Annual AML Independent Review Audit

Agent Name _____ Agent # _____

Review Time Period, From: To:

		Yes	No	Comments/Crrective Action
Policies 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 employees selling money orders?			
Compliance 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 or bill payment services 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?			
Currency Transaction Reports				
Review money order sales report				
	Has the business sold more than $10,000 (including fees) in money orders or Bill payment services for non-Authorized billers 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 or bill payment service for non-Authorized billers 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?			
Suspicious 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			

Money Order Transaction Reports or Records				
Review money order sales report				
	Has the business sold money orders or bill payment services for non-Authorized billers to a single 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, MEMO Bill Payment Transaction Report or similar form?			
	Did the business collect and record all the required information?			
	Has the business kept the Money Order Transaction Report or Bill Payment 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