

**BDO REMIT (USA), INC.
ANTI-MONEY LAUNDERING/
COUNTER TERRORIST FINANCING
COMPLIANCE MANUAL FOR AGENTS**

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SHARE THIS MANUAL WITH YOUR EMPLOYEES

As this Manual has made clear, it is extremely important that you and your employees thoroughly understand the requirements of anti-money laundering and counter terrorist financing regulations. We have provided this Manual to help you in this important task. Make sure that all of your employees read and understand this Manual.

You may obtain additional copies of this Manual by printing the manual in BRS-SAF provided to you under "tools" "AML Compliance Manual" or by calling the Compliance Department of BDO Remit at 1-800-472-3252

The penalties for non-compliance are severe. Ignorance or confusion about the regulations and laws is not a defense.

1 CHAPTER 1

1.1 Adoption of Compliance Program

By completing the Certification on this page, this entity is formally adopting the materials in this manual as a part of its USA PATRIOT Act required Compliance Program.

This entity should supplement its Compliance Program with the specific procedures of the business, as well as with additional information provided by regulators of Money Services Businesses.

The adoption of this program is just one step this entity will take to ensure that it maintains an effective Anti-Money Laundering / Counter Terrorist Financing Compliance Program. Other measures this entity will take include employee training on this program, the designation of a Compliance Officer, and an independent review of the quality of this program.

Certification of Adoption of Compliance Program

I, _____, (name) on behalf of _____, (name of business) certify that this entity has adopted an Anti-Money Laundering and Counter Terrorist Financing compliance program, which includes the policies and procedures contained in the BDO Remit (USA), Inc. Anti-Money Laundering /Counter Terrorist Financing Compliance Manual. Furthermore, this entity will comply with all of the reporting and recordkeeping requirements imposed by the Bank Secrecy Act, the USA PATRIOT Act and any other applicable anti-money laundering / counter terrorist financing laws or regulations.

Date: _____
Name: _____
Title: _____
Company: _____

1.2 Designation of a Compliance Officer

This entity agrees to formally designate a competent individual to serve as its Compliance Officer. The designated individual may be an employee of this entity, but should be in a position of responsibility in the entity's organization to ensure that he or she is able to implement an effective Anti-Money Laundering / Counter Terrorist Financing Compliance Program.

The Compliance Officer's duties will include: ensuring proper compliance training of all staff involved in Money Services Business (MSB) activities; proper recordkeeping and **reporting** as mandated by the Bank Secrecy Act; updating the Compliance Program as necessary due to changes in laws or regulations; maintaining compliance with licensing laws and OFAC requirements; and ensuring adherence to any related compliance laws and regulations

The Compliance Officer is also responsible for ensuring that an independent periodic review is conducted on the quality of the Compliance Program. The review is to be conducted by a senior level employee or a qualified professional, other than the Compliance Officer, who understands the requirements of an effective compliance program.

**Designation of Anti-Money Laundering
Compliance Officer**

_____ (name of person) is hereby designated as the Anti-Money Laundering / Compliance Officer for _____ (name of business). The Compliance Officer, as well as senior management, is responsible for ensuring the ongoing compliance of this entity with all state and federal anti-money laundering and counter terrorist financing (AML/CTF) laws, and for ensuring that all employees are trained on AML/CTF requirements before conducting any Money Services Business (MSB) activity.

Date: _____
Name: _____
Title: _____
Company: _____

1.3 Employee Training

One of the key components of an effective compliance program is employee training. At a minimum, this training must include: how to identify suspicious activity and structured transactions; recordkeeping and reporting requirements; verifying customer identification and familiarity with anti-money laundering forms.

Before conducting any Money Services Business (MSB) transactions, employees should be required to review all of the information in this Manual and sign a copy of the Acknowledgment form that will be retained in their personnel file or the business's anti-money laundering files.

ACKNOWLEDGEMENT OF EMPLOYEE TRAINING

I have read the materials in this Manual and have been trained and understand the Anti-Money Laundering / Counter Terrorist Financing Compliance Program requirements. In addition, prior to conducting any Money Services Business (MSB) transactions for this entity, I have been instructed on the Bank Secrecy Act reporting and recordkeeping requirements, including the recognition of suspicious activity and reporting such to BDO Remit (USA), Inc.

Employee's Name: _____
Employee's Signature: _____
Date: _____

1.4 Independent Review

Every Money Services Business (MSB) is required by the USA PATRIOT Act to conduct an independent review of its compliance program. A senior level employee of the MSB, or some other

qualified party such as the MSB's attorney or accountant, may conduct the review. However, the MSB's designated Compliance Officer may not conduct the review.

If an employee of the MSB conducts the review, it should be an employee who is familiar with the MSB's compliance program and the anti-money laundering / counter terrorist financing requirements that apply to the MSB. The USA PATRIOT Act does not specify the frequency with which MSB's should conduct their review, but it should be conducted at least annually.

A checklist that can be used to perform the independent review of your business's anti-money laundering / counter terrorist financing compliance program is provided in Chapter 4 – Annex "H".

Certification of Independent Review

I have completed an independent review of the compliance program of _____ (name of business). Among other things, this review focused on the requirements of the USA PATRIOT Act and the Bank Secrecy Act. The results of my review are that I find this entity's anti-money laundering / counter terrorist financing compliance program:

Acceptable _____

Acceptable, but recommend the following enhancements

Unacceptable for the following reasons _____

Reviewer's Signature _____

Reviewer's Name _____

Reviewer's Title/Position _____

Reviewer's Company _____

Date of Review _____

HERE'S WHY YOU SHOULD READ THIS GUIDE

Dear BDO Remit Agent:

The purpose of this Guide is to help you and your employees:

- Detect and prevent money laundering and terrorist financing;
- Comply with the Bank Secrecy Act's (BSA) recordkeeping and reporting requirements;
- Comply with the USA PATRIOT Act;
- Identify suspicious activity; and,
- Comply with the requirements of the Office of Foreign Assets Control (OFAC) and other anti-money laundering / counter terrorist financing regulations.

Your knowledge of the information in this Guide may help prevent your business from being used and victimized by money launderers and help you comply with the law. In addition, your compliance with these requirements may help law enforcement agents in their efforts to track down and capture terrorists who illegally launder money.

It is BDO Remit's policy to follow the spirit, as well as the letter of the law. We do not want our money transmission business to be used for illegal purposes. We will not do business with anyone who knowingly violates the law. Although we cannot take responsibility for you or your employees' compliance with the anti-money laundering / counter terrorist financing laws and regulations, we believe this Guide can help you develop your own effective anti-money laundering / counter terrorist financing compliance program.

BDO Remit thanks you for your shared dedication to the fight against money laundering and terrorism.

Guide Contents

Money Services Businesses (MSBs) and their employees who conduct money transfer transactions **must** comply with all anti-money laundering / counter terrorist financing laws and regulations that apply to them.

Section I. Money Laundering Overview

Money laundering is the attempt to conceal or disguise the nature, location, source, ownership, or control of illegally obtained money. The government requires businesses like yours to file reports and maintain records.

Section II. USA PATRIOT Act

You must implement an anti-money laundering / counter terrorist financing program based on the risks associated with your business, such as size, location, volume of business, etc.

Section III. Recordkeeping

You must record certain information regarding BDO Remit's money transfer transactions that meet prescribed regulatory and company-established monetary limits.

Section IV. Currency Transaction Report (CTR)

You must obtain all necessary information including regulatory and company-required documentations needed for BDO Remit to file a CTR for any cash/currency transaction greater than \$10,000.

Section V. Structuring

Structuring is the illegal act of breaking up a larger transaction into smaller transactions in order to avoid the recordkeeping or reporting requirements.

Section VI. Suspicious Activity Reporting

Suspicious activity involves transactions that appear to be structured or do not have any legitimate purpose. You must inform BDO Remit any suspicious activity you may notice or encounter in order for BDO Remit to investigate and if necessary file a Suspicious Activity Report by Money Services Business (SAR-MSB) on suspicious activity that involves at least \$2,000.

Section VII. OFAC and Other Reports

The U.S. Treasury Department's Office of Foreign Assets Control (OFAC) prohibits all U.S. entities from conducting business with targeted countries, drug cartels, terrorists and other specially identified individuals.

Section VIII. MSB Registration

All MSB's are required to register with the U.S. Treasury Department. *However, most BDO Remit agents are covered by BDO Remit's registration, so they do not have to register on their own.*

Section IX. Civil and Criminal Penalties

The government can impose severe penalties against individuals and businesses for violating money laundering laws and regulations. The criminal penalties for an individual may reach as much as \$500,000 in fines, up to 10 years of imprisonment, and the loss of your business.

This Guide is not legal advice. If you need legal advice, you should seek the services of an attorney.

Section I

2.2 Money Laundering Overview

Money laundering is the attempt to conceal or disguise the nature, location, source, ownership, or control of illegally obtained money.

This definition covers a wide range of activity. You need to understand how people launder money so that you can identify money laundering and know how to help prevent it.

To help prevent the laundering of cash and to obtain documentation that may be used to prosecute money launderers, the government requires certain businesses to file specific reports and maintain records on certain cash transactions.

Who Is Covered?

Because you process money transfer transactions, you are subject to the Bank Secrecy Act (BSA), the USA PATRIOT Act, OFAC, other anti-money laundering / counter terrorist financing laws, and to their reporting and recordkeeping obligations. The BSA requires anyone doing business in one or more of the capacities listed below to comply with these laws:

- A. A money transmitter;

- B. A seller of money orders, or stored value (other than a person who never sells such checks or money orders or stored value in an amount greater than \$1,000, to any person, on any day, in one or more transactions);
- C. A person engaged in the business of a check casher (other than a person who never cashes checks in an amount greater than \$1,000, for any person, on any day, in one or more transactions).

All entities that are covered by the definitions above are known as **“MSBs” which stands for Money Services Businesses.**

Section II

2.3 USA PATRIOT Act Anti-Money Laundering Compliance Program

The USA PATRIOT Act requires that all MSBs adopt a written anti-money laundering compliance program that is reasonably designed to ensure proper record keeping and reporting of certain transactions, and to prevent your business from being used to launder money. Your anti-money laundering / counter terrorist financing compliance program must include, at a minimum, the following:

- A. Internal policies, procedures and controls for:
 - Verifying customer identification
 - Filing reports
 - Creating and retaining records
 - Responding to law enforcement requests
- B. The designation of a Compliance Officer who is responsible for assuring that:
 - Policies and procedures are followed
 - Procedures are updated as needed
 - Training and education are provided
 - Reports are properly filed
- C. Risk assessment commensurate with the business activities such as:
 - Customer types, products, volumes, and amounts
 - Geographic location of the business, high intensity financial crime areas (HIFCA) and high intensity drug trafficking areas (HIDTA)
 - Multiple MSBs the agent offers to its customers and
 - The number of suspicious activity reports (SARs) that were filed
- D. An ongoing employee training program that:
 - Explains policies and procedures
 - Teaches how to recognize and identify suspicious activity
- E. An independent review of your anti-money laundering/counter terrorist financing program:
 - The review should take place as needed and be as thorough as needed based on the risks specific to your business.
 - The review may be performed by one of your responsible employees who is knowledgeable with the compliance program and the anti-money laundering / counter terrorist financing requirements that apply to the MSB.
 - Your Compliance Officer cannot perform the review.

The information contained in this Guide will provide your business with the tools it needs to build an anti-money laundering/counter terrorist financing compliance program that meets the

requirements of the USA PATRIOT Act. However, the quality and effectiveness of the program depends on your commitment to it. *The only opportunity to verify customer information and identify suspicious activity is at the point of sale. This can only be done with a knowledgeable, well-trained staff.*

**BDO Remit recommends the following steps
in order to satisfy the requirements of the USA PATRIOT Act:**

First, your business should formally adopt a risk-based anti-money laundering / counter terrorist financing compliance program. This Guide can serve as the basis for that program. See Chapter 1 for a form that can be used to certify adoption of such a program.

Second, your business must designate a Compliance Officer. The Compliance Officer may be an employee who has other duties at your business, but it should be someone in a responsible position. The Compliance Officer is responsible for your business's day-to-day compliance with the anti-money laundering laws and regulations, and for ensuring the compliance program is updated as needed. The Compliance Officer is also responsible for overseeing your business's ongoing education and training program. When you designate a Compliance Officer, you should complete the Designation of Compliance Officer form shown in Chapter 1 and then retain it in your anti-money laundering compliance files.

Third, your business must conduct a risk assessment taking into consideration:

- **Customer type**
- **Products /services/Amounts**
- **Business location – HIFCA & HIDTA**
- **Distribution channel**

Third, Your business must establish policies and procedures on how to detect suspicious transactions sent to different carriers (MSBs). Please note that BDO Remit (USA), Inc has a report in our BDO Remittance System (BRS) that would detect suspicious transactions but are limited to BDO Remit transactions only. The Compliance and Operations Officers of BDO Remit shall advise you via e-mail or phone call to tag certain remitters identified as high risk and will advise you to get a required document/s, i.e, the BSA Compliance Form or bank statement or withdrawal slip. You should not process another transaction until the required document/s is/are submitted.

Fourth, your business must establish an ongoing employee-training program for all employees who will have any involvement with MSB activities. The education and training should include instruction on the employees' responsibilities under the program, as well as the detection of suspicious transactions. One good tool for training is this Guide. All employees should be required to read this Guide prior to conducting any MSB transactions. In addition, prior to conducting any MSB transactions, employees should sign a copy of the form in Chapter 1 that is then kept in their personnel file. Employees should also receive periodic updates to their training, particularly when there are changes in regulations.

Fifth, your business must subject its anti-money laundering / counter terrorist financing program to an independent review to assure its adequacy. The regulations state that the scope and frequency of this review should be "commensurate with the risk of the financial services provided by the money services business." Such a review should be conducted annually based- on the risks faced by the MSB. An officer or employee of your business may conduct the review, but the person who is designated as the Compliance Officer cannot conduct it. A form is shown in Chapter 1 that can be used to help your business comply with this requirement.

Finally, it is important that you create recordkeeping files for your anti-money laundering /counter terrorist financing program. These files can then be readily accessed if your business is examined/audited by state or federal regulators. In addition to files containing the information described above, you should have files that are clearly labeled and contain the following:

1. A copy of this Manual in a file labeled "AML/CTF Program" (Anti-Money Laundering / Counter-Terrorist Financing Compliance Program) along with any other compliance guides you may receive from other vendors, trade associations, acco

2. Consultants, lawyers, etc. The content in these materials can serve as a guideline for your program. However, you must create a program that includes your business's internal procedures.
3. A file labeled "PATRIOT Act" for your completed Adoption of Compliance Program, Designation of Compliance Officer, Employee Training and Independent Review forms. You should also keep your completed MSB Registration form or a document that explains why your business was not required to register.
4. Although the preparation of CTRs and SARs are centralized at BDO Remit Head Office, a file containing the photo identification and information documents for transactions requiring CTRs; and, the company designed SAR Incident Report (explained in Section 6) including any supporting materials should be maintained in a file labeled "CTR/SAR".
5. A file labeled "Recordkeeping" for money transmissions that meet prescribed regulatory and company established limits. This file will include payment instructions, company designed BSA Compliance forms and photocopies of required identification and customer information.
6. In addition to these basic files, you may also want to add a file labeled "Government Communications" containing any updated information you receive from regulators or law enforcement agencies regarding money laundering or terrorism.

Section III

2.4 Recordkeeping

Recordkeeping Requirements for Money Transfers:

BDO Remit will follow state laws where they are stricter than the Company's own policies; otherwise the Company's policies will prevail.

All recordkeeping and reporting documentation required by the BSA will be maintained for a minimum of five (5) years and they will be made readily available to the Treasury Department upon request.

All forms and documents should be properly destroyed at the end of the five (5) years.

BDO Remit Identification and Recordkeeping Requirements:

BDO Remit has set a **\$2,000 or more (fee inclusive) threshold amount for single and/or multiple transactions in one business day** that requires customers to fill-up and sign a company-designed identification and recordkeeping form called **"BSA Compliance Form"** shown in Chapter 4 – Annex "D". Obtaining and recording all the information requested in this BSA Compliance Form and having the form signed by the customer, will supply all the required information.

Whenever a customer requests a money transfer, the following information must be collected **BEFORE** the transaction is processed for **single and/or multiple remittance transaction/s in one business day**, the required documentation shall be faxed to BDO Remit on the same day before any transactions will be processed at the Head Office:

For individuals

Up to \$1,999.99 (Fee inclusive for Cash/Checks/Money Orders)

- Record and verify name, present & permanent address (A P.O. Box address is not acceptable), place of birth, nature of work, source of funds, purpose of remittance and the telephone number. If remitter or beneficiary has no telephone no. "0000000" shall be indicated.
- Record and verify the type and number of any (1) valid US government-issued photo ID reviewed (i.e., State-issued ID/Driver's License/Passport, Alien Registration Card), **if none**, any (1) valid foreign government-issued photo ID e.g. passport, driver's license or alien identification card evidencing nationality or country of residence.

\$2,000.00 - \$10,000 (Fee inclusive for Cash/Checks/Money Orders)

- Record and verify name and present & permanent address (A P.O. Box address is not acceptable), place of birth, nature of work, source of funds, purpose of remittance and telephone number. If remitter or beneficiary has no telephone no. "0000000" shall be indicated.
- Record and verify the type and number of any (1) valid US government-issued photo ID reviewed (i.e., State-issued ID/Driver's License/Passport or Alien Registration Card).
- Photocopy of the photo ID.
- Record the Social Security Number.

- Require remitter to provide information and sign the BSA Compliance Form.

More than \$10,000 (Fee inclusive)

- Record and verify name and address (A P.O. Box address is not acceptable), place of birth, nature of work, source of funds, purpose of remittance and telephone number. If remitter or beneficiary has no telephone no. "00000000" shall be indicated.
- Record and verify the type and number of any (1) valid US government-issued photo ID reviewed (i.e., State-issued ID/Driver's License/Passport or Alien Registration Card).
- Photocopy of the photo ID.
- Record the Social Security Number.
- Require remitter to submit photocopy of bank statement or withdrawal slip
- Require remitter to provide information and sign the BSA Compliance Form.

For checks/money order mode of payment only:

- Photocopy of the check/money order.

For cash mode of payment only:

- Photocopy of Social Security Card (SSN Card).

For Juridical Entities

- Articles of Incorporation
- Business permit
- EIN

Notes:

1. No cash transactions exceeding \$10,000 will be accepted without a copy of SSN Card and source of funds, i.e. Bank statement or withdrawal slip. A substitute document clearly showing the SSN e.g., US withholding tax certificate, income tax return, etc. may be accepted subject to the approval of BDO Remit's General Manager or his designate.
2. For amounts \$2,000 - \$10,000, if remitter has no US ID, presentation of any (1) valid foreign government-issued photo ID, e.g., passport, driver's license or alien identification card evidencing nationality or country of residence may be accepted subject to the approval of BDO Remit's General Manager or his designate.
3. **For Seamen** remitting \$2,000 - \$10,000, the photocopies of the I-95 and company ID are required in lieu of SSN. Philippine address and telephone no. shall be indicated. Remittance transaction of more than \$10,000 will not be accepted.
4. Recording of name, address and telephone no. including type and number of ID will only be done one-time for new customers.
5. Customers with given address that is different from the address in the photo ID may be required to present proof of residence such as utility bills, credit card statements, etc.
6. All checks are subject to verification and bank clearing prior to processing.
7. BDO Remit retains the right to refuse to process any transaction at its sole discretion or as it sees fit. BDO Remit also reserves the right to require additional documents, as it deems necessary.

Third Party Information

If the customer who is conducting a transaction is doing so for someone else, the information must be obtained for both parties, one for the person conducting the transaction and one for whom the transaction is conducted for. Examples of third parties are an employee of a business

conducting the transaction for the business, or a relative of an elderly or disabled person conducting the transaction for that person.

Moreover, for transactions amounting to \$2,000 or more, one BSA Compliance form shall be completed by the person conducting the transaction and one for whom the transaction is conducted for.

2.5 Currency Transaction Reporting Requirements

A Currency Transaction Report (CTR) must be filed with the federal government for any **cash transaction of more than \$10,000**, conducted in one day, by any person, or on behalf of another person. You must treat multiple money transfers as a single transaction if you have knowledge that they are by or on behalf of the same person and total over \$10,000, during one business day. This \$10,000 amount includes both the face amount of the transaction and any fees paid by the customer. You must obtain the necessary information and documentation before the transaction is completed.

Identification Requirements for CTRs.

Before conducting any transaction that requires a CTR, you must verify your customer's name and address (A PO Box is not acceptable) in the following manner:

You must see a document that banks normally accept when cashing checks for non-customers, such as a driver's license, passport, or a state issued identification card. In all situations, you should only accept valid, current identification that contains a photograph of the customer. BDO Remit's policy involves accepting cash/currency transaction of more than \$10,000, which is subject to a CTR filing, only from customers that present a copy of the SSN Card.

The regulations require that you verify and record your customer's name, address and Social Security Number for CTR purposes. The CTR form also asks for occupation, date of birth, and other information. Again, ***by having the customer complete the company designed "BSA Compliance Form"***, you will have all of the information that you are required for CTR completion.

If two or more people are conducting the transaction, or if the transaction is being conducted on behalf of someone else, **you must obtain similar information for all parties**. Examples might be an employee of a business conducting the transaction for the business or a relative of an elderly or disabled person conducting the transaction for that person.

You must obtain all of the information ***before you complete the transaction***.

Below are BDO Remit's policies regarding preparation and filing of CTRs:

1. The preparation of the CTRs will be centralized at the BDO Remit Head Office.
2. It is the responsibility of the Agent to obtain the necessary information and documents needed for CTR purposes. Follow strictly the identification requirements prescribed by regulation and BDO Remit's Identification and Recordkeeping requirements contained in Section III. The required documentation shall be faxed to BDO Remit on the same day before any transactions will be processed at the Head Office. Incomplete information and documentation will hold processing of the remittance transaction.
3. Agent remittance tellers shall advise remitter that the transaction will be covered by a CTR to be submitted to the IRS within fifteen (15) days from date of transaction.
4. Agent shall verify identity of remitter using BDO Remit's existing records if remitter, after having been properly identified before, is a repeat customer and has been previously assigned a unique Remitter ID Number.
5. In Part III of the CTR form, the Agent name and address will be entered to indicate where the particular remittance transaction subject to CTR reporting took place. However, since CTR are centrally prepared in BDO Remit Head Office, BDO Remit will be the one to prepare, sign and file the CTR report with the IRS on a Currency Transaction Report - within 15 days of the transaction in behalf of the Agent. **In case the Agent receives any inquiries or verification letters coming from regulatory bodies regarding the filed CTRs, the Agent is required to immediately direct such to BDO Remit's Compliance department for proper disposition.**

6. BDO Remit will keep a copy of the CTR and supporting documents for at least five (5) years from the date of filing and the file will be kept in a secure location. Agents are required to keep their supporting documents also for the same period of time. Agents may request from BDO Remit copies of CTRs filed, especially in cases of Agent examinations by regulatory agencies.
7. In case new customers refused to provide the required identification details, courteously decline the transaction. Explain that the CTR is strictly required by the government for all currency transactions in excess of \$10,000.00. If sufficient and helpful information can be gathered, complete and submit a SAR Incident Report (explained in Section VI) to BDO Remit.
8. Should remitter insist that his/her transaction be accepted/processed, refer the transaction to BDO Remit's Compliance Officer. In this difficult situation, the most prudent course of action is to continue to decline the transaction because the remitter would not provide the information needed to have a CTR prepared. However, if it became clear that continuous refusal would expose to danger any of the agent personnel, the transaction shall be accepted. Immediately thereafter, the incident should be reported to BDO Remit for guidance.

Question: When do you have knowledge of multiple transactions conducted by or on behalf of the same person?

- A. If you or your employees witness the multiple transactions;
- B. If someone tells you or an employee about the multiple transactions;
- C. If you or an employee know a customer is conducting a transaction for someone else for whom you or your employee know has already conducted another transaction.

Question: Do you have to verify the information given by the customer?

You must verify the identity of the customer by viewing an official document that contains the customer's name, address and photograph. Official documents that may be used to verify the customer's identity include a state issued identification card, driver's license, passport, or alien registration card. Although it is not necessary to verify other information obtained from the customer, if you believe the information provided is false, immediately inform BDO Remit's Compliance Office for the necessary instructions.

Examples of when a CTR must be filed:

Example 1: A customer brings in \$12,000 in cash to send a money transfer.

Example 2: A customer brings in cash several times during the same day and transacts money transfers that add up to more than \$10,000 (including fees).

Note: See other examples of money transmission transactions to determine reportable transactions shown in Chapter 4 – Annex "F".

Section V

2.6 Structuring

Many money launderers are familiar with the dollar thresholds that require recordkeeping and reporting. Therefore, in order to remain anonymous and avoid the detection of law enforcement officials, they will "structure" their transactions so that the recordkeeping or reporting requirements will not be triggered. Structuring is the act of breaking up a potentially large transaction into several smaller ones.

It is illegal for you or your customers to structure transactions in order to avoid the recordkeeping or reporting requirements. For example, if a customer transacts money transfer of \$1,000 with cash in the morning and another \$1,000 money transfer with cash at the end of the day, they may be structuring their transactions in order to avoid the recordkeeping "Log".

Likewise, it is illegal for you or your employees to assist anyone in structuring transactions in order to avoid recordkeeping or reporting requirements. For example, you may not tell or even imply to a customer that they can avoid providing information by conducting a smaller transaction. Some criminals may attempt to trick you or your employees into allowing them to structure transactions by splitting up transactions with several accomplices or by trying to "con" you with a hard luck story. You need to be on the lookout for structuring so that you can prevent it from occurring.

Question: Are all multiple transactions considered structuring?

No. For example, a customer sends two money transfers to separate receivers, one for \$1,500 and another for \$1,000. Each transfer is less than \$2,000, but the total transaction exceeds \$2,000. There was nothing suspicious about the transactions, and you learn that the customer is sending money to his children who are attending two different schools. Since the aggregate amount exceeded the company threshold of \$2,000 single or multiple transaction/s in one day, you should require the customer to fill-up the BSA Compliance form in order to fulfill the recordkeeping requirement and to show that there was no attempt to structure the transactions.

2.7 Suspicious Activity Reporting

"Suspicious activity" is a difficult concept to define, because it can vary from one transaction to another based upon all of the circumstances surrounding the transaction or group of transactions. For example, transactions by one customer may be normal, because of your knowledge of that customer, while similar transactions, by another customer, may be suspicious. Many factors are involved in determining whether transactions are suspicious, including the amount, the location of your business, comments made by your customer, the customer's behavior, etc. A transaction need not be illegal to be suspicious. That is why it is important for you to read this Guide in order to help you detect suspicious activity and structured transactions.

The federal government requires MSBs to file a Suspicious Activity Report (SAR) for any transaction – or pattern of transactions - that is attempted or conducted with at least \$2,000, that you know, suspect, or have reason to suspect:

1. Involves funds derived from illegal activity or is intended to hide funds derived from illegal activity;
2. Is structured to avoid recordkeeping or reporting requirements;
3. Has no business or apparent lawful purpose; or
4. Facilitates criminal activity.

You or your employees must not alert the customer conducting the suspicious transaction of your suspicions. It is illegal to tell your customer that a SAR or information contained therein has been or will be filed by BDO Remit.

If BDO Remit believes that some of your customers may be misusing its money transfers, our compliance staff may contact you as part of an investigation. You must not tell your customer about such an inquiry.

BDO Remit retains the right to refuse to process any transaction that it deems suspicious.

BDO Remit will not do business with individual(s) of questionable integrity, even if it means a diminution in its income opportunities.

Below are BDO Remit's policies regarding preparation and filing of SARs:

1. It is the responsibility of the Agent to obtain as much information and documents needed for SAR purposes. The Agent personnel who suspects that a transaction is suspicious will report the suspicious activity by completing the SAR Incident Report shown in Chapter 4 – Annex "B" and submitting this via facsimile to BDO Remit Head Office Operations Officer at 1-866-372-3252 for further investigation or you can e-mail indicating the date, reference no., remitters name & reason why transactions is suspicious at info@bdoremitusa.com
2. The preparation of the SARs will be centralized at the Head Office.
3. BDO Remit Head Office will file the SAR report with the IRS within 30 days upon receipt from the Agents of the SAR Incident Report.
4. BDO Remit will keep a copy of the SAR and supporting documents for at least five (5) years from the date of filing and the file will be kept in a secure location. Agents are required to keep their supporting documents also for the same period.

Federal law provides protection from civil liability for all reports of suspicious activity made in good faith to appropriate authorities.

Examples of suspicious activity wherein you should consider whether to submit a SAR Incident report to BDO Remit Head Office:

Example 1: A customer sends a \$2,500 money transfer. The next day the customer sends \$9,000 to the same person. The customer may be structuring his transactions in order to avoid the CTR reporting requirements.

Example 2: A customer transacts several money transfers with cash just below \$2,000 over the course of several days. The customer may be structuring his transactions to avoid recordkeeping requirements.

Example 3: You see Nathan hand cash to Billy and Debby outside your store. Billy and Debby each give you cash and transact money transfers that total less than \$10,000 for each of them, but total more than \$10,000 together. This appears to be a structured transaction and may also require the filing of a CTR.

Example 4: A customer says that he wants to send an \$11,000 money transfer that he wants to pay for with cash. When you tell the customer that you will need to complete a CTR, he says he no longer wants to do the transaction, or asks how he can avoid having a CTR filed on the transaction. You must file a SAR on the transaction or attempted transaction.

Common suspicious transactions that should be reported as suspicious activity include, but are not limited to:

- A customer uses a fake or obviously altered ID.
- A customer is unable or unwilling to provide ID.
- Two or more customers use the same or similar IDs.
- A customer asks to alter his transaction after learning that he must show ID.
- A customer deliberately changes the spelling of his name on multiple transactions.
- A customer states he does not have a local address but he appears to reside locally because he is a repeat customer.
- A customer conducts transactions so that they fall just below amounts that require reporting and recordkeeping.
- Two or more customers apparently work together to break one transaction into two or more transactions to avoid record keeping requirements.
- A customer uses two or more remittance locations in the same city to process money transfer transactions.
- A customer offers bribes or tips to avoid record keeping requirements.
- A customer admits that the cash for his transactions came from illegal conduct.
- A customer makes large transactions that are not consistent with his occupation or business practice.
- A customer shows unusual behavior, action or demeanor (e.g., nervous, very tentative or evasive in answering normal conversational questions, very inquisitive about transaction/customer recordkeeping and reporting, could not look straight in the eyes, sweating profusely on a cool day, etc.).

NOTE: CTRs, SARs, and other records and reports are only as good as the information you provide. Therefore, it is very important that the information you provide BDO Remit to file for such reports is accurate and complete. This is your responsibility. The government and law enforcement agencies depend on this information as they fight against money laundering and terrorism.

2.8 OFAC and Other Reports

Office of Foreign Assets Control (OFAC)

The Office of Foreign Assets Control (OFAC) is part of the U.S. Department of the Treasury and is responsible for enforcing U.S. government sanctions programs against countries, organizations and individuals. Sanctions programs typically involve blocking assets to further national security. Many of the sanctioned individuals, commonly referred to as "Specially Designated Nationals" (SDNs), are drug dealers and terrorists. All U.S. entities are prohibited from conducting any financial transactions with SDNs.

You can learn more about OFAC by visiting the Treasury Department's website at www.ustreas.gov/offices/enforcement/ofac. The site also includes an extensive list of questions and answers to common questions regarding OFAC.

Agent Responsibility

BDO Remit has computer programs that review all money transfer senders and receivers against the government watch lists. BDO Remit agents may rely on BDO Remit to conduct the review of sender and receiver names. Agents must then follow BDO Remit's instructions in order to prevent any unauthorized payout or refund.

OTHER REPORTING REQUIREMENTS

There are other reporting obligations that you may be subject to under the BSA, the USA PATRIOT Act and other state and federal anti-money laundering / counter terrorist financing laws that may require the filing of additional reports with the government.

Section VIII

2.9 MSB Registration

If you engage in MSB activities on your own behalf - apart from serving as our agent - then you may be required to register with the U.S. Department of the Treasury, as an MSB. For example, a supermarket that serves as a money transfer agent but performs no other MSB services is not required to register. However, registration would be required if the supermarket, in addition to acting as an agent, also cashes checks in an amount greater than \$1,000, for any person, on any day, in one (1) or more transactions.

The MSB registration must be electronically filed at FinCEN website (www.fincen.gov) Log on to BSA E-filing. The registration of Money Service Business form OMB No. 1506-0013 shown in Chapter 4 – Annex "E".

The MSB must retain a copy of the registration form with the MSB Registration No. for five (5) years.

Section IX

2.10 Civil and Criminal Penalties

The government can impose harsh civil and criminal penalties against anyone who violates the BSA, USA PATRIOT Act, OFAC, or other anti-money laundering / counter terrorist financing laws and regulations. Civil and criminal fines can quickly reach into the hundreds of thousands or even millions of dollars. Criminal violations can result in prison terms. The criminal penalty for violating a BSA requirement is a **fine of up to \$500,000 or a jail term of up to 10 years OR BOTH**. In addition, the government can seize any property involved in criminal violations of these laws. This includes your business, your bank account, or any other assets the government can link to criminal violations.

Under certain circumstances, the government will hold businesses criminally liable for the acts of their employees. It is important that your employees are trained on anti-money laundering / counter terrorist financing compliance. It is equally important that your business has a program to ensure that your employees are complying with the laws and regulations.

The government requires strict compliance with these laws and regulations. BDO Remit will also immediately cancel the contract of any agent who knowingly or negligently fails to comply with the laws and regulations.

Non-compliance with the law is not worth the risk.

Anti-Money Laundering *EXPRESS GUIDE*

Reporting

- **Currency transactions greater than \$10,000 (including fees)**
Report on CTR
File within 15 days
Follow instructions on form
- **Suspicious activity, including structured transactions, of at least \$2,000**
Report on SAR
File within 30 days
Follow instructions on form

Recordkeeping

- **Transactions of \$2,000 or more**
- **Verify**
Customer's name, address and telephone no. If w/o telephone no. indicate "0000000" in the space provided for.
Use valid, government issued, photo ID (passport, driver's license, etc.)
- **Record**
Customer's name, address and telephone no. If w/o telephone no. indicate "0000000" in the space provided for
Type of ID provided, ID #, and ID issuer
Customer's Social Security #
Customer's date of birth
Transaction date
Transaction reference #
Amount of transaction
Point of sale address
Beneficiary's name and any other information provided about them
If transaction is conducted on behalf of someone else, record similar information on that other person
- **Record information on**
Payment Instruction
BSA Compliance Form (Applies to any method of payment for money transfers amounting to \$2,000 or more)

Maintain copies of all reports and records for 5 years

USA PATRIOT Act Requirements for MSBs

- 1) Adopt written anti-money laundering / counter terrorist financing compliance program.
- 2) Designate Compliance Officer for their business.
- 3) Train employees on anti-money laundering / counter terrorist financing compliance, including recordkeeping and reporting requirements, as well as identification of suspicious activity.
- 4) Conduct independent reviews of the anti-money laundering / counter terrorist financing compliance program and make improvements as needed.

MSB Registration

- Register at FinCEN's website using the Registration of Money Service Business form.
- Many non-check casher agents are covered by BDO Remit's registration and do not need to register on their own.
- See Registration form for details.

OFAC Sanctions

- U.S. businesses and individuals are prohibited from doing business with any country, entity or person listed on OFAC sanctions list.

For Further Information:

Contact Information:

www.msb.gov
www.fincen.gov
www.treas.gov/ofac

Treasury Department's Financial Crimes Enforcement
Network (FinCEN) "Hotline" at **1-800-949-2732**

BDO Remit's Compliance Office at **1-800-472-3252**

3 CHAPTER 3

3.1 Financial Crimes Enforcement Network (FinCEN)

The Financial Crimes Enforcement Network (FinCEN) is a bureau within the U.S. Treasury Department that administers the federal government's anti-money laundering / counter terrorist financing laws and regulations. FinCEN has created materials to assist Money Services Businesses (MSBs) to comply with these laws and regulations.

MSBs should familiarize themselves with information provided by FinCEN and should regularly review FinCEN's website for MSBs (www.fincen.gov) for any updates or new information related to anti-money laundering / counter terrorist financing compliance.

Below is a list of some of the information available for Money Services Businesses on the FinCEN.gov website:

- **Guidance** – This section is intended to clarify issues or respond to questions of general applicability that arise under FinCen regulations 31 CFR Chapter X.
- **Federal Register Notices** – This section contains the MSB registrant search web page, the definition of transmittal of funds and fund transfer and customer due diligence requirements.
- **Forms** – This section contains the forms, such as the CTR, SAR and RMSB forms along with information about how to obtain them and where to file them.
- **Administrative Rulings** – This section contains administrative letter rulings by FinCEN. These are issued pursuant to authority on the administration of the BSA.
- **News Releases** – This section contains advisories, news releases and announcements. It also contains reports published by the federal government and international groups that relate to money laundering and other crimes.
- **Advisories/Bulletins/Fact Sheet** - this section contains FinCen advisories. The title & date the guidance was issued to MSBs.

3.2 Terrorism Financing Prevention

Money laundering is most commonly associated with drug dealing and tax evasion. However, other individuals, most notably terrorists, may attempt to launder money in order to conceal their identity and finance their operations. It is critical that MSBs remain alert for any such activity, and take appropriate and immediate action if detected.

If you suspect terrorism financing, you should immediately report the incident to BDO Remit by filing a SAR Incident Report. BDO Remit will investigate the matter immediately and if necessary, BDO Remit will call the FinCEN hotline at 1-800-556-3974, which is operated 24 hours a day, seven (7) days a week. BDO Remit will also file a SAR on any suspected terrorism activity.

The Financial Action Task Force (FATF) and FinCEN have each issued guidance on financial transactions that may be indicative of terrorist financing at www.fatf-gafi.org and www.fincen.gov websites. Most of the cited examples apply to transactions conducted at banks or other depository institutions. However, the following examples may also be conducted by MSBs:

1. Movement of funds through a country designated by FinCEN or the FATF as "non-cooperative," that are identified as specially designated nationals by Treasury's Office of Foreign Assets Control, or that appear on the United Nation's list of blocked accounts;

2. Multiple transactions conducted by a group of nationals from countries associated with terrorist activity;
3. Individuals acting on behalf of another money transmitting business that use BDO Remit to transfer funds to multiple locations. This may be indicative of unlicensed money transmitters that seek to evade use of the banking system to conduct foreign transfers.

4 CHAPTER 4

4.1 Anti-Money Laundering Compliance Forms

Federal law requires the completion of various forms for recordkeeping and reporting purposes. The completion of these forms is triggered by certain monetary thresholds, which may be reached in a single transaction or multiple transactions. For specific information on when the forms must be completed, as well as examples of situations that may require the completion of a form, see the materials in Chapter 2 of this manual.

Some of the forms are created by the federal government and some by BDO Remit, but federal law requires all. Also, while some forms are to be sent to the federal government, copies of all completed forms must be kept in your files for at least five (5) years.

Although the preparation of the CTRs and SARs are centralized in BDO Remit's Head Office, we have included in this Manual the latest version of these forms for Agent familiarization. You can refer to FinCEN's website (www.fincen.gov) for any updates or amendments related to these forms.

(Note: Some states may have monetary thresholds that are lower than what is required by federal law.)

4.2 Suspicious Activity Report by Money Services Business (SAR)

A SAR will be electronically filed by BDO Remit whenever any activity is attempted or occurs that involves at least \$2,000 in any one or group of transactions ... **AND ... it is suspected that the activity:**

- Involves funds derived from illegal activity or is intended to hide funds derived from illegal activity; or
- Is structured to avoid recordkeeping or reporting requirements; or
- Has no business or apparent lawful purpose; or
- Facilitates criminal activity.

Whenever you or any of your employees encounter any of the above suspicious activity, it is your responsibility to obtain as much information and documents needed for SAR purposes. You are required to report the suspicious activity to BDO Remit by completing the SAR Incident Report.

The following list provides examples of suspicious activity that require the filing of a SAR.

1. A customer asks an employee how to avoid a reporting requirement.
2. A customer threatens or bribes an employee in order to avoid providing information.
3. A customer refuses to proceed with a transaction when asked for identification.
4. A customer refuses to provide all of the information required.
5. A customer (or group of customers working together) sends money transfers in amounts just below the recordkeeping or reporting thresholds with the apparent purpose of evading either of these requirements. **This activity is known as structuring.**
6. A customer conducts transactions that are unusually large based on their past history, employment, or level of income.

Note: A SAR-MSB is a separate requirement from a CTR. Even if BDO Remit has filed a CTR on a transaction or set of transactions, you must also inform BDO Remit through the SAR Incident Report if you believe the activity is suspicious.

Additional examples of potentially suspicious activities involving MSB services can be found at www.fincen.gov/msb_prevention_guide.pdf.

Note: BDO Remit will electronically file SAR within 30 days upon receipt of the SAR Incident Report to:

***<http://www.fincen.gov/>
Log into BSA E-Filing***

Refer to Annex “A” for the SAR Form OMB 1506-0065, also, refer to FinCEN’s website (www.fincen.gov) for any updates or amendments related to this form.

Refer to Annex “B” for BDO Remit’s SAR Incident Report.

4.3 Currency Transaction Report (CTR)

A Currency Transaction Report (CTR) must be filed with the Federal Government for any cash transaction/s, greater than \$10,000, conducted in one (1) business day, by any person or on behalf of any person. The \$10,000 threshold includes the total of the amount of the transaction and fees.

Examples of transactions that require a CTR are:

1. A customer sending a single cash/currency money transfer transaction totaling more than \$10,000 in one (1) business day.
2. A customer sending several cash/currency money transfer transactions totaling more than \$10,000 in one (1) business day.

Note: It is your responsibility to obtain the necessary information and documents needed from the remitter for CTR purposes. If you are aware that more than one (1) currency transaction has been conducted by the same customer or on behalf of the same customer, and the total amount is more than \$10,000 during the same business day, you should obtain all information before the transaction is completed.

3rd Party Information. If the customer who is conducting the transaction is doing so for someone else, the information must be obtained for both parties. Examples of 3rd parties are an employee of a business conducting the transaction for the business, or a relative of an elderly or disabled person conducting the transaction for that person.

Note: BDO Remit will electronically file the CTR within 15 days after the day of the transaction at:

***<http://www.fincen.gov/>
Log into BSA-E Filing***

Please refer to Annex “C” for the CTR Form, also, refer to FinCEN’s website (www.fincen.gov) for any updates or amendments related to this form.

4.4 Recordkeeping for BDO Remit Money Transfers

If a customer sends a money transfer of \$2,000 or more, certain information must be recorded on the BDO Remit BSA Compliance Form. It does not matter whether the customer pays by cash, check, money order, etc.

All of the information must be recorded before the transaction is completed. The customer must have valid photo identification such as a driver license, passport or alien identification card that contains the customer's name and address.

3rd Party Information. If the customer who is conducting the transaction is doing so for someone else, the information must be recorded for both parties. Examples of 3rd parties are: An employee of a business conducting the transaction for the business, or a relative of an elderly or disabled person conducting the transaction for that person.

Please refer to Annex "D" for BDO Remit's BSA Compliance Form.

4.5 MSB Registration

Your business must register with the U.S. Treasury if it conducts Money Services Business activities on its own behalf. Money Services Businesses include:

- Money transmitters
- Currency exchangers*
- Check cashers*
- Issuers of travelers checks or money orders*
- Sellers or redeemers of travelers checks or money orders*

*Must conduct transactions greater than \$1,000 for any person, on any one day, in one or more transactions to qualify.

Registration is not required if this business conducts money services business solely as an agent of another registered Money Services Business, and does not independently conduct any other MSB activity.

Registration is required within 180 days after the business begins conducting MSB activity.

Renewal is required **every two (2) years**, re-registration is required when:

- There has been a change in ownership
- There has been more than a 10 percent transfer of voting power or equity interest
- The number of agents has increased by more than 50 percent

Note: This should be electronically filed using the Registration of Money Services Business form OMB No. 1506-0013 at:

<http://www.fincen.gov/>
Log into BSA E-Filing

Please refer to Annex "E" for the RMSB form OMB No. 1506-0013, also, refer to FinCEN's website (www.fincen.gov) for any updates or amendments related to this form.

4.6 Independent Review

The USA PATRIOT Act requires that all Money Services Businesses (MSBs) have an Independent Review of their anti-money laundering / counter terrorist financing program done periodically to verify that their program is adequate. As an agent of BDO Remit, you are an MSB and **MUST** conduct an Independent Review.

Most government regulators recommend that Independent Reviews be performed at least annually by all MSBs.

The owner, manager, or an employee of your business may conduct the Independent Review. However, your designated Compliance Officer may NOT conduct the review.

If an employee of your business does conduct the review, it should be an employee who is familiar with your compliance program and the anti-money laundering / counter terrorist financing requirements that apply to MSBs. To determine compliance, sampling should be performed for a representative period, documentation supporting analysis and conclusion should be retained.

A Checklist form that may be used by the person conducting your Independent Review is shown in Chapter 4 – Annex "H".

BD Remit
ANNEX A – Suspicious Activity Report (SAR)

WARNING: PRINTED VERSIONS OF THE BSA E-FILING FORMS ARE NOT FOR SUBMISSION AND WILL NOT BE PROCESSED
by FinCEN.



Suspicious Activity Report

OMB No. 1506-0065

Version Number: 1.1

Filing name

*1 Type of filing
(Check all that apply)

☐

Initial report

☐

Correct/Amend prior report

☐

Continuing activity report

☐

Joint report

Prior report Document Control
Number/BSA Identifier

Attachment

Under penalties of perjury, I declare that I have examined this transmittal, including accompanying documents, and to the best of my knowledge and belief it is correct and complete. In the case of documents without recipient's identifying numbers, I have complied with the requirements of the law in attempting to secure such numbers from the receipts. I declare that this filing represents all Documents filed during this reporting period except for those transactions reported on paper.

Sign with PIN

WARNING: PRINTED VERSIONS OF THE BSA E-FILE FORMS ARE NOT FOR SUBMISSION AND WILL NOT BE PROCESSED by FinCEN.

Part IV Filing Institution Contact Information

*82 Type of financial institution	<input type="text" value="Other"/>		<input type="text"/>															
*78 Primary federal regulator	<input type="text"/>																	
*79 Filer name (Holding company, lead financial institution, or agency, if applicable)	<input type="text"/>																	
*80 TIN	<input type="text"/>	*81 TIN type	<input type="text" value="EIN"/>															
83 Type of Securities and Futures institution or individual filing this report - check box(es) for functions that apply to this report	<table border="0"><tr><td><input type="checkbox"/> Clearing broker-securities</td><td><input type="checkbox"/> Introducing broker-securities</td><td><input type="checkbox"/> SRO Securities</td></tr><tr><td><input type="checkbox"/> CPOCTA</td><td><input type="checkbox"/> Investment Advisor</td><td><input type="checkbox"/> Subsidiary of financial institution holding company</td></tr><tr><td><input type="checkbox"/> Futures Commission Merchant</td><td><input type="checkbox"/> Investment company</td><td><input type="checkbox"/> Other <input type="text"/></td></tr><tr><td><input type="checkbox"/> Holding company</td><td><input type="checkbox"/> Retail foreign exchange dealer</td><td></td></tr><tr><td><input type="checkbox"/> Introducing broker-commodities</td><td><input type="checkbox"/> SRO Futures</td><td></td></tr></table>			<input type="checkbox"/> Clearing broker-securities	<input type="checkbox"/> Introducing broker-securities	<input type="checkbox"/> SRO Securities	<input type="checkbox"/> CPOCTA	<input type="checkbox"/> Investment Advisor	<input type="checkbox"/> Subsidiary of financial institution holding company	<input type="checkbox"/> Futures Commission Merchant	<input type="checkbox"/> Investment company	<input type="checkbox"/> Other <input type="text"/>	<input type="checkbox"/> Holding company	<input type="checkbox"/> Retail foreign exchange dealer		<input type="checkbox"/> Introducing broker-commodities	<input type="checkbox"/> SRO Futures	
<input type="checkbox"/> Clearing broker-securities	<input type="checkbox"/> Introducing broker-securities	<input type="checkbox"/> SRO Securities																
<input type="checkbox"/> CPOCTA	<input type="checkbox"/> Investment Advisor	<input type="checkbox"/> Subsidiary of financial institution holding company																
<input type="checkbox"/> Futures Commission Merchant	<input type="checkbox"/> Investment company	<input type="checkbox"/> Other <input type="text"/>																
<input type="checkbox"/> Holding company	<input type="checkbox"/> Retail foreign exchange dealer																	
<input type="checkbox"/> Introducing broker-commodities	<input type="checkbox"/> SRO Futures																	
84 Financial institution identification	Type	<input type="text"/>																
	Number	<input type="text"/>																
*85 Address	<input type="text"/>																	
*86 City	<input type="text"/>																	
*87 State	<input type="text"/>	*88 ZIP/Postal Code	<input type="text"/>															
		*89 Country	<input type="text"/>															
90 Alternate name, e.g., AKA - individual or trade name, DBA - entity	<input type="text"/>																	
91 Internal control file number	<input type="text"/>																	
92 LE contact agency	<input type="text"/>																	
93 LE contact name	<input type="text"/>																	
94 LE contact phone number (Include Area Code)	<input type="text"/>	Ext.	<input type="text"/>															
95 LE contact date	<input type="text"/>																	
*96 Filing institution contact officer	<input type="text"/>																	
97 Filing institution contact phone number (Include Area Code)	<input type="text"/>	Ext.	<input type="text"/>															
98 Date filed	<input type="text"/>	(Date filed will be auto-populated when the form is signed.)																

WARNING: PRINTED VERSIONS OF THE BSA E-FILED FORMS ARE NOT FOR SUBMISSION AND WILL NOT BE PROCESSED by FinCEN.

Part III Information about Financial Institution Where Activity Occurred 1 of 1

*47 Type of financial institution	<input type="text" value="Other"/>		<input type="text"/>
*48 Primary federal regulator	<input type="text"/>		
49 Type of gaming institution	<input type="checkbox"/> State licensed casino <input type="checkbox"/> Tribal authorized casino <input type="checkbox"/> Card club <input type="checkbox"/> Other (specify) <input type="text"/>		
50 Type of Securities and Futures institution or individual where activity occurred - check box(es) that apply to this report	<input type="checkbox"/> Clearing broker-securities <input type="checkbox"/> Introducing broker-securities <input type="checkbox"/> Subsidiary of financial bank holding company <input type="checkbox"/> Futures Commission Merchant <input type="checkbox"/> Investment Adviser <input type="checkbox"/> Other <input type="text"/> <input type="checkbox"/> Holding company <input type="checkbox"/> Investment company <input type="checkbox"/> Introducing broker-commodities <input type="checkbox"/> Retail foreign exchange dealer		
51 Financial institution identification	Type	<input type="text"/>	
	Number	<input type="text"/>	
52 Financial institution's role in transaction	<input type="checkbox"/> Selling location <input type="checkbox"/> Paying location <input type="checkbox"/> Both		
*53 Legal name of financial institution	<input type="checkbox"/> Unknown <input type="text"/>		
54 Alternate Name, e.g., AKA - individual or trade name, DBA - entity	<input type="text"/>		
*55 TIN	<input type="checkbox"/> Unknown	<input type="text"/>	56 TIN type <input type="text"/>
*57 Address	<input type="checkbox"/> Unknown	<input type="text"/>	
*58 City	<input type="checkbox"/> Unknown	<input type="text"/>	
59 State	<input type="text"/>		
*60 ZIP/Postal Code	<input type="checkbox"/> Unknown	<input type="text"/>	
*61 Country	<input type="checkbox"/> Unknown	<input type="text"/>	
62 Internal control file number	<input type="text"/>		
63 Loss to financial institution \$	<input type="text"/> .00		
Branch where activity occurred information If no branch activity involved, check this box <input type="checkbox"/>			
Branch Information			
64 Branch's role in transaction	<input type="checkbox"/> Selling location <input type="checkbox"/> Paying location <input type="checkbox"/> Both		
65 Address of branch or office where activity occurred	<input type="text"/>		
67 City	<input type="text"/>	66 RSISD Number	<input type="text"/>
68 State	<input type="text"/>	69 ZIP/Postal Code	<input type="text"/>
		*70 Country	<input type="text"/>

WARNING: PRINTED VERSIONS OF THE BSA E-FILEG FORMS ARE NOT FOR SUBMISSION AND WILL NOT BE PROCESSED
by FinCEN.

Part I Subject Information 1 of 1

2 Check: <input type="checkbox"/> Entity, <input type="checkbox"/> "fail critical" subject information is unavailable (Does not include Item 24)	
*3 Individual's last name or entity's legal name	<input type="checkbox"/> Unknown <input type="text"/>
*4 First name	<input type="checkbox"/> Unknown <input type="text"/>
5 Middle name/initial	<input type="text"/>
Suffix	<input type="text"/>
Gender	<input type="text"/>
*16 Date of birth	<input type="checkbox"/> Unknown <input type="text"/>
6 Alternate name, e.g., AKA - individual or trade name, DBA - entity <input type="text"/>	
7 Occupation or type of business <input type="text"/>	
7a NAICS Code <input type="text"/>	
*13 TIN	<input type="checkbox"/> Unknown <input type="text"/>
14 TIN type	<input type="text"/>
18 Phone number	<input type="text"/>
Ext.	<input type="text"/>
17 Type	<input type="text"/>
19 E-mail address <input type="text"/>	
19a Website (URL) address <input type="text"/>	
20 Corroborative statement is filed?	<input type="text"/>
25 Subject's role in suspicious activity <input type="text"/>	
Subject Address Information	
*8 Address	<input type="checkbox"/> Unknown <input type="text"/>
*9 City	<input type="checkbox"/> Unknown <input type="text"/>
*10 State	<input type="checkbox"/> Unknown <input type="text"/>
*11 ZIP/Postal Code	<input type="checkbox"/> Unknown <input type="text"/>
*12 Country	<input type="checkbox"/> Unknown <input type="text"/>
*15 Form of identification for subject <input type="checkbox"/> Unknown <input type="checkbox"/>	
Type	<input type="text"/>
Number	<input type="text"/>
Issuing State	<input type="text"/>
Country	<input type="text"/>
21 Relationship of the subject to an institution listed in Part III or IV (check all that apply)	
a <input type="checkbox"/> Institution TIN <input type="text"/>	
b <input type="checkbox"/> Accountant	e <input type="checkbox"/> Attorney
c <input type="checkbox"/> Agent	f <input type="checkbox"/> Borrower
d <input type="checkbox"/> Appraiser	g <input type="checkbox"/> Customer
h <input type="checkbox"/> Director	i <input type="checkbox"/> Employee
j <input type="checkbox"/> No relationship to institution	k <input type="checkbox"/> Officer
l <input type="checkbox"/> Owner or Controlling Shareholder	m <input type="checkbox"/> Other <input type="text"/>
22 Status of relationship	<input type="text"/>
23 Action date	<input type="text"/>
*24 Financial Institution TIN and account number(s) affected that are related to subject <input type="checkbox"/> No known accounts involved <input type="checkbox"/>	
Institution TIN	<input type="text"/>
Non-US Financial Institution	<input type="checkbox"/>
account number	<input type="text"/>
Closed? Yes	<input type="checkbox"/>

WARNING: PRINTED VERSIONS OF THE BSA E-FILE FORMS ARE NOT FOR SUBMISSION AND WILL NOT BE PROCESSED by FinCEN.

Part II Suspicious Activity Information

*26 Amount involved in this report		<input type="checkbox"/> Amount Unknown	<input type="checkbox"/> No amount involved	\$	_____	.00	
*27 Date or date range of suspicious activity for this report		From	_____	To	_____		
28 Cumulative amount (only applicable when "Continuing activity report" is checked in Item 1)		\$	_____		_____	.00	
When completing Item 29 through 38, check all that apply							
29 Structuring							
a	<input type="checkbox"/> Alters transaction to avoid BSA recordkeeping requirement	e	<input type="checkbox"/> Multiple transactions below CTR threshold				
b	<input type="checkbox"/> Alters transaction to avoid CTR requirement	f	<input type="checkbox"/> Suspicious inquiry by customer regarding BSA reporting or recordkeeping requirements				
c	<input type="checkbox"/> Customer cancels transaction to avoid BSA reporting and recordkeeping requirements	z	<input type="checkbox"/> Other	_____			
d	<input type="checkbox"/> Multiple transactions below BSA recordkeeping threshold						
30 Terrorist Financing							
a	<input type="checkbox"/> Known or suspected terrorist/terrorist organization	z	<input type="checkbox"/> Other	_____			
31 Fraud (Type)							
a	<input type="checkbox"/> ACH	d	<input type="checkbox"/> Consumer loan	g	<input type="checkbox"/> Mail	j	<input type="checkbox"/> Wire
b	<input type="checkbox"/> Business loan	e	<input type="checkbox"/> Credit/Debit card	h	<input type="checkbox"/> Mass-marketing	z	<input type="checkbox"/> Other
c	<input type="checkbox"/> Check	f	<input type="checkbox"/> Healthcare	i	<input type="checkbox"/> Pyramid scheme	_____	
32 Casinos							
a	<input type="checkbox"/> Inquiry about end of business day	d	<input type="checkbox"/> Suspicious use of counter checks or markers				
b	<input type="checkbox"/> Minimal gaming with large transactions	z	<input type="checkbox"/> Other	_____			
c	<input type="checkbox"/> Suspicious intra-casino funds transfers						
33 Money Laundering							
a	<input type="checkbox"/> Exchange small bills for large bills or vice versa	g	<input type="checkbox"/> Suspicious receipt of government payments/benefits				
b	<input type="checkbox"/> Suspicion concerning the physical condition of funds	h	<input type="checkbox"/> Suspicious use of multiple accounts				
c	<input type="checkbox"/> Suspicion concerning the source of funds	i	<input type="checkbox"/> Suspicious use of noncash monetary instruments				
d	<input type="checkbox"/> Suspicious designation of beneficiaries, assignees or joint owners	j	<input type="checkbox"/> Suspicious use of third-party transactions (straw-man)				
e	<input type="checkbox"/> Suspicious EFT/wire transfers	k	<input type="checkbox"/> Trade Based Money Laundering/Black Market Peso Exchange				
f	<input type="checkbox"/> Suspicious exchange of currencies	l	<input type="checkbox"/> Transaction out of pattern for customer(s)				
		z	<input type="checkbox"/> Other	_____			
34 Identification/Documentation							
a	<input type="checkbox"/> Change in spelling or arrangement of name	d	<input type="checkbox"/> Refused or avoided request for documentation				
b	<input type="checkbox"/> Multiple individuals with same or similar identities	e	<input type="checkbox"/> Single individual with multiple identities				
c	<input type="checkbox"/> Provided questionable or false documentation	z	<input type="checkbox"/> Other	_____			
35 Other Suspicious Activities							
a	<input type="checkbox"/> Account takeover	k	<input type="checkbox"/> Suspected public/private corruption (domestic)				
b	<input type="checkbox"/> Bribery or gratuity	l	<input type="checkbox"/> Suspected public/private corruption (foreign)				
c	<input type="checkbox"/> Counterfeit instruments	m	<input type="checkbox"/> Suspicious use of informal value transfer system				
d	<input type="checkbox"/> Elder financial exploitation	n	<input type="checkbox"/> Suspicious use of multiple transaction locations				
e	<input type="checkbox"/> Embezzlement/theft/disappearance of funds	o	<input type="checkbox"/> Transaction with no apparent economic, business, or lawful purpose				
f	<input type="checkbox"/> Forgery	p	<input type="checkbox"/> Two or more individuals working together				
g	<input type="checkbox"/> Identity theft	q	<input type="checkbox"/> Unauthorized electronic intrusion				
h	<input type="checkbox"/> Little or no concern for product performance, penalties, fees, or tax consequences	r	<input type="checkbox"/> Unlicensed or unregistered MSB				
i	<input type="checkbox"/> Misuse of "free look"/cooling-off/right of rescission	z	<input type="checkbox"/> Other	_____			
j	<input type="checkbox"/> Misuse of power or self-dealing						

WARNING: PRINTED VERSIONS OF THE BSA E-FLING FORMS ARE NOT FOR SUBMISSION AND WILL NOT BE PROCESSED
by FinCEN.

36 Insurance

- | | |
|--|---|
| a <input type="checkbox"/> Excessive insurance | e <input type="checkbox"/> Suspicious termination of policy or contract |
| b <input type="checkbox"/> Excessive or unusual cash borrowing against policy/annuity | f <input type="checkbox"/> Unclear or no insurable interest |
| c <input type="checkbox"/> Proceeds sent to or received from unrelated third party | z <input type="checkbox"/> Other <input type="text"/> |
| d <input type="checkbox"/> Suspicious life settlement sales in insurance (e.g., STOLs, Viatical) | |

37 Securities/Futures/Options

- | | |
|---|---|
| a <input type="checkbox"/> Insider trading | d <input type="checkbox"/> Unauthorized pooling |
| b <input type="checkbox"/> Market manipulation/wash trading | z <input type="checkbox"/> Other <input type="text"/> |
| c <input type="checkbox"/> Misapprehension | |

38 Mortgage Fraud

- | | |
|--|---|
| a <input type="checkbox"/> Appraisal fraud | d <input type="checkbox"/> Reverse mortgage fraud |
| b <input type="checkbox"/> Foreclosure fraud | z <input type="checkbox"/> Other <input type="text"/> |
| c <input type="checkbox"/> Loan Modification fraud | |

39 Were any of the following product type(s) involved in the suspicious activity? (Check all that apply)

- | | | | |
|--|---|---|--|
| a <input type="checkbox"/> Bonds/Notes | g <input type="checkbox"/> Futures/Options on futures | m <input type="checkbox"/> Options on securities | s <input type="checkbox"/> Swap, hybrid, or other derivatives |
| b <input type="checkbox"/> Commercial mortgage | h <input type="checkbox"/> Hedge fund | n <input type="checkbox"/> Penny stocks/Microcap securities | z <input type="checkbox"/> Other (List below) <input type="text"/> |
| c <input type="checkbox"/> Commercial paper | i <input type="checkbox"/> Home equity loan | o <input type="checkbox"/> Prepaid access | |
| d <input type="checkbox"/> Credit card | j <input type="checkbox"/> Home equity line of credit | p <input type="checkbox"/> Residential mortgage | |
| e <input type="checkbox"/> Debit card | k <input type="checkbox"/> Insurance/Annuity products | q <input type="checkbox"/> Security futures products | |
| f <input type="checkbox"/> Forex transactions | l <input type="checkbox"/> Mutual fund | r <input type="checkbox"/> Stocks | |

40 Were any of the following instrument type(s)/payment mechanism(s) involved in the suspicious activity? (Check all that apply)

- | | | | |
|---|---|--|--|
| a <input type="checkbox"/> Bank/Cashier's check | d <input type="checkbox"/> Gaming instruments | g <input type="checkbox"/> Personal/Business check | z <input type="checkbox"/> Other (List below) <input type="text"/> |
| b <input type="checkbox"/> Foreign currency | e <input type="checkbox"/> Government payment | h <input type="checkbox"/> Traveler's checks | |
| c <input type="checkbox"/> Funds transfer | f <input type="checkbox"/> Money orders | i <input type="checkbox"/> U.S. Currency | |

41 Commodity type (If applicable)

42 Product/Instrument description (If needed)

43 Market where traded ☒

44 IP address (If available)

45 CUSIP® number

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Part V Suspicious Activity Information - Narrative*

A large, empty rectangular box with a thin black border, intended for the user to provide a narrative description of suspicious activity. The box occupies the majority of the page area below the header.

Page 7 of 7



SAR INCIDENT REPORT

Remitter Identification: Complete another SAR Incident Report (remitter identification portion only) for multiple subjects.

Name: _____ Date of Birth: ____/____/____
(First name) (Middle initial) (Last name)
(MM) (DD) (YYYY)

Current Address: _____ Tel. No.: _____

Name of Employer: _____ Occupation: _____

US Social Security Number: ____/____/____-____/____/____/____/____/____

ID No.: _____ (Check one) ☐ State ID ☐ Driver's License ☐ Passport
Alien ID ☐

(Check one) ☐ US ID ☐ Foreign ID (specify country) _____ ID Expiry Date: ____/____/____
(MM) (DD) (YYYY)

Remittance Information:

Date or date range of suspicious activity (From) ____/____/____ (To) ____/____/____
(MM) (DD) (YYYY) (MM) (DD) (YYYY)

Transaction Reference no./s: _____

Amount of Remittance: _____

Mode of Payment (Check applicable): ☐ Cash ☐ Check ☐ Money Order

Source of Funds (Check applicable): ☐ Savings/Checking ☐ Loans ☐ Others (pls. specify): _____

Suspicious Activity Information:

Date suspicious activity was first identified _____

Nature of Suspicious Activity: (Check applicable)

☐ Money Laundering ☐ Structuring ☐ Terrorist Financing ☐ Other (pls. specify) _____

Narrative description or explanation of the suspicious activity: (use additional sheets if necessary)


Agent Name: _____

Certified correct: _____ Date: ____/____/____
Agent Representative (Printed Name and Signature) (MM) (DD)
(YYYY)

Please send to BDO Remit Compliance department at 1559 E. Amar Rd. Suite U,
West Covina, CA 91792 or fax to 1-800-472-3252.

BDO REMIT (USA), INC.
ANNEX C – Currency Transaction Report (CTR)

Currency Transaction Report			
Home	Step 1: Person Information	Step 2: Amount and Type of Transaction	Step 3: Financial Institution Information



Currency Transaction Report

Version Number: 1.0

Filing Name

*1 Type of filing ☐ Initial report ☐ Correct/amend prior report ☐ FinCEN directed Backfiling

Document Control Number / BSA Identifier

Save

Validate

Submit

Print

Under penalties of perjury, I declare that I have examined this transmittal, including accompanying documents, and to the best of my knowledge and belief it is correct and complete. In the case of documents without recipient's identifying numbers, I have complied with the requirements of the law in attempting to secure such numbers from the receipts. I declare that this filing represents all Documents filed during this reporting period except for those transactions reported on paper.

Sign with PIN

Part I Person Involved in Transaction 1 of 1



*2 a <input type="checkbox"/> Person conducting transaction on own behalf		b <input type="checkbox"/> Person conducting transaction for another		c <input type="checkbox"/> Person on whose behalf transaction was conducted		d <input type="checkbox"/> Counter Service (private)	
3 <input type="checkbox"/> Multiple transactions							
Check <input type="checkbox"/> Identity							
*4 Individual's first name or entity's legal name		<input type="checkbox"/> Unknown		<input type="text"/>			
*5 First name		<input type="checkbox"/> Unknown		<input type="text"/>			
6 Middle name		<input type="text"/>					
Suffix		<input type="text"/>					
7 Gender		<input type="text"/>					
8 Alternate Name		<input type="text"/>					
9 Occupation or type of business		<input type="text"/>					
9a NAICS Code		<input type="text"/>					
*10 Address		<input type="checkbox"/> Unknown		<input type="text"/>			
*11 City		<input type="checkbox"/> Unknown		<input type="text"/>			
*12 State		<input type="checkbox"/> Unknown		*13 ZIP/Postal Code		<input type="checkbox"/> Unknown <input type="text"/>	
*14 Country		<input type="checkbox"/> Unknown		<input type="text"/>			
*15 TIN		<input type="checkbox"/> Unknown		16 TIN type		<input type="text"/>	
*17 Date of birth		<input type="checkbox"/> Unknown		<input type="text"/>			
18 Contact phone number		<input type="text"/>		Ext.		<input type="text"/>	
19 Email address		<input type="text"/>					
*20 Form of identification used to verify identity		<input type="checkbox"/> Unknown					
<input type="checkbox"/> Driver's license/State ID		<input type="checkbox"/> Passport		<input type="checkbox"/> Alien Registration		<input type="checkbox"/> Other <input type="text"/>	
Number <input type="text"/>		Country <input type="text"/>		Issuing State <input type="text"/>			
21 Cash in amount for individual or entity listed in Item 4		\$ <input type="text"/>					
		Account number <input type="text"/>					
22 Cash out amount for individual or entity listed in Item 4		\$ <input type="text"/>					
		Account number <input type="text"/>					



Part II Amount and Type of Transaction(s). Check all boxes that apply.

*23 Date of transaction

24 ☐ Armored car (FI Contract) ☐ ATM ☐ Mail Depositor/Statement ☐ Night Deposit ☐ Aggregated transactions

*25 CASH IN (in U.S. dollar equivalent)		*27 CASH OUT (in U.S. dollar equivalent)	
a. Deposit(s)	\$.00	a. Withdrawal(s)	\$.00
b. Payment(s)	.00	b. Advances (or credit including markers)	.00
c. Currency received for funds transfers (s) out	.00	c. Currency paid from funds transfers (s) in	.00
d. Purchase of negotiable instrument (s)	.00	d. Negotiable instrument (s) cashed	.00
e. Currency exchange(s)	.00	e. Currency exchange(s)	.00
f. Currency to prepaid access	.00	f. Currency from prepaid access	.00
g. Purchases of casino chips, tokens and other gaming instruments	.00	g. Redemption(s) of casino chips, tokens, NTO tickets and other gaming instruments	.00
h. Currency wages (s) including money plays	.00	h. Payment(s) on wages (s) (including race and OTB or sports pool)	.00
i. Bills inserted into gaming devices	.00	i. Travel and complimentary expenses and book gaming incentives	.00
j. Other (specify):	.00	j. Payment for tournament, contest or other promotions	.00
	.00	k. Other (specify):	.00
Total Cash in	\$.00	Total Cash out	\$.00

25 Foreign Cash in _____

Foreign Country



25 Foreign Cash out _____

Foreign Country



Part III Financial Institution Where Transaction(s) Takes Place 1 of 1

*37 Type of financial institution	MSB		
Other (specify):			
*29 Primary federal regulator	Internal Revenue Service (IRS)		
38 If 37a - Casino/Card Club is checked, indicate type (check only one)			
<input type="checkbox"/> State licensed casino	<input type="checkbox"/> Tribal authorized casino	<input type="checkbox"/> Card club	<input type="checkbox"/> Other
*30 Legal name of financial institution			
31 Alternate name, e.g. trade name, DBA			
*32 EIN			
*33 Address			
*34 City			
*35 State	RI		
*36 ZIP Code			
39 Financial institution ID type			
ID number			
*40 Contact office			
*41 Phone number		Ext.	
*42 Date Filed		[Date filed will be auto-populated when the form is signed.]	

BSA COMPLIANCE FORM

(FOR SINGLE/MULTIPLE TRANSACTIONS TOTALING \$2,000 AND UP IN ONE DAY)

Remitter Identification:

Name: _____ Date of Birth: ____/____/____
(First name) (Middle initial) (Last name)

(MM) (DD) (YYYY)

Current Address: _____ Tel. No.: _____
(A PO Box address is not acceptable; require physical address to include house no., street name, city, state and ZIP code)

Name of Employer: _____ Occupation: _____

Employer Address: _____ Tel. No.: _____

US Social Security Number: ____/____/____-____/____/____/____/____/____

ID No.: _____ (Check one) ☐ State ID ☐ Driver's License ☐ Passport

Alien ID ☐

(Check one) ☐ US ID ☐ Foreign ID (specify country) _____ ID Expiry

Date: ____/____/____

(MM) (DD) (YYYY)

Remittance Information:

Amount of Remittance: _____

Mode of Payment (Check applicable): ☐ Cash ☐ Check ☐ Money Order

Source of Funds (Check applicable): ☐ Savings/Checking ☐ Loans ☐ Others (pls. specify): _____

Purpose of Remittance: _____

Beneficiary Name: _____ Relationship: _____

Remitter Signature: _____ Date: ____/____/____

(MM)

(DD) (YYYY)

For Branch/Agent use only: Ref. No. _____

Certified correct: _____ Date: ____/____/____

Branch/Agent Representative Signature (MM) (DD)

(YYYY)

**1.1 ATTACH PHOTOCOPY OF ID
OF SSN**

(Required)

ATTACH PHOTOCOPY

(Required for cash transactions
amounting to more than \$10,000)

BDO REMIT (USA), INC.
ANNEX E – Registration of Money Service Business

WARNING: PRINTED VERSIONS OF THE BSA E-FILING FORMS ARE NOT FOR SUBMISSION TO AND WILL NOT BE
PROCESSED BY FINCEN.



Registration of Money Service Business

Version Number: 1.1

OMB No. 1506-0013

Steps to Submit: Complete the report in its entirety with all requested or required data known to the filer. Click "Validate" to ensure proper formatting and that all required fields are completed. Sign with PIN. Click "Save"; filers may also "Print" a paper copy for their records. Click "Submit".

Filing Name

SPECIAL NOTE: Please be advised that Part V of this registration may be left blank for an initial registration when the Primary Transaction Account for MSB Activities is not yet known. Registrants must file a corrected registration when the account data is known.

By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.

Sign with PIN

WARNING: PRINTED VERSIONS OF THE BSA E-FILING FORMS ARE NOT FOR SUBMISSION TO AND WILL NOT BE PROCESSED BY FINCEN.

Part I Filing Information

1. Indicate the type of filing by checking a, b, or d below (Check only one). If filing a ~~correction~~, check "c" and either a, b, or d.

a ☐ Initial registration b ☐ Renewal c ☐ Correct/amend a prior report d ☐ Re-registration

e. Enter RMSB registration (BSA ID) number if 1a, 1c, or 1d is checked

2. If you checked item 1 d, please indicate the reason(s). Check all that apply.

a ☐ Re-registered under state law b ☐ More than 10 percent transfer of equity interest c ☐ More than 50 percent increase in agents

Part II Registrant Information

Check here ☐ if entity

*3 Individual's last name, or entity's legal name

*4 First name

5 Middle name/initial

Suffix name

6 Alternate name, e.g., AKA - individual or DBA - entity

*7 Address

*8 City

*9 State

*10 ZIP/Postal Code

*11 Country

*12 TIN

*13 TIN type

14 Date of birth

15 Telephone number Ext.

16 Email address

17 Website address (URL)

18 Name of compliance/contact person for this registered MSB

19 Compliance telephone number Ext.

WARNING: PRINTED VERSIONS OF THE BSA E-FLING FORMS ARE NOT FOR SUBMISSION TO AND WILL NOT BE PROCESSED BY FINCEN.

Part III Owner or Controlling Person

Check here ☐ if entity

20 Individual's last name, or entity's legal name			
21 First name			
22 Middle name/initial			
Suffix name			
23 Address			
24 City			
25 State	26 ZIP/Postal Code		
27 Country			
28 TIN	29 TIN type		
30 Date of birth			
31 Email address			
32 Website address (URL)			
33 Telephone number	Ext.		

Part IV Money Services and Product Information

*34 U.S. States and/or territories where the registrant, its agents or branches are physically located and/or providing MSB activities. Note: At least one box in Item 34 must be checked. Check box a, b, or c as appropriate (Check only one). If box a, b, or c does not apply, check as many state/territory boxes as appropriate. If MSB engages in activities on tribal lands, mark the box for the state, territory or district in which the tribal lands are located. In addition, check box "d" if the MSB engages in activities in foreign locations (non-U.S. and US Territories).

a <input type="checkbox"/> All States & Territories	b <input type="checkbox"/> All States	c <input type="checkbox"/> All Territories	d <input type="checkbox"/> Foreign Location(s)
<input type="checkbox"/> Alabama (AL)	<input type="checkbox"/> Georgia (GA)	<input type="checkbox"/> Maryland (MD)	<input type="checkbox"/> New York (NY)
<input type="checkbox"/> Alaska (AK)	<input type="checkbox"/> Guam (GU)	<input type="checkbox"/> Massachusetts (MA)	<input type="checkbox"/> North Carolina (NC)
<input type="checkbox"/> American Samoa (AS)	<input type="checkbox"/> Hawaii (HI)	<input type="checkbox"/> Michigan (MI)	<input type="checkbox"/> North Dakota (ND)
<input type="checkbox"/> Arizona (AZ)	<input type="checkbox"/> Idaho (ID)	<input type="checkbox"/> Minnesota (MN)	<input type="checkbox"/> N. Mariana Isls. (MP)
<input type="checkbox"/> Arkansas (AR)	<input type="checkbox"/> Illinois (IL)	<input type="checkbox"/> Mississippi (MS)	<input type="checkbox"/> Ohio (OH)
<input type="checkbox"/> California (CA)	<input type="checkbox"/> Indiana (IN)	<input type="checkbox"/> Missouri (MO)	<input type="checkbox"/> Oklahoma (OK)
<input type="checkbox"/> Colorado (CO)	<input type="checkbox"/> Iowa (IA)	<input type="checkbox"/> Montana (MT)	<input type="checkbox"/> Oregon (OR)
<input type="checkbox"/> Connecticut (CT)	<input type="checkbox"/> Kansas (KS)	<input type="checkbox"/> Nebraska (NE)	<input type="checkbox"/> Palau (PW)
<input type="checkbox"/> Delaware (DE)	<input type="checkbox"/> Kentucky (KY)	<input type="checkbox"/> Nevada (NV)	<input type="checkbox"/> Pennsylvania (PA)
<input type="checkbox"/> District of Columbia (DC)	<input type="checkbox"/> Louisiana (LA)	<input type="checkbox"/> New Hampshire (NH)	<input type="checkbox"/> Puerto Rico (PR)
<input type="checkbox"/> FS of Micronesia (FM)	<input type="checkbox"/> Maine (ME)	<input type="checkbox"/> New Jersey (NJ)	<input type="checkbox"/> Rhode Island (RI)
<input type="checkbox"/> Florida (FL)	<input type="checkbox"/> Marshall Islands (MH)	<input type="checkbox"/> New Mexico (NM)	<input type="checkbox"/> South Carolina (SC)
			<input type="checkbox"/> South Dakota (SD)
			<input type="checkbox"/> Tennessee (TN)
			<input type="checkbox"/> Texas (TX)
			<input type="checkbox"/> Utah (UT)
			<input type="checkbox"/> Vermont (VT)
			<input type="checkbox"/> Virgin Islands (VI)
			<input type="checkbox"/> Virginia (VA)
			<input type="checkbox"/> Washington (WA)
			<input type="checkbox"/> West Virginia (WV)
			<input type="checkbox"/> Wisconsin (WI)
			<input type="checkbox"/> Wyoming (WY)

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Part IV Money Services and Product Information (Continued)

35 Enter the number of US branches of the registrant. **Reminder: do not separately register each branch.**
See instructions for an explanation of the term "branch."

36 Money services business activities of the registrant in the US. Check as many as apply. See instructions for an explanation of the terms.

- | | | |
|--|---|--|
| a <input type="checkbox"/> Issuer of traveler's checks | d <input type="checkbox"/> Seller of money orders | g <input type="checkbox"/> Check cashier (including traveler's and money orders) |
| b <input type="checkbox"/> Seller of traveler's checks | e <input type="checkbox"/> Dealer in foreign exchange | h <input type="checkbox"/> Seller of prepaid access |
| c <input type="checkbox"/> Issuer of money orders | f <input type="checkbox"/> Money transmitter | i <input type="checkbox"/> Provider of prepaid access |

37 If you are providing financial services in addition to those checked in item 36, please briefly describe.

Prepaid Program Information

If item "36" is checked, provide the following information (Items 38 to 43) to identify each prepaid program for which the registrant is the provider of prepaid access.

38 Name of prepaid program

39 IIN (BIN) of this program

40 Name of primary transaction processor

41 Name of compliance contact person for this program

42 Contact phone number

Ext.

43 Is this prepaid program usable internationally? a ☐ Yes b ☐ No

44 Is any part of the registrant's US money services business an informal value transfer system? a ☐ Yes b ☐ No
See the explanation of "money transmitter" and "informal value transfer system" in the instructions.

45 Is any part of the registrant's US money services business conducted as a mobile operation? a ☐ Yes b ☐ No

46 Enter the number of US agents authorized to conduct each money services business activity. Do not include US branches, or persons who are solely employees. See instructions for an explanation of the term "agent."

- | | |
|---|--|
| a Number of US agents selling traveler's check sales | |
| b Number of US agents selling money orders | |
| c Number of US agents involved as a dealer in foreign exchange | |
| d Number of US agents conducting money transmission | |
| e Number of US agents engaged in check cashing (including traveler's checks and money orders) | |
| f Number of US agents selling prepaid access | |

WARNING: PRINTED VERSIONS OF THE BSA E-FILE FORMS ARE NOT FOR SUBMISSION TO AND WILL NOT BE PROCESSED BY FINCEN.

Part V Primary Transaction Account for MSB Activities

Note: See instruction for an explanation of the term "transaction account." The registrant's primary transaction account is the account that has the greatest annual dollar amount of money services business activity. In Items 47 through 56, enter information about the registrant's primary transaction account for money services business activities.

56 Type of financial institution where the primary transaction account is held

a ☐ Depository institution b ☐ Non-depository institution c ☐ Foreign

47 Name of financial institution where the primary transaction account is held

48 Depository financial institution routing number

49 Primary account number

50 Depository financial institution IBAN (if foreign)

51 Address

52 City

53 State

54 ZIP/Postal Code

55 Country

Part VI U.S. Location of Supporting documentation/Address of Agent for Service of Process

If the supporting documentation is kept at the U.S. location reported in Part II, check here ☐ and continue to Part VII. If not, provide the U.S. location of where the supporting documentation is kept here in Part VI. If the MSB is located outside of the U.S., enter U.S. location of the U.S. agent for service of legal process. Do not enter a non-U.S. address.

57 Address

58 City

59 State

60 ZIP/Postal Code

Part VII Authorized Signature/Signature of Agent for Service of Process

I am authorized to file this form on behalf of the money services business listed in Part II. I declare that the information provided is true, correct and complete to the best of my knowledge. I understand that the money services business listed in Part II is subject to the Bank Secrecy Act and its implementing regulations. To the best of my knowledge, the money services business listed in Part II maintains a current list of all agents, an estimate of its business volume in the coming year, and all other information required to comply with 31 U.S.C. 5330 and the regulations thereunder. The signature of the owner, controlling person, authorized corporate officer, or U.S. agent for service of legal process is mandatory.

*61 Signature

62 Print name

63 Title

64 Date of signature

(Date field will be auto-populated when the form is signed.)

**1. CASH REMITTANCE**

Facts: A remitter sends a \$12,000.00 telegraphic transfer and pays cash.

Reportable Transactions? YES. This is a currency transaction exceeding \$10,000.00.

2. REMITTANCE PAID WITH CHECKS

Facts: A remitter sends \$18,000 to his mother and paid the transaction with a cashier's check issued by XYZ Bank.

Reportable? NO. This is not a currency transaction because a check is used. However, a copy of remitter's picture ID and the cashier's check received should be filed for future reference.

3. WIRE TRANSFERS INTO THE COMPANY'S DEPOSIT ACCOUNT

Facts: An amount of \$15,000.00 is wired to the Company's bank account for further credit to a deposit account with a Philippine Bank of a named beneficiary.

Reportable? NO. A CTR would not be required because the wire transfer did not result in a currency transaction.

4. REMITTANCE PAID BY ACH DEBIT

Facts: A customer walked in, applied for a remittance of \$20,000, and gave written authorization to debit his/her account with ABC Bank.

Reportable? NO. A CTR would not be required because the remitter's funds were already in the banking system and the remittance did not involve a currency transaction. However, the example is a highly specialized one that can only be processed in the Company's Headquarters through the use of the Automated Clearing House system of FRBSF. Proper identification of the remitter shall be obtained and the remittance may only be sent after the standard clearing time for an ACH debit.

5. CASH REMITTANCE FOR SLIGHTLY LESS THAN \$10,000

Facts: A customer applied for a remittance of \$9,995 and paid principal plus the remittance fee of \$40 in currency.

Reportable? YES. The threshold amount of \$10,000 plus \$0.01 applies to the total currency received and not to the amount of the transfer.

6. CASH REMITTANCE BY SEVERAL INDIVIDUALS

Facts: A husband and wife, their son and his wife jointly applied for a remittance of \$11,000 and paid \$2,750 each.

Reportable? YES. The total currency received for the remittance exceeded \$10,000.



Remit

ANNEX G – Independent Review Checklist

USA PATRIOT Act Independent Review

Business Information

Business Name: _____

Business DBA: _____

Address: _____

Phone Number: _____

Owner / Manager: _____

Compliance Officer: _____

Number of Locations: _____

Circle YES or NO for each question:

YES	NO	Is the business registered with the U.S. Treasury Department – Financial Crimes Enforcement Network (FinCEN) as a Money Services Business? If this entity conducts money service transactions (Examples: check cashing or currency exchange) on its own behalf that exceed \$1,000, for any one customer, on any one day, registration is required.
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YES	NO	If YES, is the MSB registration available and current? If NO, indicate the reason:
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Product Risk:

All financial services businesses, including banks; credit unions and money services businesses are at risk of being victimized by money launderers or other criminals. This risk can increase with the number of financial services that are sold, or with the use of multiple issuers/vendors for these services. Both multiple services and multiple issuers/vendors increase a money launderer or other criminal's ability to structure transactions to avoid detection and recordkeeping requirements. If more than one (1) product or service is offered, the Independent Reviewer should more carefully review this compliance program. Identify the financial services and products that are offered:

YES	NO	Money transfers / wire transfers
YES	NO	Money orders
YES	NO	Check cashing
YES	NO	Currency exchange
YES	NO	Stored value cards

Location Risk:

Law enforcement agencies and government regulators have identified areas that are at higher risk for money laundering, related financial crimes, and drug trafficking. If the answer is "YES" to any of the following three (3) questions, this MSB has a greater risk of being victimized by money launderers or

other criminals. Therefore, the Independent Reviewer should more carefully review this compliance program.

YES	NO	Is the MSB located in an area at high risk for money laundering or related financial crimes? A map identifying such areas can be found on the FinCEN website at: www.fincen.gov/hifcaregions.html .
YES	NO	Is the MSB located in an area at high risk for drug trafficking? A map identifying such areas can be found at: www.whitehousedrugpolicy.gov/hidta/index.html .
YES	NO	Does the MSB transfer funds to high-risk areas? High-risk areas can be found by reviewing the Current NCCT list on the Financial Action Task Force website at: www.fatf-gafi.org and the Sanctions Program and Country Summaries on the OFAC website at: www.treas.gov/offices/enforcement/ofac/ .

Compliance Program

YES	NO	Does the MSB have a written Compliance Program?
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Does the Compliance Program include written policies, procedures, and internal controls reasonably designed to assure compliance with the Bank Secrecy Act, including:

YES	NO	Customer identification?
YES	NO	Filing applicable reports (Suspicious Activity Reports by Money Services Business (SAR-MSB) and Currency Transaction Reports (CTR)? If you are solely an agent of BDO remit, your answer will be NO since filing of these reports are centralized in BDO Remit Headquarters.
YES	NO	Recordkeeping and retention requirements?
YES	NO	Response to law enforcement requests for information?
YES	NO	Does the Compliance Program include limits specific to this business, such as a maximum send amount, a maximum receive amount, or a maximum amount of money orders that may be purchased? If YES, describe how these limits are enforced and monitored: _____ _____
YES	NO	Has a Compliance Officer been designated?
YES	NO	Does the Compliance Officer fully understand and perform the duties and responsibilities of this position?
YES	NO	Are Independent Reviews, to monitor and maintain an adequate compliance Program, conducted at least annually by a qualified party?

Applicable for Money Transfers through BDO Remit:

SAR-MSBs

YES	NO	Does the Compliance Officer (or their designee) review daily transaction activity to look for structuring and to ensure that SAR Incident Report is sent to BDO Remit for further investigation?
YES	NO	Have SAR Incident Reports been sent to BDO Remit?

If NO, why not:

YES	NO	Are copies of filed SAR Incident Reports and supporting documentation maintained in a secure location?
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YES	NO	Are copies of SAR Incident Reports and supporting documentation maintained for 5 years?
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CTRs

YES	NO	Does the Compliance Officer (or their designee) review daily activity to look for transactions that in individual or multiple transactions may require the filing of CTRs?
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YES	NO	Are copies of supporting documentation for transactions requiring CTR filing maintained in a secure location?
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YES	NO	Are copies of the CTR supporting documentation maintained for 5 years?
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BSA Compliance forms

YES	NO	Does the Compliance Officer (or their designee) periodically review the Payment Instructions for accuracy and completeness?
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YES	NO	Are BSA Compliance Forms properly completed and the necessary Identification documents maintained for transfers of \$2,000 or more (\$1,000 or more for State of Arizona)?
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YES	NO	Are the BSA Compliance Forms and Identification documents kept in a secure location and maintained for 5 years?
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Customer Identification

YES	NO	Does the Compliance Officer (or their designee) periodically review the Money Transfer Logs and/or the BSA Compliance Forms and supporting identification documents to ensure that the identification policy and procedures are being followed?
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YES	NO	Is valid, government issued photo identification, being recorded for money transfers up to \$1,999.99?
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YES	NO	Is valid, government issued, photo identification, being recorded and photocopied for money transfers of \$2,000 or more (\$1,000 or more for State of Arizona)?
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YES	NO	Is the SSN Card photocopied for cash/currency money transfers of more than \$10,000?
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Employee Training

YES	NO	Have all employees involved in providing MSB services received compliance training from BDO Remit or other third party providers? If YES, how often?
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YES	NO	Does training include reading BDO Remit's Anti-money laundering / counter terrorist financing Compliance Manual for Agents?
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If NO, why not:

- | | | |
|-----|----|---|
| YES | NO | Are training records documented? |
| YES | NO | Is training material thorough and current?
Briefly describe the content:

_____ |
| YES | NO | Do employees fully understand compliance policies and procedures? |
| YES | NO | Are employees adequately trained to identify potentially suspicious activity, including structuring? |
| YES | NO | Is testing conducted to validate the employees' understanding of compliance?
Briefly describe the content and process:

_____ |
| YES | NO | Does the MSB conduct annual employee refresher compliance training? |

Data Review

In order to verify that transactions have been properly identified for recordkeeping and reporting requirements, the Independent Reviewer may choose to conduct a random test of a sample of transactions.

If a data review was conducted, briefly describe the results of the review and analysis:

Additional Comments (all unacceptable areas must be addressed):

Certification of Independent Review

I have completed an independent review of the compliance program of _____ (name of business). Among other things, this review focused on the requirements of the USA PATRIOT Act and the Bank Secrecy Act. The results of my review are that I find this entity's anti-money laundering / counter terrorist financing compliance program to be:

Acceptable:

Acceptable, but recommend the following enhancements:

Unacceptable for the following reasons:

Signature of the person conducting the review:

Reviewer's Name:

Reviewer's Title:

Reviewer's Company:

Date of Review: