

Revision as of January 3, 2025

This revision supersedes and replaces all other Anti-Money Laundering Compliance Guides issued by North American Money Order Company, Inc. This revision includes important updates and changes; you should no longer use any previous version of this Guide. If you have any previous version, you should keep those Guides for your records.



North American Money Order Company Agent:

This Anti-Money Laundering Compliance Guide will help you and your employees comply with federal and state laws and regulations, including but not limited to, the *Bank Secrecy Act (BSA)*, the *Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 (USA PATRIOT Act)*, and the requirements of the Office of Foreign Assets Control (OFAC), that require you to detect and prevent money laundering and terrorist financing while selling money orders.

North American Money Order Company's (NAMOC) policy is to follow the spirit, as well as the letter of these laws and regulations. We do not want our money orders to be used for illegal purposes. **We will not do business with anyone who knowingly violates or refuses to comply with these laws and regulations.**

NAMOC cannot take responsibility for you or your employees' compliance with these laws and regulations. However, this Guide will help you develop your own effective anti-money laundering (AML) compliance program. This Guide provides a general description of the BSA, USA PATRIOT Act and OFAC requirements as they relate to money orders. There may be other requirements that apply to other facets of your business. **This Guide is not intended to serve as legal advice to you.**

This Guide is divided into three sections. The first section describes the steps necessary to create an AML compliance program. The second section includes training material that can be used to train you and your employees on AML compliance issues. The third section includes the forms that will need to complete in order to create your own AML compliance program.

This Guide also contains links to videos that will assist you in understanding this Guide, training your employees, and filling out the included forms to create your own AML compliance program.

WHY YOU SHOULD READ THIS GUIDE, CREATE YOUR OWN AML COMPLIANCE PROGRAM, COMPLETE THE FORMS AND TRAIN YOUR EMPLOYEES ON COMPLIANCE ISSUES:

- **It is the law.**
- **Your business is subject to be examined by federal and state regulators.**
- **Failure to comply could result in fines or worse.**
- **Banks may choose not do business with you and/or close your account.**
- **NAMOC may terminate you as an agent.**
- **Compliance is not difficult. Most of the information you need is right here in this Guide.**

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MSB REGISTRATION

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

As our agent, you are not required to register as an MSB for the purposes of selling our money orders.

However, you may be required to register with the United States Department of Treasury through the BSA E-Filing System (information on the filing instructions can be found at www.fincen.gov/money-services-business-msb-registration) if you engage in one of the other MSB activities defined as:

- A. Being a money (wire) transmitter;
- B. A person engaged in the business of check cashing to any person on any day for more than \$1,000.

For example, a store that is an agent of ours and performs no other MSB services is not required to register; however, registration would be required if the store, in addition to acting as our agent, also cashes checks to any person on any day for more than \$1,000.

ANTI-MONEY LAUNDERING PROGRAM

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

The USA PATRIOT Act requires that all MSBs adopt a written anti-money laundering program. Accordingly, you must establish an anti-money laundering program that includes, at a minimum, the following:

- A. Internal anti-money laundering policies, procedures and controls;
- B. Designation of a specific responsible individual who will function as your business's anti-money laundering compliance officer;
- C. An ongoing employee training program on anti-money laundering that is given to all employees who have contact with customers;
- D. An independent review to test your anti-money laundering program.

We have created a template that incorporates all of the requirements noted above. It can be found at page 23 of this Guide. You may call the NAMOC Compliance Department at 1-844-507-1476 or email us at aml@northamericanmoneyorder.com and we will mail or email you a copy. You may also choose to write or develop a program on your own.

In order for the template to become a valid program, there are several blanks that need to be filled in and several options that need to be chosen in order to customize the template for your specific business. Most of the information that needs to be customized is self-explanatory, but there are two decisions that may require some explanation: designation of Compliance Officer and establishment of daily limit.

DESIGNATION OF COMPLIANCE OFFICER

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

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.

ESTABLISH A DAILY LIMIT

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

Your business will need to establish a daily limit on money orders that you knowingly sell to one person. All of the recordkeeping requirements are phased in based upon the amount of money orders that you sell to an individual on any day. **Therefore, NAMOC urges you to establish a policy that says you will NEVER sell more than \$2,000 to any one person on any day. This policy would eliminate the recordkeeping requirements discussed below.**

In the event that you wish to be more conservative, your business may wish to establish a policy that you will never sell more than \$1,000 to any one person on any day. Several banks that our agents use require this more conservative policy.

The establishment of a daily limit, as well as the monitoring and supervision to ensure that that your employees are following the daily limit, is solely the responsibility of your business. The only real opportunity to verify customer identity is at the point of sale. This can only be done with a knowledgeable and well-trained staff.

This daily limit only applies to money orders sold to customers. It does not apply to money orders used for vendor payments in the event that your business has been approved to use money orders for vendor payments.

In the event that you do not establish either the NAMOC recommended policy of a \$2,000 daily limit or the more conservative policy of a \$1,000 daily limit or in the event you or one of your employees violates your policy, see page 9 of this Guide for a summary of the recordkeeping requirements.

TRAINING PROGRAM FOR EMPLOYEES

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

Your business must establish an ongoing training program for all employees who will have any involvement with MSB activities. Their education and training should include instructions on the employees' responsibilities under the program, as well as the detections of suspicious transactions. All supervisory employees, such as the Compliance Officer and store managers, should be required to read this Guide prior to conducting any MSB transactions. Employees whose only involvement is the actual sale of money orders to customers should also be trained prior to selling any money orders. We have provided you with an Employee Quick Training Guide \$1,000 Daily Limit at page 12 of this Guide and an Employee Quick Training Guide \$2,000 Daily Limit at page 13 of this Guide.

All employees should sign a form that documents training. We have provided a form that you can use for this called the Employee AML Training Documentation Log and it may be found at page 33 of this Guide. **This documentation of training is very important and must be kept so it can be made available to regulatory personnel on request.**

In addition to the initial training noted above, employees should also receive periodic training at least annually. The training may be more often depending on your business's plan. This periodic training should also be documented as noted above. We provide training videos at the link at the top of this section.

For additional training resources, please contact the NAMOC Compliance Department at 1-844-507-1476 or email us at aml@northamericanmoneyorder.com. Additional resources are also available at www.fincen.gov.

INDEPENDENT REVIEW OF AML PROGRAM

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

Your business must subject its anti-money laundering compliance program to an independent review to assure its adequacy on a periodic basis. The scope and frequency of this review should be adjusted to allow for the risk of the financial services provided by your business; however, this independent review should be conducted at least annually. An officer or employee of your business may conduct the independent review; however, the Compliance Officer or any employee who reports to the Compliance Officer may not conduct the independent review.

NAMOC has prepared a template for an Independent Review Manual. It can be found at page 19 of this Guide or call the NAMOC Compliance Department at 1-844-507-1476 or email us at aml@northamericanmoneyorder.com and we will mail or email you a copy. You may also choose to write or develop a program on your own.

WHAT IS MONEY LAUNDERING?

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

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, but is not limited to transactions in cash. Money laundering can involve any type of money, including money orders, and other financial transactions. You need to understand how people launder money so that you can identify money laundering and know how to help prevent it.

The money laundering cycle begins when criminals place funds into the financial system by buying money orders. Once the funds have entered the system, the source of illegal funds is further disguised by transferring them through layers of financial institutions, such as bank or investment accounts. Finally, the funds are legitimized by purchasing items or investing in legitimate investments such as real estate, real property, stocks, and bonds.

To help prevent the laundering of cash and obtain documentation that may be used to prosecute money launderers, the government requires you to maintain records on certain cash transactions. Some transactions also require that reports be filed and maintained.

One way money launderers avoid reporting and recordkeeping requirements is by "structuring" transactions. See page 7 of this Guide for an explanation of "structuring". Another way that money launderers avoid reporting and recordkeeping requirements is by coercing or bribing employees not to file proper reports or complete required records. See page 6 of this Guide for an explanation on Suspicious Activity Reporting.

You and your employees have the initial responsibility to detect and prevent money laundering. **IF YOU OR YOUR EMPLOYEES HAVE A QUESTION, A DOUBT, OR ARE UNSURE ABOUT ANY TRANSACTION, SIMPLY DO NOT DO IT.**

RECORDKEEPING REQUIREMENTS

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

It is important that you create recordkeeping files for your Compliance Program. These files should be readily accessible if your business is examined/audited by regulators.

NAMOC and our agents each have separate reporting and recordkeeping responsibilities. If you establish either the NAMOC recommended daily limit of \$2,000 or the more conservative daily limit of \$1,000, there will be no reports to file or records to keep. However if you do not establish and follow our recommended policy, you are responsible for proper reporting and maintaining copies of the records as described in Recordkeeping Requirements on Money Sales over \$3,000 on page 9 of this Guide.

SUSPICIOUS ACTIVITY REPORTING

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

You must file a Suspicious Activity Report by Money Services Business ("FinCEN SAR") whenever any activity is attempted or occurs that involves at least \$2,000 in one or more transactions and you suspect or have reason to suspect that:

1. The transaction involves funds derived from illegal activity or is intended to hide funds derived from illegal activity;
2. The transaction is structured to avoid record-keeping or reporting requirements. See discussion of structuring on page 7 of this Guide; or
3. The transaction has no business or apparent lawful purpose.

The following list provides examples of potentially suspicious activity that should raise concerns and may require you to file a FinCEN SAR:

1. A customer or employee appears to be structuring transactions in an attempt to avoid a BSA recordkeeping or a reporting requirement;
2. An individual provides phony or expired identification;

3. Two or more individuals, who are obviously together, split up to conduct separate transactions for under your daily limit that together add up to over your daily limit;
4. An individual refuses to proceed with a transaction once he/she is informed that a report will be filed or that records will be kept;
5. A customer asks an employee how to avoid reporting or record-keeping requirements;
6. An individual attempts to threaten or bribe an employee;
7. The same person buys one or more money orders several times a day, but never buys money orders totaling more than the daily limit during any single visit;
8. Multiple money orders are purchased by the same person in even hundred dollar denominations or in unusual quantities.
9. You must file a FinCEN SAR if you have reason to believe a transaction is structured to avoid filing a CTR or other recordkeeping requirement or is otherwise suspicious, and the transaction meets the \$2,000 reporting requirement.

Example 1: Jim purchases money orders just below \$2,000 over the course of several days. Jim may be structuring his purchases, and you should consider whether a FinCEN SAR needs to be filed.

Example 2: You see Jim hand cash to Bill and Susan outside your store. Bill and Susan each give you cash and purchase money orders that total less than \$10,000 for each of them. This appears to be a structured transaction, and may require the filing of a FinCEN SAR and/or a CTR.

Example 3: Jim purchases money orders from your location just under the daily limit. After Jim has left, you discover that Jim also purchased money orders at some of your other offices on the same day. Jim may be attempting to avoid the reporting requirements. You should consider whether a structured or suspicious transaction has occurred. If you conclude that a structured a suspicious transaction has occurred, you must file a FinCEN SAR if the reporting threshold is met. If the total amount of currency that Jim paid in all such transactions exceeds \$10,000 you must also file a CTR.

You must file a FinCEN SAR within 30 days of the suspicious event. You must keep a copy of the report and all supporting documentation for at least five years from the time of its filing. Federal law provides protection from civil liability for all reports of suspicious transactions made to appropriate authorities.

Never Tell Your Customer That You Filed a FinCEN SAR. It is illegal for you to tell your customer that you are filing a suspicious transaction report.

If we find evidence in our records that your customers may be misusing our money orders, we may contact you as part of our investigation. You must not tell your customer that we have made such an inquiry.

All FinCEN SARs must now be filed with the federal government electronically. If you have registered as an MSB as described on page four above, you must file the Suspicious Activity Reports yourself. The instructions on how to file can be found at www.fincen.gov. If you are not required to file as an MSB as described on page four (most of our agents fall into this category), you can contact the NAMOC Compliance Department at 1-844-507-1476, and we can help you file the FinCEN SAR.

STRUCTURING

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

One type of suspicious transaction that requires the filing of a FinCEN SAR is a structured transaction. **It is illegal for you or your customer to structure transactions in order to avoid the recordkeeping or reporting requirements.** For example, if a customer buys \$2,000 of money orders in the morning and \$2,000 of money orders at the end of the day, they may be structuring their purchases in order to avoid recordkeeping.

“Structuring” involves breaking up a larger transaction that would have to be recorded or reported into smaller transactions in order to avoid the reporting and recordkeeping requirements. Even if it's done for a legitimate reason, the fact that the transaction is broken up to avoid the reporting and recordkeeping requirements is still considered “structuring.” In other words, there is no innocent excuse for “structuring.”

A customer purchasing several money orders is **not** “structuring” unless they do it to avoid the reporting and recordkeeping requirements. There are many legitimate situations in which someone will purchase multiple money orders. It is only if they arrange the purchases in such a manner as to avoid a recordkeeping or reporting requirement that you should become concerned about “structuring.” If you suspect “structuring” you will want to report the transaction as suspicious activity.

LAW ENFORCEMENT INQUIRIES AND REQUESTS

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

NAMOC and our agents are required by law to cooperate with law enforcement. Inquiries from law enforcement can include such things as grand jury subpoenas and National Security Letters. You should cooperate fully with any request. In addition, you should notify the NAMOC Compliance Department at 1-844-507-1476 in the event of any such request. All requests and notifications should be handled in a timely manner. In the event you receive correspondence that is addressed to NAMOC, you should forward the correspondence to NAMOC immediately **and** notify the NAMOC Compliance Department at 1-844-507-1476.

FINANCIAL CRIMES ENFORCEMENT NETWORK (FinCEN)

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

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

OFAC

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

The Office of Foreign Assets Control ("OFAC") is a division of the Department of the Treasury that administers and enforces U.S. economic and trade sanctions against targeted foreign countries, terrorists, drug cartels and others. **The OFAC regulations require all businesses to identify and freeze the assets of oppressive governments, international terrorists, narcotic traffickers and other specially designated persons.** OFAC maintains a list called the Specially Designated Nationals and Blocked Entities List ("SDN List") that identifies most individuals and entities to which the OFAC restrictions apply. Any type of transaction involving an SDN is prohibited as a blocked transaction. Some of the countries and groups that are currently targeted by OFAC include: Cuba, Iran, Iraq, Libya, North Korea, Syria, Sudan and the Taliban. The scope of the regulations (and what businesses may and may not do) varies with the specific economic sanctions program. Refer to the OFAC web site (www.ustreas.gov/ofac) for further information.

TERRORIST FINANCING PREVENTION

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

Money laundering is most commonly associated with drug dealing and tax evasion. However, terrorists often 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 terrorist financing, you should immediately report the incident to the FinCEN hotline at 1-800-556-3974, which is operated 24 hours a day, seven (7) days a week. You should also file a **FinCEN SAR** on any suspected terrorist activity. The Financial Action Task Force (FATF) and FinCEN have both issued guidance on financial transactions that may be indicative of terrorist financing at www.fatf-gafi.org and www.fincen.gov. Some examples include, but are not limited to:

- A. Movement of funds through a country designated by FinCEN or the FATF as "non-cooperative," that are identified as specially designated nationals by OFAC, or that appear on the United Nation's list of blocked accounts;
- B. Multiple transactions conducted by a group of nationals from countries associated with terrorist activity.

CIVIL AND CRIMINAL PENALTIES

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

The government can impose harsh civil and criminal penalties against anyone who violates the BSA, USA PATRIOT Act, OFAC or other anti-money laundering laws and regulations. Civil and criminal fines can quickly reach into the hundreds of thousands or even millions of dollars. The criminal penalty for violating a BSA requirement is a fine of up to \$500,000, 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, businesses can be held criminally liable for the acts of their employees; it is important for your employees to be trained in these matters and for your business to have a system in place to ensure employees' compliance with the laws and regulations. If you or your employees do not comply, you may be subject to large fines and/or imprisonment.

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

Non-compliance isn't worth the risk.

RECORDKEEPING ON MONEY ORDER SALES OVER \$3,000

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

This section describes the reporting and record-keeping requirements in the event that you do not establish our recommended policy of never selling more than \$2,000 to any person on any day or the conservative policy of never selling more than \$1,000 to any person on any day. **This also describes the reporting and recordkeeping requirements that will be necessary in the event that you or one of your employees violates that policy.**

MONEY ORDER SALES \$3,000 TO \$10,000

Whenever a customer purchases money orders with cash, throughout the same business day, in amounts from \$3,000 to \$10,000, certain information must be obtained and retained. The information is to be recorded on a Money Order Transaction Log (Log). See sample Log at page 24 of this guide. Only cash purchases are covered by this requirement - purchases by check or credit card are not, regardless of the amount.

Identification for Log. Before completing a transaction that requires a Log entry, you must verify the name and address of the individual buying the money orders by looking at a valid identification document, such as a driver's license, passport or alien identification card that contains the customer's name and address. The regulations require you to record:

1. Customer's name;
2. Customer's address;
3. Customer's Social Security or alien identification number;
4. Customer's date of birth;
5. Date of purchase of the money order(s);
6. The serial number of money orders(s) purchased;
7. The dollar amount of money order(s) purchased;
8. The location where the money order(s) was purchased;
9. The total amount purchased with cash;
10. You are also required to record specific information on the identification used to verify the purchaser's identity (e.g., driver's license number and state of issuance).
11. If the money orders being purchased are for a third party (someone other than the purchaser), then the following information also needs to be recorded in the Log: the third party's name, the third party's address and the third party's Social Security number, alien identification number or tax identification number.

You must obtain all of this information ***before you complete the transaction.*** Logs are to be kept at each of your locations that sell money orders. A copy of the Log must be kept for five years after the date of the last transaction in the Log. Logs are **not** to be sent to NAMOC.

MONEY ORDER SALES OVER \$10,000

A Currency Transaction Report ("CTR") is required for single or multiple transactions in currency performed in any one day by any person (or on behalf of any third party) that totals more than \$10,000. In other words, you must treat multiple cash purchases of money orders 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 any one business day. (This \$10,000 amount includes both the face amount of the transaction and the fees paid by the purchaser.)

You must file the report with the Internal Revenue Service (IRS) on a Currency Transaction Report, which can be obtained online at the following location: www.fincen.gov or from the NAMOC Compliance Department at 1-844-507-1476.

Identification for CTRs. Before you complete any transaction that requires a CTR, you must verify the name and address of the individual conducting the transaction:

1. If your customer is a resident of the United States, you must see a document that banks normally accept when cashing a check for a non-customer. This includes a driver's license, a state-issued identification card or other type of identification card.
2. If your customer is an alien or not a resident of the United States, you must examine a passport, an alien identification card, or other official document. The "other official document" must show their nationality or home address.

The regulations require that you record your customer's name, address and Social Security number (or taxpayer identification number or other identifying number) on the CTR. The CTR form also asks for occupation, date of birth, and other information.

If two or more people are doing the transaction, or if the transaction is on behalf of a third person other than the individual performing the transaction, you must obtain similar information for all parties before you complete the transaction.

Identification for Elderly or Disabled Persons. Elderly or disabled persons may not have identification documents, such as a driver's license or state-issued identification card. In these cases, you may accept as appropriate identification a Social Security, Medicare, Medicaid or other insurance card presented along with another document that contains both the name and address of the individual (e.g., an organization membership or voter registration card, utility or real estate tax bill).

You must maintain a written list of the specific types of documents that you or your employees may accept from elderly or disabled people.

Filing the CTR. You must prepare and file the CTR within 15 days of the transaction. The CTR form shows the address where it is to be filed.

Record-keeping of CTRs. You must keep copies of each CTR for at least five years from the date of filing.

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

- A. If you or your employee witness multiple transactions;
- B. If someone tells you or an employee about the multiple transactions;
- C. If you or an employee knows a transaction is part of multiple transactions;
- D. If you or an employee knows a customer is conducting a transaction for another party, whom you or your employee knows has already conducted another transaction.

Question: What is considered currency?

"Currency" includes cash, and it is not limited to U.S. money. Currency is coin, paper money or banknotes of the United States or any other country that is designated as legal tender and customarily accepted as a medium of exchange in the country in which it was issued.

Question: When must you file a CTR?

You must file a CTR when, in the same day, you receive cash from the same person or from different individuals acting on behalf of the same person which together with any consumer fees paid in cash, exceeds \$10,000.

Example 1: Jim brings in \$12,000 in cash on one occasion and wants to purchase money orders. You must file a CTR.

Example 2: Jim brings in cash on several separate occasions during the same day and requests a number of purchases money orders that add up to more than \$10,000 (including fees). You must file a CTR.

Question: What should you do if the customer refuses or is unable to provide all of the Information required to complete a CTR?

You must obtain all of the information required by the CTR. If the customer refuses to or is unable to provide the required information, you should not conduct the transaction. Also, you should determine whether you need to file a FinCEN SAR on such a transaction. The FinCEN SAR is explained on page 14 of this Guide.

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 and preferably a photograph and address. Official documents that may be used to verify the customer's identity include a driver's license, passport, national identification card (i.e., Cedula card), alien identification card or state-issued identification card. Although it is not necessary to verify other information obtained from the customer, if you believe the information provided is false, do not complete the transaction.

Question: Do you have to keep a copy of the CTR and, if so, for how long?

Yes. You must keep a copy of the CTR for five years from the date of filing.

Question: How soon and where must you file the CTR?

You must complete and file the CTR within 15 days following the date of the transaction. The instructions on the forms provide the addresses where they are to be filed.

EMPLOYEE QUICK TRAINING GUIDE \$1,000 DAILY LIMIT

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

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

Money laundering is illegal and it is a serious problem. There are Federal and state laws including the Bank Secrecy Act and the USA Patriot Act that regulate money order sales to prevent money laundering. Your company has developed a plan to prevent money laundering. This training is a part of that plan.

Here are the 2 most important rules that you need to follow:

- **DO NOT SELL MORE THAN \$1,000 OF MONEY ORDERS TO A SINGLE PERSON ON A SINGLE DAY FOR ANY REASON.**
- **DO NOT ENGAGE IN ANY CONVERSATION WITH ANY PERSON ON ANY WAY TO AVOID THE RULE ABOVE.**

Watch out for customers trying to avoid the \$1,000 limit. Don't sell them the money orders if you think that they are trying to avoid the \$1,000 limits. Here are 2 ways that you need to watch out for:

- The same person buys money orders several times a day, but never buys more than \$1,000 in a single visit, but together add up to more than \$1,000.
- Two or more individuals, who are obviously together, conduct separate transactions under \$1,000 each, but together add up to more than \$1,000.

If you inadvertently or mistakenly sell more than \$1,000 to a single person or if you discover at later time that you sold more than \$1,000 to a single person, there may be forms that have to be completed. Notify your supervisor immediately.

In the event that your supervisor is unavailable or unable to answer your questions about a particular money order transaction or about money laundering prevention, call the NAMOC Compliance Department at 1-844-507-1476.

IF YOU ARE SUSPICIOUS OR HAVE QUESTIONS OR ARE UNSURE ABOUT ANY PARTICULAR TRANSACTION, SIMPLY DO NOT DO IT

EMPLOYEE QUICK TRAINING GUIDE \$2,000 DAILY LIMIT

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

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

Money laundering is illegal and it is a serious problem. There are Federal and state laws including the Bank Secrecy Act and the USA Patriot Act that regulate money order sales to prevent money laundering. Your company has developed a plan to prevent money laundering. This training is a part of that plan.

Here are the 2 most important rules that you need to follow:

- **DO NOT SELL MORE THAN \$2,000 OF MONEY ORDERS TO A SINGLE PERSON ON A SINGLE DAY FOR ANY REASON.**
- **DO NOT ENGAGE IN ANY CONVERSATION WITH ANY PERSON ON ANY WAY TO AVOID THE RULE ABOVE.**

Watch out for customers trying to avoid the \$2,000 limit. Don't sell them the money orders if you think that they are trying to avoid the \$2,000 limits. Here are 2 ways that you need to watch out for:

- The same person buys money orders several times a day, but never buys more than \$2,000 in a single visit, but together add up to more than \$2,000.
- Two or more individuals, who are obviously together, conduct separate transactions under \$2,000 each, but together add up to more than \$2,000.

If you inadvertently or mistakenly sell more than \$2,000 to a single person or if you discover at later time that you sold more than \$2,000 to a single person, there may be forms that have to be completed. Notify your supervisor immediately.

In the event that your supervisor is unavailable or unable to answer your questions about a particular money order transaction or about money laundering prevention, call the NAMOC Compliance Department at 1-844-507-1476.

IF YOU ARE SUSPICIOUS OR HAVE QUESTIONS OR ARE UNSURE ABOUT ANY PARTICULAR TRANSACTION, SIMPLY DO NOT DO IT.

AGENT ANTI-MONEY LAUNDERING COMPLIANCE PROGRAM FOR MONEY ORDER SALES

Revision as of January 3, 2025

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

This Program should be reviewed and updated on a periodic basis. NAMOC recommends that this review and update be performed on an annual basis. If you need additional copies of this program, you may copy this AGENT ANTI-MONEY LAUNDERING COMPLIANCE PROGRAM FOR MONEY ORDER SALES, or contact the NAMOC Compliance Department at 1-844-507-1476 or email at aml@northamericanmoneyorder.com.

PROGRAM INFORMATION AND INSTRUCTIONS

This document contains policies and procedures to help your business comply with federal and state specific Anti-Money Laundering (AML) regulations, guidelines and laws for money order sales. If you engage in any other Money Services Business (MSB) activity, such as check cashing, money transfers, or stored value sales, then you will need to adopt a similar program for those activities. In order for this document to be considered an adequate AML program, you must:

Information needs to be completed wherever you see the following symbol



- Adoption of this document as your AML Program (Page 15)
- Policies and procedures on MSB Registration (Page 15)
- Designation and Duties of Compliance Officer (Page 16)
- Policies and procedures on employee training (Page 16)
- Policies and procedures on transaction monitoring (Page 17)
- Document transaction limits (Page 17)
- Policies and procedures on Record Keeping Requirements (Page 18)
- Policies and procedures on Law Enforcement Inquiries and Requests (Page 18)
- Policies on Independent Review (Page 18)

LEGAL DISCLAIMER

Although this document contains legal information, it is not intended to be, nor should it be considered legal advice. For legal advice, including the interpretation and application of any law, please consult an attorney.

CIVIL & CRIMINAL SANCTIONS

Any person who sells and/or offers money orders must be aware that he / she is responsible if the business and / or employee is willfully blind to suspicious activity or knew information that he / she “should have known” was suspicious. The penalties for violating federal and / or state specific AML regulations are severe, and under certain circumstances, could be assessed against a business and / or business’s employees.

Any employee that violates these policies and procedures, either unknowingly or intentionally may be subject to disciplinary action, including but not limited to, termination of employment, civil fines and criminal punishment.

**ADOPTION OF ANTI-MONEY LAUNDERING COMPLIANCE PROGRAM
FOR MONEY ORDER SALES**



Name of Business

to be known herein as the 'Business' hereby certifies and adopts the policies and procedures contained in this document, including the:

North American Money Order Company Anti-Money Laundering Compliance Guide, Revision as of January 3, 2025
as its Anti-Money Laundering (AML) Compliance Program For Money Order Sales.



Print Name



Title



Signature



Date

POLICY STATEMENT

The Business, its directors, its officers and its employees are dedicated to the fight against money laundering and are committed to preventing our products and services from being used for illegal purposes. The Business refuses to do business with anyone who knowingly engages in illegal activity. Therefore, this Anti-Money Laundering Program (AML Program) is being established to ensure that not only the letter of the various laws and regulations, both state and federal, relating to anti-money laundering including but not limited to the Bank Secrecy Act (BSA), the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 (USA PATRIOT) and the requirements of the Office of Foreign Assets Control (OFAC), are observed; but also, that the spirit of those laws is observed as well. The Business's AML Program is designed to prevent, detect, and ultimately help prosecute money laundering and the financing of terrorism.

MSB REGISTRATION REQUIREMENTS

If the Business only sells North American Money Order Company, Inc. (NAMOC) money orders and does not conduct any other MSB activity, then the Business does not need to register as a MSB with the U.S. Department of the Treasury.

If the Business conducts MSB transactions on its own behalf (such as check cashing over \$1,000), then the Business must complete FinCEN Registration of Money Services Business within 180 days from the date the Business began conducting MSB transactions. Every two (2) years a re-registration is also required. Instructions on how to file the registration can be found at www.fincen.gov.

BUSINESS MSB REGISTRATION

Check which applies:

- The Business DOES NOT conduct money services business transactions on its own behalf and the Business does not conduct any other money services business transactions on behalf of another company. The Business is covered by the NAMOC MSB registration. The Business DOES NOT need to register independently as a MSB.
- The Business DOES NOT conduct money services business transactions on its own behalf. The Business does conduct other money services business transactions on behalf of another registered company (such as a wire transfer service). The Business is covered by the NAMOC MSB registration and is covered by the registration of the other registered company. The Business DOES NOT need to register independently as a MSB.
- The Business conducts money services business transactions on its own behalf. The Business MUST register as a MSB with the U.S. Department of the Treasury. The Business will maintain a copy of the registration with its AML Files. Re-registration as a MSB is required every two years.

THE COMPLIANCE OFFICER



Name of Person



Title

is hereby designated as the Anti-Money Laundering Compliance Officer.

DUTIES OF COMPLIANCE OFFICER

The Compliance Officer, as well as senior management, responsibilities include:

- I. The development and revision, as necessary, of this AML Program for the Business including the following:
 - A. Establish and update policies and procedures for the completion, review, filing and retention of all reports required under the BSA and USA Patriot Act;
 - B. Establish and update policies and procedures for compliance matters, such as handling the reporting of suspicious transactions, responding to requests and inquires from government and law enforcement officials (including IRS examination notices) and conducting AML Program reviews;
 - C. Work with the Business' management to implement policies, procedures and internal controls to correct compliance deficiencies, enhance compliance performance, and respond to regulatory changes.
- II. The ongoing training and supervision of all employees involved in AML Program:
 - A. Manage and update the employee training program to ensure that employees receive, at a minimum, initial and ongoing training on AML issues;
 - B. Provide supplemental training as needed to address and correct any compliance deficiencies noted through monitoring and audit activities.
- III. The monitoring of employees on AML compliance issues:
 - A. Perform and/or supervise the daily, weekly and monthly transaction testing;
 - B. Investigate any unusual changes in transaction or consumer activity;
 - C. Review all currency and suspicious activity reports for accuracy and completeness before filing;
 - D. Monitor employee compliance with policies and procedures;
 - E. Identify the need for and implement corrective action;
 - F. Ensure that annual independent compliance program review is conducted and that any necessary corrective actions are taken.
- IV. Maintain records to show compliance:
 - A. Maintain compliance manuals and program materials;
 - B. Maintain documented records of employee and agent training;
 - C. Maintain monitoring records and reports;
 - D. Maintain any filings with governmental entities including CTRs, SARs, and registrations.
- V. Serve as primary contact and provide information as requested by law enforcement officials.

EMPLOYEE TRAINING TRAINING REQUIREMENTS

Training must be provided to all supervisory employees who are involved with MSB transactions and at a minimum must include:


1. Identifying suspicious activity and structured transactions;
2. Recordkeeping and reporting requirements;
3. Verifying customer identification;
4. Familiarity with AML forms.

Before conducting any MSB transactions, new supervisory employees are required to understand and comply with the contents of this AML Compliance Program and sign the Employee AML Training Documentation Log. Existing supervisory employees who conduct MSB transactions will receive periodic refresher AML training that will be documented by re-signing the Employee AML Training Documentation Log.

The *North American Money Order Company Anti-Money Laundering Compliance Guide* can be used to help train employees. Additional employee and Compliance Officer training are available from NAMOC Compliance Department or from www.fincen.gov.

SCHEDULING PERIODIC EMPLOYEE TRAINING

The Business Compliance Officer will schedule and ensure periodic employee AML training is conducted:

 Check which applies:

- Every month
- Semi-Annually (every 6 months)
- Annually (every 12 months)
- As necessary
- Other: _____

TRANSACTION MONITORING

The Compliance Officer must establish procedures to review and monitor high risk, out of the ordinary transactions involving money orders to identify transactions that may require special recordkeeping or reporting.

Transaction monitoring should include reviewing all MSB transactions to identify if the same or related customers conduct multiple transactions in a short period of time.

All transactions and customer activity that appears to be abnormal or suspicious must be reported.

TRANSACTION LIMITS FOR MONEY ORDERS

The Business will offer or sell a **single money order** to one person **in a single business day** to the maximum amount of:

 \$ _____

The Business will offer or sell **combined money order purchases** to one person **in a single business day** to the maximum amount of:

 \$ _____

Aggregated money order sales of \$3,000 or more to the same person, or related persons, in the same business day must be documented on the Money Order Transaction Log Sales Over \$3,000, regardless of Business limits.

Transactions that are structured at or below AML Compliance thresholds should be considered Suspicious Activity and should be filed on a FinCEN SAR.

The Business is solely responsible for ensuring money order limitations are enforced.

RECORDKEEPING AND REPORTING REQUIREMENTS

All recordkeeping and reporting procedures are designed to comply with Federal and state specific AML Regulations. See the *North American Money Order Company Anti-Money Laundering Compliance Guide, Revision as of January 3, 2025* for specific requirements. Complying with the AML Regulations requires the Business to:

1. Register as a MSB;
2. File suspicious activity reports;
3. Keep records of aggregated cash purchases of money orders (multiple purchases made in the same day) of \$3,000 to \$10,000;
4. File FinCEN Currency Transaction Report (CTR) for all currency transactions of more than \$10,000;
5. Obtain and retain other records as necessary;
6. Employee training documentation and logs;
7. Independent Reviews.

All recordkeeping and reporting documentation required by the Bank Secrecy Act (BSA) and state specific regulations will be maintained for a minimum of five (5) years and will be made readily available to the U.S. Treasury Department and / or representatives from other government officials upon legitimate request.

In accordance with the Privacy Act, the Business will protect customers' personal and private information. All documents that contain customers' private and personal information will be stored in a secure location. If the Business discards any MSB documents, the documents must be completely destroyed prior to disposal.


RESPONSE TO LAW ENFORCEMENT REQUESTS

Government regulators and law enforcement agencies may seek information and records from time to time. Any person associated with or connected to the Business who receives or is served with a summons, subpoena or court order related to business with NAMOC should immediately contact the NAMOC Compliance Department at 1-844-507-1476 for assistance.

The Business will assist these entities in their investigations, provided the requests are conducted in a lawful manner. This is necessary to ensure that the Business complies with customer privacy laws. Furthermore, government agents are not permitted to use their summons authority to go on unwarranted "fishing" expeditions in our records. Employees should not feel pressured by government agents to release consumer or company information without first receiving a proper summons, subpoena or court order.

INDEPENDENT REVIEW OF AML COMPLIANCE PROGRAM

The Business will conduct periodic independent reviews of its AML Compliance Program as required by Federal AML Regulations. The Independent Review will be conducted by a person or persons who are knowledgeable about the AML requirements that apply to MSBs. The Business' Independent Review cannot be conducted by the Business' designated Compliance Officer or any person who reports to the Compliance Officer.

 The Business' Compliance Officer will schedule and ensure an Independent Review of the Businesses' AML Compliance Program:

- Semi-Annually (every 6 months)
- Annually (every 12 months)
- As necessary
- Other: _____

INDEPENDENT REVIEW MANUAL OF ANTI-MONEY LAUNDERING COMPLIANCE PROGRAM FOR MONEY ORDER SALES


Revision as of January 3, 2025

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml


If you need additional copies of this manual, you may copy this Independent Review Manual, or contact the NAMOC Compliance Department at 1-844-507-1476 or send an email request to aml@northamericanmoneyorder.com for another copy.

One of the requirements of USA Patriot Act is that a periodic Independent Review of the Anti-money Laundering Compliance Program be performed. This Independent Review should be completed as required by your own AML Plan.


You may want to employ an outside third party firm such as an AML Compliance Firm or an auditing firm to conduct this Independent Review; **HOWEVER, YOU ARE NOT REQUIRED TO EMPLOY AN OUTSIDE THIRD PARTY TO CONDUCT THIS REVIEW.** The Independent Review may be performed by any individual with knowledge of your business and the AML guidelines. This individual may be an employee of the company. The only limitation is the Independent Review CANNOT be conducted by the Compliance Officer, an employee of the Compliance Officer or an employee who reports to the Compliance Officer. If the owner of the business is the Compliance Officer, then the Independent Review may be conducted by a spouse, other family member of the owner or a friend. If you have questions as to whether an individual can act as an Independent Reviewer, you may contact the North American Money Order (NAMOC) Compliance Department.

This Independent Review Manual of Money Order Sales is provided as a guide for the individual conducting the Independent Review and should be completed each year. The Manual begins on page 19 and ends on page 22 of this Guide. There is information that needs to be completed wherever you see the following symbol .

If you engage in other MSB activity, such as check cashing or wire transfers, then this additional activity is also subject to an Independent Review that is not covered in this manual.

 Name of Independent Reviewer: _____

The Independent Reviewer CANNOT be the Compliance Officer, be an employee of the Compliance Officer, or report to the Compliance Officer and should be familiar with the business and aware of AML Guidelines

 Business Name (full legal name): _____

 Doing business as: _____

 Address: _____

If more than one location is covered by this review, attach a separate page with a list of all addresses.

Independent Review Manual For Money Order Sales

MSB REGISTRATION

Check all that apply:

- The Business only sells money orders on behalf of North American Money Order Company, Inc. (NAMOC). Therefore, the Business is covered by the NAMOC registration and is not required to independently register with US Department of the Treasury at this time.
- The Business conducts money services business transactions on behalf of another MSB such as wire transfers and is either covered by that MSB's registration or is registered as an MSB with the US Department of the Treasury.
- The Business conducts money services business transactions on its own behalf such as check cashing and is registered as an MSB with the US Department of the Treasury.

COMPLIANCE OFFICER

Yes No

- The Business has designated a Compliance Officer.

Name of Compliance Officer: _____

- The Compliance Officer fully understands and performs the duties and responsibilities of this position.

AML COMPLIANCE PROGRAM

Yes No

- The Business has adopted the NAMOC AML Compliance Program for Money Order Sales

If no, then

- The Business has adopted an AML Compliance Program that includes the following:
 - Written policies, procedures and internal controls designed to comply with the Bank Secrecy Act, USA Patriot Act, and OFAC;
 - Customer identification requirements;
 - Filing of FinCEN SARs and CTRs;
 - Recordkeeping requirements;
 - Response to law enforcement and regulatory request;
 - Limits on money order sales.

EMPLOYEE TRAINING

Yes No

- All employees involved in money order sales are trained on compliance issues.
- New employees are trained at time of hire.
- All employees receive additional training at least annually.
- Employees are trained to identify suspicious activity, including structuring or attempted structuring.
- Training records are maintained for a minimum of five (5) years.

INDEPENDENT REVIEW

Yes No

- The Business conducts annual Independent Reviews (like this one).

**Independent Review Manual
For Money Order Sales**


 **MONEY ORDERS SALES**

Yes No

- The Compliance Officer (or his designee) reviews daily activity to identify multiple transactions that may require a Money Order Transaction Log, FinCEN SAR or CTR to be completed.
- Money Order Transaction Logs are maintained for money order sales of \$3,000 or more. Logs are maintained for a minimum of five (5) years.
- FinCEN SARs and CTRs are maintained for a minimum of five (5) years.

TRANSACTION TESTING

NAMOC monitors money orders on a daily basis to identify whether transactions have been properly identified for recordkeeping and reporting requirements. Transaction testing of a random sample during an Independent Review is not required if the Independent Reviewer believes that procedures and controls in place are sufficient. However, the Independent Reviewer may choose to conduct a random test of a sample of transactions. The Independent Reviewer can request a download of transactions from the NAMOC Compliance Department.

 Yes No

- The Independent Reviewer believes that procedures and controls in place as noted are sufficient and as such Transaction Testing is not required.

If no, then


- Transaction Testing was performed.

Briefly describe the testing done and results:


Additional Comments (all unacceptable areas must be addressed):

Certification of Independent Review

An independent review of the compliance program of


 _____
Name of Business

has been completed. Among other things, this review focused on the requirements of the USA Patriot Act, the Bank Secrecy Act and OFAC.

 The results of this review show this business's anti-money laundering compliance program to be:


- Acceptable:
- Acceptable, but recommend the following enhancements:

- Unacceptable for the following reasons:

 Date of Independent Review: _____

 Time Period Reviewed: _____ to _____

 Independent Reviewer Name: _____

 Independent Reviewer Signature: _____

EMPLOYEE AML TRAINING DOCUMENTATION LOG

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

Use this log to record employee training. This form must be kept for five (5) years and will need to be made available at both the annual Independent Review and any examinations made by regulatory personnel. Do not send this form to North American Money Order Company, Inc. (NAMOC) unless instructed to by the NAMOC Compliance Department. Make as many copies of this form as you need or obtain additional ones from NAMOC Compliance Department.

_____ Employee Signature	_____ Print Employee Name	_____ Employee Title	
_____ Date of Training	Training Materials Used: <input type="checkbox"/> Employee Quick Training Guide	<input type="checkbox"/> Manager Video <input type="checkbox"/> Employee Video	<input type="checkbox"/> NAMOC AML Compliance Guide <input type="checkbox"/> Other: _____

_____ Employee Signature	_____ Print Employee Name	_____ Employee Title	
_____ Date of Training	Training Materials Used: <input type="checkbox"/> Employee Quick Training Guide	<input type="checkbox"/> Manager Video <input type="checkbox"/> Employee Video	<input type="checkbox"/> NAMOC AML Compliance Guide <input type="checkbox"/> Other: _____

_____ Employee Signature	_____ Print Employee Name	_____ Employee Title	
_____ Date of Training	Training Materials Used: <input type="checkbox"/> Employee Quick Training Guide	<input type="checkbox"/> Manager Video <input type="checkbox"/> Employee Video	<input type="checkbox"/> NAMOC AML Compliance Guide <input type="checkbox"/> Other: _____

_____ Employee Signature	_____ Print Employee Name	_____ Employee Title	
_____ Date of Training	Training Materials Used: <input type="checkbox"/> Employee Quick Training Guide	<input type="checkbox"/> Manager Video <input type="checkbox"/> Employee Video	<input type="checkbox"/> NAMOC AML Compliance Guide <input type="checkbox"/> Other: _____

_____ Employee Signature	_____ Print Employee Name	_____ Employee Title	
_____ Date of Training	Training Materials Used: <input type="checkbox"/> Employee Quick Training Guide	<input type="checkbox"/> Manager Video <input type="checkbox"/> Employee Video	<input type="checkbox"/> NAMOC AML Compliance Guide <input type="checkbox"/> Other: _____

_____ Employee Signature	_____ Print Employee Name	_____ Employee Title	
_____ Date of Training	Training Materials Used: <input type="checkbox"/> Employee Quick Training Guide	<input type="checkbox"/> Manager Video <input type="checkbox"/> Employee Video	<input type="checkbox"/> NAMOC AML Compliance Guide <input type="checkbox"/> Other: _____

_____ Employee Signature	_____ Print Employee Name	_____ Employee Title	
_____ Date of Training	Training Materials Used: <input type="checkbox"/> Employee Quick Training Guide	<input type="checkbox"/> Manager Video <input type="checkbox"/> Employee Video	<input type="checkbox"/> NAMOC AML Compliance Guide <input type="checkbox"/> Other: _____

_____ Employee Signature	_____ Print Employee Name	_____ Employee Title	
_____ Date of Training	Training Materials Used: <input type="checkbox"/> Employee Quick Training Guide	<input type="checkbox"/> Manager Video <input type="checkbox"/> Employee Video	<input type="checkbox"/> NAMOC AML Compliance Guide <input type="checkbox"/> Other: _____

_____ Employee Signature	_____ Print Employee Name	_____ Employee Title	
_____ Date of Training	Training Materials Used: <input type="checkbox"/> Employee Quick Training Guide	<input type="checkbox"/> Manager Video <input type="checkbox"/> Employee Video	<input type="checkbox"/> NAMOC AML Compliance Guide <input type="checkbox"/> Other: _____

MONEY ORDER TRANSACTION LOG SALES OVER \$3,000

Explanation/Training Video Link: www.northamericanmoneyorder.com/aml

Use this log to record customer information for cash money order sales in the amount of \$3,000 or more to one person in one day. This form must be retained for five (5) years from date of sale. Do not send this form to North American Money Order Company, Inc. (NAMOC) unless instructed to by the NAMOC Compliance Department. Make as many copies of this form as you need or obtain additional ones from NAMOC Compliance Department.

Store Name

Purchaser's Name

Street Address

Street Address

City, State, Zip

City, State, Zip

Money Orders are purchased:

- For Purchaser's Use
 - On behalf of another person
- (List other person's information on back of this form.)

Purchaser's Specific Occupation

Purchaser's Social Security Number
(or Alien ID Number)

Purchaser's Date of Birth

Purchaser's Driver License Number

State

Other Identification (Only if no Driver License)

ID Positively Verified by:

Signature of Employee

Name of Employee

Total Dollar Amount _____

Money Order Information (List serial numbers and amounts):

Serial Number _____	Amount _____		Serial Number _____	Amount _____
Serial Number _____	Amount _____		Serial Number _____	Amount _____
Serial Number _____	Amount _____		Serial Number _____	Amount _____
Serial Number _____	Amount _____		Serial Number _____	Amount _____
Serial Number _____	Amount _____		Serial Number _____	Amount _____
Serial Number _____	Amount _____		Serial Number _____	Amount _____
Serial Number _____	Amount _____		Serial Number _____	Amount _____
Serial Number _____	Amount _____		Serial Number _____	Amount _____

Purchaser's Signature

Date of Purchase