

Anti-Money Laundering  
Compliance Guide

USA PATRIOT Act

Prevention of Terrorist  
Financing




Reporting Requirements

Recordkeeping

FinCEN Resources

Employee Training

**MoneyGram** 



Why you need to read this Manual and create an anti-money laundering compliance program as outlined in these materials:

- 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
  - o Use the materials in this book, which are also available at [www.moneygram.com](http://www.moneygram.com)
  - o Use the Money Services Business materials available from the federal government at [www.msb.gov](http://www.msb.gov)
  - 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 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;
- 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 and USA PATRIOT Act 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.





## Guide Contents

Money Services Businesses (MSBs) and their employees who conduct money order sales and money transfer transactions **must** comply with all anti-money laundering laws and regulations that apply to them.

### **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.

### **Section II. MSB Registration**

All MSBs are required to register with the U.S. Treasury Department. *Most MoneyGram agents are covered by MoneyGram's registration and do not have to register on their own.*

### **Section III. Anti-Money Laundering Compliance Program**

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

### **Section IV. Recordkeeping**

You must record information regarding money order purchases and MoneyGram money transfer transactions of \$3,000 or more, (\$1,000 or more in some states).

### **Section V. Currency Transaction Reporting Requirements**

You must file a CTR for any transaction greater than \$10,000 in cash.

### **Section VI. Structuring**

Structuring is the illegal act of breaking up a larger transaction into smaller transactions in order to avoid the recordkeeping or reporting requirements.

### **Section VII. Human Smuggling**

Human smuggling is an activity where payment is made by the families or friends of undocumented aliens who are attempting to enter the United States illegally across the border.

### **Section VIII. Suspicious Activity Reporting**

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.

### **Section IX. Office of Foreign Assets Control**

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

### **Section X. Terrorist Financing Prevention**

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.

### **Section XI. Civil and Criminal Penalties**

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.

### **Section XII. Anti-Money Laundering Forms and Samples**

**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 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 ore 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 require that all MSBs adopt a written anti-money laundering compliance program that is reasonably designed to ensure proper recordkeeping and reporting of certain transactions 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.

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 *ANTI-MONEY LAUNDERING AND TERRORIST FINANCING PREVENTION COMPLIANCE PROGRAM* can be downloaded from the Anti-Money Laundering page at [www.moneygram.com](http://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 educations and training should include instructions on the employees' responsibilities under the program, as well as the detections 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 documentations 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](http://www.moneygram.com)

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

[www.moneygramu.com](http://www.moneygramu.com)



**Fourth**, your business should subject its 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.

**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.

## **Section IV.**

### **Recordkeeping**

#### **Recordkeeping for Money Orders:**

If a customer purchases \$3,000 to \$10,000 in money orders with cash, you must obtain and record the following customer and transaction information on a Money Order Log BEFORE completing the transaction(s):


- Name
- Address
- Valid government issued photo ID
- Social security number or tax identification number, if purchaser is U.S. citizen / resident
- Date of birth
- Transaction date
- Money order serial number(s)
- Amount of each money order purchased
- Total amount purchased

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

Both sending and receiving agents must obtain and record specific information for money transfers of \$3,000 or more regardless of the 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 of \$900 or more, you must obtain and record the customer's government issued photo ID.





For money transfer Sends and / or Receives of \$3,000 or more, you must obtain and record all of the information requested on both the front and back of the Send/Receive form, including:

- Name
- Address
- Valid government issued photo ID
- Social security number or tax identification number, if purchaser is U.S. citizen / resident
- Date of birth
- Occupation
- Transaction date
- Reference Number and Date of Transaction;

For single or multiple money transfer Send transactions totaling \$9,100 or greater, 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 driver's license, passport 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 or combined send total of \$20,000.



## **Documenting Customer Information**

If your business is a FormFree location or does not have customers complete Send or Receive Forms, you must obtain the client's signature on the transaction receipt. By completing the front and back of the Send/Receive Form and / or 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 \$3,000 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."

## **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 they are by or on behalf of the same person and total over \$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.

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 \$1,500 money transfer in the morning and another \$1,500 money transfer send transaction in the afternoon, he may be structuring his purchases in order to avoid the \$3,000 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 \$2,000 and another for \$1,500. Each transfer is less than \$3,000, but the total of the transactions exceeds \$3,000. 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 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 an activity where payment is made by the families or friends of undocumented aliens who are attempting to enter the United States illegally across the border. Where illegal aliens are attempting to enter through the U.S./Mexican border, the activity is referred to as “coyote” activity. “Snakehead” activity refers to human smuggling involving Asians entering the United States, usually through Canada.



To avoid detection, this activity typically involves multiple payments between \$899 and \$2,999. While coyotes operate most frequently in Arizona, California, New Mexico and Texas, coyote and snakehead activity has been reported throughout the United States.

## **Section VIII.**

### **Suspicious Activity**

“Suspicious Activity” is a difficult concept to define, because it can vary from one transaction to another based upon 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 location 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 hid 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 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 SAR-MSB 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 completion of 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 \$2,000 or more. 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. You must file a SAR-MSB on the transaction or attempted transaction.

**Example 7:** A customer picks up a transfer at an agent location along the U.S. border and is 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 transfers in agent locations along the U.S. border from multiple senders in various parts of the U.S. All of the transfers are in similar dollar amounts.

**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 “SDNs,” are drug dealers and terrorists. All U.S. entities are prohibited from conducting any financial transactions with SDNs.

You can learn more about OFAC by visiting the Treasury Department’s website at [www.ustreas.gov/offices/enforcement/ofac](http://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 has computer programs that review all money transfer senders and receivers against the government watch lists. Although agents are responsible for coordinating and monitoring their own day-to-day compliance with OFAC and for providing appropriate employee training, they may rely on MoneyGram to conduct the initial review of sender and receiver names. Agents must follow MoneyGram’s instructions in order to prevent any unauthorized payout or refund.

#### **What is an SDN?**

As part of its enforcement efforts, OFAC publishes a list of individuals and companies owned or controlled by, or acting for on behalf of, targeted countries. It also lists individuals groups and entities such as terrorists and narcotics traffickers designated under programs that are not country-specific. Collectively, such individuals and companies are called Specially Designated Nationals or SDNs. U.S. persons are generally prohibited from dealing with SDNs.



## **How do I get a copy of this list?**

The best way to get the list is from OFAC's website. The list is provided in a number of different formats, including fixed field / delimited files that can be integrated into databases.

## **What do I do if I have a match to the SDN list?**

If you have checked a name manually or by using software and find a match, you should do a little more research. Is it an exact name match, or very close? Is your customer located in the same general area as the SDN? If not, it may be a "false hit." If there are enough similarities, contact the OFAC hotline at 1-800-540-6322 for verification. Unless a transaction involves an exact match, it is recommended that you contact OFAC Compliance before actually blocking assets.

## **How do I get the OFAC Starter Kit?**

The Starter Kit is comprised of the SDN list, the brochure for the industry you represent (financial, travel / tourism, insurance, export / import or securities), and any articles that appear to be of interest based on your specific needs or interest. Those documents can be obtained from OFAC's website or from OFAC's fax on demand service at 202-622-0077.

## **Is there a dollar limit on which transactions are subject to OFAC regulations?**

No. There is no minimum or maximum amount subject to the regulations.


## **Section X.**

### **Terrorist 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 terrorist 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 terrorist 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](http://www.fatf-gafi.org) and [www.finen.gov](http://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 a 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 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 states may have monetary thresholds that are lower than what is required by federal law.)

	<b>At Least \$2,000</b>	<b>Suspicious Activity Report For Money Services Business (SAR-MSB)</b> This report must be sent to the federal government within 30 days of becoming aware of the suspicious activity
	<b>\$3,000 Or More (\$1,000 or more in AZ)</b>	<b>Money Order Log or MoneyGram Money Transfer Send/Receive Form of Form Free Receipt</b> The required information must be recorded before the transaction is completed
	<b>More Than \$10,000</b>	<b>Currency Transaction Report (CTR)</b> 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 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
- Facilitates criminal activity

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

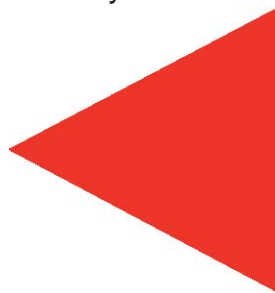
1. A customer asks an employee how to avoid a reporting requirement.
2. A customer threatens or bribes an employee in order to avoid providing information.
3. A customer refuses to proceed with a transaction when asked for identification.
4. A customer refuses to provide all of the information required.
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 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 their past history, employment, or level of income.

**Note:** A SAR-MSB is a separate requirement from a CTR. Even if 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](http://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:

**IRS Detroit Computing Center  
Attention: SAR-MSB  
PO Box 33117  
Detroit, MI 48232-5980**



FinCEN Form 109 March 31, 2007. Suspicious Activity Report by Money Services Business. Please type or print. Always complete entire report. Items marked with an asterisk \* are considered critical. (See instructions.)

1 [ ] Check this box only if amending or correcting a prior report... 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 [x] Purchaser/sender b [ ] Payee/receiver c [ ] Both a & b z [ ] Other

\*4 Individual's last name or entity's full name: Doe \*5 First name: John 6 Middle initial: A

\*7 Address: 456 Side Street

\*8 City: Anytown \*9 State: M N \*10 ZIP Code: 5 5 0 0 0 0 0 1 2 3 \*11 Country Code (if not US)

\*12 Government issued identification (if available) a [x] 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: M N

\*13 SSN/ITIN (individual) or EIN (entity) \*14 Date of birth: 06/01/1955 15 Telephone number: (6 1 2) 5 5 5 - 5 5 5 5

Part II Suspicious Activity Information

\*16 Date or date range of suspicious activity: From 01/14/2009 To 01/14/2009 \*17 Total amount involved in suspicious activity a [ ] Amount unknown \$: 1 1 0 4 5 1.00

\*18 Category of suspicious activity (check all that apply) a [ ] Money laundering b [x] 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). a [x] Money order b [ ] Traveler's check c [x] Money transfer z [ ] Other e [ ] Currency exchange

Check all of the following that apply (1) [x] Alters transaction to avoid completing funds transfer record or money order or traveler's check record (\$3,000 or more) (5) [ ] Individual(s) using multiple or false identification documents (6) [ ] Two or more individuals using the similar/same identification (2) [x] Alters transaction to avoid filing CTR form (more than \$10,000) (7) [ ] Two or more individuals working together (3) [x] Comes in frequently and purchases less than \$3,000 (8) [ ] Same individual(s) using multiple locations over a short time period (4) [ ] Changes spelling or arrangement of name (9) [ ] Offers a bribe in the form of a tip/gratuity (10) [ ] Exchanges small bills for large bills or vice versa

If mailing, send each completed SAR report to: Enterprise Computing Center - Detroit Attn: SAR-MSB P.O. Box 33117 Detroit, MI 48232-0980

A free secure e-filing system is available to file this report. Go to http://bsaeifiling.fincen.treas.gov for more information and to register.

Catalog No. 49340J

(Rev. 3/07)

**Part II Suspicious Activity Information, Continued**

2

\*20 Purchases and redemptions (check box "P" for purchase or box "R" for redemption ).

Instrument	P	R	Issuers	Total Instruments	Total Amount (US Dollars)
Money Orders:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	MoneyGram	10	\$ 5,000.00
	<input type="checkbox"/>	<input type="checkbox"/>			\$ .00
	<input type="checkbox"/>	<input type="checkbox"/>			\$ .00
Traveler's Checks:	<input type="checkbox"/>	<input type="checkbox"/>			\$ .00
	<input type="checkbox"/>	<input type="checkbox"/>			\$ .00
	<input type="checkbox"/>	<input type="checkbox"/>			\$ .00
Money Transfers:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	MoneyGram	3	\$ 6,000.00
	<input type="checkbox"/>	<input type="checkbox"/>			\$ .00
	<input type="checkbox"/>	<input type="checkbox"/>			\$ .00

*21 Currency Exchanges:	Tendered Currency/Instrument	Country	Received currency	Country	Amount (US Dollars)
<input type="checkbox"/> If bulk small currency					\$ .00
<input type="checkbox"/> If bulk small currency					\$ .00

**Part III Transaction Location**

22  Multiple transaction locations

23 Type of business location (check only one) a  Selling location b  Paying location c  Both

*24 Legal name of business Smith LLC		*25 Doing business as AB Market			
*26 Permanent address (number, street, and suite no.) 123 Main Street		*27 City Anytown	*28 State M N	*29 ZIP Code 5 5 0 0 0 - 0 1 2 3	
*30 EIN (entity) or SSN/ITIN (individual) 0 1 5 5 7 8 7 8 7	*31 Business telephone number ( 6 1 2 ) 5 5 5 - 0 1 0 1		*32 Country Code (If not US)	*33 Internal control/file number (If available)	

**Part IV Reporting Business**

34  The Reporting Business is the same as the Transaction Location (go to Part V)

*35 Legal name of business		*36 Doing business as			
*37 Permanent address (number, street, and suite no.)		*38 City	*39 State	*40 ZIP Code	
*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 (If available)		

**Part V Contact for Assistance**

*45 Designated contact office Edward Smith	*46 Designated phone number (Include area code) ( 6 1 2 ) 5 5 5 - 0 1 0 1	*47 Date filed (See instructions) 01/15/2009
---	--	---

48 Agency (If not filed by a Money Services Business)

**Part VI Suspicious Activity Information - Narrative\*****3**

**Explanation/description of suspicious activity(ies).** This section of the report is **critical**. The care with which it is completed 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, as a guide, 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.

- a. **Describe** conduct that raised suspicion.
- b. **Explain** whether the transaction(s) was completed or only attempted.
- c. **Describe** supporting documentation and retain 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.
- e. **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.
- f. **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.).
- h. **Indicate** whether the suspicious activity is an isolated incident or relates to another transaction.
- i. **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.
- j. **Indicate** whether any information has been excluded from this report; if so, state reasons.
- k. **Indicate** whether any U.S. or foreign instrument(s) were involved. If so, provide the amount, name of currency, and country of origin.
- l. **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.
- m. **Indicate** any additional account number(s), and any foreign bank(s) account numbers which may be involved in transfer of money.
- n. **Identify** any employee or other individual or entity (e.g., agent) suspected of improper involvement in the transaction(s).
- o. **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.
- s. **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](http://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, 2009, he purchased five money orders totaling \$2500 from our employee. He came in later that day, went to a different employee and purchased another five money orders totaling \$2500. That same afternoon, he returned and sent a money transfer in the amount of \$2000 to Juan Mendoza in Rome, Italy. The same evening, he sent two additional transactions, each for \$2000, to Juan Mendoza, in Roma, Italy. The total amount of the activity that day was \$11,045.

This activity appears to be suspicious. The subject may be attempting to avoid record-keeping requirements by purchasing money orders and sending MoneyGram transactions for less than \$3000. 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 for previous transactions. We also filed a Currency Transaction Report, since all transactions were paid for in cash. We have copies of the MoneyGram Send forms and the money order sale receipts that show the serial numbers of the money orders and the date and time of the transactions.

**Safe Harbor**

Federal law (31 U.S.C. 5318(g)(3)) provides complete protection from civil liability for all reports of suspicious transactions made to appropriate authorities, including supporting documentation, regardless of whether such reports are filed pursuant to this report's instructions or are filed on a voluntary basis. Specifically, the law provides that a financial institution, and its directors, officers, employees and agents, that make a disclosure of any possible violation of law or regulation, including in connection with the preparation of suspicious activity reports, "shall not be liable to any person under any law or regulation of the United States, any constitution, law, or regulation of any State or political subdivision of any State, or under any contract or other legally enforceable agreement (including any arbitration agreement), for such disclosure or for any failure to provide notice of such disclosure to the person who is the subject of such disclosure or any other person identified in the disclosure".

**Notification Prohibited**

Federal law (31 U.S.C. 5318(g)(2)) provides that a financial institution, and its directors, officers, employees, and agents, who report suspicious transactions to the government voluntarily or as required by 31 CFR 103.20, may not notify any person involved in the transaction that the transaction has been reported.

**Notification Required**

In situations involving suspicious transactions requiring immediate attention, such as ongoing money laundering schemes, a money transmitter, a currency dealer or exchanger; or an issuer, seller, or redeemer of money orders and/or traveler's checks shall immediately notify, by telephone, an appropriate law enforcement authority. In addition, a timely SAR-MSB form shall be filed, including recording any such notification in Part VI on the form.

**A. When To File A Report:**

1. Money transmitters; currency dealers and exchangers; and issuers, sellers and redeemers of money orders and/or traveler's checks that are subject to the requirements of the Bank Secrecy Act and its implementing regulations (31 CFR Part 103) are required to file a suspicious activity report (SAR-MSB) with respect to:

a. Any transaction conducted or attempted by, at, or through a money services business involving or aggregating funds or other assets of at least \$2,000 (except as described in section "b" below) when the money services business knows, suspects, or has reason to suspect that:

i. The transaction involves funds derived from illegal activity or is intended or conducted in order to hide or disguise funds or assets derived from illegal activity (including, without limitation, the nature, source, location, ownership or control of such funds or assets) as part of a plan to violate

or evade any Federal law or regulation or to avoid any transaction reporting requirement under Federal law or regulation;

ii. The transaction is designed, whether through structuring or other means, to evade any regulations promulgated under the Bank Secrecy Act; or

iii. The transaction has no business or apparent lawful purpose and the money services business knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction.

iv. The transaction involves the use of the money services business to facilitate criminal activity.

b. To the extent that the identification of transactions required to be reported is derived from a review of clearance records or other similar records of money orders or traveler's checks that have been sold or processed, an issuer of money orders or traveler's checks shall only be required to report a transaction or a pattern of transactions that involves or aggregates funds or other assets of at least \$5,000.

2. File a SAR-MSB no later than 30 calendar days after the date of initial detection of facts that constitute a basis for filing the report.

3. The Bank Secrecy Act requires that each financial institution (including a money services business) file currency transaction reports (CTRs) in accordance with the Department of the Treasury implementing regulations (31 CFR Part 103). These regulations require a financial institution to file a CTR (FinCEN Form 104) whenever a currency transaction exceeds \$10,000. If a currency transaction exceeds \$10,000 and is suspicious, a money transmitter, or issuer, seller or redeemer of money orders and/or traveler's checks or currency dealer or exchanger must file two forms, a CTR to report the currency transaction and a SAR-MSB to report the suspicious aspects of the transaction. If the suspicious activity involves a currency transaction that is \$10,000 or less, the institution is only required to file a SAR-MSB. Appropriate records must be maintained in each case. See 31 CFR Part 103.

**B. Abbreviations and Definitions**

1. EIN -- Employer Identification Number
2. IRS -- Internal Revenue Service
3. ITIN -- Individual Taxpayer Identification Number
4. SSN -- Social Security Number
5. Instruments -- includes Money order(s) and/or Traveler's Check(s)

6. Redeemer --A business that accepts instruments in exchange for currency or other instruments for which it is not the issuer is a redeemer. The MSB definition in 31 CFR 103.11(u)(4) extends to "redeemers" of money orders and traveler's checks only insofar as the

instruments involved are redeemed for monetary value — that is, for currency or monetary or other negotiable or other instruments. The taking of the instruments in exchange for goods or general services is not redemption under BSA regulations.

**C. General Instructions**

1. This form should be e-filed through the Bank Secrecy Act e-filing System. Go to <http://bsaeiling.fincen.treas.gov> to register. This form is also available for download on the Financial Crimes Enforcement Network's Web site at [www.fincen.gov](http://www.fincen.gov), or may be ordered by calling the IRS Forms Distribution Center at (800) 829-3676.

2. If not filed electronically, send each completed suspicious activity report to:

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

3. While all items should be completed fully and accurately, items marked with an asterisk (\*) must be completed according to the provisions of paragraph 4 below.

4. If the information for a data item marked with an asterisk (\*) is not known or not applicable, enter special response "XX" (Exception: **Items 11, 20, 21, and 34 - see instructions in Section D**) NOTE: Check boxes are not data items. To indicate "Total amount" as unknown, check the box provided. Non-asterisk fields should be left blank if the information is unknown or not applicable.

5. Complete each suspicious activity report by providing as much information as possible on initial and amended or corrected reports.

6. Do not include supporting documents when filing the suspicious activity report. Retain a copy of the suspicious activity report and all supporting documentation or business record equivalent in your files for five (5) years from the date of the report. All supporting documentation (such as copies of instruments; receipts; sale, transaction or clearing records; photographs, surveillance audio and/or video recording medium) must be made available to appropriate authorities upon request.

7. Type or complete the report using block written letters.

8. If more than one subject is being reported, use as many copies of the Part I Subject Information page as necessary to record the additional subjects. Attach the additional page(s) behind page 1. If more than one transaction location is being reported, use as many copies of the Part III Transaction Location Information page as necessary to record the additional locations. Attach the additional page(s) behind page 2. If more space is needed for the Part VI Narrative, add as many blank continuation pages as necessary to complete the narrative. Attach the additional pages behind page 3.

If more space is needed to complete any other item, identify that item in Part VI by "item number" and provide the additional information.

9. Enter all **dates** in MM/DD/YYYY format where MM = month, DD = day, and YYYY = year. Precede any single number with a zero, i.e., 01, 02, etc.

10. Enter all **telephone numbers** with (area code) first and then the seven numbers, using the format (XXX) XXX-XXXX. List fax and international telephone numbers in Part VI.

11. Always enter an **individual's name** by entering the last name, first name, and middle initial (if known). If a legal entity is listed, enter its legal name in the last name item. If the legal entity has a trade name that is different, list the trade name in Part VI.

12. Enter all **identifying numbers** (alien registration, driver's license/state ID, EIN, ITIN, Foreign National ID, passport, SSN, vehicle license number, etc.) starting from left to right. Do not include spaces or other punctuation.

13. Enter all **ZIP Codes** with at least the first five numbers (ZIP+4, if known).

14. Enter all **monetary amounts** in U.S. Dollars. Use whole dollar amounts rounded up when necessary. Use this format: \$000,000,000. If foreign currency is involved, record the currency amount in U.S. Dollars, name, and country of origin in the Part VI narrative.

15. **Addresses, general.** Enter the permanent street address, city, two letter state/territory abbreviation used by the U.S. Postal Service, and ZIP code (ZIP+4, if known) of the individual or entity. A post office box number should not be used for an individual, unless no other address is available. For an individual also enter any apartment number or suite number and road or route number. If a P.O. Box is used for an entity, enter the street name, suite number, and road or route number. If the address is in a foreign country, enter the city, province or state if Canada or Mexico, and the name of the country. Complete any part of the address that is known, even if the entire address is not known. If the street address, city, ZIP Code or country is unknown, enter "XX" in the item.

Lists of two-digit country and state codes are available on the FinCEN web site at [www.fincen.gov/reg\\_bsaforms.html](http://www.fincen.gov/reg_bsaforms.html), or by calling 1-800-949-2732 and selecting option 5 to request a list by mail.

#### D. Item Preparation Instructions

**Item 1.** Check the box if this report amends (adds missing data) or corrects errors in the prior report. (See Part VI, item "5").

**Item 1a--** Check this box if this is a recurring report filed on continuing activity.

#### Part I Subject Information

**Note:** Enter information about the person(s) or entity involved that caused this report to be filed, not the victim of the activity.

**Item 2 -- Multiple Subjects.** If there are multiple subjects involved, check box "2" and complete a separate Part I for each subject. If ANY subject information is available, record that information in Part 1, and insert the appropriate special response in any critical item for which data is missing.

**Item 3 Subject type.** Check box "a" if the subject purchased a money order(s) or traveler's check(s) or sent a money transfer(s). Check box "b" if the subject cashed a money order(s) or traveler's check(s) or received payment of a money transfer(s). Check box "c" if both "a" and "b" apply. If the transaction is a currency exchange check box "c." Check box "z" Other and describe in Part VI if the subject is an individual other than a customer. Examples are MSB employees and agents.

**Items 4, 5, and 6 \*Name of subject.** See General Instruction 11. Enter the name of the subject individual in Items 4 through 6. If the MSB knows that the individual has an "also known as" (AKA) or "doing business as" (DBA) name, enter that name in Part VI. If the subject is an entity, enter the legal name in Item 4 and the trade or DBA name in item 5. If the legal name is not known, enter the DBA name in Item 4. If there is more than one subject, use as many Part I Subject Information continuation pages as necessary to provide the information about each subject. Attach the additional copies behind page 1. When there is more than one purchaser and/or payee (e.g., two or more transactions), indicate in Part VI whether each subject is a purchaser or payee and identify the instrument or money transfer information associated with each subject. If part of an individual's name is unknown, enter "XX" in the appropriate name item. If the subject is an entity, enter "XX" in Item 5 (if the trade or legal name is not known) and in Item 6.

**Items 7 - 11 \*Permanent address.** See General Instructions 13 and 15. Enter "XX" if the street address, city, and ZIP Code items are unknown or not applicable. Enter "XX" if the state or country is not known. If country is US, always leave country code blank.

**Item 12 \*Government issued identification (if available).** See General Instruction 12. Check the box showing the type of document used to verify subject identity. If you check box "z" Other, be sure to specify the type of document used. In box "e" list the number of the identifying document. In box "f" list the issuing state or country. If more space is required, enter the additional information in Part VI. If the subject is an entity or an individual's identification was not available, check box "z" and enter "XX" in "Other."

**Item 13 \*SSN/ITIN (individual) or EIN (entity).** See General Instruction 12 and

definitions. If the subject named in Items 4 through 6 is a U.S. Citizen or an alien with a SSN, enter his or her SSN in Item 13. If that person is an alien who has an ITIN, enter that number. For an entity, enter the EIN. If the SSN, ITIN, or EIN was unknown or not applicable, enter "XX" in this item.

**Item 14 \*Date of birth.** See General Instruction 9. If the subject is an individual, enter the date of birth. If the month and/or day is not available or unknown, fill in with zeros (e.g., "01/00/1969" indicates an unknown date in January, 1969). If entire date is unknown, or if an entity, enter XX in the MM part of the date field.

**Item 15 Telephone number.** See General Instruction 10. Enter the U.S. home or business number for individual or entity. List foreign telephone numbers and any additional U.S. numbers (e.g., hotel, etc.) in Part VI.

#### Part II Suspicious Activity Information

**Item 16 \*Date or date range of suspicious activity.** See General Instruction 9. Enter the date of the reported suspicious activity in the "From" field. If more than one day is involved, indicate the duration of the activity by entering the first date in the "From" field and the last date in the "To" field.

**Item 17 \*Total dollar amount.** See General Instruction 14. If unknown, check box 17a. If the suspicious activity only involved purchases, or redemptions, or currency exchanges, enter the total U.S. Dollar value involved in the reported activity. For instance, if multiple money orders from more than one issuer were redeemed, enter the total of all money orders redeemed. If multiple activities are involved, such as a redemption of money orders combined with purchase of a money transfer, enter the largest activity amount in Item 17. For instance, if the transaction involved redeeming \$5,000 in money orders and purchase of a \$3,500 money transfer, the Item 17 amount would be \$5,000.

**Item 18 \*Category of suspicious activity.** Check the box(es) which best identifies the suspicious activity. Check box "b Structuring" when it appears that a person (acting alone, in conjunction with, or on behalf of other persons) conducts or attempts to conduct activity designed to evade any record keeping or reporting requirement of the Bank Secrecy Act. If box "z" is checked, specify the type of suspicious activity which occurred. Describe the character of such activity in Part VI. Box "z" should only be used if no other type of suspicious activity box adequately categorizes the transaction.

**Item 19 \*Financial services involved.** Check any of boxes "a" through "e" that apply to identify the services involved in the suspicious activity. If box "z" is checked, briefly explain the service on the following line. If "unusual use" is involved, check the appropriate service box(s) and box "z" and note "unusual use" and explain in Part VI. Check all of boxes "1" through "10" that apply to describe the character of the suspicious activity.

**Item 20 \*Purchases and redemptions** (See definition 6 on page 1 of the instructions). Enter information about purchases or redemptions of money orders, traveler's checks, or money transfers. Check the appropriate box in column "P" or "R" to identify the entry as a purchase or redemption. If reporting a money transfer(s) check "P" if subject is sending money and "R" if subject is receiving money. Enter the name of the issuer, the total number of instruments purchased or the total redeemed, and the total amount of the instruments. You can enter up to three issuers in each instrument category. If more than three issuers are involved, enter the information on the additional issuers in Part VI. The use of "XX" for unknown only applies if reporting on a particular transaction, i.e., "XX" should not be entered on non-reporting blank lines.

**Item 21 \*Currency Exchanges.** Record up to two currency exchanges made by the subject(s). Check the box "If bulk small currency" if a large number of small bills was used to pay for the currency exchange. Enter the name of the currency or type of monetary instrument used to pay for the exchange, and the two-letter code for the country that issued the currency. An example of this would be "Pesos" for the name of the currency and "MX" representing Mexico as issuer of the currency. Enter the name of the currency received in exchange and the two-digit code for the country that issued the currency. Enter the value of the exchange in U.S. Dollars. If there were more than two currency exchanges, enter the information about the additional exchanges in Part VI. The use of "XX" for unknown only applies if reporting a currency exchange, i.e., "XX" should not be entered on non-reporting blank lines.

#### Part III Transaction Location Information

**Item 22 Multiple selling and/or paying business locations.** Check the box if the reported activity occurred at multiple selling and/or paying business locations. Fill out as many Part III Transaction Location Information sections as necessary to record all locations. Attach the additional sections behind page 2 of the SAR-MSB.

**Item 23 Type of business location(s).** Check box "a" if this is the selling location where the customer purchases a money order(s) or traveler's check(s), or initiated a money transfer(s), or exchanged currency. Check box "b" if this is the paying location where the customer cashed a money order(s) or traveler's check(s) or received payment of a money transfer(s). Check box "c" if multiple transactions are reported and the business was both a selling and paying location for one or more transactions.

**Item 24 \*Legal name of business.** Enter the legal name of the business where the transactions took place.

**Item 25 Doing business as.** Enter the trade name by which the business is commonly known.

**Items 26-29, 32 \*Transaction location address.** Enter the transaction location address by following General Instructions 13 and 15.

**Item 30 \*EIN (entity) or SSN/ITIN (individual).** See General Instruction 12 and definitions. If the business identified in Item 24 has an EIN, enter that number in Item 30. If not, enter individual owner's SSN or ITIN.

**Item 31 \*Business telephone number.** See General Instruction 10. Enter the telephone number of the business listed in Item 24.

**Item 32 Country code.** Enter the 2-letter country code if not US.

**Item 33 Internal control/file number (if available).** Enter any internal file or report number assigned by the reporting institution to track this report. This information will act as an identification aid if contact is required.

#### Part IV Reporting Business Information

**Item 34** Check this box and go to Part V if the reporting business is the same as the Part III Transaction Location. If the reporting business is different, complete Part IV. **If item 34 is checked, leave items 35 through 44 blank and do not enter "XX" in these items.**

**Item 35 \*Legal name of business.** Enter the legal name of the reporting business.

**Item 36 Doing business as.** Enter the trade name by which the reporting business is commonly known (if other than the legal name).

**Items 37-40, 43 \*Reporting business address.** Enter the reporting business address by following General Instructions 13 and 15.

**Item 41 \*EIN (entity) or SSN/ITIN (individual).** See General Instruction 12 and definitions. If the business identified in Item 35 has an EIN, enter that number in Item 41. If not, enter individual owner's SSN or ITIN.

**Item 42 \*Business phone number.** Enter the telephone number of the reporting business. If the reporting business telephone number is a foreign telephone number, leave Item 42 blank and enter the number in the Part VI Narrative. See General Instruction 10.

**Item 43 Country code.** Enter the 2-letter country code if not US.

**Item 44 Internal control/file number (if available).** Enter any internal file or report number assigned by the reporting institution to track this report. This information will act as an identification aid if contact is required.

#### Part V Contact for Assistance

**Item \*45-- Designated contact office.** Enter the name of the office that the financial institution has designated to receive request for assistance with this report.

This office must have an individual knowledgeable of this report available during regular business hours.

**Item \*46--Phone number.** See General Instruction B10. Enter the work telephone number of the contact office.

**Item \*47--Date filed.** See General Instruction B9. Enter the date this report was filed. For electronic filing, it is the date that the report was e-filed using BSA Direct. For all other filers, it is the date the financial institution completed the final review and mailed/submitted the report to ECC-D.

**Item 48--Agency.** If this report is filed by an agency other than an MSB, such as a federal or state examiner, enter the name of the reporting agency in Item 48.

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

Enter a narrative describing all aspects of the suspicious activity not covered by form data items. See page 3 of the form for instructions on completing the narrative. If the initial Part VI narrative page is not sufficient, continue on plain bond paper and attach the additional pages after the initial narrative page. **Do not include charts or tables. Legal disclaimers will not be included in this narrative.**

#### Paperwork Reduction Act Notice

The purpose of this form is to provide an effective means for a money services business (MSB) to notify appropriate law enforcement agencies of suspicious transactions and activities that occur by, through, or at an MSB. This report is authorized by law, pursuant to authority contained in 31 U.S.C. 5318(g). Information collected on this report is confidential (31 U.S.C. 5318(g)). Federal regulatory agencies, State law enforcement agencies, the U.S. Departments of Justice and Treasury, and other authorized authorities may use and share this information. Public reporting and record keeping burden for this form is estimated to average 60 minutes per response, and includes time to gather and maintain information for the required report, review the instructions, and complete the information collection. Send comments regarding this burden estimate, including suggestions for reducing the burden, to the Office of Management and the Budget, Paperwork Reduction Project, Washington, DC 20503 and to the Financial Crimes Enforcement Network, Attn.: Paperwork Reduction Act, P.O. Box 39, Vienna VA 22183-0039. The agency may not conduct or sponsor, and an organization (or a person) is not required to respond to, a collection of information unless it displays a currently valid OMB control number.





## 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 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? Identify if any additional locations, beside the one in Part III of the SAR-MSB form, were involved.

**Why** do you think the activity is criminal or suspicious? 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 IRS Detroit Computing Center. IT must be kept at your business with your copy of the SAR-MSB for a minimum of 5 years.



---

## Example 1

The SAR-MSB is being filed on a suspect who sent three money transfers through MoneyGram in a way that seemed like it was intended to avoid identification and recordkeeping requirements.

On October 21, 2008 at about 10 a.m., the subject sent a money transfer to a receiver named James Doe. The destination city was Miami, FL. The amount of the transaction was \$890.

On the same day, at approximately 10:30 a.m., the subject sent another money transfer to a receiver named James Dean. The destination city was Miami, FL. The amount of the transaction was \$890.

On the same day, at approximately 1:30 p.m., the subject sent a third money transfer to a receiver named James Brown. The destination city was Miami, FL. The amount of the transaction was \$890.

These transactions were considered suspicious because MoneyGram requires the sender to provide identification at \$900. Each transaction was just below \$900. The subject used the same test question for each transaction. The test question was "How is the weather?" The answer to the test question was "Snow." All three transactions were conducted by the same employee, Jane Smith. Jane thought that the transactions were unusual and asked the subject why he was sending these transactions to Miami. The subject appeared to be very nervous and would not provide an answer. The subject has been a regular customer and had not conducted transactions that were unusual before.


We will continue to watch the subject's activity for any more suspicious transactions. We have the MoneyGram "Send Forms" for each transaction in our files.

## Example 2

The SAR-MSB is being filed on three suspects who received three money transfers in a way that seemed like it was intended to avoid identification and recordkeeping requirements.

On October 21, 2008, at about 3 p.m., subject James Doe received a money transfer for \$890. On the same day, at about 3:15 p.m., subject James Brown received a money transfer for \$890. Then, on the same day, at about 4 p.m., subject James Dean received a money transfer for \$890.

These transactions seemed suspicious because they were all sent by the same sender, John Doe, from Minneapolis, MN. All three transactions were under \$900, so no ID is required if the sender uses a test question. All the subjects had the same test question



and all the answers were the same too. All the subjects had similar addresses and they all had the same phone number.

We will continue to watch the subjects' future activity for any more suspicious transactions. We have the MoneyGram "Receive Forms" for each transaction and pictures of the three subjects in our files.

### **Example 3**

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. The \$10,000 threshold includes the total of the amount of the transaction and fees.

### **Examples of transactions that require a CTR are:**

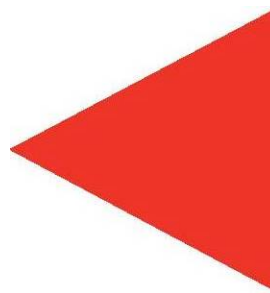
1. A customer receiving single or multiple MoneyGram money transfer transactions totaling more than \$10,000 in one (1) business day.
2. A customer sending single or multiple MoneyGram money transfer transactions totaling more than \$10,000 in one (1) business day.
3. A customer obtaining more than \$10,000 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 cash in one (1) business day.
5. A customer combining money order purchases and MoneyGram money transfer send transactions in one (1) business day for more than \$10,000.


**Note:** If you are aware that more than one (1) currency transaction has been conducted by the same customer or on behalf of the same customer, and the total amount is more than \$10,000 during the same business day, you should file a CTR.

*3rd 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 3rd 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 3rd 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:

**IRS Detroit Computing Center  
Attention: CTR  
PO Box 33604  
Detroit, MI 48232-5604**



FINCEN Form <b>104</b> (Formerly Form 4789) (Eff. December 2003) Department of the Treasury FinCEN		<b>Currency Transaction Report</b> ▶ Previous editions will not be accepted after August 31, 2004. ▶ Please type or print. (Complete all parts that apply--See Instructions)			 OMB No. 1506-0004	
1 Check all box(es) that apply:    a <input type="checkbox"/> Amends prior report    b <input type="checkbox"/> Multiple persons    c <input checked="" type="checkbox"/> Multiple transactions						
<b>Part I Person(s) Involved in Transaction(s)</b>						
<b>Section A--Person(s) on Whose Behalf Transaction(s) Is Conducted</b>						
2 Individual's last name or entity's name <b>Doe</b>			3 First name <b>John</b>		4 Middle initial <b>A</b>	
5 Doing business as (DBA)				6 SSN or EIN 1 2 3 4 5 6 7 8 9		
7 Address (number, street, and apt. or suite no.) <b>456 Side Street</b>				8 Date of birth <b>06/01/1955</b>		
9 City <b>Anytown</b>		10 State <b>M N</b>	11 ZIP code <b>55000</b>	12 Country code (if not U.S.)	13 Occupation, profession, or business <b>Paint Store Manager</b>	
14 If an individual, describe method used to verify identity:    a <input checked="" type="checkbox"/> Driver's license/State I.D.    b <input type="checkbox"/> Passport    c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other _____    e Issued by: <b>MN</b> f Number: <b>D456-789-001-002</b>						
<b>Section B--Individual(s) Conducting Transaction(s) (if other than above).</b> If Section B is left blank or incomplete, check the box(es) below to indicate the reason(s)						
a <input type="checkbox"/> Armored Car Service    b <input type="checkbox"/> Mail Deposit or Shipment    c <input type="checkbox"/> Night Deposit or Automated Teller Machine    d <input type="checkbox"/> Multiple Transactions    e <input checked="" type="checkbox"/> Conducted On Own Behalf						
15 Individual's last name			16 First name		17 Middle initial	
18 Address (number, street, and apt. or suite no.)				19 SSN		
20 City		21 State	22 ZIP code	23 Country code (if not U.S.)	24 Date of birth MM DD YYYY	
25 If an individual, describe method used to verify identity:    a <input type="checkbox"/> Driver's license/State I.D.    b <input type="checkbox"/> Passport    c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other _____    e Issued by: _____    f Number: _____						
<b>Part II Amount and Type of Transaction(s). Check all boxes that apply.</b>						
26 Total cash in \$ <b>13045.00</b>		27 Total cash out \$ <b>0.00</b>		28 Date of transaction <b>01/03/2009</b>		
26a Foreign cash in <b>0.00</b> <small>(see instructions, page 4)</small>		27a Foreign cash out <b>0.00</b> <small>(see instructions, page 4)</small>				
29 <input type="checkbox"/> Foreign Country _____		30 <input checked="" type="checkbox"/> Wire Transfer(s)		31 <input checked="" type="checkbox"/> Negotiable Instrument(s) Purchased		
32 <input type="checkbox"/> Negotiable Instrument(s) Cashed		33 <input type="checkbox"/> Currency Exchange(s)		34 <input type="checkbox"/> Deposit(s)/Withdrawal(s)		
35 <input type="checkbox"/> Account Number(s) Affected (if any): _____ _____		36 <input type="checkbox"/> Other (specify) _____ _____				
<b>Part III Financial Institution Where Transaction(s) Takes Place</b>						
37 Name of financial institution <b>AB Market</b>				Enter Regulator or BSA Examiner code number (see instructions) ▶ <b>7</b>		
38 Address (number, street, and apt. or suite no.) <b>123 Main Street</b>				39 EIN or SSN <b>0 1 5 5 7 8 7 8 7</b>		
40 City <b>Anytown</b>		41 State <b>M N</b>	42 ZIP code <b>55000</b>	43 Routing (MICR) number _____		
<b>Sign Here ▶</b>	44 Title of approving official <b>Owner</b>		45 Signature of approving official <i>Edward Smith</i>		46 Date of signature <b>01/03/2009</b>	
	47 Type or print preparer's name <b>Edward Smith</b>		48 Type or print name of person to contact <b>Edward Smith</b>		49 Telephone number <b>(6 1 2) 5 5 5 - 0 1 0 1</b>	
▶ For Paperwork Reduction Act Notice, see page 4.    Cat. No. 37683N    FinCEN Form 104 (Formerly Form 4789) (Rev. 08-03)						

### Multiple Persons

Complete applicable parts below if box 1b on page 1 is checked

**Part I Person(s) Involved in Transaction(s)**

**Section A--Person(s) on Whose Behalf Transaction(s) Is Conducted**

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 birth MM / DD / YYYY		
9 City	10 State	11 ZIP code	12 Country code (if not U.S.)		13 Occupation, profession, or business			
14 If an individual, describe method used to verify identity: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> 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 		
20 City	21 State	22 ZIP code	23 Country code (if not U.S.)		24 Date of birth	MM / DD / YYYY		
25 If an individual, describe method used to verify identity: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other _____ e Issued by: _____ f Number: _____								

**Part I Person(s) Involved in Transaction(s)**

**Section A--Person(s) on Whose Behalf Transaction(s) Is Conducted**

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 birth MM / DD / YYYY		
9 City	10 State	11 ZIP code	12 Country code (if not U.S.)		13 Occupation, profession, or business			
14 If an individual, describe method used to verify identity: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> 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 		
20 City	21 State	22 ZIP code	23 Country code (if not U.S.)		24 Date of birth	MM / DD / YYYY		
25 If an individual, describe method used to verify identity: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other _____ e Issued by: _____ f Number: _____								

**Suspicious Transactions**

This Currency Transaction Report (CTR) should NOT be filed for suspicious transactions involving \$10,000 or less in currency OR to note that a transaction of more than \$10,000 is suspicious. Any suspicious or unusual activity should be reported by a financial institution in the manner prescribed by its appropriate federal regulator or BSA examiner. (See the instructions for Item 37). If a transaction is suspicious and in excess of \$10,000 in currency, then both a CTR and the appropriate Suspicious Activity Report form must be filed.

In situations involving suspicious transactions requiring immediate attention, such as when a reportable transaction is ongoing, the financial institution shall immediately notify, by telephone, appropriate law enforcement and regulatory authorities in addition to filing a timely suspicious activity report.

**General Instructions**

**Who Must File.** Each financial institution (other than a casino, which instead must file FinCEN Form 103, and the U.S. Postal Service for which there are separate rules) must file FinCEN Form 104 (CTR) for each deposit, withdrawal, exchange of currency, or other payment or transfer, by, through, or to the financial institution which involves a transaction in currency of more than \$10,000. Multiple transactions must be treated as a single transaction if the financial institution has knowledge that (1) they are by or on behalf of the same person, and (2) they result in either currency received (Cash In) or currency disbursed (Cash Out) by the financial institution totaling more than \$10,000 during any one business day. For a bank, a business day is the day on which transactions are routinely posted to customers' accounts, as normally communicated to depository customers. For all other financial institutions, a business day is a calendar day.

Generally, financial institutions are defined as banks, other types of depository institutions, brokers or dealers in securities, money transmitters, currency exchangers, check cashers, and issuers and sellers of money orders and traveler's checks. Should you have questions, see the definitions in 31 CFR Part 103.

**When and Where To File.** This form should be e-filed through the Bank Secrecy Act E-filing System. Go to <http://bsaeiling.fincen.treas.gov/index.jsp> to register. This form is also available for download on the Financial Crimes Enforcement Network's Web site at [www.fincen.gov](http://www.fincen.gov), or may be ordered by calling the IRS Forms Distribution Center at (800) 829-3676. File this CTR by the 15th calendar day after the day of the transaction with the:

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

Keep a copy of each CTR for five years from the date filed.

A financial institution may apply to file the CTRs magnetically. To obtain an application to file magnetically, write to the:

IRS Detroit Computing Center  
ATTN: CTR Magnetic Media Coordinator  
P.O. Box 33604  
Detroit, MI 48232-5604

**Identification Requirements.** All individuals (except a employee of armored car services) conducting a reportable transaction(s) for themselves or for another person, must be identified by means of an official

document(s). Acceptable forms of identification include driver's license, military and military/dependent identification cards, passport, state issued identification card, cedular card (foreign), non-resident alien identification cards, or any other identification document or documents, which contain name and preferably address and a photograph and are normally acceptable by financial institutions as a means of identification when cashing checks for persons other than established customers.

Acceptable identification information obtained previously and maintained in the financial institution's records may be used. For example, if documents verifying an individual's identity were examined and recorded on a signature card when an account was opened, the financial institution may rely on that information. In completing the CTR, the financial institution must indicate on the form the method, type, and number of the identification. Statements such as "known customer" or "signature card on file" are not sufficient for form completion.

**Penalties.** Civil and criminal penalties are provided for failure to file a CTR or to supply information or for filing a false or fraudulent CTR. See 31 U.S.C. 5321, 5322 and 5324.

**For purposes of this CTR, the terms below have the following meanings:**

**Currency.** The coin and paper money of the United States or any other country, which is circulated and customarily used and accepted as money.

**Person.** An individual, corporation, partnership, trust or estate, joint stock company, association, syndicate, joint venture or other unincorporated organization or group.

**Organization.** Entity other than an individual.

**Transaction in Currency.** The physical transfer of currency from one person to another. This does not include a transfer of funds by means of bank check, bank draft, wire transfer or other written order that does not involve the physical transfer of currency.

**Negotiable Instruments.** All checks and drafts (including business, personal, bank, cashier's and third-party), money orders, and promissory notes. For purposes of this CTR, all traveler's checks shall also be considered negotiable instruments whether or not they are in bearer form.

**Foreign exchange rate.** If foreign currency is a part of a currency transaction that requires the completion of a CTR, use the exchange rate in effect for the business day of the transaction to compute the amount, in US dollars, to enter in item 26/27. The source of the exchange rate that is used will be determined by the reporting institution.

**Specific Instructions**

Because of the limited space on the front and back of the CTR, it may be necessary to submit additional information on attached sheets. Submit this additional information on plain paper attached to the CTR. Be sure to put the individual's or entity's name and identifying number (items 2, 3, 4, and 6 of the CTR) on any additional sheets so that if it becomes separated, it may be associated with the CTR.

**Item 1a. Amends Prior Report.** If this CTR is being filed because it amends a report filed previously, check Item 1a. Staple a copy of the original CTR to the amended one, complete Part III fully and only those other entries which are being amended.

**Item 1b. Multiple Persons.** If this transaction is being conducted by more than one person or on behalf of more than one person, check Item 1b. Enter information in Part I for one of the persons and provide information on any other persons on the back of the CTR.

**Item 1c. Multiple Transactions.** If the financial institution has knowledge that there are multiple transactions, check Item 1c.

**PART I - Person(s) Involved in Transaction(s)**

Section A must be completed. If an individual conducts a transaction on his own behalf, complete Section A and leave Section "B" BLANK. If an individual conducts a transaction on his own behalf and on behalf of another person(s), complete Section "A" for each person and leave Section "B" BLANK. If an individual conducts a transaction on behalf of another person(s), complete Section "B" for the individual conducting the transaction, and complete Section "A" for each person on whose behalf the transaction is conducted of whom the financial institution has knowledge.

**Section A. Person(s) on Whose Behalf Transaction(s) Is Conducted.** See instructions above.

**Items 2, 3, and 4. Individual/Organization Name.** If the person on whose behalf the transaction(s) is conducted is an individual, put his/her last name in Item 2, first name in Item 3, and middle initial in Item 4. If there is no middle initial, leave item 4 BLANK. If the transaction is conducted on behalf of an entity, enter the name in Item 2 and leave Items 3 and 4 BLANK.

**Item 5. Doing Business As (DBA).** If the financial institution has knowledge of a separate "doing business as" name, enter it in Item 5. For example, if Smith Enterprise is doing business as MJ's Pizza, enter "MJ's Pizza" in item 5.

**Item 6. SSN or EIN.** Enter the Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN) or Employer Identification Number (EIN) of the person or entity identified in Item 2. If none, write NONE.

**Items 7, 9, 10, 11, and 12. Address.** Enter the permanent address including ZIP Code of the person identified in Item 2. Use the U.S. Postal Service's two letter state abbreviation code. A P. O. Box should not be used by itself, and may only be used if there is no street address. If a P. O. Box is used, the name of the apartment or suite number, road or route number where the person resides must also be provided. If the address is outside the U.S., provide the street address, city, province or state, postal code (if known), and the two letter country code. For country code list go to [www.fincen.gov/reg\\_bsaforms.html](http://www.fincen.gov/reg_bsaforms.html) or telephone 800-949-2732 and select option number 5. If U.S., leave item 12 blank.

**Item 8. Date of Birth.** Enter the date of birth. Eight numerals must be inserted for each date. The first two will reflect the month, the second two the day, and the last four the year. A zero (0) should precede any single digit number. For example, if an individual's birth date is April 3 1948, Item 8 should read 04 03 1948.

**Item 13. Occupation, profession, or business.** If known, identify the occupation, profession or business that best describes the individual or entity in Part I (e.g., attorney, car dealer, carpenter, doctor, farmer, plumber, truck driver, etc.). Do not use nondescript terms such as businessman, merchant, store owner (unless store's name is provided), or self employed. If unemployed, or retired are used enter the regular or former occupation if known.

**Item 14. If an Individual, Describe Method Used To Verify Identity.** If an individual conducts the transaction(s) on his/her own behalf, his/her identity must be verified by examination of an acceptable document (see **General Instructions**). For example, check box a if a driver's license is used to verify an individual's identity, and enter the state that issued the license and the number in items e and f. If the transaction is conducted by an individual on behalf of another individual not present, or on behalf of an entity, check box "14d" "Other" and enter "NA" on the line provided.

**Section B. Individual(s) Conducting Transaction(s) (if other than above).** Financial institutions should enter as much information as is available. However, there may be instances in which Items 15-25 may be left BLANK or incomplete. If Items 15-25 are left BLANK or incomplete, check one or more of the boxes provided to indicate the reasons.

**Example:** If there are multiple transactions that, if only when aggregated, the financial institution has knowledge the transactions exceed the reporting threshold, and therefore, did not identify the transaction(s), check box d for Multiple Transactions.

**Items 15, 16, and 17. Individual's Name.** Complete these items if an individual conducts a transaction(s) on behalf of another person. For example, if John Doe, an employee of XY Grocery Store, makes a deposit to the store's account, XY Grocery Store should be identified in Section A and John Doe should be identified in section B.

**Items 18, 20, 21, 22, and 23. Address.** Enter the permanent street address including ZIP Code of the individual. (See the instructions for Items 7 and 9 through 12.) Enter country code if not U.S. (Reference item 12).

**Item 19. SSN/ITIN.** If the individual has a Social Security Number, or Individual Taxpayer Identification Number, enter it in Item 19. If the individual does not have an SSN/ITIN, enter NONE.

**Item 24. Date of Birth.** Enter the individual's date of birth. (See the instructions for Item 8.)

**Item 25. If an Individual, Describe Method Used To Verify Identity.** Enter the method used to identify the individual's identity. (See **General Instructions** and the instructions for Item 14.)

**PART II - Amount and Type of Transaction(s)**  
Complete Part II to identify the type of transaction(s) and the amount(s) involved.

**Items 26 and 27. Total Cash In/Total Cash Out.** In the spaces provided, enter the total amount of currency received (Total Cash In) or total currency disbursed (Total Cash Out) by the financial institution. If foreign currency is exchanged, use the U.S. dollar equivalent on the day of the transaction (See "Foreign exchange rates"), and complete item 26a or 27a, whichever is appropriate.

If less than a full dollar amount is involved, increase that figure to the next highest dollar. For example, if the currency totals \$20,000.05, show the total as \$20,001.00.

**Items 26a and 27a. Foreign cash in/Foreign cash out.** If foreign currency is exchanged, enter the amount of foreign currency (Do not convert to U.S. dollars) in items 26a and 27a. Report country of origin in item 29.

**Item 28. Date of Transaction.** Insert eight numerals for each date. (See instructions for Item 8.)

**Item 29. Foreign Country.** If items 26a and/or 27a are completed indicating that foreign currency is involved, check Item 29 and identify the country. If multiple foreign currencies are involved, check box 36 and identify the additional country(s) and/or currency(s) involved.

**Determining Whether Transactions Meet the Reporting Threshold.**

Only cash transactions that, if alone or when aggregated, exceed \$10,000 should be reported on the CTR. Transactions shall not be offset against one another.

If there are both Cash In and Cash Out transactions that are reportable, the amounts should be considered separately and not aggregated. However, they may be reported on a single CTR.

If there is a currency exchange, it should be aggregated separately with each of the Cash In and Cash Out totals.

**Example 1:** A person deposits \$11,000 in currency to his savings account and withdraws \$3,000 in currency from his checking account. The CTR should be completed as follows:

Cash In \$11,000 and no entry for Cash Out. This is because the \$3,000 transaction does not meet the reporting threshold.

**Example 2:** A person deposits \$11,000 in currency to his savings account and withdraws \$12,000 in currency from his checking account. The CTR should be completed as follows:

Cash In \$11,000, Cash Out \$12,000. This is because there are two reportable transactions. However, one CTR may be filed to reflect both.

**Example 3:** A person deposits \$6,000 in currency to his savings account and withdraws \$4,000 in currency from his checking account. Further, he presents \$5,000 in currency to be exchanged for the equivalent in Euro's. The CTR should be completed as follows:

Cash In \$11,000 and no entry for Cash Out. This is because in determining whether the transactions are reportable, the currency exchange is aggregated with each of the Cash In and Cash Out amounts. The result is a reportable \$11,000 Cash In transaction. The total Cash Out amount is \$9,000, which does not meet the reporting threshold. Therefore, it is not entered on the CTR.

**Example 4:** A person deposits \$6,000 in currency to his savings account and withdraws \$7,000 in currency from his checking account. Further, he presents \$5,000 in currency to be exchanged for the equivalent in Euro's. The CTR should be completed as follows:

Cash In \$11,000, Cash Out \$12,000. This is because in determining whether the transactions are reportable, the currency exchange is aggregated with each of the Cash In and Cash Out amounts. In this example, each of the Cash In and Cash Out totals exceed \$10,000 and must be reflected on the CTR.

**Items 30-33.** Check the appropriate item(s) to identify the following type of transaction(s):

- 30. Wire Transfer(s)
- 31. Negotiable Instrument(s) Purchased
- 32. Negotiable Instrument(s) Cashed
- 33. Currency Exchange(s)

**Item 34. Deposits/Withdrawals.** Check this item to identify deposits to or withdrawals from accounts, e.g. demand deposit accounts, savings accounts, time deposits, mutual fund accounts, or any other account held at the financial institution. Enter the account number(s) in Item 35.

**Item 35. Account Numbers Affected (if any).** Enter the account numbers of any accounts affected by the transactions that are maintained at the financial institution conducting the transaction(s).

**Example 1:** If a person cashes a check drawn on an account held at the financial institution, the CTR should be completed as follows:

Indicate negotiable instrument(s) cashed and provide the account number of the check.

If the transaction does not affect an account, make no entry.

**Example 2:** A person cashes a check drawn on another financial institution. In this instance, negotiable instrument(s) cashed would be indicated, but no account at the financial institution has been affected. Therefore, Item 35 should be left BLANK.

**Item 36. Other (specify).** If a transaction is not identified in Items 30-34, check Item 36 and provide an additional description. For example, a person presents a check to purchase "foreign currency." If multiple (more than one) foreign currencies are involved in the transaction, enter the amount of the largest foreign currency transaction in item 26a or 27a and that currency's country-code of origin in item 29. Then check box 36 and enter the additional foreign currencies amount(s) and country-code(s) of origin in the space provided.

**PART III - Financial Institution Where Transaction(s) Take Place**

**Item 37. Name of Financial Institution and Identity of Regulator or BSA Examiner.** Enter the financial institution's full legal name and identify the regulator or BSA examiner, using the following codes:

Regulator or BSA Examiner	CODE
Comptroller of the Currency (OCC).....	1
Federal Deposit Insurance Corporation (FDIC).....	2
Federal Reserve System (FRS).....	3
Office of Thrift Supervision (OTS).....	4
National Credit Union Administration (NCUA).....	5
Securities and Exchange Commission (SEC).....	6
Internal Revenue Service (IRS).....	7
U.S. Postal Service (USPS).....	8
Commodity Futures Trading Commission (CFTC).....	9
State Regulator.....	10

**Items 38, 40, 41, and 42. Address.** Enter the street address, city, state, and ZIP Code of the financial institution where the transaction occurred. If there are multiple transactions, provide information of the office or branch where any one of the transactions has occurred.

**Item 39. EIN or SSN.** Enter the financial institution's EIN. If the financial institution does not have an EIN, enter the SSN of the financial institution's principal owner.

**Item 43. Routing (MICR) Number.** If a depository institution, enter the routing (Magnetic Ink Character Recognition (MICR)) number.

**SIGNATURE**

**Items 44 and 45. Title and signature of Approving Official.** The official who reviews and approves the CTR must indicate his/her title and sign the CTR.

**Item 46. Date of Signature.** The approving official must enter the date the CTR is signed. (See the instructions for Item 8.)

**Item 47. Preparer's Name.** Type or print the full name of the individual preparing the CTR. The preparer and the approving official may not necessarily be the same individual.

**Items 48 and 49. Contact Person/Telephone Number.** Type or print the name and telephone number of an individual to contact concerning questions about the CTR.

**Paperwork Reduction Act Notice.** The requested information is useful in criminal, tax, and regulatory investigations and proceedings. Financial institutions are required to provide the information under 31 U.S.C. 5313 and 31 CFR Part 103, commonly referred to as the Bank Secrecy Act (BSA). The BSA is administered by the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN). You are not required to provide the requested information unless a form displays a valid OMB control number. The time needed to complete this form will vary depending on individual circumstances. The estimated average time is 19 minutes. If you have comments concerning the accuracy of this time estimate or suggestions for making this form simpler, you may write to the **Financial Crimes Enforcement Network, P. O. Box 39, Vienna, VA 22183. Do not send this form to this office. Instead, see When and Where to File** in the instructions.





## Recordkeeping for Money Orders

### Money Order Transaction Log

If a customer purchases money orders in one (1) or more transactions throughout the same business day with cash in the amount of \$3,000 to \$10,000, 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 valid, government issued photo identification such as a driver's license that contains the customer's name and address.

*3<sup>rd</sup> Party Information. If the customer who is conducting the transaction is going 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.*

## MONEY ORDER TRANSACTION LOG

Use this log to record consumer information for cash money order sales 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.

AB Market  
Store Name

John Doe  
Purchaser's Name

123 Main Street  
Street Address

456 Side Street  
Street Address

Anytown, MN 55000  
City, State, Zip

Anytown, MN 55000  
City, State, Zip

Money order are purchased:

For Purchaser's Use

01/12/2009  
Date of Purchase

- On behalf of another person  
 (List other person's name, address, social security #, or alien I.D. #, and taxpayers I.D. # on the back of this form)

Paint Store Manager  
Purchaser's Specific Occupation

123-45-6789  
Purchaser's Social Security Number  
(or Alien I.D. Number)

06-01-55  
Purchaser Date of Birth

Purchaser's Driver License Number D-456-789-001-002 State MN

Other Identification \_\_\_\_\_

I.D. Positively Verified Jim Davis  
(Name of Store Employee)

**Note: Purchaser's address must be listed on the ID and must match address listed above**

DOLLAR AMOUNT \$4,000

TRANSACTION(S):

SERIAL NUMBER 801456001 AMOUNT 500 | SERIAL NUMBER 801456007 AMOUNT 500

SERIAL NUMBER 801456002 AMOUNT 500 | SERIAL NUMBER 801456008 AMOUNT 500

SERIAL NUMBER 801456003 AMOUNT 500 | SERIAL NUMBER \_\_\_\_\_ AMOUNT \_\_\_\_\_

SERIAL NUMBER 801456004 AMOUNT 500 | SERIAL NUMBER \_\_\_\_\_ AMOUNT \_\_\_\_\_

SERIAL NUMBER 801456005 AMOUNT 500 | SERIAL NUMBER \_\_\_\_\_ AMOUNT \_\_\_\_\_

SERIAL NUMBER 801456006 AMOUNT 500 | SERIAL NUMBER \_\_\_\_\_ AMOUNT \_\_\_\_\_

John Doe  
Purchaser's Signature

\* **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.



## Recordkeeping for MoneyGram Money Transfer

If a customer “sends” or “receives” a money transfer of \$3,000 or more, certain information must be recorded on the MoneyGram money transfer form. It does not matter whether the customer pays by cash, check, credit card, etc.

All of the information must be recorded before the transaction is completed. The customer must have valid photo identification such as a driver’s license, passport or alien identification card.

*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.*

**SEND/ENVIO**

PLEASE COMPLETE IN CAPITAL LETTERS/POR FAVOR UTILICE LETRAS MAYÚSCULAS

**MONEYGRAM REWARDS CARD NUMBER**  
 NÚMERO DE TARJETA DE MONEYGRAM 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. / \*Solicite al agente su inscripción en MoneyGram Rewards™ y comience a recibir recompensas de inmediato. MoneyGram puede utilizar la información suministrada en este formulario para enviarle más información a los miembros de MoneyGram Rewards™.

**DESTINATION/LUGAR DE DESTINO**

**Receive Country** País Receptor: ITALY  
**City** Ciudad: ROME  
 NOTE: A Transfer can be picked up in any Location in the Receive Country. If acting on behalf of another person or company and sending a Transfer in excess of \$3,000, additional information must be supplied to the Agent. / NOTA: Las transferencias pueden retirarse en cualquier lugar del país receptor. Si actúa en nombre de otra persona o empresa y envía una transferencia que supere los \$3,000, se deberá suministrar información adicional al agente.

**RECEIVER/RECEPTOR**

**First Name** Primer Nombre: JUAN  
**Middle Name** Segundo Nombre:  
**Last Name** Apellido: MENDOZA  
**Second Last Name** Segundo apellido:

**TRANSACTION/TRANSACCIÓN**

**Amount to be Sent** Monto a enviar: 4,000 - Agent must provide additional information on this form for transactions of \$900 or more. / El agente debe incluir información adicional en este formulario si la transacción supera los \$900.  
**Message** Mensaje:  
**Test Question** Not available on transactions of \$900 or more. / Pregunta de prueba No disponible para transacciones de \$900 o más.  
**Test Answer** Respuesta De Clave:

**RECEIVE OPTIONS/OPCIONES DE RECEPCIÓN**

(If no option is selected, transaction will be available at a MoneyGram Agent) / (Si no se selecciona ninguna opción, la transacción estará disponible en un Agente de MoneyGram)

**MoneyGram Location** Sucursal de MoneyGram\*  
 **Account Deposit** Depósito en cuenta  
 **Card Deposit** Depósito en tarjeta  
 **Home Delivery** Entrega a domicilio  
 Options above only available in selected countries. / Las opciones anteriores están disponibles únicamente en ciertos países.  
**Additional Receiver Information** / Información adicional del receptor.  
 If information has not already been provided to MoneyGram, Si la información no se ha suministrado aún a MoneyGram.

**Registration Number (RRN)**  
 Número de registro (RRN)

**SENDER/EMISOR**

Required information if not including Rewards Card Number / Información requerida si no se incluye el Número de tarjeta de Rewards

**First Name** Primer Nombre: JOHN  
**Middle Name** Segundo Nombre: A  
**Last Name** Apellido: DOE  
**Address** Dirección: 456 SIDE STREET  
**Town/City** Pueblo/Ciudad: ANYTOWN  
**State** Estado: MN **Zip Code** C.P.: 55000  
**Country** País: US  
**Telephone Number** Teléfono: 612-555-5555  
 Include area code / Incluir código del área

**SIGNATURE/FIRMA**

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.

**Sender's Signature** Firma del emisor: John Doe  
**Date** Fecha: 12/01/2009



**AGENT USE ONLY/USO EXCLUSIVO DEL AGENTE**

**Office Name** Sello: AB MARKET

<b>Amount Sent</b> Monto enviado	4000 -
<b>Consumer Fee</b> Tarifa al consumidor	160 -
<b>Total to be Collected</b> Total a cobrar	4160 -

**Receive Information** Información de recepción

Complete this once the transaction has been sent: / Completar únicamente después de enviar la transacción:

**Receive Currency** Moneda de la recepción: E EURO

Note to Sender: Even though the Amount to be Received is stated in US Dollars, the Transfer may be paid out in another currency if the Location selected by the Receiver does not pay out in US Dollars. In that event, the currency exchange rate will be set at the time the Receiver receives the Transfer in the foreign country. See the Terms & Conditions for more information. / Nota para el remitente: Aunque el monto a recibir está expresado en Dólares de los Estados Unidos, la transferencia puede ser pagada en cualquier otra moneda si la Agencia seleccionada por el Destinatario no tiene pago en Dólares. En tal caso, la tasa de cambio de la moneda a pagar será establecida en el momento en que el Destinatario recibe la transferencia en el país extranjero. Ver la sección de Términos y Condiciones para mayor información.

**Exchange Rate** Tasa de cambio: .736148

Exchange Rate (If the Amount to be Received is stated below is in US Dollars or Euro, any Exchange Rate stated above may be inapplicable.) / Tipo de Cambio (Si la Cantidad que Recibirán indicada abajo se refleja en dólares estadounidenses o Euro, cualquier tipo de cambio indicado arriba podrá ser inaplicable.)

**Amount to be Received** Monto a recibir: 2944.60

**Reference No.** / Número de referencia: 12428375

**PHONE CALL PIN NUMBER/NÚMERO DE CÓDIGO PARA LLAMADA**

See reverse side for complete instructions. / Vea al reverso para instrucciones completas.

Agent Employee Name / Nombre del Empleado del Agente: LS

MoneyGram Operator # / Número del Operador de MoneyGram: 555

www.moneygram.com

CUSTOMER COPY/COPIA PARA EL CLIENTE

7409G MG5001SUS LOYAL (Rev 02/08)

**Transfers of \$900 or more**  
**Envíos de EE.UU \$900 dólares o más**

FOR AGENT USE  
 Para uso del agente



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 envío de EE.UU \$900 dólares o más y debe ser llenada por el agente.

**COMPLETE FOR ALL TRANSFERS OF \$900 OR MORE.**  
**COMPLETAR PARA TRANSACCIONES de EE.UU \$900 DOLARAES O MÁS.**

DRIVER'S LICENSE  
 ID Type / Tipo de identificación

D-456-789-001-002  
 Sender's government issued ID#. / Identificación emitida por el gobierno, del remitente

MN  
 Issuer / Emisor

**COMPLETE FOR ALL TRANSFERS OF \$3000 OR MORE.**  
**COMPLETAR PARA TRANSACCIONES de EE.UU \$3000 DOLARAES O MÁS.**

06-01-55  
 Date of Birth / Fecha de nacimiento

PAINT STORE MANAGER  
 Occupation - Type of business / Ocupación - Tipo de Negocio

**U.S. citizens and residents / Ciudadanos y residentes Estadounidenses**

123-45-6789  
 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 de Pasaporte

\_\_\_\_\_  
 Country of Issuance / País emisor

**ADDITIONAL INFORMATION MAY BE REQUIRED ABOVE \$10,000.**  
**SE PUEDE REQUERIR INFORMACIÓN ADICIONAL EN ENVÍOS MAYORES de EE.UU \$10,000 DOLARAES O MÁS.**

**If sending for someone else, complete the following information on that person or organization. / Si está enviando dinero en representación de otra persona, complete la siguiente información de la persona u organización.**

\_\_\_\_\_  
 First Name, Middle Name, Last Name / Primer Nombre, Segundo Nombre, Apellido

\_\_\_\_\_  
 Organization Name / Organización

_____ Address Dirección	_____ City Ciudad	_____ State Estado	_____ Zip C.P.
-------------------------------	-------------------------	--------------------------	----------------------

\_\_\_\_\_  
 Date of Birth / Fecha de nacimiento

\_\_\_\_\_  
 Occupation - Type of business / Ocupación - Tipo de Negocio

**U.S. Citizens, Residents or U.S. Businesses / Ciudadanos, Residentes o Negocios Americanos**

\_\_\_\_\_  
 Social Security # or Tax ID # / Número de Seguro Social o Número de Renta

OR, IF NO SS# / O, A FALTA DEL NÚMERO DE SEGURO SOCIAL

\_\_\_\_\_  
 Alien ID # OR Passport # / Número de tarjeta de residente o Número de Pasaporte

\_\_\_\_\_  
 Country of Issuance / País emisor

**For Banks, Savings and Loans and Credit Unions Only.**  
**Para uso de bancos cajas de ahorro y otras entidades bancarias solamente.**

\_\_\_\_\_  
 Sender's Account # / Cuenta del remitente

AGENT MUST RETAIN THIS FORM ON-SITE FOR A MINIMUM OF FIVE (5) YEARS FOR AMOUNTS OF \$3000 OR MORE, OR SIX (6) MONTHS FOR AMOUNTS LESS THAN \$3000. EL AGENTE DEBERÁ CONSERVAR ESTA FORMA EN SU ESTABLECIMIENTO POR UN MÍNIMO DE CINCO (5) AÑOS PARA CANTIDADES de EE.UU \$3000 DOLARAES O MÁS, O POR SEIS (6) MESES PARA CANTIDADES MENORES de EE.UU \$3000 DOLARAES O MÁS.

**RECEIVE / RECIBO**



**CUSTOMER USE / PARA USO DEL CLIENTE**

REFERENCE NUMBER / NÚMERO DE REFERENCIA: 1 2 3 4 5 6 5 4

RECEIVER'S NAME: LA PERSONA QUE RECIBE:  
**JOHN A. DOE**  
 First Name / Primer Nombre Middle Initial / Inicial Last Name / Apellido(s)

456 SIDE STREET  
 Street / Calle

ANYTOWN MN 55000 612-555-5555  
 City Estado Zip C.P. Home Phone Teléfono

SENDER'S PHONE NUMBER: NÚMERO DE TELÉFONO DE LA PERSONA QUE ENVIÁ:  
(612) 555-1111

SENDER'S NAME: LA PERSONA QUE ENVIÁ:  
JANE DOE

RECEIVE AMOUNT: CANTIDAD A RECIBIR:  
\$ 4,000

Agent must complete the reverse side of this form for transactions of \$3000.00 or more. El Agente tiene que llenar el otro lado de este documento para transacciones de \$3000.00 o más.

What city and state was transaction sent from? ¿Desde que ciudad y estado se envió la transacción?  
FAIRTOWN, MN

RECEIVER'S SIGNATURE: FIRMA DE LA PERSONA QUE RECIBE:  
John Doe 1-12-09  
 Date / Fecha

I acknowledge receipt of payment in full of the MoneyGram money transfer as provided above. Admito haber recibido la transacción de MoneyGram como se indica en este recibo.

**AGENT USE / PARA USO DEL AGENTE**

MN DL D-456-789-001-002  
 RECEIVER GOVERNMENT ISSUED ID# AND TYPE: NÚMERO IDENTIFICACIÓN EMITIDO POR EL GOBIERNO, DE LA PERSONA QUE RECIBE Y TIPO:

TEST QUESTION: PREGUNTA DE PRUEBA:

Test Question / Pregunta de prueba

Test Answer / Respuesta de prueba

MESSAGE / MENSAJE:

CHECK NUMBER: NÚMERO DE CHEQUE: 24-1112223334

Check #1 Agent Check / Cheque del Agente      Check #2 Customer Check / Cheque del Cliente

CHECK AMOUNT: CANTIDAD DE CHEQUE: \$ 4,000      \$

AUTHORIZATION: AUTORIZACIÓN:

LS      555

Agent Employee Name / Nombre del empleado del Agente      MoneyGram Operator # / Número de operador de MoneyGram

**Receives of \$3000.00 or more  
Recibos de \$3000.00 o más**

FOR AGENT USE  
Para uso del Agente



This information is required for any **Receive transaction or combination of transactions of \$3000.00 or more** and must be completed by the Agent. Esta forma junto con la forma de Recibos es requerida en toda transacción para envío por encima de los \$3000.00. Debe ser completada por el Agente.

**COMPLETE FOR RECEIVE TRANSACTIONS OF \$3000.00 US OR MORE.  
COMPLETAR EN TRANSACCIONES DE RECIBOS DE \$3000.00 O MÁS.**

06-01-55

Date of Birth / Fecha de nacimiento

PAINT STORE MANAGER

Occupation - Type of Business / Profesión - Tipo de Negocio

123-45-6789

Social Security# / Número de Seguro Social  
(US citizens and residents) / (Ciudadanos y residentes Americanos)

**OR, IF NO SS# / SI NO SS#**

Alien ID # OR Passport # / Número de tarjeta de residente o Número de Pasaporte

Country of Issuance / País de Origen

**ADDITIONAL INFORMATION MAY BE REQUIRED ABOVE \$10,000.00.  
INFORMACIÓN ADICIONAL PUEDE SER NECESARIA PARA  
TRANSACCIONES POR ENCIMA DE LOS \$10,000.00.**

**If receiving for someone else, complete the following information on that person or organization.  
Si está recogiendo dinero para alguien, complete la siguiente información de la persona u organización.**

First, MI, Last Name  
Nombre, Inicial, Apellido(s)

OR  
u

Organization Name  
Organización

Address  
Dirección

City  
Ciudad

State  
Estado

Zip  
C.P.

Date of Birth /  
Fecha de nacimiento

Occupation - Type of Business  
Profesión - Tipo de Negocio

Social Security # or Tax ID # / Número de Seguro Social o Número de Renta  
(US Citizens, residents or US Businesses) / (Ciudadanos y residentes Americanos)

**OR, IF NO SS# / SI NO SS#**

Alien ID # OR Passport # / Número de tarjeta de residente o Número de Pasaporte

Country of Issuance / País de Origen

**AGENT MUST RETAIN THIS FORM ON-SITE FOR A MINIMUM OF FIVE (5) YEARS FOR AMOUNTS OF \$3000.00 OR MORE, OR FOR SIX (6) MONTHS FOR AMOUNTS LESS THAN \$3000.00  
El Agente deberá conservar esta forma en su establecimiento por un mínimo de cinco (5) años por cantidades de \$3,000.00 ó mayores, o por seis (6) meses por cantidades menores a \$3,000.00.**



---

## **MSB Registration**

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

Your business must register with the U.S. Treasury if it conducts Money Services Business activities on its own behalf. Money Services Business 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 solely as an agent of another registered Money Services Business, and does not independently conduct any other MSB activity.

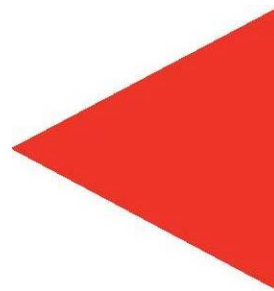
Registration is required within 180 days after the business begins conducting MSB activity.

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:

***IRS Detroit Computing Center  
Attention: SAR-MSB  
PO Box 33117  
Detroit, MI 48232-5980***





**FinCEN Form 107**

August, 2008

Previous editions will not be accepted after December 31, 2008.

**Registration of Money Services Business**

Please type or print. Always complete entire report. See instructions for items marked with an asterisk (\*).



OMB No. 1506-0013

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

**Part I Filing Information**

1 Indicate the type of filing by checking a, b, or d below (Check only one). If filing a correction, check "c" and either a, b, or d.

a  Initial registration b  Renewal c  Correcting a prior filing d  Re-registration

2 If you checked item 1 d please indicate the reason(s). Check all that apply.

a  Re-registered under state law b  More than 10 percent transfer of equity interest c  More than 50 percent increase in agents

**Part II Registrant Information**

\*3 Legal name of the money services business

Smith, LLC

4 Doing business as

AB Market

\*5 Address

123 Main Street

\*6 City

Anytown

\*7 State

M N

8 ZIP Code

5 5 0 0 0 0 0 1 2 3

\*9 EIN (entity), SSN/ITIN (individual)

0 1 5 6 7 8 7 8 7

10 Telephone number (include area code)

(6 1 2) 5 5 5 0 1 0 1

11 E-mail address (if available)

**Part III Owner or Controlling Person**

12 Individual's last name, or organization's name

Smith

13 First name

Edward

14 Middle initial

J

15 Address

888 5th Street

16 City

Anytown

17 State

M N

18 ZIP Code/Postal Code

5 5 0 0 0 0 0 1 2 3

19 Country (if other than US)

20 Telephone number - (include area code)

(6 1 2) 5 5 5 1 2 3 4

21 Date of birth

12/01/1961

22 SSN/ITIN (individual), EIN (entity)

4 7 4 0 0 0 0 1 1

23 Skip this item if you completed item 22.

If the owner or controlling person is an individual enter their form of identification, the ID number, and the issuing state or country.

a  Driver's license/state ID b  Passport c  Alien registration z  Other

e ID number 5 7 5 5 7 5 5 0 1 2 1 f Issuing state or country MN

**Part IV Money Services and Product Information**

24 States and/or territories where the registrant, its agents or branches are located. Check box a, b, or c as appropriate (Check only one) and do not check individual state/territory boxes. If box a, b, or c does not apply, check as many state/territory boxes as necessary.

- a  All States & Territories b  All States c  All Territories
- Alabama (AL)  Georgia (GA)  Maryland (MD)  New York (NY)  South Dakota (SD)
- Alaska (AK)  Guam (GU)  Massachusetts (MA)  North Carolina (NC)  Tennessee (TN)
- American Samoa (AS)  Hawaii (HI)  Michigan (MI)  North Dakota (ND)  Texas (TX)
- Arizona (AZ)  Idaho (ID)  Minnesota (MN)  N. Mariana Isls. (MP)  Utah (UT)
- Arkansas (AR)  Illinois (IL)  Mississippi (MS)  Ohio (OH)  Vermont (VT)
- California (CA)  Indiana (IN)  Missouri (MO)  Oklahoma (OK)  Virgin Islands (VI)
- Colorado (CO)  Iowa (IA)  Montana (MT)  Oregon (OR)  Virginia (VA)
- Connecticut (CT)  Kansas (KS)  Nebraska (NE)  Palau (PW)  Washington (WA)
- Delaware (DE)  Kentucky (KY)  Nevada (NV)  Pennsylvania (PA)  West Virginia (WV)
- District of Columbia (DC)  Louisiana (LA)  New Hampshire (NH)  Puerto Rico (PR)  Wisconsin (WI)
- FS of Micronesia (FM)  Maine (ME)  New Jersey (NJ)  Rhode Island (RI)  Wyoming (WY)
- Florida (FL)  Marshall Islands (MH)  New Mexico (NM)  South Carolina (SC)

**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". |\_|\_|\_|\_|\_|\_|\_| 0

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 <input type="checkbox"/> Issuer of traveler's checks	d <input type="checkbox"/> Issuer of money orders	g <input type="checkbox"/> Currency dealer or exchanger
b <input type="checkbox"/> Seller of traveler's checks	e <input checked="" type="checkbox"/> Seller of money orders	h <input checked="" type="checkbox"/> Check casher
c <input type="checkbox"/> Redeemer of traveler's checks	f <input type="checkbox"/> Redeemer of money orders	i <input checked="" type="checkbox"/> Money transmitter

27 Is any part of the registrant's money services business an informal value transfer system? See the explanation of "money transmitter" in the instructions. a  Yes b  No

28 Is any part of the registrant's money services business conducted as a mobile operation? a  Yes b  No

29 Enter the number of agents authorized to conduct each money services business activity. Do not include branches, or persons who are solely employees. See instructions for an explanation of the term "agent".

a Traveler's check sales	_ _ _ _ _ _ _  0	e Currency exchange or dealer	_ _ _ _ _ _ _  0
b Traveler's check redemption	_ _ _ _ _ _ _  0	f Check cashing	_ _ _ _ _ _ _  0
c Money order sales	_ _ _ _ _ _ _  0	g Money transmission	_ _ _ _ _ _ _  0
d Money order redemption	_ _ _ _ _ _ _  0		

**Part V Primary Transaction Account for MSB Activities**

30 If the registrant has more than one transaction account for money services business activities check here.  See instructions for an explanation of the term "transaction account". The registrant's primary transaction account is the one that has the greatest annual dollar amount of money services business activity. In items 31 through 36 enter information about the registrant's primary transaction account for money services business activities.

31 Name of financial institution where the primary transaction account is held  
**Anytown National Bank**

32 Address **120 Main Street** 33 City **Anytown**

34 State **M N** 35 ZIP Code **5 5 0 0 0 - 0 1 2 3** 36 Primary transaction account number **1 0 0 1 4 5 6 1 0 0 2**

**Part VI Location of Supporting Documentation**

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

**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 Smith* 42 Print name **Edward Smith**

43 Title **Owner** 44 Date of signature **01/15/2009**

**FinCEN Form 107a Registration of Money Services Business Instructions****1****General Information****Who Must Register**

Generally each money services business must register with the Department of the Treasury. This form must be used by a money services business (also referred to as an MSB) to register. However, not all MSBs are required to register. For example, if you are an MSB solely because you are an agent of another MSB, you are not required to register. The discussion below will help you determine whether or not you are an MSB that is required to register. For more information visit [www.msb.gov](http://www.msb.gov).

The term money services business includes:

1. Currency dealers or exchangers who exchange more than \$1,000 for any one customer on any day.
2. Check cashers who cash checks totaling more than \$1,000 for any one customer on any day.
3. Issuers of traveler's checks, money orders or stored value who issue more than \$1,000 in traveler's checks, money orders or stored value for any one customer on any day.
4. Sellers of traveler's checks, money orders or stored value who sell more than \$1,000 in traveler's checks, money orders or stored value for any one customer on any day.
5. Redeemers of traveler's checks, money orders or stored value who redeem more than \$1,000 in traveler's checks, money orders or stored value for any one customer on any day.
6. Money transmitters.
7. U.S. Postal Service.

The following are not required to register:

1. A business that is an MSB solely because it serves as an agent of another MSB. For example, a supermarket corporation that sells money orders for an issuer of money orders is not required to register. This is true even if the supermarket corporation serves as an agent for two or more MSBs. However, an MSB that serves as an agent of another MSB and engages in MSB activities on its own behalf must register. For example, a supermarket corporation must register if, in addition to acting as an agent of the money order issuer, it provides check cashing or currency exchange services on its own behalf in an amount greater than \$1,000 for any one person on any day.
2. The United States Postal Service, any agency of the United States, of any state, or of any political subdivision of any state.
3. At this time, persons are not required to register to the extent that they issue, sell or redeem stored value. If, however, a money services business provides money services in addition to stored

value, the provision of stored value services does not relieve it of the responsibility to register, if required, as a provider of those other services.

For the regulatory definition of "money services business" see 31 CFR 103.11(n) and (uu).

The following terms are used in the form and instructions to describe a money services business:

1. An "agent" is a separate business entity from the issuer that the issuer authorizes, through written agreement or otherwise, to sell its instruments or, in the case of funds transmission, to sell its send and receive transfer services. A person who is solely an employee of the MSB is not an agent of that MSB.
2. A "branch" is an owned location of either an issuer or agent at which financial services are sold. An MSB should not separately register each of its branches. A mobile operation owned by an MSB is a branch of that MSB. The MSB's headquarters is not a branch. If the MSB has only one location, that location is not a branch.
3. A "check casher" is a person engaged in the business of providing cash to persons in return for a check.
4. A "currency dealer or exchanger" is a person who engages in the physical exchange of currency for retail customers.
5. "Informal value transfer system". See explanation of the term money transmitter.
6. An "issuer" is the business that is ultimately responsible for payment of money orders or travelers checks as the drawer of such instruments, or a money transmitter that has the obligation to guarantee payment of a money transfer.
7. A "money transmitter" is a person that engages as a business in the transfer of funds through a financial institution.

Generally, acceptance and transmission of funds as an integral part of the execution and settlement of a transaction other than the funds transmission itself (for example, in connection with the bona fide sale of securities) will not cause a person to be a money transmitter.

An "informal value transfer system" is a kind of money transmitter. An informal value transfer system includes any person who engages as a business in an informal money transfer system or any network of people who engage as a business in facilitating the transfer of money domestically or internationally outside of the conventional financial institutions system.

8. A "person" is an individual, a corporation, a partnership, a trust or estate, a joint stock company, an association, a syndicate, joint venture, or other unincorporated organization or group, an Indian Tribe (as that term is defined in the Indian Gaming Regulatory Act), and all entities cognizable as legal personalities.

9. A "redeemer" is a business that accepts instruments in exchange for currency or other instruments for which it is not the issuer. You are not a redeemer if you take the instruments in exchange for goods or general services, provided that the amount of cash returned is not more than \$1,000 for any one customer on any day.

10. A "seller" is a business that issues, authorizes, through written agreement or otherwise, to sell their instruments or their send and receive transfer services.

11. A "transaction account" is a deposit or account on which the depositor or account holder is permitted to make withdrawals by negotiable or transferable instrument, payment orders of withdrawal, telephone transfers, or other similar items for the purpose of making payments or transfers to third persons or others. Such terms include demand deposits, negotiable order of withdrawal accounts, savings deposit subject to automatic transfers, and share draft accounts. See 12 USC 461(b)(1)(c).

**When to Register**

**Initial registration:** File the form within 180 days after the date the business is established.

**Renewal:** Each MSB must renew its registration every two years, on or before December 31. See 31 CFR 103.41(b)(2). For example, if an MSB registered on October 15, 2003, it must file a renewal by December 31, 2004, and then every 24 months thereafter (on or before December 31, 2006, then December 31, 2008, etc.). **Renewals must be submitted on a new Form 107. Photo copies of previously submitted forms or facsimiles will not be accepted for renewal purposes**

**Correction:** Use the form to correct a prior report. Complete Part I in its entirety and only those other entries that are being added or changed. Staple a copy of the prior report (or the acknowledgment from ECC-D if received) to the corrected report.

**Re-registration:** Refile a new registration form when one of the following events occurs:

1. a change in ownership requiring re-registration under state registration law;
2. more than 10 percent of voting power or equity interest is transferred (except certain publicly-traded companies) or;
3. the number of agents increases by more than 50 percent.

**Where to Register**

Send your completed form to:

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

The Enterprise Computing Center-Detroit (ECC-D) will send an acknowledgment of receipt to the registrant listed in Part II within approximately 60 days after the form is processed (See note below). ECC-D can respond to general questions over the phone at telephone (800) 800-2877.

## General Instructions

**NOTE: All items on FinCEN Form 107 should be completed fully and accurately. Items marked with an asterisk (\*) must be completed for the registration to be accepted, processed, and recorded. Acknowledgment letters will not be provided if these items are not complete.**

- This form is available on the Financial Crimes Enforcement Network's web site for MSBs at [www.msb.gov](http://www.msb.gov), or FinCEN's web site at [www.fincen.gov](http://www.fincen.gov), or by calling the IRS Forms Distribution Center at (800) 829-2437.
- Unless there is a specific instruction to the contrary, leave blank any items that do not apply or for which information is not available.
- Complete the form by providing as much information as possible.
- Do not include supporting documents with this form.
- Type or complete the form using block written letters.
- Enter all dates in MM / DD / YYYY format where MM=month, DD=day, and YYYY=year. Precede any single number with a zero, i.e., 01,02, etc.
- List all U.S. telephone numbers with area code first and then the seven-digit phone number, using the format (XXX) XXX-XXXX.
- Always enter an individual's name as last name, first name, and middle initial (if known). If a legal entity is listed, enter its name in the last name field.
- Enter identifying numbers starting from left to right. Do not include spaces, dashes, or other punctuation. Identifying numbers include social security number (SSN), employer identification number (EIN), individual taxpayer identification number (ITIN), alien registration number, driver's license/state identification, foreign national identification, and passport number.
- Enter all Post Office ZIP Codes from left to right with at least the first five numbers, or with all nine (ZIP + 4) if known.
- Addresses: Enter the US permanent street address, city, two-letter state or territory abbreviation used by the U.S. Postal Service and ZIP Code (ZIP+4 if known) of the individual or

entity. A post office box number should not be used for an individual, unless no other address is available. For an individual, also enter any apartment number, suite number, or road or route number. If a P.O. Box is used for an entity, enter the street name, suite number, and road or route number. If the address of the individual or entity in PART III is in a foreign country, enter the city, province or state, postal code and the name of the country. Complete any part of the address that is known, even if the entire address is not known. If the address is in the United States leave country code blank.

## Specific Instructions

### Part I Filing Information

See "When to Register" in the General Information part of these instructions.

**Item 1--** Check either box a, b, or d (only one) for the type of filing. If this report corrects an earlier filing, check box "c" and either box a, b, or d.

**Item 2--** If you checked box 1d, please indicate the reason by checking boxes a, b, or c (check all that apply).

### Part II Registrant Information

Enter the US State or Territory operating location.

**Item \*3--Legal name of the money services business.** Enter the full legal name of the registrant money services business as it is shown on the charter or other document creating the entity. For example, enter Good Hope Enterprises, Inc. when the money services business is Good Hope Enterprises, Inc. If a sole proprietorship, enter the business name of the proprietorship.

**Item 4-- Doing business as.** If applicable, enter the separate doing business as name of the registrant. For example, if Good Hope Enterprises, Inc., is doing business as "Joe's Check Cashing" enter in item 4, Joe's Check Cashing.

**Items \*5, \*6, \*7 and 8-- Address.** Enter the permanent United States address of the registrant's US operations that is being registered.

**Item \*9--EIN (entity), SSN/ITIN (individual).** If the registrant is an entity enter its employer identification number (EIN). If the registrant is an individual and a U. S. Citizen or an alien with a social security number, enter his/her SSN. If the registrant is an individual who is an alien and has an individual taxpayer identification number, enter his/her ITIN.

**Item 10-- Telephone number.** Enter the telephone number of the MSB listed in item 3.

**Item 11-- E-mail address (Optional).** If the MSB has an e-mail address please enter it here. An e-mail address may be used to contact the MSB should questions arise regarding their registration.

### Part III Owner or Controlling Person

**General:** Any person who owns or controls a money services business is responsible for registering the MSB. Only one registration form is required for any business in any registration period. If more than one person owns or controls the business, they may enter into an agreement designating one of them to register the business. The designated owner or controlling person must complete Part III and provide the requested information. In addition, that person must sign and date the form as indicated in Part VII. Failure by the designated person to register the business does not relieve any other person who owns or controls the business of the liability for failure to register the business.

An "Owner or Controlling Person" includes the following:

<i>Registrant Business</i>	<i>Owner or Controlling Person</i>
Sole Proprietorship.....	the individual who owns the business
Partnership.....	a general partner
Trust.....	a trustee
Corporation.....	the largest single shareholder

If two or more persons own equal numbers of shares of a corporation, those persons may enter into an agreement as explained above that one of those persons may register the business.

If the owner or controlling person is a corporation, a duly authorized officer of the owner-corporation may execute the form on behalf of the owner-corporation.

**Item 12--Individual's last name, or organization's name.** If the registrant is a publicly held corporation, it is sufficient to write "public corporation" in item 12. Where registrant is a public corporation, a duly authorized officer of the registrant must execute the form in Part VII.

**Items 13 to 22--**Enter the applicable information for the owner or controlling person. Their home address and phone number should not be used, unless a business address and phone number are unavailable.

**Item 23--Identification information.** If you completed item 22, you may omit this item. If you did not complete item 22, enter separately the form of identification, the ID number, and the issuing state or country. Do not provide "other" identification unless no driver's license/state ID, passport or alien registration number is available. "Other" identification includes any unexpired official identification that is issued by a governmental authority. If you check item 23z, give a brief description of the "other" identification.

### Part IV Money Services and Product Information

**Item 24--States and/or territories where the registrant, its agents or branches are located.** Check box "a" for All States and Territories, "b"

for All States, or "c" for All Territories (Check only one) as appropriate, and **do not** check any individual state or territory boxes. If box a, b, or c **does not apply**, check as many state or territory boxes as necessary. If a service is offered on tribal lands, mark the box for the state, territory or district in which the tribal lands are located.

**Item 25--Enter the number of branches of the registrant.** Enter the number of branches of the money services business at which one or more MSB activities are offered. If there are no branches, enter zero. See the General Information for an explanation of the term "branch".

**Item 26--MSB activities of the registrant.** Items 25a through 25i are MSB activities. Check the box of each MSB activity conducted by the registrant at its branches. See the General Information for an explanation of the terms "issuer", "seller", "redeemer", "check casher", and "money transmitter".

**Item 27--Informal value transfer system.** If any part of the registrant's money services business is an informal value transfer system, check yes. An informal value transfer system is a kind of money transmitter. See the General Information explanation of the term "money transmitter".

**Item 28--Mobile operation.** If any part of the registrant's money services business is conducted as a mobile operation, check yes. A mobile operation is one based in a vehicle. For example, a check cashing service offered from a truck is a mobile operation. For purposes of Item 25, each mobile operation should be counted as a separate branch.

**Item 29--Number of agents.** Enter the number of agents that the registrant has authorized to sell or distribute its MSB services. Do not count branches or any person who is solely an employee of the MSB. A bank is not an agent for this purpose. See the General Information for an explanation of the term "agent".

### Part V Primary Transaction Account for MSB Activities

**Item 30--Check the box if the registrant has more than one primary transaction account for money services business activities.** Example: If the registrant is both an issuer of money orders and an issuer of traveler's checks and the registrant has separate clearing accounts for money orders and traveler's checks, the box should be checked.

**Item 31--Name of the financial institution where the primary transaction account is held.** Enter the name of the bank or other financial institution where the registrant has its primary transaction account. If you indicated that the registrant has more than one primary transaction account in Item 30, enter information about the account with the greatest money service activity transaction volume as measured by value in dollars. See the General

Information for an explanation of the term "transaction account".

**Items 32 to 35--Enter the permanent address for the financial institution.**

**Item 36--Primary transaction account number.** Enter the primary transaction account number.

### Part VI Location of Supporting Documentation

**General:** The registrant must retain for five (5) years certain information at a location within the United States. That information includes:

1. A copy of the registration form.
2. Annual estimate of the volume of the registrant's business in the coming year.
3. The following information regarding ownership or control of the business: the name and address of any shareholder holding more than 5% of the registrant's stock, any general partner, any trustee, and/or any director or officer of the business.
4. An agent list.

If the registrant has agents it must prepare and maintain a list of its agents. That agent list must be updated annually and retained by the business at the location in the United States reported on this registration form in Part II or Part VI. The agent list should not be filed with this registration form.

The agent list must include:

- a. Each agent's name,
- b. Each agent's address,
- c. Each agent's telephone number,
- d. The type of service(s) provided by each agent on behalf of the registrant,
- e. A listing of the months in the immediately preceding 12 months in which the gross transaction amount of each agent with respect to financial products/services issued by the registrant exceeds \$100,000,
- f. The name and address of any depository institution at which each agent maintains a transaction account for the money services business activities conducted by the agent on behalf of the registrant,
- g. The year in which each agent first became an agent of the registrant, and
- h. The number of branches or subagents of each agent.

**Items 37 to 40--If the supporting documentation is retained at a location other than the address listed in Part II, enter the location information in items 37 through 40.**

### Part VII Authorized Signature

**Items 41 to 44--The owner or controlling person listed in Part III must sign and date the form as indicated in Part VII. If the owner or controlling person is a corporation, a duly authorized officer of the corporation must execute the form on behalf of the corporation. Enter the date this document was signed.**

**Penalties for failure to comply:** Any person who fails to comply with the requirements to register, keep records, and/or maintain agent lists pursuant

to 31 CFR 103.41 may be liable for civil penalties of up to \$5,000 for each violation. Failure to comply also may subject a person to criminal penalties, which may include imprisonment for up to five (5) years and criminal fines. See 18 USC 1960. **Note: This registration does not satisfy any state or local licensing or registration requirements.**

#### Paperwork Reduction Act Notice.

The purposes of this form are to provide an effective and consistent means for money services businesses to register with the Financial Crimes Enforcement Network, and to assure maintenance of reports or records where such reports or records have a high degree of usefulness in criminal, tax, or regulatory investigations or proceedings. This report is required by law, pursuant to authority contained in Public Law 103-305; 31 USC 5330; 5 USC 301; 31 CFR 103. The information collected may be provided to those officers and employees of any constituent unit of the Department of the Treasury who have a need for the records in the performance of their duties. The records may be referred to any other department or agency of the United States, to any State, or Tribal Government. Public reporting and recordkeeping burden for this information collection is estimated to average 30 minutes per response, and includes time to gather and maintain data for the required report, review the instructions, and complete the information collection. Send comments regarding this burden estimate, including suggestions for reducing the burden, to the Office of Management and Budget Paperwork Reduction Project, Washington, DC 20503 and to the Paperwork Reduction Act; Department of the Treasury, Financial Crimes Enforcement Network, P.O. Box 39, Vienna, VA 22183-0039. The agency may not conduct or sponsor, and an organization (or a person) is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

#### Privacy Act Notice.

Pursuant to the requirements of Public Law 93-579 (Privacy Act of 1974), notice is hereby given that, in accordance with 5 U.S.C. 552a(e), the authority to collect information on **FinCEN Form 107** is Public Law 103-305; 31 USC 5330; 5 USC 301; 31 CFR 103. The Department of the Treasury may use and share the information with any other department or agency of the United States, to any State, or Tribal Government, or part thereof, upon the request of the head of such department or agency, or authorized State or Tribal Government official for use in a criminal, tax, or regulatory investigation or proceeding, and to foreign governments in accordance with an agreement, or a treaty. Disclosure of this information is mandatory. Civil and criminal penalties, including in certain circumstances a fine of not more than \$5,000 per day and imprisonment of not more than five years, are provided for failure to file the form, supply information requested by the form, and for filing a false or fraudulent form. Disclosure of the social security number or taxpayer identification number is mandatory. The authority to collect is 31 CFR 103. The social security number/taxpayer identification number will be used as a means to identify the individual or entity who files the report.



---

## Financial Crimes Enforcement Network (FinCEN)

The Financial Crimes Enforcement Network (FinCEN) is a bureau within the U.S. Treasury Department that administers the federal government's anti-money 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 ([www.msb.gov](http://www.msb.gov)) for any updates or new information related to anti-money laundering compliance.

Below is a list of some of the information available on the FinCEN [msb.gov](http://msb.gov) website:

- **Guidance** – This section provides: summaries of the anti-money laundering compliance requirements that apply to MSBs; all of the statutes and regulations; and a glossary of terms and contact information for FinCEN.
- **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.
- **Materials** – This section contains information on the training material that FinCEN has prepared for MSBs. FinCEN has a “Money Laundering Prevention Guide” designed specifically for MSBs, as well as “Quick Reference Guides.” These guides can be downloaded from the website or you can order them. You can also order training videos and CDs. All of FinCEN's training material is FREE of charge.
- **Publications** – This section contains advisories, news releases and announcements. It also contains reports published by the federal government and international groups that relate to money laundering and other crimes.

In the Advisories/Bulletins area of this section, a very important and informative document titled “Bank Secrecy Act/Anti-Money Laundering Examination Manual for Money Services Businesses” was issued on December 9, 2008.

This document aims to provide a summary of BSA 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](http://www.moneygram.com) or by calling the MoneyGram Compliance Department at 1-800-328-5678 ext. 3385.