

**Anti-Money Laundering News for MEMO Agents** 

April - June 2022

## REPORTING HIGH DOLLAR TRANSACTIONS

High Dollar Transactions of \$3,000 - \$10,000 sold to one or more person(s) in one or more transaction(s) must be recorded on the correct form and sent to MEMO. It is IMPORTANT to send the Money Order Transaction Report and/or Bill Payment Transaction Report to MEMO by the end of that same business day. If the form is not received the same day, MEMO will contact you as a courtesy to assist our agents in complying with this federal recordkeeping requirement. A copy of the report must be kept for your records for five (5) years.

## **STRUCTURING**

## Watch for Structuring

Structuring can occur in a single day or over several days. The same purchaser will make a purchase just below what is required to make a record. Then come back in next day or over several days later and purchase more money orders. If this is the same person, they are structuring, and a Money Order Transaction Report will need to be completed and a copy sent to MEMO.

Reminder: MEMO recommends yearly AML training. Make sure your training is current Visit <u>www.memoco.com</u> Agents Only then AML Compliance

IMPORTANT: COMPLETE AN INDEPENDENT REVIEW OF YOUR AML PROGRAM NOW. THE INDEPENDENT REVIEW OF YOUR AML PROGRAM MUST BE CONDUCTED BY SOMEONE OTHER THAN THE COMPLIANCE OFFICER. FORMS CAN BE FOUND IN CHAPTER 2 OF THE AML MANUAL.

**Check Cashers:** Be sure to send your Independent Review to MEMO yearly when completed.

IMPORTANT: PLEASE RESPOND PROMPTLY WHEN YOUR BANK REQUESTS INFORMATION AND ANSWER ALL QUESTIONS TO AVOID THE BANK CLOSING YOUR ACCOUNT. Banks are required by law to obtain and maintain detailed information about their account holders, especially Money Services Businesses (MSBs).

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 have trained employees on Anti-Money Laundering Laws and Regulations. Keep all signed copies for 5 years.			
Name/Signature	Agent Number	Date	

## **MEMO's Compliance Department Contacts**

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