

# ANTI-MONEY LAUNDERING EXPRESS GUIDE

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

## BEFORE YOU START

Before processing any transaction you should:

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

## IDENTIFICATION REQUIREMENTS

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

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

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

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

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

## STRUCTURING AND SUSPICIOUS ACTIVITY

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

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

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

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

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

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

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

**SEND FORMS**

**Front:**

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

**Back:**

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

**RECEIVE FORMS**

**Front:**

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

**Back:**

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

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