



Section 3: Compliance Monitoring Documentation Log

Agent Name:		Agent Number:	
Monitoring Period:	Start:	End:	Date:
		YES	NO
1	<p>Have you identified any unusual and/or potentially suspicious activity during this monitoring period? For example, structuring (splitting transactions to avoid Social Security Number/additional information), flipping (consumer receiving and wanting to send the money back out), excessive number of transactions or amounts? <i>If you answered "yes," ensure SAR(s) have been filed and the activity escalated to MoneyGram according to your policies and procedures.</i></p>		
2	<p>Have you identified any transactions totaling over \$10,000 in CASH for ONE consumer in ONE day for this monitoring period? <i>If you answered "yes," ensure CTR(s) have been filed according to your policies and procedures.</i></p>		
3	<p>Have you sold any Money Orders that total \$3,000 or more, in cash, to ONE consumer in ONE day during this monitoring period? <i>If you answered "yes," ensure money transaction order log(s) have been completed according to your policies and procedures.</i></p>		
4	<p>Did you identify any data integrity type of issues, such as incomplete addresses or ID numbers not being entered accurately? <i>If you answered "yes," ensure employees are re-trained on correct data entry according to your policies and procedures.</i></p>		
5	<p>Did you hire any new employees during this monitoring period? <i>If you answered "yes," ensure employees have been trained on AML and Anti-Fraud requirements, how to record required information from transactions and how to escalate potentially unusual or suspicious activity. Ensure this training has been documented according to your policies and procedures.</i></p>		
6	<p>Did any employee escalate unusual and/or potentially suspicious activity to the Compliance Officer? <i>If you answered "yes," how many escalations did you receive?</i> <i>Enter the number here:</i> _____ <i>If you answered "no," ensure employees are reminded about the importance of escalating any potentially suspicious or unusual activity to the Compliance Officer.</i></p>		

Ensure you document your decision to file or not to file a SAR based on any identified unusual and/or potentially suspicious activity (findings) during this monitoring period in the table below. Use additional paper if necessary and attach.

Findings	Cause	Recommendation	Reporting Decision
<i>Description of the potentially suspicious or unusual activity</i>	<i>Explanation of the nature of the potentially suspicious or unusual activity</i>	<i>Action(s) taken to mitigate the risk identified</i>	<i>Documenting the decision to file or not to file a SAR</i>

Compliance Officer / Delegate Name

Signature

Date