility for you or your employees' compliance with the anti-money laundering laws and regulations, we believe this Guide can help you develop your own effective anti-money laundering compliance program.

This Guide provides a general description of the BSA, USA PATRIOT Act and the State of Oklahoma requirements as they may relate to MoneyGram money transfers and should not be considered to cover all possible situations; there may be other requirements that apply to other facets of your business.

MoneyGram thanks you for your shared dedication to the fight against money laundering and terrorism.

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You must implement an anti-money laundering program based on the risks associated with your business, such as size, location, volume of business, etc.

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Suspicious activity involves transactions that appear to be structured or do not have any legitimate purpose. You must file a Suspicious Activity Report by Money Services Business (SAR-MSB) on suspicious activity that involves at least \$2,000.

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The U.S. Treasury Department's Office of Foreign Assets Control (OFAC) prohibits all U.S. entities from conducting business with specially designated individuals and entities.

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Terrorists may attempt to launder money in order to conceal their identity and finance their operations. It is critical that you take appropriate and immediate action if detected.

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The government can impose severe penalties against individuals and businesses for violating money laundering laws and regulations. The criminal penalties for an individual can include as much as \$500,000 in fines, up to 10 years of imprisonment, and the loss of your business.

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This guide is not legal advice. If you need legal advice, you should seek the services of an attorney.

#### Section I.

# **Money Laundering Overview**

Money laundering is the attempt to conceal or disguise the nature, location, source, ownership or control of illegally obtained money.

This definition covers a wide range of activity and is not limited to cash or currency transactions. Money laundering can involve any type of money, including money orders, money transfers and other financial transactions. You need to understand how people launder money so that you can identify money laundering and know how to help prevent it.

The money laundering cycle begins when criminals place funds into the financial system by buying money orders or sending money transfers. Once the funds have entered the system, the source of illegal funds is further disguised by transferring them through layers of financial institutions, such as bank or investment accounts. Finally, the funds are integrated into the economy and legitimized by purchasing items or investing in legitimate investments such as real estate, real property, stocks and bonds.

To help prevent the laundering of cash and to obtain documentation that may be used to prosecute money launderers, the government requires you to maintain records on certain cash transactions. Some transactions also require that reports be filed and maintained.

## Who is covered?

Because you sell money orders and / or money transfers, you are subject to the Bank Secrecy Act (BSA), the USA PATRIOT Act, OFAC, other anti-money laundering laws, and to their reporting and recordkeeping obligations. The BSA requires anyone doing business in one or more of the capacities listed below to comply with these laws:

- **A.** A money transmitter;
- **B.** A seller of money orders, or stored value (other than a person who never sells such checks or money orders or stored value in an amount greater than \$1,000, to any person, on any day, in one or more transactions);
- **C.** A person engaged in the business of a check casher (other than a person who never cashes checks in an amount greater than \$1,000, for any person, on any day, in one or more transactions).

All businesses and entities that are covered by the definitions above are known as **Money Services Businesses, or MSBs.** 

## Section II.

# **MSB** Registration

If you engage in MSB activities on your own behalf – apart from serving as a MoneyGram agent – you may be required to register as an MSB with the U. S. Department of the Treasury. For example, a supermarket that is a money order agent but performs no other MSB services is not required to register. However, registration would be required if the supermarket also cashes checks for \$1,000 or more for any person on any day, in one (1) or more transactions.

- The MSB registration must be filed on the form required by the Department of the Treasury and sent to the address provided on the form.
- The MSB must retain a copy of the registration form and confirmation letter for five (5) years.

#### Section III.

# **Anti-Money Laundering Compliance Program**

The BSA and USA PATRIOT Act regulations require that all MSBs adopt a written antimoney laundering compliance program that is reasonably designed to ensure proper recordkeeping and reporting of certain transaction and to prevent your business from being used to launder money. At a minimum, your anti-money laundering compliance program must include:

- **A.** The designation of a Compliance Officer who is responsible for assuring that:
  - Policies and procedures are followed
  - Procedures are updated as needed
  - Training and education are provided
  - Reports are properly filed
- **B.** Internal policies, procedures and controls for:
  - Verifying customer identification
  - Filing reports
  - Creating and retaining records
  - Responding to law enforcement requests
- **C.** An ongoing employee training program that:
  - Explains policies and procedures
  - Teaches how to identify suspicious activity
- **D.** An independent review of your anti-money laundering program:
  - The review should take place as needed and be as thorough as needed based on the risks specific to your business.
  - The review may be performed by one of your employees, but cannot be performed by your Compliance Officer or an employee who reports directly to the Compliance Officer.

Although the information contained in this Guide provides the necessary tools to build an anti-money laundering compliance program that meets the requirements of the USA PATRIOT Act, the quality and effectiveness of the program depends on your commitment to it.

The only opportunity to verify customer information and identify suspicious activity is at the point of sale. This can only be done with a knowledgeable, well trained staff.

## **Establishing an Effective Compliance Program**

**First,** your business must designate a Compliance Officer. The Compliance Officer may be an employee who has other duties at your business, but it should be someone in a responsible position. The Compliance Officer is responsible for your business's day-to-day compliance with the anti-money laundering laws and regulations, and for ensuring the compliance program is updated as needed. The Compliance Officer is also responsible for overseeing your business's ongoing education and training program.

**Second,** your business should formally adopt an anti-money laundering compliance program. An easy to use template titled the *OKLAHOMA ANTI-MONEY LAUNDERING COMPLIANCE AND TERRORIST FINANCING PREVENTION PROGRAM* can be downloaded from the Anti-Money Laundering page at www.moneygram.com to create a customized Compliance Program for your business.

**Third,** your business must establish an ongoing training program for all employees who will have any involvement with MSB activities. The education and training should include instruction on the employees' responsibilities under the program, as well as the detection of suspicious transactions. All employees should be required to read this Guide prior to conducting any MSB transactions. In addition, employees should sign your Compliance Program or another form of training documentation that is kept in their personnel file. Employees should also receive periodic updates to their training, particularly when there are changes in regulations. For additional training resources, please refer to the Anti-Money Laundering page at:

## www.moneygram.com

MoneyGram also offers a series of on-line AML training courses for Compliance Officers and agent employees at:

#### www.moneygramu.com

**Fourth,** your business should subject your anti-money laundering compliance program to an independent review to assure its adequacy. The scope and frequency of this review should be adjusted to allow for the risk of the financial services provided by your business. This review may be conducted by an officer or employee of your business, but it can not be conducted by the Compliance Officer or an employee who reports directly to the Compliance Officer.

**Finally,** it is important that you create recordkeeping files for your Compliance Program. These files should be readily accessible if your business is examined/audited by regulators.

If your business engages in Money Services Business (MSB) activities other than those performed as a MoneyGram agent, you are advised to develop a separate written AML compliance program for those services. This AML compliance program is intended to cover only MoneyGram International services performed by the business.

## Section IV.

# Recordkeeping

## **Recordkeeping for Money Orders:**

If a customer uses cash to purchase *one or more* money orders totaling \$3,000 to \$10,000 in one day, you must obtain and record the customer and transaction information noted below on a money order transaction log BEFORE completing the transaction(s). These transactions must be recorded on the Money Order Transaction Log.

A template for the Money Order Transaction Log is provided in this Kit.

Collect and record the following information:

- Name
- Physical address (Post Office boxes are not acceptable as a physical address)
- Unexpired government issued photo ID with the customer's current residential address printed on it
- Social security number or tax identification number, if purchaser is US citizen / resident
- Date of birth
- Transaction date
- Money order serial number(s)
- Amount of each money order purchased
- Total amount purchased
- Customer's signature

#### **Recordkeeping for Money Transfers:**

Both sending and receiving agents must obtain and record specific information for money transfers of \$1,000 or more, regardless of the amount or method of payment. The customer must be physically present in your location when conducting a transaction so that you can obtain and verify the customer's identifying information.

Before completing a Send and / or Receive transaction at certain amounts, you must obtain and record all of the information requested on both the front and back of the AZ/OK Send/Receive form.

#### \$900.00 - 999.99

- o Name
- Current Residential address (include apartment / unit number if applicable) \*
- Valid government issued photo ID

## \$1,000.00 - \$10,000.00

- Name
- Current Residential address (include apartment / unit number if applicable) \*
- o Phone number
- Date of birth
- Valid government issued photo ID
   (Record the ID type, ID number and the issuer of the ID)
- Social security number (SSN) or individual tax identification number (ITIN), if the customer is a citizen or authorized resident in the US (A SSN or ITIN is not required if the customer lives and works outside of the US and presents a passport or other applicable photo ID evidencing nationality or residence).
- Current specific occupation
- Transaction amount
- o Reference number and date of transaction

\*The customer must provide a physical address. A post office box (PO Box) is not an acceptable physical address. The customer CANNOT use a business address in place of a current residential address.

For single or multiple money transfer Send transactions totaling \$9,100 or more, you MUST contact the MoneyGram Anti-Money Laundering Operations at 1-800-926-9400 ext. 4899 BEFORE completing the transaction(s)

## **Third Party Transaction Requirements**

If you know that your client is sending or receiving a transaction on behalf of someone else, then you must also obtain similar information on that other person. Examples of this could be a relative of an elderly person conducting a receive transaction for the elderly person or an employee for a business conducting the transaction for the business.

## MoneyGram's Identification Requirements

Before completing any Send money transfer, you must verify the client's identity by examining a valid government issued photo identification that contains the person's name and address, such as a valid (non-expired) driver's license or other government-issued ID card.

For all Receive money transfers, regardless of amount, you must verify the client's identity. Test questions are permitted for money transfers up to \$899 if the beneficiary does not have acceptable photo identification. Identification details or the answer to the test question must be recorded for Receive amounts.

## **Maximum Aggregated Transactions**

The maximum send amount per transaction is \$10,000. MoneyGram limits customers to a daily maximum aggregated send total of \$20,000.

## **Documenting Customer Information**

If your business is a FormFree location or does not have customers complete the AZ/OK Send or Receive Forms, you must obtain the client's signature on the transaction receipt. The customer's signature on the receipt must match the customer's signature on his / her photo ID.

By completing the front and back of the AZ/OK Send/Receive Form and having the client sign the transaction receipt, you should have all of the information that you are required to obtain.

You must retain the physical documents for all money transfers of \$1,000 or more for five (5) years.

## **Protecting Consumer Privacy**

As an agent, you must safeguard nonpublic personal information. You may only ask for and collect the personally identifying information that is necessary to complete the transaction. You are required to have policies in place regarding the collection and disclosure of consumer information considered to be "nonpublic personal information."

Any notes, forms, logs or other documents containing consumer's nonpublic personal information must be shredded before disposing of the document.

#### Section V.

# **Currency Transaction Reporting Requirements**

A Currency Transaction Report (CTR) must be filed with the federal government for any cash transaction that is greater than \$10,000 conducted in one day, by any person, or on

behalf of another person. The \$10,000 threshold includes both the face amount of the transaction and all fees paid by the customer.

You must treat multiple cash purchases of money orders or money transfers as a single transaction if you have knowledge that the transactions are conducted by or on behalf of the same person and total more than \$10,000 during one business day.

## Filing Requirements for CTRs

You must file the CTR within 15 days of the transaction. The CTR must be mailed to the address on the form, DO NOT send the CTR to MoneyGram.

## **Recordkeeping for CTRs**

You must keep a copy of each CTR for at least five (5) years.

#### Section VI.

## **Structuring**

Many money launderers are familiar with the dollar thresholds that require recordkeeping and reporting. Therefore, in order to remain anonymous and avoid the detection of law enforcement officials, they will "structure" their transactions so that the recordkeeping or reporting requirements will not be triggered. Structuring is the act of breaking up a potentially large transaction into several smaller ones to avoid reporting or recordkeeping requirements.

*Microstructuring* is a form of structuring where frequent, low-dollar cash transactions are conducted over an extended period of time to avoid record keeping requirements. Transactions are usually performed by multiple individuals with one person acting as a central coordinator. MoneyGram recommends that you periodically review your customers' activity patterns and evaluate whether the patterns of activity are reasonable.

It is illegal for you or your clients to structure transactions in order to avoid the recordkeeping or reporting requirements. For example, if a client sends a \$7,500 money transfer in the morning and another \$3,000 money transfer send transaction in the afternoon, he may be structuring his purchases in order to avoid the \$10,000 recordkeeping requirements.

It is also illegal for you or your employees to assist anyone in structuring transactions to avoid recordkeeping or reporting requirements. For example, you may not tell or even imply to a client that they can avoid providing information by conducting a smaller transaction. Some criminals may attempt to trick you or your employees into allowing them to structure transactions by splitting up their activity with several accomplices or by trying to "con" you with a hard luck story. You need to be on the lookout for structuring so that you prevent it from occurring.

## Question: Are all multiple transactions considered structuring?

No. For example, a client sends two money transfers to separate receivers, one for \$6,000 and another for \$5,000. Each transfer is less than \$10,000, but the total of the transactions exceeds \$10,000. You learn that the customer is sending money to her children who are attending two different schools. So long as you record the appropriate information on the back of the Send form in order to fulfill the recordkeeping requirement and to show that there was no attempt to structure the transactions, there is nothing suspicious about the transactions.

#### Section VII.

# **Human Smuggling**

"Human smuggling" is the illegal transportation of people across international borders. "Coyotes" or "snakeheads" are individuals who are paid to assist undocumented aliens enter the United States illegally across the border.

To avoid detection, multiple payments below the recordkeeping and reporting thresholds are made to the "coyote" / "snakehead" or directly to the undocumented alien. It is critical that ongoing monitoring of transactions is conducted to ensure that your business is not being targeted by human smuggling activity. If you identify patterns of suspicious behavior, follow the steps outlined in the Suspicious Activity section of this guide (Section VIII.) to file a Suspicious Activity Report by Money Services Business.

#### Section VIII.

# **Suspicious Activity**

"Suspicious Activity" is a difficult concept to define, because it can vary from one transaction to another based upon on all of the circumstances surrounding the transaction or group of transactions. For example, transactions by one client may be normal, because of your knowledge of that client, while similar transactions by another client may be suspicious. Many factors are involved in determining whether the transactions are suspicious, including the amount, the locations of your business, comments made by your client, the client's behavior, etc. That is why it is important for you to read this Guide in order to help you detect suspicious activity and structured transactions.

The federal government requires you to file a Suspicious Activity Report by Money Services Business (SAR-MSB) for any transaction – or pattern of transactions – that is attempted or conducted with at least \$2,000, that you know, suspect or have reason to suspect:

- 1. Involves funds derived from illegal activity or is intended to hide funds derived from illegal activity;
- 2. Is structured to avoid recordkeeping or reporting requirements;
- **3.** Has no business or apparent lawful purpose; or
- 4. Facilitates criminal activity.

You may file a SAR-MSB on suspicious activity below \$2,000, but the regulations do not require it.

## Filing Requirements for SAR-MSBs

You must file a SAR-MSB with the U.S. Treasury within 30 days of detection of the suspicious event. The SAR-MSB must be mailed to the address on the form, DO NOT send the report to MoneyGram.

## Recordkeeping for SAR-MSBs

You must keep a copy of each SAR-MSB for at least five (5) years.

#### Never Tell Your Customer that You Filed a SAR-MSB.

It is illegal to tell your customer that you are filing a SAR-MSB. If MoneyGram believes that some of your customers may be misusing its money orders or money transfers our compliance staff may contact you as part of an investigation. You must not tell your customer about such an inquiry.

#### Examples of suspicious activity:

**Example 1:** A customer sends a \$4,400 money transfer. The next day, the customer sends \$9,400 to the same person. The customer may be structuring his transactions in order to avoid the CTR reporting requirements. You should consider whether a SAR-MSB should be filed.

**Example 2:** A customer purchases money orders with cash just below \$3,000 over the course of several days. The customer may be structuring his purchases; you should consider if you need to file a SAR-MSB.

**Example 3:** You see Jim hand cash to Bill and Susan outside your store. Bill and Susan each give you cash and purchase money orders that total less than \$10,000 each, but total more than \$10,000 together. This appears to be a structured transaction and may require the filing of a CTR and / or a SAR-MSB and a Money Order Log.

**Example 4:** A customer comes in several times on the same day to pick up money transfers which add up to more than \$10,000. You must file a CTR, if you paid out more than \$10,000 in cash to the customer. You should also determine whether a SAR-MSB needs to be filed.

**Example 5:** A customer picks up a money transfer from your location. After the customer has left, you discover that the customer also picked up money transfers at some of your other offices on the same day. The customer may be attempting to avoid recordkeeping and reporting requirements. If you conclude that structured or suspicious activity has occurred, you must file a SAR-MSB if the total of all the transactions is at least \$2,000. If the total amount of currency paid to the customer in all the transactions exceeds \$10,000, you must also file a CTR.

**Example 6:** A customer says that he wants to send \$5,000 and wants to pay in cash. When you tell the customer that you need to collect his personally identifying information, he asks what amount he can send without showing you his ID. Although a transaction was not completed, you should still consider whether a SAR-MSB should be filed.

**Example 7:** A customer picks up a money transfer from your location, accompanied by another person. The other person appears to be telling the customer what to do. After the transaction is completed the customer gives the money to the other person. The customer may be paying to have a family member or friend smuggled across the border.

**Example 8:** A customer picks up multiple money transfer transactions, in similar dollar amounts, from many senders in various parts of the United States.

**NOTE:** CTRs, SAR-MSBs and other records and reports are only as good as the information you provide. Therefore, it is very important that the information you provide on such reports is accurate and complete. This is your responsibility. The government and law enforcement agencies depend on this information as they fight against money laundering and terrorism.

## Section IX.

# Office of Foreign Assets Control

## Office of Foreign Assets Control (OFAC)

OFAC is part of the U.S. Department of the Treasury and is responsible for enforcing U.S. government sanctions programs against countries, organizations and individuals. Sanctions programs typically involve blocking assets to further national security. Many of the sanctioned individuals, commonly referred to as Specially Designated Nationals (SDNs), are known or suspected drug dealers and terrorists. All U.S. entities are prohibited from conducting any financial transactions with SDNs even if transactions with the SDN originate or terminate outside of the United States.

As a U.S. company, MoneyGram must comply with U.S. sanctions regarding Cuba. MoneyGram and its agents cannot process any transactions where a sender or receiver is a Cuban National. All such issues MUST be referred to MoneyGram's AML Compliance Department.

You can learn more about OFAC by visiting the Treasury Department's website at www.ustreas.gov/offices/enforcement/ofac. The site also includes an extensive list of questions and answers to common questions regarding OFAC.

## **Agent Responsibility**

MoneyGram reviews *all* money transfer sender and receiver names against the OFAC SDN list, regardless of the dollar amount of the transaction. If a name is a potential match to the SDN list, agents must follow MoneyGram's instructions in order to prevent any unauthorized payout or refund.

If you receive a Code 4 message on an attempted transaction you will be instructed to contact MoneyGram. It is important to contact MoneyGram before refusing the transaction. The MoneyGram representative will request additional information to validate whether the consumer's name is a true match to the OFAC SDN list.

Your cooperation is critical. Transactions CANNOT be paid out or refunded until MoneyGram has investigated and released possible OFAC SDN matches.

#### Section X.

# **Terrorism Financing Prevention**

Money laundering is most commonly associated with drug dealing and tax evasion, however, terrorists often attempt to launder money in order to conceal their identity and finance their operations. It is critical that MSBs remain alert for any such activity, and take appropriate and immediate action if detected.

If you suspect terrorism financing, you should immediately report the incident to the FinCEN hotline at 1-800-556-3974, which is operated 24 hours a day, seven (7) days a week. You should also file a SAR-MSB on any suspected terrorism activity.

The Financial Action Task Force (FATF) and FinCEN have both issued guidance on financial transactions that may be indicative of terrorist financing at www.fatf-gafi.org and www.finen.gov. Some examples include, but are not limited to:

- **A.** Movement of funds through a country designated by FinCEN or the FATF as "non-cooperative," that are identified as specially designated nationals by OFAC, or that appear on the United Nation's list of blocked accounts;
- **B.** Multiple transactions conducted by group of nationals from countries associated with terrorist activity;
- C. Individuals acting on behalf of another money transmitting business that use MoneyGram to transfer funds to multiple locations. This may be indicative of unlicensed money transmitters that seek to evade use of the banking system to conduct foreign transfers.

#### Section XI.

## **Civil and Criminal Penalties**

The government can impose harsh civil and criminal penalties against anyone who violates the BSA, USA PATRIOT Act, OFAC or other anti-money laundering laws and regulations. Civil and criminal fines can quickly reach into the hundreds of thousands or even millions of dollars. The criminal penalty for violating a BSA requirement is a fine of up to \$500,000, a jail term of up to 10 years, OR BOTH. In addition, the government can seize any property involved in criminal violations of these laws. This includes your business, your bank account or any other assets the government can link to criminal violations.

Under certain circumstances, businesses can be held criminally liable for the acts of their employees; it is important for your employees to be trained in these matters and for your business to have a system in place to ensure employees' compliance with the laws and regulations. If you or your employees do not comply, you may be subject to large fines and/or imprisonment.

The government requires strict compliance with these laws and regulations. MoneyGram will immediately cancel the contract of any agent who knowingly or negligently fails to comply with the laws and regulations.

Non-compliance just isn't worth the risk.

## Section XII.

# **Anti-Money Laundering Compliance Forms and Samples**

Federal law requires the completion of various forms for recordkeeping and reporting purposes. The completion of these forms is triggered by certain monetary thresholds, which may be reached in a single transaction or multiple transactions. For specific information on when the forms must be completed, as well as examples of situations that may require the completion of a form, see the materials in this Manual.

Some of the forms are created by the federal government and some by MoneyGram; but all are required by federal law. Also, while some forms are to be sent to the federal government, copies of all completed forms must be kept in your files for at least five (5) years.

(Note: Some state may have monetary thresholds that are lower than what is required by federal law.)

At least \$1,000	MoneyGram Send/Receive Form (AZ/OK) or FormFree Receipt The required information must be recorded before the transaction is completed.
At Least \$2,000	Suspicious Activity Report by Money Services Business (SAR-MSB) This report must be sent to the federal government within 30 days of becoming aware of the suspicious activity.
At least \$3,000	Money Order Transaction Log – one or more money order transactions in the same day. The required information must be recorded before the transactions are completed.
More Than \$10,000	Currency Transaction Report (CTR)  This report must be sent to the federal government within 15 days of the transaction.

# **Suspicious Activity Report by Money Services Business (SAR-MSB)**

A SAR-MSB must be filed whenever any activity is attempted or occurs that involves at least \$2,000 in any one transaction, or group of transactions, **AND** it is suspected that the activity:

- Involves funds derived from illegal activity or is intended to hide funds derived from illegal activity,
- Is structured to avoid recordkeeping or reporting requirements,
- Has no business or apparent lawful purpose, or
- Facilitates criminal activity.

The following list provides examples of suspicious activity that require the filing of a SAR-MSB:

- 1. A customer asks an employee how to avoid a reporting requirement.
- 2. A customer threatens or bribes an employee in order to avoid providing information.
- 3. A customer refuses to proceed with a transaction when asked for identification.
- 4. A customer refuses to provide all of the information required.
- 5. A customer (or group of customers working together) purchases money orders just below the recordkeeping or reporting thresholds with the apparent purpose of evading either of these requirements. **This activity is known as structuring.**
- 6. A customer (or group of customers working together) sends or receives money transfers in amounts just below the recordkeeping or reporting thresholds with the apparent purpose of evading either of these requirements. **This activity is known as structuring.**
- 7. A customer conducts transactions that are unusually large based on his/her past history, employment or level of income.

**Note:** A SAR-MSB is a separate requirement from a CTR. Even is you have filed a CTR on a transaction or set of transactions, you must also file a SAR-MSB, if you believe the activity is suspicious.

Additional examples of potentially suspicious activities involving MSB services can be found at www.fincen.gov/msb\_prevention\_guide.pdf.

**Note:** Original copy of the SAR-MSB must be filed within 30 days of becoming aware of the activity to:

Enterprise Computing Center – Detroit Attn: SAR-MSB P.O. Box 33117 Detroit, MI 48232-5980

## SAMPLE SAR-MSB

#### FinCEN Form 109 Suspicious Activity Report by March 31 2007 Money Services Business Previous editions will not be accepted after September 30, Please type or print. Always complete entire report. Items 2007 marked with an asterisk \* are considered critical. (See instructions.) (Formerly Form TD F 90-22.56) Check this box only if amending or correcting a prior report (see item 1 instructions) 1a Check this box if this is a recurring report Part I Subject Information 2 Multiple subjects (see item instructions) 3 Subject type (check only one box) a 🗸 Purchaser/sender b 🔲 Payee/receiver c Both a & b z Other \*4 Individual's last name or entity's full name \*5 First name 6 Middle initial John Α Doe \*7 Address 456 Side Street \*8 City \*10 ZIP Code \*11 Country Code (If not US) \*9 State o k Anytown 7 | 4 | 0 | 0 | 0 | \_ | 0 | 1 | 2 | 3 \*12 Government issued identification (if available) a 📝 Driver's license/state I.D. b 🔲 Passport c 🔲 Alien registration z 🧾 Other e Number D 4 5 6 7 8 9 0 0 1 0 0 2 f Issuing state/country \*13 SSN/ITIN (individual) or EIN (entity) \*14 Date of birth 15 Telephone number 1 2 3 4 5 6 7 8 9 (405)555-555 06/01/1955 Part II Suspicious Activity Information \*17 Total amount involved in suspicious activity a Amount unknown \*16 Date or date range of suspicious activity 01/14/2010 01/14/2010 1 1 0 4 5 00 \*18 Category of suspicious activity (check all that apply) a Money laundering b V Structuring c Terrorist financing z Other (specify) \*19 Financial services involved in the suspicious activity and character of the suspicious activity, including unusual use (check all that apply). b Traveler's check a Money order c Money transfer z Other e Currency exchange Check all of the following that apply (1) Alters transaction to avoid completing funds transfer record (5) Individual(s) using multiple or false identification documents (6) Two or more individuals using the similar/same identification or money order or traveler's check record (\$3,000 or more) (2) Alters transaction to avoid filing CTR form (more than \$10,000) (7) Two or more individuals working together (8) Same individual(s) using multiple locations over a short time period (3) Comes in frequently and purchases less than \$3,000 (9) Offers a bribe in the form of a tip/gratuity (4) Changes spelling or arrangement of name (10) Exchanges small bills for large bills or vice versa If mailing, send each completed SAR report to: Enterprise Computing Center - Detroit A free secure e-filing system is available to file this report. Go to http://bsaefiling.fincen.treas.gov for more Attn: SAR-MSB information and to register. P.O. Box 33117 Detroit, MI 48232-0980 Catalog No. 49340J (Rev. 3/07)

# SAMPLE SAR-MSB

Part II Suspicious Activity Information, Continued 2								
*20 Purchases and redemptions (check box "P" for purchase or box "R" for redemption ).								
Instrument P R Money Orders:	MoneyGram	s	Total Instruments	Total Amount (US Dollars) \$				
				\$00				
				s				
Traveler's Checks:				\$00				
				s <u>.00</u>				
Manus Tanafana 🗔 🗔	MoneyGram		3	s				
Money Transfers:	Moneyoram			ş <u>, , , , , , , , , , , , , , , , , , , </u>				
				\$				
*21 Currency Exchanges: Te	endered Currency/Instrument	Country Received o	urrency Country	Amount (US Dollars)				
If bulk small currency				\$				
If bulk small currency				\$				
Part III Transaction	Location 22	Multiple transaction location	15					
23 Type of business location (che	eck only one) a 🗸 Sell	ing location b P	aying location c	Both				
*24 Legal name of business		25 Doing busine	ess as					
Smith LLC		AB Market						
*26 Permanent address (number,	street, and suite no.) *27	7 City	*28 State *29 2	ZIP Code				
123 Main Street		nytown	0 K 7 4	33 Internal control/file number				
"30 EIN (entity) or SSN/ITIN (indivi	. ( )	5 — 0 1 0 1	32 Country Code (If not US)	(If available)				
Part IV Reporting B	1. (.1.1. )	-1 1-1-1-1	, 1 i	5 1 5 4 1 5 115				
"35 Legal name of business	usiness 34 🗸	The Reporting Business is th 36 Doing busine		ction Location (go to Part V)				
*37 Permanent address (number	, street, and suite no.) *38	3 City	*39 State *40 Z	IP Code				
341 EIN (antity) or SCN/ITIN (indi-	idual) M2 Rusinoss phono pu	umber (include area code) 4	3 Country	44 Internal control/file number				
*41 EIN (entity) or SSN/ITIN (individual) *42 Business phone number (include area code) 43 Country Code (If not US) 44 Internal control/file number								
Part V Contact for Assistance								
"45 Designated contact office "46 Designated phone number (Include area code) 47 Date filed (See instructions)								
Edward Smith (4 0 5 ) 5 5 5 - 0 1 0 1 0 1								
48 Agency (If not filed by a Money Services Business)								

## SAMPLE SAR-MSB

#### Part VI Suspicious Activity Information - Narrative\*

3

Explanation/description of suspicious activity(ies). This section of the report is <u>critical</u>. The care with which it is completed <u>may determine whether or not the described activity and its possible criminal nature are clearly understood by investigators. Provide a clear, complete and chronological description of the activity, including what is unusual, irregular or suspicious about the transaction(s). Use the checklist below, <u>as a guide</u>, as you prepare your description. The description should cover the material indicated in Parts I, II and III, but the money services business (MSB) should describe any other information that it believes is necessary to better enable investigators to understand the suspicious activity being reported.</u>

- Describe conduct that raised suspicion.
- b. Explain whether the transaction(s) was completed or only attempted.
- Describe supporting documentation and <u>retain</u> such documentation for your file for five years.
- d. Indicate a time period, if it was a factor in the suspicious transaction(s For example, specify the time and whether it occurred during AM or PM. If the activity covers more than one day, identify the time of day when such activity occurred most frequently.
- Retain any admission or explanation of the transaction(s) provided by the subject(s) or other persons. Indicate when and to whom it was given.
- Retain any evidence of cover-up or evidence of an attempt to deceive federal or state examiners, or others.
- g. Indicate where the possible violation of law(s) took place (e.g., main office, branch, agent location, etc.).
- Indicate whether the suspicious activity is an isolated incident or relates to another transaction.
- Indicate for a foreign national any available information on subject's passport(s), visa(s), and/or identification card(s). Include date, country, city of issue, issuing authority, and nationality.
- Indicate whether any information has been excluded from this report; if so, state reasons.
- Indicate whether any U.S. or foreign instrument(s) were involved.
   If so, provide the amount, name of currency, and country of origin.
- I. Indicate whether any transfer of money to or from a foreign country,

- or any exchanges of a foreign currency were involved. If so, identify the currency, country, and sources and destinations of money.
- Indicate any additional account number(s), and any foreign bank(s) account numbers which may be involved in transfer of money.
- d. Indicate a time period, if it was a factor in the suspicious transaction(s).

  n. Identify any employee or other individual or entity (e.g., agent)

  For example, specify the time and whether it occurred during AM or

  suspected of improper involvement in the transaction(s).
  - For issuers, indicate if the endorser of money order(s) and/or traveler's check(s) is different than payee. If so, provide the individual or entity name; bank's name, city, state and country; ABA routing number; endorser's bank account number; foreign non-bank name (if any); correspondent bank name and account number (if any); etc.
  - p. For selling or paying locations, indicate if there is a video recording medium or surveillance photograph of the customer.
  - q. For selling or paying locations, if you do not have a record of a government issued identification document, describe the type, issuer and number of any alternate identification that is available (e.g., for a credit card specify the name of the customer and credit card number.)
  - r. For selling or paying locations, describe the subject(s) if you do not have the identifying information in Part I or if multiple individuals use the same identification. Use descriptors such as male, female, age, etc.
  - If amending a prior report, complete the form in its entirety and note the changes here in Part VI.
  - t. If a law enforcement agency has been contacted, list the name of the agency and the name of any person contacted, their title, their telephone number, and when they were contacted.

Supporting documentation should not be filed with this report. Maintain the information for your files.

Enter the explanation/description narrative in the space below. If necessary, continue the narrative on a duplicate of this page or a blank page.

Tips on SAR form preparation and filing are available in the SAR Activity Reviews at www.fincen.gov/pub\_reports.html.

Legal disclaimers will not be included in this narrative. Also, do not include charts or tables.

This SAR-MSB is being filed because the subject seemed to structure his purchases of ten money orders and three money transfers.

The subject purchased ten money orders and three money transfers on the same day at our business, but came in at three different times during the day. On January 14, 2010, he purchased five money orders totaling \$2,500 from our employee. He came in later that day, went to a different employee and purchased another five money orders totaling \$2,500. That same afternoon, he returned and sent a money transfer in the amount of \$2,000 to Juan Mendoza in Toronto, Ontario, Canada. The same evening he sent two additional transactions, each for \$2,000 to Juan Mendoza in Toronto, Ontario, Canada. The total amount of the activity that day was \$11,045.

This activity appears to be suspicious. The subject may be attempting to avoid recordkeeping requirements by purchasing money orders and sending MoneyGram transactions for less than \$3,000. It doesn't make sense that the sender would come in at different times, rather than conducting all of his transactions and money order purchases at the same time.

We were able to complete this report with information on file from previous transactions. We also filed a Currency Transaction Report since all the transactions were paid for in cash. We have copies of the MoneyGram Send forms and the money order sale receipts that show serial numbers of the money orders and the date and time of the transactions.

# What to write in the Narrative or explanation section of the SAR-MSB (Part VI)

This section of the report is critical. Write a clear and complete explanation that includes all the details. It should contain:

**Who** is conducting the criminal or suspicious activity? Give as much information as you have about the suspect, such as a description of the suspect and their behavior. How long they have been a customer of your business, and note their occupation and employer.

**What** type of money services did the suspect use to commit the criminal or suspicious activity? Specify if the suspect purchased a money order, sent or received a money transfer, or if the suspect did a combination of transactions. Also, describe how the suspect paid. Identify if they paid with cash or cashed a check or money order.

**When** did the criminal or suspicious activity occur? Specify if this suspect has committed this activity before. If the suspect has committed this type of activity before, describe when and note any SAR-MSBs that you have previously filed on this suspect.

**IMPORTANT:** Give the date that your business first identified the criminal or suspicious activity. You have 30 days from this date to file the SAR-MSB.

**Where** did the criminal or suspicious activity take place? Include any information about the suspicious activity that your business knows about.

**How** did the criminal or suspicious activity occur? Paint the picture of how the suspect accomplished or attempted to accomplish the criminal or suspicious activity. Do not assume that the reader knows anything about your business. Map out exactly what happened and how the pieces fit together.

**IMPORTANT:** Do **NOT** include any supporting documentation or attachments with the SAR-MSB when filed with the Enterprise Computing Center – Detroit. It must be kept at your business with your copy of the SAR-MSB for a minimum of five (5) years.

## **SAR-MSB Narrative Example**

The SAR-MSB is being filed on a suspect who seems to be buying numerous money orders and structuring the transactions to avoid the recordkeeping requirements or showing ID.

The suspicious activity involves 15 money orders that were bought between October 21, 2008 and October 23, 2008. We discovered that the activity was suspicious on October 25, 2008.

On October 23, 2008, in the afternoon, the subject purchased five \$500 money orders. The employee noticed that the subject had a lot of cash in his wallet. It was also noticed that the subject had other money orders in his wallet.

After the transaction, the employee discussed this transaction with the store manager. An investigation revealed that two other employees also remembered selling money orders to the subject. One employee sold five \$500 money orders to the subject on October 21, 2008, in the evening. Another employee sold five \$500 money orders to the subject in the morning on October 22, 2008.

The subject is a Hispanic male who is about 35 years old. He is about 5'5" tall and has an average build. He has short, dark brown hair, walks with a noticeable limp and has a tattoo of a snake on his left hand.

We will ask for ID the next time the subject comes in to purchase money orders, no matter what the amount. We have the point of sale receipts that show the serial numbers of the money orders and the date and time of the transactions. There are also photographs of the subject, waiting in line, that also show the date and time that are the same as on the sale receipts.

# **Currency Transaction Report (CTR)**

A Currency Transaction Report (CTR) must be filed with the federal government for any cash transaction(s), greater than \$10,000, conducted in one (1) business day, by any person or on behalf of any person. For "send" transactions, the \$10,000 threshold includes the total of the transaction face value plus the fees.

**Note:** Multiple cash transactions are treated as a single transaction if the agent has knowledge that the transactions are conducted by the same person or on behalf of the same person, and the amount of cash paid to the agent by the customer ("cash in") <u>or</u> paid to the customer by the agent ("cash out") totals more than \$10,000 in the same calendar day.

## Examples of transactions that require a CTR are:

- 1. A customer receiving single or multiple MoneyGram money transfer transactions totaling more than \$10,000 in one (1) business day.
- 2. A customer sending single or multiple MoneyGram money transfer transactions totaling more than \$10,000 in one (1) business day.
- 3. A customer obtaining more than \$10,000 in cash from any combination of cashed checks and MoneyGram money transfer receive transactions in one (1) business day.
- 4. A Customer purchasing money orders with more than \$10,000 in cash in one (1) business day.
- 5. A customer combining money order purchases and MoneyGram money transfer send transaction in one (1) business day for more than \$10,000.

# 3<sup>rd</sup> Party Information

If the customer who is conducting the transaction is doing so for someone else, the information must be obtained for both parties. Examples of 3<sup>rd</sup> parties are an employee of a business conducting the transaction for the business, or a relative of an elderly or disabled person conducting the transaction for that person. Complete the Multiple Persons pages if multiple transactions are conducted on behalf of a 3<sup>rd</sup> party. The Multiple Persons sections are the same as in Part I, Section A, and can be found on the second page of the CTR form.

**Note:** Original copy of CTR must be filed within 15 days of the day of the transaction to:

Enterprise Computing Center – Detroit Attn: CTR P.O. Box 33604 Detroit, MI 48232-5604

# **SAMPLE CTR**

Part I Section 2 Individ Doe 5 Doing b		pply: a ☐ Amends Ived in Transacti Whose Behalf Tra entity's name	(Complete prior report on(s)	Please all parts	ansactic t be accepted e type or prini that applySee Multiple po enducted	after Aug	ust 31, 20 ns)		6 SSN or Ell	4 5 6 7 8 9
9 City Anyto	Side Street own		10 State		code 74000		ntry code ot U.S.)		13 Occupation	n, profession, or business
14 If an in		nethod used to verify	identity: a e Issuedby:		's license/State I.C homa	. b[	Passpor		Allen registration D45678	39001002
1		Conducting Transa ncomplete, check the								
		Mail Deposit or Shipment					d [	Multiple Ti	ransactions e	Conducted On Own Behalf
15 Individ	ual's last name						16 First			17 Middle initial
18 Addres	is (number, street, a	nd apt. or suite no.)							19 SSN	
20 City			21 State			(If	not U.S.)		24 Date of	MM DD YYYY
d 🔲 Oth	her	nethod used to verify	e issued by:					o 📙	Allen registration nber:	
Part II	Amount and T	ype of Transaction	on(s). Ch	ieck a	ll boxes th	at appl	ly.			28 Date of transaction
	al cash in \$	11045			sh out \$				0_00	01/14/2010
	Foreign Country.	structions, page 4)		_	cash out re Transfer(s)	(s	ee instruction	_	0.00	nent(s) Purchased
_	Negotiable Instrume	nt(s) Cashed	33		rency Exchang	e(s)	34		osit(s)/Withdra	
35 🗆	Account Number(s)	Affected (if any):	36	□ Ott	er (specify)					
Part III										
37 Name	Financial Institution Where Transaction(s) Takes Place  37 Name of financial institution  AB Market  Enter Regulator or BBA Examiner code number (see Instructions)									
	38 Address (number, street, and apt. or suite no.)  123 Main Street  0 1 5 5 7 8 7 8 7					SSN				
40 City	own				41 State	42 ZIP	code 74000	)	43 Routing	(MICR) number
7	44 Title of approx	ring official			ature of appro	oving offi	cial		46 Date of	
Sign 👠	Owner				dward					01/14/2010
Here	47 Type or print p Edward Sn				e or print nam dward Smit		on to con	tact		5 5 5 - 0 1 0 1
► For Pa	perwork Reduction	Act Notice, see page 4.		Cat. I	lo. 37683N		FinC	EN Form		Form 4789) (Rev. 08-03)

# **SAMPLE CTR**

FinCEN Form 104 (formerly Form 4789) (Eff. 12-03)			Page 2				
Multiple Persons							
Complete applicable parts below if box 1b on page 1 is checked							
Part I Person(s) Involved in Transacti	ion(s)						
Section APerson(s) on Whose Behalf Tra							
2 Individual's last name or entity's name	.,,	3 First name	4 Middle initial				
5 Doing business as (DBA) 6 SSN or EIN							
7 Address (number, street, and apt. or suite no.)		8 Date of birt	h , ,				
			MM DD YYYY				
9 City	10 State 11 ZIP code	12 Country code (if not U.S.)	, profession, or business				
14 If an individual, describe method used to verify	identity: a Driver's Irense/State I D	b Passport o Allen registration					
d Other	e issued by:	f Number:					
Section BIndividual(s) Conducting Transa	action(s) (if other than above)						
15 Individual's last name	.ouo.i(a) (ii ouiei uiaii above).	46 East page	17 Middle initial				
19 mulvidual 5 last flame		16 First name	17 midule initial				
18 Address (number, street, and apt. or suite no.)		19 SSN					
20 City	21 State 22 ZIP code	23 Country code 24 Date of b					
25 If an individual, describe method used to verify	identity: a Driver's license/State I.D.	b Passport o Allen registration	MM DD YYYY				
d Other	e Issued by:	f Number:					
Part I Person(s) Involved in Transacti							
Section A-Person(s) on Whose Behalf Tra 2 Individual's last name or entity's name	ansaction(s) is Conducted	3 First name	4 Middle initial				
5 Doing business as (DBA)		6 SSN or EIN					
7 Address (number, street, and apt. or suite no.)		8 Date of birt	//				
9 City	10 State 11 ZIP code	12 Country code 13 Occupation	, profession, or business				
		(if not U.S.)					
14 If an individual, describe method used to verify							
d Other e Issued by: f Number:							
Section B—Individual(s) Conducting Transaction(s) (if other than above).							
15 Individual's last name		16 First name	17 Middle initial				
18 Address (number, street, and apt. or suite no.)		19 SSN					
To Address (number, street, and apr. or suite no.)		13 3314					
20 City	21 State 22 ZIP code	23 Country code (if not U.S.) 24 Date of b	irth				
25 If an individual, describe method used to verify	identity a Dispersions after 10		MM DD YYYY				
d Other	e Issuedby:	f Number:					

# **Recordkeeping for Money Orders**

## **Money Order Recordkeeping Requirement**

If a customer purchases money orders in one or more transactions throughout the same business day wit cash in the amount of \$3,000 to \$1,000, certain information must be recorded. The information is to be recorded on a Money Order Transaction Log. Only cash purchases are covered by this requirement.

All of the information required for the Log must be obtained before completing the transaction. The customer's identity must be verified with a non-expired, government-issued photo identification that contains the customer's name and current residential address.

# 3<sup>rd</sup> Party Information.

If the customer who is conducting the transaction is doing so for someone else, the information must be recorded for both parties. Examples of 3<sup>rd</sup> parties are an employee of a business conducting the transaction for the business, or a relative of an elderly or disabled person conducting the transaction for that person.

Refer to Addendum A, *Oklahoma Recordkeeping Guide*, at the end of this manual for a quick-reference guide to customer identifying information required on transactions conducted in Oklahoma.

# SAMPLE: MONEY ORDER TRANSACTION LOG

Use this log to record consumer information for cash purchases of money orders with a face amount of \$3,000 or more to one individual in one business day. This form must be retained for five years from date of sale, according to the U.S. Treasury Department regulations.

Store Name 123 Main Street	Purchaser's Name  456 Side Street Street Address
Street Address	
Anytown, OK 74000	Anytown, OK 74000
City, State, Zip	City, State, Zip
Money orders are purchased:	
	01/14/2010
✓ For Purchaser's Use	Date of Purchase
☐ On behalf of another person	Paint store manager
☐ (List other person's name, address, social security #	Purchaser's Specific Occupation
or alien I.D. #, and taxpayers I.D. # on the back of this form)	
123-45-6789	06-01-1955
Purchaser's Social Security Number	Purchaser Date of Birth
(or Alien I.D. Number)	
Purchaser's Driver License Number <u>D456-789-001-002</u>	StateOK
Other Identification	
Other Identification	
(Name of Store Employee)  Note: Purchaser's address must be listed on the ID and must match	h address listed above
DOLLAR AMOUNT \$5,000	
TRANSACTION(S):	
SERIAL NUMBER <u>801456001</u> AMOUNT <u>500</u>   SERIAL	NUMBER_801456007_AMOUNT_500_
SERIAL NUMBER 801456002 AMOUNT 500   SERIAL	NUMBER <u>801456008</u> AMOUNT <u>500</u>
SERIAL NUMBER_801456003_AMOUNT_500_   SERIAL	NUMBER <u>801456009</u> AMOUNT <u>500</u>
SERIAL NUMBER 801456004 AMOUNT 500   SERIAL	NUMBER <u>801456010</u> AMOUNT <u>500</u>
SERIAL NUMBER 801456005 AMOUNT 500   SERIAL	NUMBERAMOUNT
SERIAL NUMBER <u>801456006</u> AMOUNT <u>500</u>   SERIAL	NUMBERAMOUNT
Tohn Doe	
Purchaser's Signature	

<sup>\*</sup> $3^{rd}$  Party Information. If the customer who is conducting the transaction is doing so for someone else, the information must be obtained for both parties. Examples of  $3^{rd}$  parties are: An employee of a business conducting the transaction for the business, or a relative of an elderly or disabled person conducting the transaction for that person.

# **Recordkeeping for Money Gram Money Transfer**

Specific customer information for all person-to-person "sends" and "receives" must be recorded on the MoneyGram money transfer form. It does not matter whether the transaction is paid by cash, check, credit card, etc.

All of the information must be recorded before the transaction is completed. The customer's identity must be verified with a non-expired, government-issued photo identification.

# 3<sup>rd</sup> Party Information

If the customer who is conducting the transaction is doing so for someone else, the information must be recorded for both parties. Examples of 3<sup>rd</sup> parties are an employee of a business conducting the transaction for the business, or a relative of an elderly or disabled person conducting the transaction for that person.

Refer to Addendum A, *Oklahoma Recordkeeping Guide*, at the end of this manual for a quick-reference guide to customer identifying information required on transactions conducted in Oklahoma.

# SAMPLE MONEYGRAM SEND FORM

SEND/ENVIO PLEASE COMPLETE IN CAPITAL LETTERS/POR FAVOR UTILIZE LETRAS MAYÚSCULAS								
MONEYGRAM REWARDS CARD NUMBER NÜMERO DE TARJETA DE MONEYGRAM REWARDS	MoneyG	ram. 🥨						
**NOMERIC DE TANGETA DE MONETORIAM REWARDS  **Ask agent to enroll in MoneyGram Rewards** and begin receiving rewards immediately. MoneyGram may use information provided on this form for the purpose of sending MoneyGram Rewards** members further information. / *Solicle all agents as incorpicion en MoneyGram Rewards** continuous operanders ministrated en each between thomscoper and in the information to the interesting and inter								
DESTINATION/LUGAR DE DESTINO	AGENT LISE ONLY/LISO	SYCLUSIVO DEL ACENTE						
Receive Country Pais Receptor Canada Office Name								
rais receptor Receive State Province Pais Estado (Provincia Ontario Ontario Ontario								
ABS Statistical/Provincia:  AB Market  AB Ma								
RECEIVER/RECEPTOR								
First Name Primer Nombre Juan	Amount Sent Monto enviado	2.000						
Middle Name Segundo Nombre	Consumer Fee farita al consumidor	45						
Last Name Mendoza Mendoza	Total to be Collected Total a cobrar	2.045						
Second Last Name Segundo apellido	Total a cobrar	2,040						
Telephone Number 614-555-5151 Include area code/incluir codigo del área	Receive Information Información de recepción	ón						
TRANSACTION/TRANSACCIÓN	Complete this once the tra Completar únicamente despué	nsaction has been sent:						
Amount to be Sent Monto a enviar  2,000.00  Arizona: Agents must provide additional information for all transactions of \$500 or a control or an enviar and the same additional information on this Island for the same additional information on the Island for \$500 or a control or an enviar and the same additional information and the same additional information and the same additional information additional enviar and the same additional information additional information additional information additional information and \$500 or a control or additional information of \$500 or additio	Receive Currency Moneda de la recepción	s de enviar la transaccion:						
Message Mensaje	Note to Sender: Even though	the Amount to be Received						
Test Question Not available on transactions of \$900 or more.  Pregunta de prueba No disponible para transacciones de \$900 o más.	is stated in US Dollars, the another currency if the Local does not pay out in US Dollar	Transfer may be paid out in tion selected by the Receiver rs. In that event, the currency						
Test Answer Hespuesta De Clave	exchange rate will be set at the Transfer in the foreign Conditions for more informate Aunque et monto a recibir est	tion. / Nota para el remitente:						
RECEIVE OPTIONS/OPCIONES DE RECEPCIÓN (If no option is selected, transaction will be avaitable at a MoneyGramAgent)/(S) no se selected, transaction estará deponible en un Agente de MoneyGram)	Estados Unidos, la transfere	encia puede ser pagada en						
	cualquier otra moneda si la Destinatario no tiene pago en l cambio de la moneda a p	Dólares. En tal caso, la tasa de agar será establecida en el						
MoneyGram Location Sucursal de MoneyGram*  Account Deposit Deposit Deposito en cuenta Control Deposit Deposito en Cuenta Deposi	momento en que el Destinatar país extranjero. Ver la secció	io recibe la transferencia en el						
Opinios and e vin y available in a recover continues as recover continues an activities continues an activities and activities activities and activities and activities activities and activities activities and activities activities and activities activities activities activities and activities	para mayor información.							
<b>企图是以通过通过和自由的的。</b>	Exchange Rate lasa de cambio							
Registration Number (RRN)	Exchange Rate (If the Amou	int to be Received is stated						
Número de registro (RRN)	below is in US Dollars or Eur above may be inapplicable.)	Tipo de Cambio (Si la Cantidad						
SENDER/EMISOR Required information if not including Rewards Card Number information requerids st no se incluye et Numero de tarjeta de Rewards  First Name John	que Hecibiran Indicada al estadounidenses o Euro, cuai arriba podra ser inaplicable.)	najo se refleja en dólares quier tipo de cambio indicado						
Middle Name Segundo Nombre A								
Last Name Apellido	Amount to be Received Monto a recibir							
Address 456 Side Street	Reference No./Número d							
Town/City Pueblo/Ciudad  Anytown	1 2 3 4	5 6 7 8						
State O K   Zip Code   74000	PHONE CALL PIN NUMBER/	IÚMERO DE CÓDIGO PARA LLAMADA						
Estado Country Pais Pais								
Telephone Number 405-555-5555 See reverse side for complete instructions.  Vea al reverso para instrucciones completas.								
Teléfono Include area code/Incluir código del área Mary Jones								
SIGNATURE/FIRMA Agent Employee Name/Nombre del Empleado del Agente								
This transaction is subject to the terms & conditions contained in this form. Those terms & conditions limit the sender's legal rights and should be reviewed prior to signing. Esta transacción está sujeta a los términos y condiciones que aparecen en esta forma. Esos términos y condiciones limitan los derechos del remitente y deberán ser revisados antes de firmar.	555							
Sender's Signature Joke Doc Date 1 4 / 0 1 / 2 0 1 0 V	MoneyGram Operator #/Núme	ro del Operador de MoneyGram						
AGENT COPY/COPIA PARA EL AGENTE 7521G MG50015US AZ OK RWDS (Rev 08/09)	www.mone	ygram.com						

## SAMPLE MONEYGRAM SEND FORM

Arizona: For all Transfers Oklahoma: Transfers of \$900 or more

Arizona: Para transacciones

Oklahoma: Envíos de EE.UU \$900 dólares o más

FOR AGENT USE Para uso del agente

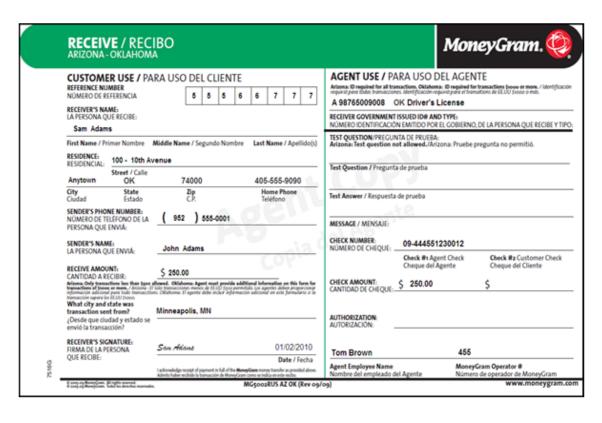


Arizona -This information is required for all Transfers and must be completed by the Agent. Oklahoma – This information is required for any Transfers or combination of Transfers of \$900 or more and must be completed by the Agent. / Esta información se requiere para cualquier transacción o combinación de transacciones de envio de FE.UU \$000 dólares o más y debe ser llenada por el gaente.

ARIZONA – COMPLETE FOR ALL TRANSFERS. OKLAHOMA: COMPLETE FOR ALL TRANSFERS OF \$900 OR MORE. ARIZONA: COMPLETAR PARA TRANSACCIONES OKLAHOMA:COMPLETAR PARA TRANSACCIONES de EE.UU \$900 DÓLARES O	If sending for someone else, complete the following information on that p organization. / Si está enviando dinero en representación de otra persona, co siguiente información de la persona u organización.			
Driver's license	First Name, Middle Name, Last Name / Primer Nombre, Segundo Nombre, Apr	ellido		
ID Type / Tipo de identificación	, , , , , , , , , , , , , , , , , , , ,			
D456789001002	Organization Name / Organización			
Sender's government issued ID#. / Identificación emitida por el gobierno, del remitente	organization teamer organization			
State of Oklahoma	Address City State Zi	in		
Issuer / Emisor	Dirección Ciudad Estado C.	i <b>p</b> .P.		
COMPLETE FOR ALL TRANSFERS OF \$1000 OR MORE.  COMPLETAR PARA TRANSACCIONES de EE.UU \$1000 DOLARAES O MÁS.	Date of Birth / Fecha de nacimiento			
06/01/1955	Occupation - Type of business / Ocupación - Tipo de Negocio			
Date of Birth / Fecha de nacimiento	U.S. Citizens, Residents or U.S. Businesses / Ciudadanos, Residentes o Negocios An	nericano		
Paint store manager				
Occupation - Type of business / Ocupación - Tipo de Negocio	Social Security # or Tax ID # / Número de Seguro Social o Número de Rento	7		
U.S. citizens and residents / Ciudadanos y residentes Estadounidenses				
123-45-6789	OR, IF NO SS# / O, A FALTA DEL NÚMERO DE SEGURO SOCIAL			
Social Security # / Número de Seguro Social		—		
OR, IF NO SS# / O, A FALTA DEL NÚMERO DE SEGURO SOCIAL	Alien ID # OR Passport # / Número de tarjeta de residente o Número de Pa	isaporte		
	Country of Issuance / País emisor			
Alien ID # OR Passport # / Número de tarjeta de residente o de Pasaporte	For Banks, Savings and Loans and Credit Unions Only.			
Country of Issuance / Pais emisor	Para uso de bancos cajas de ahorro y otras entidades bancarias sol	ament		
ADDITIONAL INFORMATION MAY BE REQUIRED ABOVE \$10,000.				
SE PUEDE REQUERIR INFORMACIÓN ADICIONAL EN ENVÍOS MAYORES de EE.UU				

AGENT MUST RETAIN THIS FORM ON-SITE FOR A MINIMUM OF SIX (6) MONTHS FOR AMOUNTS LESS THAN \$1,000. FOR AMOUNTS OF \$1,000 OR MORE, AGENTS MUST RETAIN TH FORM ON-SITE FOR THREE (3) YEARS. \* LE AGENTE DEBERÉ CONSERVAR ESTA FORMA EN 92 FABLECIMIENTO POR UN MÍNIMO DE SEIS (6) MESES POR CANTIDADES MENORES A \$1,000. Y POR CANTIDADES MAYORES DE \$1,000 AGENTE CONSERVARÁ LA FORMA POR TRES (3) ANOS.

## SAMPLE MONEYGRAM RECEIVE FORM



#### Arizona: For all Transfers Oklahoma: Transfers of \$1000 or more FOR AGENT USE MoneyGram. 📵 Para uso del Agente Arizona: Para transacciones Oklahoma: Envios de EE.UU \$1000 dólares o más Arizona: This information is required for all Receive transactions and must be completed by the Agent. Oklahoma: This information is required for any Receive transaction or combination of transactions of \$1000 or more and must be completed by the Agent. / Arizona: Esta información es requerida para todo Recibe transacciones y debe ser completado por el Agente. Oklahoma: Esta forma junto con la forma de Recibos es requerida en toda transacción para envío por encima de los EEJUU \$1000. Debe ser completada por el Agente. ARIZONA: COMPLETE FOR ALL TRANSACTIONS. OKLAHOMA: COMPLETE FOR RECEIVE TRANSACTIONS OF \$10000.00 US OR MOREL. ARIZONA. COMPLETE FINAL TOXAS TRANSACCIONES. OKLAHOMA: COMPLETE FINAL TOXAS TRANSACCIONES. If receiving for someone else, complete the following information on that person or organization. Si está recogier de la persona u organización. 07/04/1990 Date of Birth / Fecha de nacimiento First Name/Middle Name/Last Name Organization Name Primer Nombre/Segundo Nombre/Apellido(s) Organización Occupation - Type of Business / Profesión - Tipo de Negocio Address 456-78-1234 Social Security# / Número de Seguro Social (US citizens and residents) / (Ciudadanos y residentes Americanos) Occupation - Type of Business Profesión - Tipo de Negocio OR, IF NO SS# / SI NO SS# Social Security # or Tax ID # / Número de Seguro Social o Número de Renta (US Citizens, residents or US Businesses) / (Ciudadanos y residentes Americanos) Alien ID # OR Passport # / Número de tarjeta de residente o Número de Pasaporte OR, IF NO SS# / SI NO SS# Allen ID # OR Passport # / Número de tarieta de residente o Número de Pasaporte ADDITIONAL INFORMATION MAY BE REQUIRED ABOVE \$10,000.00. TRANSACCIONES POR ENCIMA DE LOS \$10,000.00. Country of Issuance / Pais de Origen AGENT MUST RETAIN THIS FORM ON-SITE FOR A MINIMUM OF SIX (6) MONTHS FOR AMOUNTS LESS THAN \$1000. FOR AMOUNTS OF \$1000 OR MORE, AGENTS MUST RETAIN THIS FORM ON-SITE FOR THREE (3) YEARS. / E1 Agente debera conservar esta forma en su establecimiento por unminimo de seis (6) meses por cantidades menores a EEU \$1000. Y por cantidades mayores de EE.UU \$1000 Agente conservaria la forma por tres (3) añon.

# **MSB** Registration

## **Registration of Money Services Business Form**

Your business must register with the U.S. Department of the Treasury if it conducts Money Services Business activities on its own behalf. Money Services Business activities include:

- Money transmitters
- Currency exchangers\*
- Check cashers\*
- Issuers of travelers checks or money orders\*
- Sellers or redeemers of travelers checks or money orders\*

\*Must conduct transactions greater than \$1,000 for any person, on any one day, in one or more transactions to qualify.

Registration is not required if this business conducts money services business activities solely as an agent of another registered Money Services Business, and does not independently conduct any other MSB activity.

If the business qualifies, registration is required within 180 days after the business begins conducting MSB activity.

Re-registration is required **every two (2) years** or when:

- There has been a change in ownership
- There has been more than a 10 percent transfer of voting power or equity interest
- The number of agents has increased by more than 50 percent

**Note:** Original copy of the Registration of Money Services Business form must be filed with:

Enterprise Computing Center – Detroit Attn: Money Services Business Registration P.O. Box 33116 Detroit, MI 48232-0116



# SAMPLE MSB REGISTRATION FORM

FinCEN Form 107	R	Registration of Mon Services Busines			
Previous editions will not be	Please type	e or print. Always complete	ort.		
accepted after December 31, 2008.	See instruc	tions for items marked with ar	n asterisk	( * ).	OMB No.1506-0013
Complete and send to: Enterprise	Computing Center-De	etroit, Attn: Money Services Busin	ess Regist	tration, P. O. B	lox 33116, Detroit, MI 48232-0116
Part I Filing Inforr	mation				
1 Indicate the type of filing by cl	hecking a, b, or d belo	ow (Check only one). If filing a <u>con</u>	rection, che	eck "c" and eith	her a, b, or d.
a 🗸 Initial registration b	Renewal c	Correcting a prior filing	d 🔲	Re-registratio	on
2 If you checked item 1 d pleas	se indicate the reason	(s). Check all that apply.			
a Re-registered under stat	te law b More	than 10 percent transfer of equity i	interest	c More ti	han 50 percent increase in agents
Part II Registrant	Information				
*3 Legal name of the money se	rvices business				
Smith LLC					
4 Doing business as AB Market					
*5 Address 123 Main Street		*6 City		State 8 ZIP Co	
*9 EIN (entity), SSN/ITIN (individu	(al) 10 Telephone	Anytown number (include area code) 11		K 7 4	0 0 0 0 _ 0 1 2 3
0   1   5   5   7   8   7   8		5 5 1— 0 1 0 1	E-mail ac	uuless (II avalla	sole)
	Controlling Pe				
12 Individual's last name, or orga		3011	13 First n	name	14 Middle initial
Smith	anization 5 manie		Edwar		
15 Address					
1400 Easy Street					
16 City	17 State 18	3 ZIP Code/Postal Code	19	9 Country (if o	ther than US)
Anytown		7 4 0 0 0 — 0 1	2 3	100.0	SOMETHIC CALL DEPART OF
20 Telephone number - (include (4 0 5) 5 5 5 5	area code) 1 1 1 1 1	21 Date of birth 12/25/1962			8 7 6 5 4 3 2 1
23 Skip this item if you complete					
_	_	enter their form of identification, the			
a Driver's license/state	ID b Pass	port c∐ Alien registra	tion	z Other	ate or country
			1		
,		oduct Information			
		gents or branches are located. Ch oox a, b, or c does not apply, che			
a All States & Territories b			eux as mai	ny state territor	y boxes as necessary.
Alabama (AL)	Georgia (GA)	Maryland (MD)		York (NY)	South Dakota (SD)
_	Guam (GU)	Massachusetts (MA)	☐ Nort	th Carolina (NC	
	Hawaii (HI)	Michigan (MI)	☐ Nort	th Dakota (ND)	Texas (TX)
	Idaho (ID)	☐ Minnesota (MN)	_	Mariana Isls. (Mi	
Arkansas (AR)	Illinois (IL)	☐ Mississippi (MS)	Ohio		☐ Vermont (VT)
California (CA)	Indiana (IN)	Missouri (MO)		ahoma (OK)	☐ Virgin Islands (VI)
Colorado (CO)	lowa (IA)	Montana (MT)	Oreg	gon (OR)	☐ Virginia (VA)
Connecticut (CT)	Kansas (KS)	☐ Nebraska (NE)	☐ Pala		Washington (WA)
Delaware (DE)	Kentucky (KY)	☐ Nevada (NV)	☐ Penr	nsylvania (PA)	_
District of Columbia (DC)	Louisiana (LA)	New Hampshire (NH)	Puer	rto Rico (PR)	Wisconsin (WI)
FS of Micronesia (FM)	Maine (ME)	New Jersey (NJ)	Rho	de Island (RI)	☐ Wyoming (WY)
Florida (FL)	Marshall Islands (MH)	New Mexico (NM)	Sout	th Carolina (SC	()
		Catalog Number 39578N			Rev. 8/08

# SAMPLE MSB REGISTRATION FORM

Part IV (continued)		2					
25 Enter the number of branches of the registrant. Reminder: do not separately register each branch.  See instructions for an explanation of the term "branch".							
26 Money services business activities of the registrant. Check as many as apply. See instructions for an explanation of the terms "issuer", "seller", "redeemer", "check casher", and "money transmitter".							
a 🔲 Issuer of traveler's checks d 🔲 Issuer of mon	ey orders g Currency dealer	or exchanger					
b ☐ Seller of traveler's checks e   ✓ Seller of mone	y orders h 🗸 Check casher						
c Redeemer of traveler's checks f Redeemer of	noney orders i 📝 Money transmitte	er					
27 Is any part of the registrant's money services business an inform. See the explanation of "money transmitter" in the instructions.	al value transfer system? a 🔲 Yes	b No					
28 Is any part of the registrant's money services business conducted		b No					
29 Enter the number of agents authorized to conduct each money se solely employees. See instructions for an explanation of the term "ag		or persons who are					
a Traveler's check sales	e Currency exchange	0					
b Traveler's check redemption	f Check cashing	0					
c Money order sales 0	g Money transmission	0					
d Money order redemption 0							
Part V Primary Transaction Account for M	ISB Activities						
30 If the registrant has more than one transaction account for mone See instructions for an explanation of the term "transaction account The registrant's primary transaction account is the one that has the In items 31 through 36 enter information about the registrant's pri	nt". he greatest annual dollar amount of money services						
31 Name of financial institution where the primary transaction accoun	is held						
Anytown State Bank							
32 Address	33 City						
250 Main Street	Anytown	1					
	ransaction account number						
	1 9 0 0 9 1 2 3 4 5 6 7	8 9					
Part VI Location of Supporting Document	ation						
If the supporting documentation is kept at the U.S. location reported in	Part II check here and continue to Part VII.						
37 Address							
38 City	39 State 40 ZIP Code						
Se State 40 Zil Gode							
Part VII Authorized Signature							
I am authorized to file this form on behalf of the money services business listed in Part II. I declare that the information provided is true, correct and complete. I understand that the money services business listed in Part II is subject to the Bank Secrecy Act and its implementing regulations. See 31 CFR Part 103. The money services business listed in Part II maintains a current list of all agents, an estimate of its business volume in the coming year, and all other information required to comply with 31 U.S.C. 5330 and the regulations thereunder. The signature of the owner, controlling person or authorized corporate officer is mandatory.							
41 Signature Edward Snith	41 Signature Edward Snitk 42 Print name Edward Smith						
43 Title 44 Date of signature							
Owner		01/02/2010					

# **Financial Crimes Enforcement Network (FinCEN)**

The Financial Crimes Enforcement Network (FinCEN) is a bureau within the U.S. Department of the Treasury that administers the federal government's antimoney laundering laws and regulations. FinCEN has created materials to assist Money Services Businesses (MSBs) with compliance with these laws and regulations.

MSBs should familiarize themselves with information provided by FinCEN and should regularly review FinCEN's website for MSBs (<a href="www.fincen.gov">www.fincen.gov</a>, select Information for Money Services Businesses) for updates or new information related to anti-money laundering compliance.

Below is a list of some of the information available on FinCEN's website:

- MSB Home Page This section provides important information MSBs including MSB registration information, MSB materials in English and seven foreign languages, and additional contacts, including appropriate State contacts. Recent news for MSBs is also provided.
- Guidance This section is intended to clarify issues or respond to general questions about FinCEN regulations that are applicable to MSBs.
- Forms This section contains the forms, such as the CTR and SAR-MSB forms along with information about how to obtain them and where to file them.
- Advisories/Bulletins/Fact Sheets This section contains FinCEN advisories relating to money laundering and other financial crimes. It also contains helpful bulletins and fact sheets for MSBs.
- Quick Links There are quick links to general information for MSBs, MSB Frequently Asked Questions (FAQs) and MSB Useful Tools/Information.

The Quick Links section provides access to a very important and informative document titled, "MSB Examination Manual". This document, issued on December 9, 2008, provides a summary of Bank Secrecy Act / Anti-Money Laundering (BSA/AML) compliance requirements and exam procedures to the MSB industry. It contains an overview of AML program requirements, BSA/AML risk and risk management expectations, sound industry practices and examination procedures.

# **Keep this Guide**

As this Guide has made clear, it is extremely important that you and your employees thoroughly understand the requirements of anti-money laundering laws and regulations. We have provided this Guide to help you in this important task. Make sure that all of your employees read and understand this Guide.

You may obtain additional copies of this Guide from the MoneyGram website, www.moneygram.com or by calling the MoneyGram Compliance Department at 1-800-328-5678 ext. 3385.

#### RECORDKEEPING FOR MONEY ORDER PURCHASES

Complete a **Money Order Transaction Log** for one or more money order purchases of \$3,000 - \$10,000 by the same person on the same business day,

Recorded transactions must include:

- Agent's store name
- Agent's street address, city/state/zip
- Customer's name
- Customer's physical address (Post Office boxes are not acceptable as a physical address)
- Unexpired government issued photo ID with the customer's current residential address printed on it
- Social security number or tax identification number, if purchaser is US citizen/resident
- Specific occupation
- Date of purchase
- Indication if the purchase is on behalf of a third party
- Money order serial number(s)
- Money order amount(s)
- Total transaction amount
- Customer's signature

If the customer is purchasing money orders on behalf of someone else, personal identification information must be obtained for both parties. Examples of "3<sup>rd</sup> parties" include (but are not limited to):

- An employee of a business purchasing money orders for the business
- A relative of an elderly or disabled person purchasing money orders for that person

Completed Money Order Transaction Logs must be maintained by the Agent for five (5) years

## RECORDKEEPING FOR MONEY TRANSFER SEND TRANSACTIONS

Before completing a Send transaction, obtain and record all of the information requested on both the front and back of the AZ/OK Send form including:

#### • \$900.00 - \$999.99

- Name
- Current residential address (include apartment / unit number if applicable)\*
- Valid government issued photo ID

## • \$1,000.00 - \$10,000.00

- Name
- Current residential address (include apartment / unit number if applicable)\*
- Phone number
- Date of birth
- Valid government issued photo ID

(Record the ID type, ID number and the issuer of the ID)

- Social security number (SSN) or individual tax identification number (ITIN), if the customer is a citizen or authorized resident in the US
  - (A SSN or ITIN is not required if the customer lives and works outside of the US and presents a passport or other applicable photo ID evidencing nationality or residence.)
- Current specific occupation
- Signature (must match signature on photo ID)

For single or multiple money transfer Send transactions conducted by a single person totaling \$9,100 or more, contact MoneyGram Anti-Money Laundering Operations at 1-800-926-9400 ext. 4899 BEFORE completing the transaction(s).

If the customer is sending the money transfer on behalf of someone else, personal identification information must be obtained for both parties. Examples of "3<sup>rd</sup> parties" include (but are not limited to):

- An employee of a business sending a money transfer for the business
- A relative of an elderly or disabled person sending a money transfer for that person

## RECORDKEEPING FOR MONEY TRANSFER RECEIVE TRANSACTIONS

Before completing a Receive transaction, obtain and record all of the information requested on both the front and back of the AZ/OK Receive form including:

## • \$900.00 - \$999.99

- Name
- Current residential address (include apartment / unit number if applicable)\*
- Valid government issued photo ID

If the receive customer does not have acceptable photo ID, test questions are permitted to receive money transfer

## • \$1,000.00 - \$10,000.00

- Name
- Current residential address (include apartment / unit number if applicable)\*
- Phone number
- Date of birth
- Valid government issued photo ID

(Record the ID type, ID number and the issuer of the ID)

- Social security number (SSN) or individual tax identification number (ITIN), if the customer is a citizen or authorized resident in the US

(A SSN or ITIN is not required if the customer lives and works outside of the US and presents a passport or other applicable photo ID evidencing nationality or residence.)

- Current specific occupation
- Signature (must match signature on photo ID)

<sup>\*</sup>The customer must provide a physical address. A post office box (P.O. Box) is not an acceptable physical address. The customer CANNOT use a business address in place of a current residential address.

## SUSPICIOUS ACTIVITY REPORT BY MONEY SERVICES BUSINESS (SAR-MSB)

A **SAR-MSB** must be filed for any transaction, or pattern of transactions, that is attempted or conducted in amounts of at least \$2,000, where it is known or suspected that the transaction:

- Involves funds derived from illegal activity or is intended to hide funds derived from illegal activity
- Is structured to avoid recordkeeping or reporting requirements
- Has no business or apparent lawful purpose
- Facilitates criminal activity

If suspicious activity occurs, the business must:

- File SAR-MSBs according to the instructions on the form and include as much information as is known about the customer
- Record the transactions on a Log, if necessary (filing a SAR-MSB does not satisfy any other recordkeeping requirements)
- File a CTR is necessary (filing a CTR does not satisfy any other recordkeeping requirements)
- Retain copies of SAR-MSBs for five (5) years

## **CURRENCY TRANSACTION REPORT (CTR)**

- File CTRs for all MSB cash transactions greater than \$10,000
- Multiple cash transactions are treated as a single transaction if the
  agent has knowledge that the transactions are conducted by the same
  person or on behalf of the same person, and the amount of cash paid
  to the agent by the customer ("cash in") or paid to the customer by the
  agent ("cash out") totals more than \$10,000 in the same calendar day.
- File CTRs according to the instructions on the form
- Retain copies of CTRs for five (5) years



Notes: