

USA PATRIOT Act Independent Review

Business Information

Business Name: _____

Business DBA: _____

Address: _____

Phone Number: _____

Owner / Manager: _____

Compliance Officer: _____

Number of Locations: _____

Circle YES or NO for each question:

YES NO Is the business registered with the U.S. Treasury Department – Financial Crimes Enforcement Network (FinCEN) as a Money Services Business? If this entity conducts money service transactions (Examples: check cashing or currency exchange) on its own behalf that exceed \$1,000, for any one customer, on any one day, registration is required.

YES NO If yes, is the MSB registration available and current?
If no, indicate the reason:

Risk Assessment

Product Risk:

All financial services businesses, including banks, credit unions and money services businesses are at risk of being victimized by money launderers or other criminals. This risk can increase with the number of financial services that are sold, or with the use of multiple issuers/vendors for these services. Both multiple services and multiple issuers/vendors increase a money launderer or other criminal's ability to structure transactions to avoid detection and recordkeeping requirements. If more than one (1) product or service is offered, the Independent Reviewer should more carefully review this compliance program.

Identify the financial services and products that are offered:

YES	NO	Money transfers / wire transfers
YES	NO	Money orders
YES	NO	Check cashing
YES	NO	Currency exchange
YES	NO	Stored value cards

Location Risk:

Law enforcement agencies and government regulators have identified areas that are at higher risk for money laundering, related financial crimes, and drug trafficking. If the answer is "YES" to any of the following three (3) questions, this MSB has a greater risk of being victimized by money launderers or other criminals. Therefore, the Independent Reviewer should more carefully review this compliance program.

YES	NO	Is the MSB located in an area at high risk for money laundering or related financial crimes? A map identifying such areas can be found on the FinCEN website at: http://www.fincen.gov/hifcaregions.html .
YES	NO	Is the MSB located in an area at high risk for drug trafficking? A map identifying such areas can be found at: http://www.whitehousedrugpolicy.gov/hidta/index.html .
YES	NO	Does the MSB transfer funds to high-risk areas? High-risk areas can be found by reviewing the Current NCCT list on the Financial Action Task Force website at: www.fatf-gafi.org and the Sanctions Program and Country Summaries on the OFAC website at: http://www.treas.gov/offices/enforcement/ofac/ .

Compliance Program

YES NO Does the MSB have a written Compliance Program?

Does the Compliance Program include written policies, procedures, and internal controls reasonably designed to assure compliance with the Bank Secrecy Act, including:

YES NO Customer identification?

YES NO Filing applicable reports (Suspicious Activity Reports by Money Services Business (SAR-MSB) and Currency Transaction Reports (CTR))?

YES NO Recordkeeping and retention requirements?

YES NO Response to law enforcement requests for information?

YES NO Does the Compliance Program include limits specific to this business, such as a maximum send amount, a maximum receive amount, or a maximum amount of money orders that may be purchased,?

If YES, describe how these limits are enforced and monitored:

YES NO Has a Compliance Officer been designated?

YES NO Does the Compliance Officer fully understand and perform the duties and responsibilities of this position?

YES NO Are Independent Reviews, to monitor and maintain an adequate compliance Program, conducted at least annually by a qualified party?

SAR-MSBs

YES NO Does the Compliance Officer (or their designee) review daily transaction activity to look for structuring and to ensure that SAR-MSBs are being filed when necessary?

YES NO Have SAR-MSBs been filed?
If NO, why not:

YES NO Are blank SAR-MSB forms available?

- YES NO Are copies of filed SAR-MSB forms and supporting documentation maintained in a secure location?
- YES NO Are SAR-MSBs being accurately completed and filed on a timely basis for all transaction(s) of \$2,000 or more that appear to be suspicious?
- YES NO Are copies of SAR-MSBs maintained for 5 years?

CTRs

- YES NO Does the Compliance Officer (or their designee) review daily activity to look for transactions that in individual or multiple transactions may require the filing of CTRs?
- YES NO Have CTRs been filed?
If NO, why not:
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- YES NO Are blank CTR forms available?
- YES NO Are copies of filed CTR forms and supporting documentation maintained in a secure location?
- YES NO Are CTRs being accurately completed and filed on a timely basis for all transaction(s) greater than \$10,000, including fees?
- YES NO Are copies of CTRs maintained for 5 years?

Money Orders

- YES NO Are Logs maintained for money order sales of \$3,000 or more?
- YES NO Does the Compliance Officer (or their designee) review daily activity to look for multiple transactions that may require that the Log be completed?
- YES NO Are Logs current and accurately completed?
- YES NO Are money order Logs reviewed to determine if CTRs/SAR-MSBs should have been filed?
- YES NO Are Logs maintained for 5 years?

Money Transfers through MoneyGram

- YES NO Does the Compliance Officer (or their designee) periodically review the Send/Receive forms or Form Free receipts for accuracy and completeness?
- YES NO Are Send/Receive forms or Form Free receipts properly completed and maintained for transfers of \$3,000 or more?
- YES NO Are Send/Receive forms or Form Free receipts reviewed to determine if CTR/SAR-MSBs should have been filed?
- YES NO Are the Send/Receive forms or Form Free receipts maintained for 5 years?

Customer Identification

- YES NO Does the Compliance Officer (or their designee) periodically review the Money Order logs and/or the Send/Receive forms or Form Free receipts to ensure that the identification policy and procedures are being followed?
- YES NO Is valid, government issued, photo identification, being recorded for money order sales of \$3,000 or more?
- YES NO Is valid, government issued photo identification, being recorded for money transfers of \$900 or more for MoneyGram money transfer transactions?

Employee Training

- YES NO Have all employees involved in providing MSB services received compliance training?
If YES, how often?
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- YES NO Does training include reading the Compliance Program?
If NO, why not:
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- YES NO Are training records documented?
 - YES NO Is training material thorough and current?
Briefly describe the content:
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YES NO Do employees fully understand compliance policies and procedures?

YES NO Are employees adequately trained to identify potentially suspicious activity, including structuring?

YES NO Is testing conducted to validate the employees' understanding of compliance? Briefly describe the content and process:

YES NO Does the MSB conduct annual employee refresher compliance training?

Data Review

In order to verify that transactions have been properly identified for recordkeeping and reporting requirements, the Independent Reviewer may choose to conduct a random test of a sample of transactions.

If a data review was conducted, briefly describe the results of the review and analysis:

Additional Comments (all unacceptable areas must be addressed):

Certification of Independent Review

I have completed an independent review of the compliance program of

_____ (name of business).

Among other things, this review focused on the requirements of the USA PATRIOT Act and the Bank Secrecy Act. The results of my review are that I find this entity's anti-money laundering compliance program to be:

Acceptable:

Acceptable, but recommend the following enhancements:

Unacceptable for the following reasons:

Signature of the person conducting the review:

Reviewer's Name: _____

Reviewer's Title: _____

Reviewer's Company: _____

Date of Review: _____