

Anti-Money Laundering Compliance Guide

Travelers Express Money Orders

MoneyGram Money Transfers

- Reports
- Recordkeeping
- Suspicious Transactions
- OFAC



WHY YOU SHOULD READ THIS GUIDE

The law requires compliance. This Guide contains important information about federal laws and regulations that affect you and your employees. You and your employees must understand the requirements of the Bank Secrecy Act ("BSA"), the USA Patriot Act, the Office of Foreign Assets Control ("OFAC") economic sanctions, and other anti-money laundering laws and regulations, and comply with them. If you or your employees fail to comply, you and your employees and your business may be subject to civil fines, criminal penalties, or forfeiture of assets.

MoneyGram and Travelers Express require compliance. It is our policy that we follow both the letter and the spirit of the law and regulations. We do not want our money transfers, money orders, or other financial transactions to be used in illegal money laundering schemes. We will not do business with anyone who knowingly violates the regulations. We have a comprehensive compliance program within our organization to help ensure compliance. The Guide is designed to help you comply as well.

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



MONEY LAUNDERING

There are strict federal and state laws and regulations designed to help prevent money laundering. The laws and regulations impose both civil and criminal fines and even jail time for violations. U.S. law enforcement officials have seen money transfers, money orders, and other financial transactions used to launder money. This Guide can help reduce your risk of being used by criminals to launder money.

| LAU

LAUNDERING

MONEY

IS ILLEGAL.

WHAT IS MONEY LAUNDERING?

You need to understand how people launder money so that you can identify money laundering and know how to help prevent it.

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. Notice that this definition is not limited to transactions in cash or currency. Money laundering can involve any type of money, including money orders, money transfers, and other financial transactions.

Because cash leaves no trail, criminals generally use cash in the early stages of their money laundering. To help counter the laundering of cash and to obtain documentation that may be used to prosecute money launderers, the government requires businesses like yours to file specific reports and maintain certain records.

All businesses must also comply with the Office of Foreign Assets Control ("OFAC") economic sanctions regulations. The regulations prohibit giving any goods or services to any individual, entity, governmental official or other parties who have been identified by OFAC as subject to one of the sanction laws.



WHO IS COVERED?

You are subject to the BSA, the USA Patriot Act, OFAC and other anti-money laundering laws and to their reporting and recordkeeping obligations. The BSA provides that any agent doing business in one or more of the capacities listed below must comply with these laws:

MSB =

MONEY

SERVICES

BUSINESSES

A. A money transmitter;

B. A seller of money orders, or stored value (other than a person who does not ever sell 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 does not ever cash checks in an amount greater than \$1,000 for any person on any day in one or more transactions).

All entities that are covered by the definitions above are known as "MSBs" which stands for Money Services Businesses. You qualify as a MSB, and must comply with all applicable requirements of the BSA and the USA Patriot Act, as well as other applicable laws and regulations.

MSB REGISTRATION

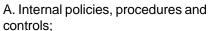
If you engage in MSB activities on your own behalf – apart from serving as our agent- then you may be required to register. For example, a supermarket that acts as an agent of ours and performs no other MSB services is not required to register; however, registration would be required if the supermarket in addition to acting as an agent, also cashes checks in an amount greater than \$1,000 for any person on any day, in one or more transactions.

The MSB registration must be filed on the form required by the Department of Treasury and sent to the address provided on the form.

The MSB must retain a copy of the registration form and any registration number than may be assigned to the business for five years.

ANTI-MONEY LAUNDERING PROGRAM

The USA Patriot Act requires that all MSBs adopt an anti-money laundering program in order to guard against money laundering. Accordingly, you must establish an anti-money laundering program that includes, at a minimum, the following:



- B. The designation of a compliance officer:
- C. An ongoing employee training program; and
- D. An independent audit function to test the program

RECORDKEEPING

Money Orders: Whenever a customer purchases money orders, or checks, with cash in the amount of \$3,000 to \$10,000 certain information must be obtained and retained. (Purchases of more than \$10,000 require filing a Currency Transaction Report (CTR) which is explained later in these materials.) The information is to be recorded on a Monetary Instrument Log ("Log"). Only cash purchases are covered by this requirement – purchases by check or credit card are not, regardless of the amount.

If a customer makes multiple cash purchases throughout the same business day that total between \$3000 and \$10,000, you must record the appropriate information on the log. Appendix (I) shows a copy of a blank Log. You may order additional copies of the Log by contacting your Account Specialist at 800-257-8418.



RECORDKEEPING

REQUIREMENTS

FOR MONEY

ORDERS



Identification for Log. Before completing a transaction that requires a Log entry, you must verify the name and address of the individual buying the money orders by looking at a valid identification document, such as a driver's license, passport or alien identification card that contains the customer's name and address.

The regulations require you to record:

- 1. Customer's name;
- 2. Customer's address;
- 3. Customer's Social Security number or alien identification number;
- 4. Customer's date of birth;
- 5. Date of purchase of the money order(s);
- 6. The serial number of each money order(s) purchased;
- 7. The dollar amount of each money order(s) purchased:
- 8. The location where the money order(s) was purchased;
- 9. The total amount purchased with cash;
- 10. You are also required to record specific information on the identification used to verify the purchaser's identity (e.g., driver's license number and state of issuance).
- 11. If the money orders being purchased are for a third party (someone other than the purchaser), then the following information also needs to be recorded in the Log: the third party's name, the third party's address and the third party's Social Security number, alien identification number or tax identification number.

You must obtain all of this information **before** you complete the transaction.

Location and Availability of Logs.

Logs are to be kept at each of your locations that sell money orders. A copy of the Log must be kept for five years after the date of the last transaction in the Log.

MONEY

ORDER

"LOG"

\$3,000

TO

\$10,000

RECORDKEEPING REQUIREMENTS 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 form of payment. Appendix (II) shows copies of blank MoneyGram Send and Receive forms.

Money Transfer "Sends": For a money transfer of \$3,000 or more, you must obtain and record the following information.

- 1. Name and address of the sender;
- 2. The type of identification reviewed, the number of the identification document, and the issuing authority;
- The sender's taxpayer identification number (i.e. Social Security number or Employer Identification Number, or if none, alien identification number or passport number and country of issuance, or note if there is none);
- 4. Amount of the money transfer;
- 5. Reference number for the transaction;
- 6. Date of the money transfer;
- 7. Sender's date of birth;
- 8. Sender's occupation;
- 9. Name and address of the receiver;
- 10. Any other specific identification of the receiver:
- 11. Any money transfer instructions received from the sender;
- 12.A signed copy of the send form.

If you know that the person is sending on behalf of another party, then you must also obtain similar information for that other party.

Verification of "Sender's" Identity. Before completing any "Send" or "Receive" money transfer you must examine a document that contains the person's name, address and preferably photograph

ALL
MONEYGRAM
TRANSACTIONS

\$3,000

OR MORE

(e.g. driver's license, passport, alien identification card or other official document evidencing nationality or residence);



Money Transfer "Receives". You must verify the identity of the receiver the same way that you would verify a sender's identity and record the same information for the receiver.

MoneyGram's Identification Requirements:

1. For any "Send" of \$900 or more, MoneyGram requires you to record the sender's name and address, type of photo identification and identification number that is used to verify the information.

IDENTIFICATION

2. MoneyGram requires the same identification procedure for all "Receives", although test questions are permitted for money transfers up to \$900 if the recipient does not have acceptable photo identification.

"Send" and "Receive" Forms. By completing the front and back of the send and receive forms you should have all of the required information. You must retain these forms for five years.

Question: How long must you keep the information on money transfers or money order sales of \$3,000 or more?

You must keep such records for five years.

CURRENCY TRANSACTION REPORTING REQUIREMENTS

A Currency Transaction Report ("CTR") is required for single or multiple transactions in currency performed in any one day by any person (on or behalf of any third party) that totals more than \$10,000. In other words, 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 any one business day. (This \$10,000 amount includes both the face amount of the transaction and the fees paid by the purchaser.)

You must file the report with the Internal Revenue Service (IRS) on a Currency Transaction Report Form 4789, which can be obtained from your local IRS office or from www.treas.gov/fincen. Appendix (III) shows Form 4789.

Identification for CTRs. Before doing any transaction that requires a CTR, you must verify the name and address of the individual conducting the transaction.

- 1. If your customer is a resident of the United States, you must see a document that banks normally accept when cashing a check for a noncustomer. This includes driver's license, a state-issued identification card or other type of identification card.
- 2. If your customer is an alien or not a resident of the United States, you must examine a passport, an alien identification card, or other official document. The "other official document" must show their nationality or home address.

The regulations require that you record your customer's name, address and Social Security number (or taxpayer identification number or other identifying number) on the CTR. The CTR form also asks for occupation, date of birth, and other information.

If two or more people are doing the transaction, or if the transaction is on behalf of a third person other than the individual performing the transaction, you must obtain similar information for all parties before you complete the transaction.

You must obtain all this information from your customer *before you complete the transaction*.



CTR

\$10,000

OR MORE

Identification for Elderly or Disabled Persons.

Elderly or disabled persons may not have identification documents, such as a driver's license or state-issued identification card. In these cases, you may accept as appropriate identification a Social Security, Medicare, Medicaid or other insurance card presented along with another document that contains both the name and address of the individual (e.g., an organization membership or voter registration card, utility or real estate tax bill).

You must maintain a written list of the specific types of documents that you or your employees may accept from elderly or disabled people.

Filing the CTR. You must prepare and file the CTR within 15 days of the transaction. The CTR form shows the address where it is to be filed.

Recordkeeping of CTRs. You must keep copies of each CTR for at least five years from the date of filing.

Question: When do you have knowledge of multiple transactions done by or on behalf of the same person?

- A. If you or your employee witnesses the multiple transactions:
- B. If someone tells you or an employee about the multiple transactions;
- C. If you or an employee know a transaction is part of multiple transactions. If you or an employee know a customer is conducting a transaction for another party, whom you or your employee know has already conducted another transaction.

Question: What is considered currency?

"Currency" includes cash, and it is not limited to U.S. money. Currency is coin, paper money or banknotes of the United States or any other

country that is designated as legal tender and customarily accepted as a medium of exchange in the country in which it was issued.

Question: When must you file a CTR?

You must file a CTR when, in the same day, you receive cash from the same person or from different individuals acting on behalf of the same person which together with any consumer fees paid in cash exceeds \$10,000.

Example 1: Jim brings in \$12,000 in cash on one occasion and requests a money transfer or want to purchase money orders. You must file a CTR.

Example 2: Jim brings in cash on several separate occasions during the same day and requests a number of separate money transfers, or purchases money orders which add up to more than \$10,000 (including fees). You must file a CTR.

Example 3: Jim brings in \$11,000 in cash on one occasion, requests an \$8,000 money transfer and purchases money orders totaling \$3,000. You must file a CTR.

Question: What should you do if the customer refuses or is unable to provide all of the information required to complete a CTR?

You must obtain all of the information required by the CTR. If the customer refuses to or is unable to provide the required information, you should not conduct the transaction. Also, you should determine whether you need to file an SAR-MSB on such a transaction. The SAR-MSB is explained later in these materials.

Question: Do you have to verify the information given by the customer?

You must verify the identity of the customer by



viewing an official document that contains the customer's name and preferably a photograph and address. Official documents that may be used to verify the customer's identity include a driver's license, passport, national identification card (i.e., Cedula card) alien identification card or state-issued identification card. Although it is not necessary to verify other information obtained from the customer, if you believe the information provided is false, do not complete the transaction.

Question: Do you have to keep a copy of the CTR and, if so, for how long?

Yes. You must keep a copy of the CTR for five years from the date of filing.

Question: How soon must you file the CTR?

You must complete and file the CTR within 15 days following the date of the transaction.

Question: Where is the CTR filed?

The instructions on the forms provide the addresses where they are to be filed.

STRUCTURING

It is illegal for you or your customer to structure transactions in order to avoid the recordkeeping or reporting requirements. For example, if a customer buys \$2,000 of money orders in the morning and \$2,000 of money orders at the end of the day, they may be structuring their purchases in order to avoid the recordkeeping "Log".

"Structuring" involves breaking up a larger transaction that would have to be recorded or reported into smaller transactions in order to avoid the reporting and recordkeeping requirements. Even it it's done for a legitimate reason, the fact that the transaction is broken up to avoid the reporting and recordkeeping requirements is still considered "structuring." In other words, there is no innocent

excuse for "structuring."

A customer purchasing several money orders or money transfers is **not** "structuring" unless they do it to avoid the reporting and recordkeeping requirements. There are many legitimate situations in which someone will purchase multiple money orders or money transfers. It is only if they arrange those purchases in such a manner as to avoid a recordkeeping or reporting requirement that you should become concerned about "structuring." If you suspect "structuring" you will want to report the transaction as suspicious activity.

Question: Are all multiple transactions considered structuring?

No. For example: Jim sends two money transfers to two separate receivers for \$2000 each. Each transfer is less than \$3000 but the total transaction exceeds \$3000. There was nothing suspicious about the transactions, and you learn that Jim is sending money to his children attending two different universities. You should record the appropriate information on the back of both send forms to fulfill the recordkeeping requirement and to show that there was no deliberate attempt to structure the transaction.

SUSPICIOUS ACTIVITY REPORTING

You must file a Suspicious Activity Report by Money Services Business ("SAR-MSB") whenever any activity is attempted or occurs that involves at least \$2,000 in one or more transactions and you suspect or have reason to suspect that:

- 1. The transaction involves funds derived from illegal activity or is intended to hide funds derived from illegal activity;
- 2. The transaction is structured to avoid recordkeeping or reporting requirements; or

STRUCTURING
TRANSACTIONS
TO AVOID
RECORDKEEPING
AND
REPORTING
REQUIREMENTS
IS ILLEGAL.

3. The transaction has no business or apparent lawful purpose.

The following list provides examples of potentially suspicious activity that should raise concerns and may require you to file an SAR-MSB:

- 1. A customer or employee appears to be structuring transactions in an attempt to avoid a BSA recordkeeping or reporting requirement;
- 2. An individual provides phony or expired identification;
- 3. Two or more individuals, who are obviously together, split up to conduct separate transactions for under \$3,000, but which together add up to over \$3,000;
- 4. An individual refuses to proceed with a transaction once he/she is informed a CTR will have to be filed:
- 5. A customer asks an employee how to avoid reporting or recordkeeping requirements;
- 6. An individual attempts to threaten, or bribe an employee;
- 7. Several customers complete money transfers to the same recipient in a single day, and there is not apparent business reason for such transfers:
- 8. The same person buys one or more money orders several times a day, but never buys money orders totaling more than \$3,000 during any single visit;
- 9. Multiple money orders are purchased by the same person in even hundred dollar denominations or in unusual quantities.

Filing the SAR-MSB. You must file an SAR-MSB (which is available at www.treas.gov/fincen, or www.msb.gov or through the IRS) within 30 days of the suspicious event. You must keep a copy of the report and all supporting documentation for at least five years from the time of its filing. Appendix (IV) shows the SAR-MSB form.

EXAMPLES OF SUSPICIOUS ACTIVITY

AT THE PRESENT TIME, THE FEDERAL GOVERNMENT HAS NOT YET FINALIZED THE NEW SAR-MSB FORM. THEREFORE, UNTIL IT IS FINALIZED, YOU SHOULD CONTINUE TO USE THE EXISTING BANK SAR FORM TO REPORT SUSPICIOUS ACTIVITY.

Federal law provides protection from civil liability for all reports of suspicious transactions made to appropriate authorities, including supporting documentation.

Never Tell Your Customer That You Filed an SAR-MSB. It is illegal for you to tell your customer that you are filing a suspicious transaction report.

If we find evidence in our records that your customers may be misusing our money orders or money transfers, we may contact you as part of our investigation. You must not tell your customer that we have made such an inquiry.

Question: Is there a deadline for filing an SAR-MSB?

Yes. You must file an SAR-MSB no later than 30 days after the detection of facts that constitute a basis for filing the report.

Question: Should you file supporting documentation with the SAR-MSB?

No. You should retain a copy of the SAR-MSB and all original supporting documentation or business record equivalent (including copies of instruments, receipts, photographs, surveillance audio or video tapes, etc.) for five years from the date of filing the SAR-MSB. All supporting documentation must be made available to appropriate authorities upon request. An SAR-MSB report must be typed or legibly handwritten.



Question: When must you file an SAR-MSB?

You must file an SAR-MSB if you have reason to believe a transaction is structured to avoid filing a CTR or other recordkeeping requirement, or is otherwise suspicious and the transaction meets the \$2,000 reporting requirement.

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

Example 2: Jim purchases money orders just below \$3,000 over the course of several days. Jim may be structuring his purchases and you should consider whether an SAR-MSB needs to be filed.

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 for each of them. This appears to be a structured transaction, and may require the filing of a CTR and/or an SAR-MSB.

Example 4: Jim 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 currency to Jim. You should also determine whether an SAR-MSB needs to be filed.

Example 5: Jim and Bill each pick up money transfers. Neither money transfer alone exceeds \$10,000, but together they exceed \$10,000. You give Jim and Bill cash in the amount of their separate money transfers. You then see Jim and Bill give the cash to Susan. This appears to be a structured and suspicious transaction. If you conclude that a structured transaction occurred, you must file an SAR-MSB. If you conclude that

a structured transaction has not occurred, but you determine that Jim and Bill are acting on the behalf of Susan, you must file a CTR. If you are unable to fully complete the CTR, you must complete as much as possible and file the CTR.

Example 6: Jim picks up a money transfer from your location. After Jim has left, you discover that Jim also picked up money transfers at some of your other offices on the same day. Jim may be attempting to avoid the reporting requirements. You should consider whether a structured or suspicious transaction has occurred. If you conclude that a structured or suspicious transaction has occurred, you must file an SAR-MSB if the reporting threshold is met. If the total amount of currency paid to Jim in all such transactions exceeds \$10,000 you must also file a CTR.

Question: Where is an SAR-MSB filed?

The instructions on the form provide the address where it is to be filed.

OFAC AND OTHER REPORTS

The Office of Foreign Assets Control ("OFAC") is a division of the Department of the Treasury that administers and enforces U.S. economic and trade sanctions against targeted foreign countries, terrorists, drug cartels and others. The OFAC regulations require all businesses to identify and freeze the assets of oppressive governments, international terrorists, narcotic traffickers and other specially designated persons. OFAC maintains a list called the Specially Designated Nationals and Blocked Entities List ("SDN List") that identifies most individuals and entities against whom the OFAC restrictions apply. Any type of transaction, involving an SDN is prohibited as a blocked transaction. Some of the countries and groups that are currently targeted by OFAC include: Cuba, Iran, Iraq, Libya, North Korea, Syria, Sudan and the Taliban. The scope of the

OFFICE OF
FOREIGN
ASSETS
CONTROL
REGULATIONS
AND
REPORTING



regulations (and what businesses may and may not do) varies with the specific economic sanctions program. Refer to the OFAC web site (www.ustreas.gov/ofac) for further information.

OTHER REPORTING REQUIREMENTS

There are other reporting obligations that you may be subject to under the BSA, the USA Patriot Act and other anti-money laundering laws. For example, if the President issues an "Executive Order" it may also trigger the filing of additional reports with the government.

Also some states may have specific anti-money laundering regulations that impose additional reporting or recordkeeping requirements on your business.

Question: Will MoneyGram or Travelers Express maintain any of these records on your behalf?

Travelers Express/MoneyGram and our agents each have separate recordkeeping responsibilities. You are responsible for maintaining copies of CTRs, SAR-MSBs, money transfer Send and Receive information, the Logs with information about currency purchases of money orders, and other required records for a period of five years.

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. Criminal violations can result in prison terms. 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, the government will hold businesses criminally liable for the acts of their employees. It is important that your employees are trained on anti-money laundering compliance. It is equally important that your business have a system that enables you to insure that your employees are strictly complying with the laws and regulations.

The government requires strict compliance with these laws and regulations. If you do not comply, you may be subject to large fines, imprisonment, and possibly the loss of your business or other assets. We may also immediately cancel the contract of any agent who knowingly or negligently fails to comply with the laws and regulations.

In other words, non-compliance just isn't worth the risk.

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 IS ACCURATE AND COMPLETE. THIS IS YOUR RESPONSIBILITY. THE GOVERNMENT AND LAW ENFORCEMENT AGENCIES DEPEND ON THIS INFORMATION AS THEY FIGHT AGAINST MONEY LAUNDERING.

Question: What are your principal obligations under the Bank Secrecy Act and the USA Patriot Act?

- 1. To establish an appropriate anti-money laundering program.
- 2. To file a Currency Transaction Report ("CTR") on IRS Form 4789 with the Internal Revenue Service ("IRS") for cash transactions of more than \$10,000 (including consumer fees).



- 3. To file an SAR-MSB whenever you know, suspect, or have reason to suspect: (a) that a transaction involves funds derived from illegal activity or is intended to hide or disguise funds derived from illegal activity; (b) that a transaction is designed to evade any anti-money laundering; or (c) the transaction has no business or apparent lawful purpose and you know of no reason able explanation for the transaction after examining the available facts. An SAR-MSB must be filed when the suspicious activity involves at least \$2,000.
- 4. To keep a copy of any CTR or SAR-MSB (and its supporting documentation) for five years from the date of filing.
- 5. To identify customers and obtain and record certain information about money transfers of \$3,000 or more, for five years.
- 6. To collect certain information and maintain records of money order sales of \$3,000-\$10,000 for five years.
- 7. To comply with the OFAC regulations.

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

You may order more copies of the Guide through your Account Specialist at (800) 257-8418.

If you have any questions about the provision of the laws and regulations, consult your attorney, as we cannot give you legal advice. The penalties for non-compliance are severe, and the government will not accept ignorance or confusion about the regulations as an excuse. **KEEP**

THIS

GUIDE



APPENDIX I

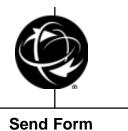
Money Order Log

retaine	is log to record cash money order sales of \$3,000 d for five years from date of sale, according to the	he U.S. Treasury D	epartment regulations.		
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Street Address		Street A	Street Address		
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	For Purchaser's Use	Date	e of Purchase		
	On behalf of another person	_	<u> </u>		
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APPENDIX II

Currency Transaction Report

Rev. June 1998 Peparament of the Teasury The Teasury To Check all box(es) that apply: Use this 1998 revisio For Paperwork Reduction Act Notice (Complete all parts that	saction Report on effective June 1, 1988, e, see page 3. Please type or print. apply—See instructions) OMB No. 1506-0004
Complete all parts that Complete all parts that	apply—See instructions)
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9 City 10 State 11 ZIP co	ide 12 Country (if not U.S.) 13 Occupation, profession, or business
14 If an individual, describe method used to verify identity:	
a ☐ Driver's license/State I.D. b ☐ Passport c ☐ Alien reg e Issued by: f Number:	gistration d Other
Section B-Individual(s) Conducting Transaction(s) (if o	other than above).
if Section B is left blank or incomplete, check the box(es) below a □ Armored Car Service b □ Mail De	to indicate the reason(s): posit or Shipment c Night Deposit or Automated Teller Machine (ATM)
	posit or Shipment c in raight beposit or Automated Takes Machine (ATM) cted On Own Behalf
15 Individual's last name	16 First name 17 M.I.
18 Address (number, street, and apt. or suite no.)	19 SSN : : : : : :
20 City 21 State 22 ZIP co	
25 If an individual, describe method used to verify identity:	birth
a Driver's license/State I.D. b D Passport c Alien reg	gistration d Other
e Issued by: f Number:	
Part II Amount and Type of Transaction(s). Check a	
26 Cash in \$	
29 Greign Currency (Country) 30 Wire Tr.	•
32 Negotiable Instrument(s) Cashed 33 Currenc	cy Exchange(s) 34 Deposit(s)/Withdrawal(s)
35 Account Number(s) Affected (if any): 36 Other (s	specify)
Part III Financial Institution Where Transaction(s) To	okon Plano
37 Name of financial institution	
57 Tagries of Illigracial alsonomia	Enter Federal Regulator or BSA Examiner code number from the instructions here. ►
38 Address (number, street, and apt. or suite no.)	39 SSN or EIN
40 City 41 St	tate 42 ZIP code 43 MICR No.
44 Title of approving official 45 Signature of a	of signature
Here 47 Type or print preparer's name 48 Type or print	name of person to contact 49 Telephone number



APPENDIX III

SENDE / NAVIO

Latific America

Contribution

**Contributi

APPENDIX III

Receive Form

RECEIVE / RECI	ВО	Money G
CUSTOMER USE / PA	RA USO DEL CLIENTE	AGENT USE / PARA USO DEL AGENTE
REFERENCE NUMBER NÚMERO DE REFERENCIA		
RECEIVER'S NAME: LA PERSONA QUE RECIBE:		RECEIVER GOVERNMENT ISSUED ID# AND TYPE: NÚMERO IDENTIFICACIÓN EMITIDO POR EL GOBIERNO, DE LA PERSO
First Name / Primer Nombre	Middle Initial / Inicial Last Name / Apellido(s)	TEST QUESTION: PREGUNTA DE PRUEBA:
Street / Calle	4	Test Question / Pregunta de prueba
City State Ciudad Estado	Zip Home Phone C.P. Teléfono	Test Answer / Respuesta de prueba
SENDER'S PHONE NUMBER: NÚMERO DE TELÉFONO DE LA PERSONA QUE ENVIÁ: SENDER'S NAME:	() (8	MESSAGE / MENSAGE.
LA PERSONA QUE ENVIÁ:	Cobia	NÚMERO DE CHEQUE: Check #1 Agent Check Cheque del Agente Cheque
CANTIDAD QUE ESPERA: Agent must complete the reverse side of thi	\$ form for transactions of \$3000.00 or more. e documento para transactiones de \$1000.00 o más.	CHECK AMOUNT: \$ \$
What city and state was transaction sent from? ¿Desde que ciudad y estado se envió la transacción?		AUTHORIZATION: AUTORIZACIÓN:
RECEIVER'S SIGNATURE: FIRMA DE LA PERSONA		
QUE RECIBE:	Date / Fecha Lacknowledge 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 Employee Name Nombre del empleado del Agente Número de operado

APPENDIX IV

SAR-MSB

TD F 90-22.56 Treasury Form February 2002	Suspicious Activ Money Service Please type or print. Always comple	s Business	OMB No. Unassigned
1 Check the box if this report of	orrects a prior report.		
2 Type of filer (check all that a	oply)		
a Issuer of money orde	r(s) b Seller of money ord	er(s) c 🔲 Redeem	er of money order(s)
d 🔲 Issuer of traveler's ci	neck(s) e Seller of traveler's c	heck(s) f Redeem	er of traveler's check(s)
g Money transmitter	h U.S. Postal Service	i 🗌 Other	
Part I Custome	information		
3 Type of customer			
a Purchaser b		5 First name	6 Middle initial
4 Individual's last name or Enti	ny name	5 First name	6 Middle initial
7 Permanent address (number	street, and apt. or suite no.)		
8 City	9 State 10 Zip	code 11	Country (innot U.S.)
12 Government issued identifica		17	
a Driver's license/State	I.D. b Passport	ien registration	
e Number i	ar 14 Date of birth 15	Phone number (include area code)	e or country
1 1 1 1 1 1 1		\sim	1 1 1 1
16 Customer number, if any	D 77	Occupation/Type of business	1 1 1 1
18 Endorser's last name or Enti	ly name, (any) 19 Endorser's fi	rst name, if any 20 Bank ac	count number of endorser, if any
	strument/Funds Transfer I		
_ \ /	suspect transaction(s) (Check all that app	··	
a Funds transfer 22 Date or date range of suspice	· · · ·	aveler's Check dOther	picious activity
From//	То/	\$! ! ! ! ! !	.00
24.1 Serial number(s) of money	and a few plants and a short of the state of	a Issuer name	
b Starting No.	. .	Ending No.	
24.2 Serial number(s) of money	order(s) or traveler's check(s)	a Issuer name	
b Starting No.		Ending No.	
24.3 Serial number(s) of money	order(s) Or traveler's check(s)	a Issuer name	
b Starting No.		Ending No.	1111111
25.1 Funds transfer number a Issuer name		5.2 Funds transfer number a Issuer name	
b No.		b No.	
	Codolog No. V	vvvvv	

SAMPLE, NOT ALL PAGES SHOWN

	,	

FURTHER INFORMATION

For additional information, refer to the following web-sites:

www.treas.gov/fincen

www.treas.gov/ofac

www.msb.gov

www.temgweb.com

Or Call:

Treasury Department's Financial Crimes Enforcement Network (FinCen) "Hotline" at (800) 949-2732.

MoneyGram at (800) 926-9400 Ext. 4899

Travelers Express at (800) 257-8418