

# Independent Review

Review Time Period: From

To:

	Yes	No	Comments/Corrective Action
<b>Policies and Procedures</b>			
Is the MEMO Manual at the selling location?			
Are there written policies and procedures?			
Does the selling location's anti-money laundering policies and procedures reflect the current laws and regulations?			
Does the selling location communicate the policies and procedures to all employees selling money orders?			
<b>Compliance Officer:</b>			
Has the business designated a Compliance Officer?			
Does the Compliance Officer perform the duties and requirements written in the business' anti-money laundering program?			
<b>Training</b>			
Have all employees who sell money orders to consumers received anti-money laundering training during the review period?			
Are there records showing which employees have been trained?			
Has the Compliance Officer made sure employees understand the business' compliance policies and procedures relating to anti-money laundering?			
<b>Currency Transaction Reports</b>			
<b>Review money order sales report</b>			
Has the business sold more than \$10,000 (including fees) in money orders to a single consumer in a single day? If yes answer the next questions.			
Did the business submit a CTR for each sale of money orders exceeding \$10,000 to a single consumer in a single day?			
Are the CTRs properly completed (included signed and dated by Agent)?			
Were the CTRs filed within 15 days of the transaction?			
Has the business kept copies of the CTRs for 5 years?			
<b>Suspicious Activity Reports</b>			
Review completed SAR-MSBs			
Has the business filed any SAR-MSBs? If yes, answer the following questions.			
Were the SAR-MSBs filed within 30 days of the suspicious activity?			
Were the SAR-MSBs completed properly?			
Has the business kept the SAR-MSB for 5 years?			

