Independent Review

Review T	me Period: From To:			
		Yes	No	Comments/Corrective Action
Policies a	and Procedures			
	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?			
Compliar	nce Officer:			
	Has the business designated a Compliance Officer?			
	Does the Compliance Officer perform the duties and requirements written in			
	the business' anti-money laundering program?			
Training				
	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 beend trained?			
	Has the Compliance Officer made sure employees understand the business'			
	compliance policies and procedures relating to anti-money laundering?			
Currency	Transaction Reports			
Review n	noney order sales report			
	Has the business sold more than \$10,000 (including fees) in money orders to			
	a singler 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?			
Suspicio	us Activity Reports			
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?			
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Money Order Transaction Reports or Records			
Review money order sales report			
Has the business sold money orders to a singler consumer in a single day totaling \$3,000 - \$10,000 (including fees)? If yes answer the next questions.			
Did the business make a record of the transaction using the MEMO Money Order Transaction Report or similar form?			
Did the business collect and record all the required information?			
Has the business kept the money order transaction report for 5 years?			
Previous Independent Reviews			
Has the business taken action to correct past problems?			

Summary and description of any corrective action the business should take based upon this Review:

Program Reviewer

Date

Compliance Officer

Date