
ANTI-MONEY LAUNDERING COMPLIANCE PROGRAM

Compliance Officer

_____ designated _____ as the Compliance Officer.
The Compliance Officer is available Monday thru Friday _____ AM thru _____ PM.
The Store address is _____.

The Compliance Officer is responsible for implementing and overseeing this compliance program.

The Compliance Officer's responsibilities will include:

1. Creating anti-money laundering policies and procedures
2. Updating policies and procedures
3. Monitoring the program
5. Ensuring CTR's and SAR's are accurate and complete and filed timely.
6. Ensuring that a money order and wire transfer log is maintained for transactions of \$3,000 or more and;
7. Retaining the documentation for a period of 5 Years.

MONEY TRANSFERS

Each employee handling wire transfers will be responsible for reviewing and recording customer identification for transfers of \$3,000 or more (inclusive of fees) and multiple transactions of \$3,000 or more by or on behalf of a single customer in one business day.

Money Transfer \$1,000 or more

1. Review customer identification and ensure:

Current valid,
Government Issued,
Contains a photograph.
Contains customers name, and
Contains customer's address.

2. Verify customer identity by comparing customer to identification documents
3. Record on the send or receive forms the customers name, address, type of ID, and ID number.
4. Obtain the customers signature on the wire transfer form.

Money transfer of \$3,000 (inclusive of fees) or more (one or more transactions in the same day)

5. In addition to the procedures above, the employee will record on the wire transfer log the name and address of the transmitter, and the amount of the transmittal order.

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The execution date of the transmittal order
Any payment instructions received from the transmitter with the transmittal form
The name and address of the recipient
Any other specific identifier of the recipient, and;
Any form relating to the transmittal of funds that is completed or signed by the person
Placing the transmittal order.

MONEY ORDERS

Each employee handling money order transaction will be responsible for reviewing and recording customer identification for transactions of \$3,000 or more (inclusive of fees) and multiple transactions of \$3,000 or more by or on the behalf of a single customer in one business day.

1. Review Customer Identification and Ensure
 - Current Valid,
 - Government Issued,
 - Contains a photograph,
 - Contains Customer's name, and
 - Contains customers address.
2. Verify customer's identity by comparing customer to identification documents
3. For any Money Order transaction of \$3,000 or more (single or multiple transactions inclusive of fee) in any one business day by one or on behalf of a single consumer in one day, the employee must obtain and record on the Money Order Log, the customer's:
 - Date Of Purchase
 - Serial Number of each Money Order Sold
 - Amount of each Money Order
 - Name
 - Address
 - Type of Identification (____ Drivers License)
 - Identification Number
 - Social Security Number or Alien ID Number
 - Date of Birth
 - Occupation
 - Clerk's Name
4. Notify the Compliance Officer of any single or multiple transactions that exceed \$10,000 at the time of the transaction to ensure that a complete and accurate CTR is filed within 15 days of the transaction date with the DCC.
5. Required records shall be retained for a period of 5 years and shall be made available to the Secretary of Treasury upon request.

CHECK CASHING

Each employee handling check cashing will be responsible for reviewing and recording customer identification for transactions of \$3,000 or more (inclusive of d=fees) and multiple transactions of \$3,000 or more by or on behalf of a single customer in one business day. (Whatever dollar figure business is comfortable with).

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1. Review Customer Identification and ensure
 - Current Valid
 - Government Issued
 - Contains a Photograph
 - Contains customers name
 - Contains customers address
 - Verify customer identity by comparing customer to identification documents, and Record or make copy of the ID information.
2. Enter the check on the Daily deposit slip
3. Notify the compliance officer of any checks of \$10,000 or more (single of multiple transactions in one day), so that an accurate and complete CTR is filed within 15 days of the transaction with the DCC.

CURRENCY TRANSACTION REPORTS (CTRs) FOR MONEY ORDERS, MONEY TRANSFERS , AND CHECK CASHING

The Compliance Officer will be responsible for completing the CTR for a single currency transaction of \$10,000 (inclusive of fees) and multiple currency transactions that total over \$10,000 by a single customer in one business day. The CTRs will be filed within 15 days of the transaction with the:

IRS Detroit Computing Center
Attn: CTR
P.O. Box 33604
Detroit, MI 48232-5604

A copy of the CTRs filed will be retained in the CTR folder along with any supporting documentation and retained for 5 years.

The Compliance Officer will be the contact for law enforcement.

The compliance officer will be responsible for responding to any IRS correspondence requiring additional or corrected information.

SUSPICIOUS ACTIVITY REPORT FOR MONEY ORDERS, MONEY TRANSFERS, AND CHECK CASHING

The compliance officer will be responsible for completing SAR for transactions over \$2,000 or more and suspicious. Employees will be responsible for identifying and collecting as much information as possible about the customer and providing this to the compliance officer.

Through training (initial and ongoing) provided to the employees they will be able to identify suspicious activity that includes, but is not limited to:

- Possible attempts to launder money
- Structuring transactions to avoid Bank Secrecy Act reporting and record keeping requirements
- Transactions that serve no business or apparent lawful purpose
- Transactions that are unusual for the customer, and there is no reasonable explanation
- Inconsistent information, and
- Any other transaction involving potential criminal activity in the view of the company.

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The Compliance Officer will send completed SARs to:

IRS Detroit Computing Center
Attn: SAR-MSB
P.O. Box 33117
Detroit, MI 48232-5980

MONITORING THE ANTI-MONEY LAUNDERING COMPLIANCE PROGRAM

1. Each day the Compliance Officer will verify that:
 - CTRs are being completed correctly and filed within the required time
 - Employees are reporting suspicious activity according to the training they received
 - SAR-MSBs are being completed correctly and filed within the required time
 - ID requirements are being met
 - Money order and Wire transfer logs are complete and accurate
 - New Compliance information is provided to the employees.
 - New and existing employees receive initial and ongoing compliance training
2. Each month the Compliance Officer will document the monitoring process
3. The Compliance Officer will review the Daily Transaction logs (e.g. wire transfer daily logs, money order tapes, copies of deposit slips) looking for Suspicious Activity and for Aggregate amounts of over \$10,000 in order to complete SARs and CTRs.

EMPLOYEE TRAINING

1. Initial Employee training will be conducted by the Compliance Officer within one week of hire.
2. The employee will read the Compliance Book and will sign and date an acknowledgement of their training. This acknowledgement will be kept in the employees personnel file.
3. The Compliance Officer will review with employees the compliance program and procedures.
4. Every month each employee will be required to read, sign and date the _____ newsletter.
5. Each employee will be required to read, sign and date available correspondence related to money laundering.
6. Each employee will have their own user name and pass codes to access the systems.
7. The Compliance Officer will remove access to the systems after an employee leaves the company.
8. Each employee is responsible for adhering to the Companies Policies and Procedures.

COMPLIANCE PROGRAM REVIEW PLAN

_____ designates _____ as the independent reviewer

Of this Anti-Money Laundering Compliance Program.

The independent Reviewer will perform a program review every six months

This review will determine whether the compliance program is sufficient to comply with the Bank Secrecy Act and is being followed.

At the completion of the review, the Compliance Officer will take remedial action within one week to correct any deficiencies.

A copy of the review will be retained for 5 years.

RECORD RETENTION

_____ will maintain all records required by the Bank Secrecy Act for a period of 5 years.