

STRUCTURING

Structuring is when someone acting alone or with another person, makes several purchases of money orders to avoid completing a Currency Transaction Report (CTR) or making a record of the money order purchase.



Structuring can occur in a single day or over several days

Examples of Structuring:

- ABC Corporation needs \$7500 in money orders. They send four different employees to purchase money orders from one store in amounts of \$2000, \$1900, \$2500, and \$1100 at different times during one business day.
- A customer wants to buy \$5000 in money orders, but knowing the threshold of \$3000, she buys \$2500 worth of money orders in the morning and returns to buy \$2500 worth of money orders the next day or in the afternoon.

Structuring is a Federal Crime that must be reported on a Suspicious Activity Report (MSB-SAR)



CLUES TO DETECT STRUCTURING.....



The customer comes into the store several times and buys money orders that fall just below the amounts that require making a record.

Several people work together to break one large money order purchase into two or more money order purchases.

IMPORTANT:

Agents cannot help someone “structure” or attempt to “structure” a money order purchase by telling or implying to a person that buying smaller amounts of money orders over several purchases will allow the buyer to avoid the record keeping requirements.

Print, sign, and keep this document as proof that you received continuous training on anti-money laundering laws and regulations. Make additional copies for employees as proof that you trained employees on anti-money laundering laws and regulations. Keep all signed copies for 5 years.

Name/Signature

Agent Number

Date