

Money Services Businesses



Loughnane Associates LLC
Value Touches Everything

1

Learning Objectives:

TLO 9. Describe the roles of Gatekeepers and the value to financial investigations.

- | | |
|---------|---|
| ELO 9.1 | Describe the role of remittance systems. |
| ELO 9.2 | Explain the FinCEN process and oversight of MSBs. |
| ELO 9.3 | Explain the process of MSB approval at the state level. |
| ELO 9.4 | Explain the BSA regulations with regard to MSB reporting. |
| ELO 9.5 | Describe the process of large money transmitters, small money transmitters, and hawala systems. |
| ELO 9.6 | Explain the Southwest Border Record Analysis Center. |



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The Value of Alternate Remittance

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Banking For The Unbanked (2017)

United States

Germany

Mexico

United Kingdom

Belgium

Colombia

Country	\$	Country	\$	Country	\$	Country	\$	Country	\$	Country	\$
Mexico	\$30,019,000,000	France	\$2,124,000,000	US	\$2,949,000,000	Nigeria	\$4,119,000,000	France	\$2,319,000,000	Spain	\$55,000,000
China	\$16,141,000,000	Poland	\$2,117,000,000	Guatemala	\$2,738,000,000	India	\$3,941,000,000	Morocco	\$508,000,000	US	\$38,000,000
India	\$11,715,000,000	Italy	\$1,510,000,000	Spain	\$2,292,000,000	France	\$1,782,000,000	Italy	\$379,000,000	Ecuador	\$29,000,000
Philippines	\$11,099,000,000	Austria	\$1,102,000,000	France	\$1,713,000,000	Pakistan	\$1,689,000,000	Spain	\$376,000,000	France	\$26,000,000
Vietnam	\$7,735,000,000	Czech Rep.	\$1,034,000,000	Honduras	\$1,520,000,000	Germany	\$1,258,000,000	Germany	\$336,000,000	Venezuela	\$18,000,000
Guatemala	\$7,725,000,000	Spain	\$1,030,000,000	China	\$1,195,000,000	Poland	\$1,149,000,000	Luxembourg	\$245,000,000	China	\$11,000,000
Nigeria	\$6,191,000,000	Hungary	\$997,000,000	Colombia	\$1,119,000,000	China	\$977,000,000	Netherlands	\$179,000,000	Lebanon	\$10,000,000
El Salvador	\$4,611,000,000	Lebanon	\$878,000,000	Germany	\$962,000,000	Spain	\$738,000,000	Poland	\$119,000,000	Germany	\$9,000,000
Dom Rep	\$4,594,000,000	Russia	\$781,000,000	El Salvador	\$655,000,000	Kenya	\$663,000,000	China	\$118,000,000	Peru	\$9,000,000
Honduras	\$3,769,000,000	Vietnam	\$748,000,000	Belgium	\$647,000,000	Philippines	\$658,000,000	Nigeria	\$110,000,000	Belgium	\$8,000,000
S. Korea	\$2,834,000,000	Nigeria	\$699,000,000	China	\$586,000,000	Belgium	\$632,000,000	India	\$77,000,000	Italy	\$8,000,000
Germany	\$2,801,000,000	Romania	\$647,000,000	Lebanon	\$459,000,000	Sri Lanka	\$525,000,000	Romania	\$77,000,000	Panama	\$7,000,000
France	\$2,373,000,000	China	\$646,000,000	Switzerland	\$363,000,000	Bangladesh	\$469,000,000	Portugal	\$75,000,000	Mexico	\$6,000,000
Thailand	\$1,859,000,000	Thailand	\$635,000,000	Luxembourg	\$344,000,000	USA	\$465,000,000	Sweden	\$74,000,000	Costa Rica	\$4,000,000
Jamaica	\$1,800,000,000	Croatia	\$618,000,000	India	\$251,000,000	Australia	\$446,000,000	Serbia	\$65,000,000	Brazil	\$3,000,000
Colombia	\$1,767,000,000	Serbia	\$617,000,000	Mali	\$245,000,000	Italy	\$428,000,000	USA	\$50,000,000	Guatemala	\$3,000,000
Japan	\$1,593,000,000	Belgium	\$582,000,000	Madagascar	\$229,000,000	Hungary	\$418,000,000	Hungary	\$49,000,000	Japan	\$3,000,000
		Luxembourg	\$575,000,000	Serbia	\$209,000,000	Uganda	\$372,000,000	United Kingdom	\$45,000,000		

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Remittance flows worldwide in 2017. (2020, October 2017-18) Pew Research Center Project. <https://www.pewresearch.org/global/international-remittances/> www.loughnaneassociates.com



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Legitimate Purposes of Remittance

- Pure altruism (concern for family back home)
- Pure self-interest
- Implicit family agreement: co-insurance and loan
- Migrant's saving target
- Portfolio management decisions



Always ask, "Why is the money going there?"



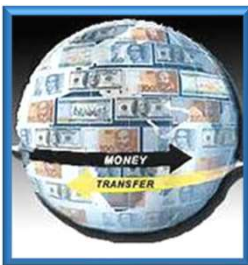
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Services – Remittance Transfer Systems



New Payment Product Systems (NPPS)

- Mobile payments (m-payments)
- Internet-based payment services (e-payments)
- Prepaid access products

Money transmission (or wire transfer)

- Western Union, MoneyGram
- Hawala
- Virtual assets (cryptocurrency)
- Money order products
- Currency exchange services
- Hand carried/courier

NPPS are also known as Money Services Businesses (MSB), Value Transfer Systems, and Designated Non-Financial Businesses and Professions (DNFBP)

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Money Services Businesses (Generally)

- Acting as a Principal or Agent (may only work from one location or international)
- Banking Services for the Unbanked
 - May support payments from diaspora to specific countries
 - Example: Hawala system to Somalia
- Remittances sent abroad are usually in small amounts
- Examples of MSBs:
 - Casas de Cambio
 - Foreign Exchange Houses
 - Banques de Checks
 - Hawala
 - Convertible Virtual Currency Exchanges - aka Virtual Asset Service Providers



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The MSB Registration Process

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MSB Types

MSB KEY SERVICES LIST

(FinCEN)

- 401 Issuer of traveler's checks
- 402 Seller of traveler's checks
- 404 Issuer of money orders
- 405 Seller of money orders
- 408 Check casher
- 409 Money transmitter
- 413 Seller of prepaid access
- 414 Provider of prepaid access
- 415 Dealer in foreign exchange
- 499 Other

- Activity based - not business based
- Money transmission (or wire transfer) services
- Fiat currency to/from Virtual Asset Service Providers (VASP)
- Money order products
- Check cashing services
- Traveler's check products
- Currency exchange services
- Reloadable cards and services
- Stored value products

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Federal MSB Registration

- MSB are required to register with FinCEN and, as part of that registration, disclose their owner

FinCEN Form 107 Registration of Money Services Business

March 2011
Previous versions will not be accepted after expiration on 03/31/11.
Complete and send to: Enterprise Company Center-Centel, Attn: Money Services Business Registrations, P.O. Box 53316, Detroit, MI 48232-0116

Part I Filing Information

1 Indicate the type of filing by checking a, b, or c below (Check only one). If filing a corrected check "X" and either a, b, or c.
 Initial registration Renewal Correcting a prior filing Re-registration

2 If you checked item 1 d (insert indicate the reason(s)). Check all that apply.
 No longer registered under state law More than 10 percent transfer of equity received More than 50 percent increase in agents

Part II Registrant Information

3 First name of the money services business

4 Doing business as

5 Address State ZIP Code

6 City State ZIP Code

7 Telephone number (include area code) State ZIP Code

8 E-mail address (if available)

Part III Owner or Controlling Person

9 Individual's last name, or organization's name First name Middle initial

10 Address State ZIP Code

11 Country (if other than US)

12 Telephone number (include area code) State ZIP Code

13 SSN/ITIN (individual), EIN (entity)

14 Date of birth Date of death SSN/ITIN (individual), EIN (entity)

15 Skip this item if you completed item 12.
 If the owner or controlling person is an individual enter their form of identification, the ID number, and the issuing state or country.
 Driver's license/state ID Passport Alien registration Other

16 ID number Issuing state or country

Part IV Money Services and Product Information

17 Enter the number of branches of the registrant in each of the following states or countries. Check box a, b, or c as appropriate (Check only one).
 All States & Territories All States All Countries

18 Enter the number of branches of the registrant in each of the following states or countries. Check box a, b, or c as appropriate (Check only one).
 All States & Territories All States All Countries

19 Enter the number of branches of the registrant in each of the following states or countries. Check box a, b, or c as appropriate (Check only one).
 All States & Territories All States All Countries

Part IV (continued)

25 Enter the number of branches of the registrant. (Reminder: do not separately register each branch. See instructions for an explanation of the term "branch".)

26 Money services business activities of the registrant. Check as many as apply. See instructions for an explanation of the terms "issuer," "seller," "redeemer," "check casher," and "money transmitter".

a Issuer of traveler's checks Issuer of money orders Currency dealer or exchanger
 b Seller of traveler's checks Seller of money orders Check casher
 c Redeemer of traveler's checks Redeemer of money orders Money transmitter

27 Is any part of the registrant's money services business an internal value transfer system?
 See the explanation of "money transmitter" in the instructions. Yes No

28 Is any part of the registrant's money services business conducted as a middle operator?
 Yes No

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

a Traveler's check sales Currency exchange or dealer
 b Traveler's check redemption Check cashing
 c Money order sales Money transmission
 d Money order redemption

Part V Primary Transaction Account for MSB Activities

30 If the registrant has more than one transaction account for money services business activities check here
 See instructions for an explanation of the term "transaction account".
 The registrant's primary transaction account is the one that has the greatest annual dollar amount of money services business activity.
 In items 31 through 36 enter information about the registrant's primary transaction account for money services business activities.

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

32 Address State ZIP Code

33 City State ZIP Code

34 State ZIP Code Primary transaction account number

Part VI Location of Supporting Documentation

If the supporting documentation is kept at the U.S. location reported in Part I check here and continue to Part VI.

37 Address State ZIP Code

38 City State ZIP Code

Part VII Authorized Signature

I am authorized to file this form on behalf of the money services business listed in Part I. I declare that the information provided is true, correct and complete. I understand that the money services business listed in Part I is subject to the Bank Secrecy Act and its implementing regulations. See 31 CFR Part Chapter II. The money services business listed in Part I 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. 5336 and the regulations thereunder. The signature of the owner, controlling person, or authorized corporate officer is mandatory.

41 Signature 42 First name

43 Title 44 Date of signature MM DD YYYY

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Federal MSB Registration

- Registrant Information
- Legal business name
- Doing Business As (DBA)
- Address, city, state, country
- Employer identification number
- Tax Identification number
- Social Security number
- Email address
- Same for owner/controlling person
 - Identification: DL, Passport
 - Alien Registration
- State(s)/Territories to operate

FinCEN Form 107
March 2011
Previous editions will not be accepted after September 30, 2011.

Registration of Money Services Business
Please type or print. Always complete entire report.
See instructions for items marked with an asterisk (*).

OMB No. 1506-0013

Complete and send to: Enterprise Computing Center-Detroit, Attn: Money Services Business Registration, P. O. Box 33116, Detroit, MI 48232-0116

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 Correcting a prior filing d Re-registration
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
3 Legal name of the money services business
4 Doing business as
5 Address 6 City 7 State 8 ZIP Code
9 EIN (entity), SSN/ITIN (individual) 10 Telephone number (include area code) 11 E-mail address (if available)
Part III Owner or Controlling Person
12 Individual's last name, or organization's name 13 First name 14 Middle initial
15 Address
16 City 17 State 18 ZIP Code/Postal Code 19 Country (if other than US)
20 Telephone number, (include area code) 21 Date of birth 22 SSN/ITIN (individual), EIN (entity)
23 Skip this item if you completed item 22.
If the owner or controlling person is an individual enter their form of identification, the ID number, and the issuing state or country.
a Driver's license/state ID b Passport c Alien registration z Other
e ID number f Issuing state or country

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Federal MSB Registration

- Number of branches
 - Include any "informal value transfer systems"
 - Operation as a mobile operator
- Type(s) of service
- Number of "agents"
- Identify bank accounts
- Supporting documentation
- Authorized signatures

Part IV (continued)
24 Enter the number of branches of the registrant. Remember, do not separately register each branch. See instructions for an explanation of the term "branch".
25 Money services business activities of the registrant. Check as many as apply. See instructions for an explanation of the terms "issuer", "holder", "redeemer", "check casher", and "money transmitter".
a Issuer of traveler's checks b Issuer of money orders c Currency dealer or exchanger
d Casher of traveler's checks e Casher of money orders f Check casher
g Redeemer of traveler's checks h Redeemer of money orders i Money transmitter
27 Is any part of the registrant's money services business an informal value transfer system? a Yes b No
28 Is any part of the registrant's money services business conducted as a mobile operator? a Yes b No
29 Enter the number of agents authorized to conduct each money services business activity. Do not include branches, or persons who are solely employees. See instructions for an explanation of the term "agent".
a Traveler's check sales b Currency exchange or dealer
c Traveler's check redemption d Check cashing
e Money order sales f Money transmission
g Money order redemption

Part V Primary Transaction Account for MSB Activities
30 If the registrant has more than one transaction account for money services business activities check here
See instructions for an explanation of the term "transaction account".
The registrant's primary transaction account is the one that has the greatest annual dollar amount of money services business activity in items 31 through 34 enter information about the registrant's primary transaction account for money services business activities.
31 Name of financial institution where the primary transaction account is held
32 Address 33 City
34 State 35 ZIP Code 36 Primary transaction account number

Part VI Location of Supporting Documentation
37 If the supporting documentation is kept at the U.S. location reported in Part V, check here and continue to Part VII.
38 Address
39 City 38 State 40 ZIP Code

Part VII Authorized Signature
41 Signature 42 Print name
43 Title 44 Date of signature
ME DE YYYY

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FinCEN MSB Search



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MSB Registrant Search

The MSB Registrant Search Web page contains entities that have registered as Money Services Businesses (MSBs) pursuant to the Bank Secrecy Act (BSA) regulations at 31 CFR 1022.380(a)-(f), administered by the Financial Crimes Enforcement Network (FinCEN).

You cannot register as an MSB on this Web page. All MSB registrations must be completed electronically through the [BSA E-Filing System](#).

The MSB Registrant Search Web page reflects information exactly as provided by the registrant. Posted entries should include: (1) Registrant's legal name, (2) Registrant's "doing business as" name (if applicable), (3) Registrant's address, (4) MSB activities in which the Registrant engages, (5) states in which the Registrant engages in MSB activities, (6) number of branches, (7) date the registration form was signed, and (8) date the registration form was received.

- The MSB Registrant Search Web page is the public information source for MSBs registered with the Financial Crimes Enforcement Network (FinCEN).
- **MSB acknowledgement letters will not be sent to MSBs. FinCEN will not provide facsimiles or copies of filed Registration of Money Services Business (RMSB) Form 107s.**
- Searches may be performed on individual or multiple fields. Search criteria must be entered exactly as submitted on the Registration of Money Services Business (RMSB) Form 107. Variations in abbreviations or spellings could result in negative search results. If you initially receive a negative search result, please try searching again using the state or zip code field. For best results, please enter an MSB Registration Number.
- Click on the highlighted Legal Name link on the search results page to generate a printable PDF document that contains the registration status information.

How do I search for MSB Registration Information?

- step 1** Start by entering complete or partial information in one or more of the search fields
- step 2** Click the button
- step 3** On the RESULTS PAGE: click the desired MSB's LEGAL NAME to retrieve its printable registration information

MSB REGISTRATION NUMBER/DCN

LEGAL NAME

DBA NAME

STREET ADDRESS

CITY

STATE

ZIP

MSB ACTIVITIES (MSB Services Key List)

STATES OF MSB ACTIVITIES

FOREIGN LOCATION

MSB Registrant Search | FinCEN.gov (v.4) | Financial Crimes Enforcement Network | <https://www.fincen.gov/msb-registrant-search>

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Herndon,
Virginia

LEGAL NAME	DBA NAME	STREET ADDRESS	CITY	STATE	ZIP	MSB ACTIVITIES	STATES OF MSB ACTIVITIES	ALL STATES & TERRITORIES & FOREIGN FLAG*	FOREIGN LOCATION	# OF BRANCHES	AUTH SIGN DATE	RECEIVED DATE
ALV FINANCIAL LLC		1082 ELDEN ST	HERNDON	VA	20170	405 408 409	VA				11/28/2019	11/28/2019
DIANA'S BOUTIQUE & SERVICES, INC.		1110 ELDEN STREET, SUITE 103	HERNDON	VA	20170	405 408 409	VA				12/28/2020	12/28/2020
EFFECTIVO SVC LLC	MUNDI TRANSFERS	890 ELDEN STREET	HERNDON	VA	20170	405 408 409	VA				01/05/2021	01/05/2021
KELVIN BOON LLC		13528 DAVINCI LANE	HERNDON	VA	20171	409	AK AR AS AZ CA CO DC DE FL FM GA GU IA ID IL IN KS KY LA MA MD ME MH MI MN MO MP MS MT NC ND NE NH NJ NM NV OH OK OR PA PR PW RI SC SD TN TX UT VA VI WI WV WY			1	12/28/2019	12/28/2019
MELGAR LLC	MEGA GIROS	890 ELDEN STREET	HERNDON	VA	20170	408 409	VA				12/31/2020	12/31/2020
Mid-Atlantic Development Group, LLC		1141 Eiden St STE 102/103	Herndon	VA	20170	408 409	VA			2	02/07/2019	02/07/2019
Mid-Atlantic Development Group, LLC		1141 Eiden St suite 102/103	Herndon	VA	20170	408 409	VA				03/28/2019	03/28/2019
Mid-Atlantic Development Group, LLC	Eiden Market and Deli	1141 Eiden St suite 102/103	Herndon	VA	20170	408 409	VA				03/28/2019	03/28/2019
NOVEDADES K & J INC		794 C CENTER ST	HERNDON	VA	20170	408 409	VA				12/28/2020	12/28/2020
R.S. Associates Inc.	Herndon Check Cash	1110 F Eiden St Suite 109	Herndon	VA	20170	405 408 409	VA				12/20/2019	12/20/2019
RJK SONIDO LATINO INC		1110 ELDEN ST SUITE 105	HERNDON	VA	20170	405 408 409	VA				01/08/2021	01/08/2021
SFB CAPITAL SYSTEMS LLC	SPEEDY	1031 STERLING ROAD, SUITE 201	HERNDON	VA	20170	409	VA				12/05/2020	12/05/2020
VARIIDADES CRISTINA LLC		1228 ELDEN ST	HERNDON	VA	20170	408 409	VA				12/23/2020	12/23/2020
VARIIDADES RUBI INC		902 ALABAMA DR #104	HERNDON	VA	20170	408 409	VA				12/28/2020	12/28/2020

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Financial Crimes Enforcement Network Department of the Treasury

MSB Registration Status Information

Date: 04/15/2021

The inclusion of a business on the MSB Registrant Search Web page is not a recommendation, certification of legitimacy, or endorsement of the business by any government agency.

The MSB Registrant Search Web page, which is updated on a weekly basis, contains entities that have registered as Money Services Businesses (MSBs) pursuant to the Bank Secrecy Act (BSA) regulations at 31 CFR 1022.380(a)-(f), administered by the Financial Crimes Enforcement Network (FinCEN).

Information contained on this site has been provided by the MSB registrant. FinCEN does not verify information submitted by the MSB. Information provided on this site reflects only what was provided directly to FinCEN. If an error or incomplete information is detected on this site, the registrant should follow the appropriate instructions for correcting a Registration of Money Services Business (RMSB) form.

MSB Registration Number: 31000100688808
Registration Type: Renewal
Legal Name: KELVIN BOON LLC
DBA Name:

Street Address: 13528 DAVINCI LANE
City: HERNDON
State: VIRGINIA
Zip: 20171

MSB Activities:
Money transmitter
States of MSB Activities:

Alaska, American Samoa, Arizona, Arkansas, California, Colorado, Delaware, District Of Columbia, Federated States Of Micronesia, Florida, Georgia, Guam, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Marshall Islands, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, North Carolina, North Dakota, Northern Mariana Islands, Ohio, Oklahoma, Oregon, Palau,

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State Corporation Commission Clerk's Information System

Entity Information

Entity Information

Entity Name: Kelvin Boon LLC	Entity ID: S4631281
Entity Type: Limited Liability Company	Entity Status: Active
Formation Date: 07/16/2013	Reason for Status: Active
VA Qualification Date: 07/16/2013	Status Date: 08/19/2019
Industry Code: 0 - General	Period of Duration: Perpetual
Jurisdiction: VA	Annual Report Due Date: N/A
Registration Fee Due Date: Not Required	Charter Fee: N/A

Registered Agent Information

RA Type: Individual	Locality: FAIRFAX COUNTY
RA Qualification: Member or Manager of the Limited Liability Company	
Name: RAJESH PAVITHRAN	Registered Office Address: 13528 DAVINCI LANE, HERNDON, VA, 20171 - 0000, USA

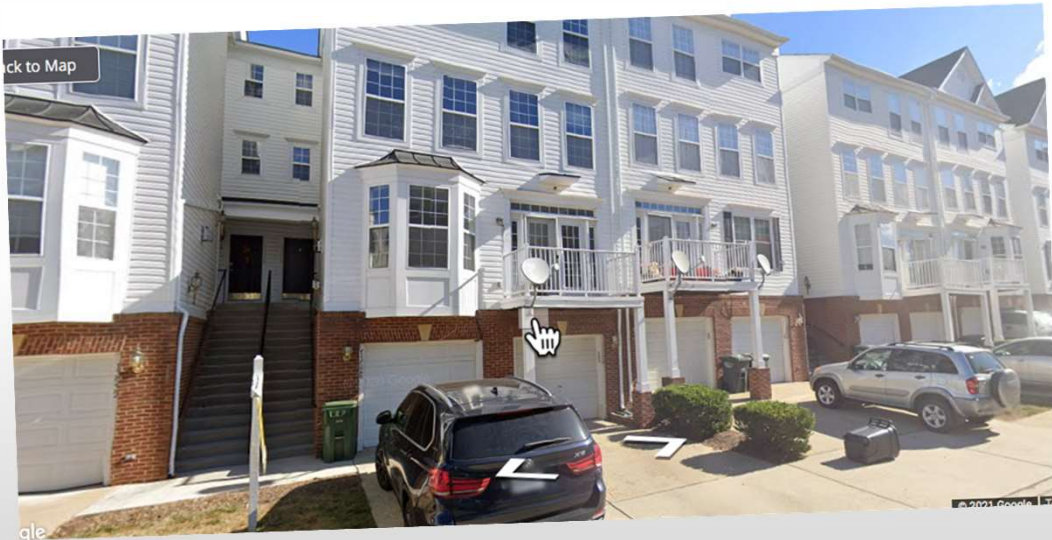
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Civil and Criminal Penalties for Operating an Unregistered Money Transmitting Business (FinCEN)

Failure to comply with 31 U.S.C. 5330 or 31 CFR 103.41
Civil penalty of \$5000 for each violation, up to \$5,000 for each day

(Whoever) (knowingly) (conducts, controls, manages, supervises, directs, or owns all or part) of (an unlicensed money transmitting business)

Shall be fined in accordance with this title or imprisoned not more than 5 years, or both. [18 U.S.C § 1960(a)]

Criminal: A (money transmitting business) which affects (interstate or foreign commerce) and (fails to comply with the money transmitting business registration requirements under section 31 U.S.C. 5330), or regulations prescribed under such section,

Shall be fined or imprisoned not more than 5 years, or both. [18 U.S.C § 1960(b)(1)(B)]

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Foreign-Located Money Services Businesses FIN-2012-A001 (February 15, 2012)

If the MSB operates in the US, even if none of its agents, agencies, branches or offices are physically located in the U.S.:

- Subject to the same civil and criminal penalties for BSA violations
- Each foreign-located MSB is required to appoint a person residing in the U.S. as an agent for service of legal process with respect to compliance with the BSA and its implementing regulations

LEGAL NAME	DBA NAME	STREET ADDRESS	CITY	STATE	ZIP	MSB ACTIVITIES	STATES OF MSB ACTIVITIES	ALL STATES & TERRITORIES & FOREIGN FLAG	FOREIGN LOCATION	# OF BRANCHES	AUTH SIGN DATE	RECEIVED DATE
FINANCIERA PAGOS INTERNACIONALES S.A./PAGOS INTERN		CL 5 50 103	CALI		76004	409 415	AS FM GU MH MP PR PW VI	CD	COLOMBIA		03/19/2019	03/19/2019

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FinCEN Documentation Requirements

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MSB BSA Recordkeeping And Reporting Requirements Vary

Based upon the type and amount of MSB activity

- Transmitter - below \$3,000 no real verification is required
- At \$3,000, Transmitter is required to maintain/retain more detailed transaction records
- Currency Exchange - at \$1,000, requires detailed information retention
- At \$10,000, all must file a CTR
- SAR filings are required



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SAR Form For MSBs

- Subject information
- Purchaser/Sender, Payee/Receiver
- Standard KYC information
- Government issued ID
- Suspicious Activity Details
- Date, Amount
- Category
- Financial Services Involved
- Nature (behavior) in activity

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- Location(s)
- Reporting Business
- Contact information

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- Narrative
- Some guidance and form explanation

Part VI Suspicious Activity Information - Narrative*		3
<p>Explanation/Description of suspicious activity(ies). This section of the report is critical. The care with which it is completed may determine whether or not the described activity and its possible criminal nature are clearly understood by investigators. Provide a clear, complete and chronological description of the activity, including what is unusual, irregular or suspicious about the transaction(s). Use the checklist below, see a guide, as you prepare your description. The description should cover the material indicated in Parts I, II and III, but the money services business (MSB) should describe any other information that it believes is necessary to better enable investigators to understand the suspicious activity being reported.</p>		
<p>B. Describe conduct that raised suspicion.</p> <p>D. Explain whether the transaction(s) was completed or only attempted.</p> <p>C. Describe supporting documentation and <u>attach</u> such documentation (attach) for your file for five years.</p> <p>D. Indicate a time period, if it was a factor in the suspicious transaction(s). For example, specify the time and whether it occurred during AM or PM. If the activity covers more than one day, identify the time of day when such activity occurred most frequently.</p> <p>O. Retain any admission or explanation of the transaction(s) provided by the subject(s) or other persons. Indicate when and to whom it was given.</p> <p>F. Retain any evidence of cover-up or evidence of an attempt to receive federal or state examiners, or others.</p> <p>G. Indicate where the possible violator of law(s) took place (e.g., main office, branch, agent location, etc.).</p> <p>H. Indicate whether the suspicious activity is an isolated incident or relates to another transaction.</p> <p>I. Indicate if a foreign national any available information on subject's (suspect's), (visit) (and/or identification card(s)). Include date, country, city of issue, issuing authority, and nationality.</p> <p>K. Indicate whether any information has been excluded from this report. If so, state reasons.</p> <p>L. So, provide the amount, name of currency, and country of origin.</p> <p>I. Indicate whether any transfer of money to or from a foreign country.</p>	<p>or any exchanges of a foreign currency were involved. If so, identify the currency, country, and source and destinations of money.</p> <p>Indicate any additional account number(s), and any foreign account numbers which may be involved in transfer of money.</p> <p>Identify any employee or other individual or entity (e.g., agent) suspected of improper involvement in the transaction(s).</p> <p>For issuers, indicate the endorser of money order(s) and/or transfer's check(s) if different than issuer. If so, provide the individual or entity name, bank's name, city, state and country, ABA routing number, endorser's bank account number, foreign non-bank name (if any), correspondent bank name and account number (if any), etc.</p> <p>For selling or paying locations, indicate if in a video recording medium or surveillance photograph of the customer.</p> <p>For selling or paying locations if you do not have a record of a government issued identification document, describe the type, issuer and number of any alternate identification that is available (e.g., for a credit card specify the name of the customer and credit card number).</p> <p>For selling or paying locations describe the subject(s) if you do not have the identifying information in Part I or if multiple individuals use the same identification. Use descriptors such as male, female, age, etc.</p> <p>If amending a prior report, complete the form in its entirety and note the changes here in Part VI.</p> <p>If a law enforcement agency has been contacted, list the name of the agency and the name of any person contacted, their title, their telephone number, and when they were contacted.</p>	
<p>Supporting documentation should not be filed with this report. Maintain the information for your files.</p> <p>Enter the explanation/description narrative in the space below. If necessary, continue the narrative on a duplicate of this page or a blank page.</p> <p><small>Tip: on SAR form preparation and filing are available in the SAR Activity Reviews at www.fincen.gov/sar_reports.html.</small></p> <p>Legal disclaimers will not be included in this narrative.</p>		

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State Registration Information

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Typical Applicant Information

- Audited financial statements of the applicant business and any subsidiaries
- Personal financial records of all directors, principal officers, owner or 10% shareholders ("Control Persons")
- Records of occupations for all Control Persons for the last fifteen years, including any disciplinary actions taken by any employer
- List of all lawsuits or criminal complaints against any Control Person in the last fifteen years
- Comprehensive compliance policy AML/KYC
- Compliance Officer
- IT infrastructure
- Proforma and financial projections over 2-3 year period
- Source of funds
- Banking relationship
- Bonding
- Third-party criminal and civil background checks
- Fingerprints of Control Persons

S. (2021, March 17). *Virginia Money Transmitter License*. Money Transmitter Law. <https://moneytransmitterlaw.com/state-laws/virginia/>

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The screenshot shows a webpage for 'shipkevich ATTORNEYS AT LAW'. The main heading is 'eBook | Regulatory Guide To Money Transmission & Payment Laws In The U.S' with a 'Download Now' button. Below this is a section titled 'Virginia Money Transmitter Laws'. It contains two sub-sections: 'Who needs to register?' and 'Who is the regulator?'. The 'Who needs to register?' section states that under Virginia statute, those selling money orders or engaging in the business of money transmission must obtain a license. The 'Who is the regulator?' section identifies the Virginia Bureau of Financial Institutions. On the right side, there is a vertical list of state names: Alabama, Alaska, Arizona, Arkansas, California, and Colorado. The footer of the webpage includes the same copyright and training notice as slide 27.

S. (2021, March 17). *Virginia Money Transmitter License*. Money Transmitter Law. <https://moneytransmitterlaw.com/state-laws/virginia/>

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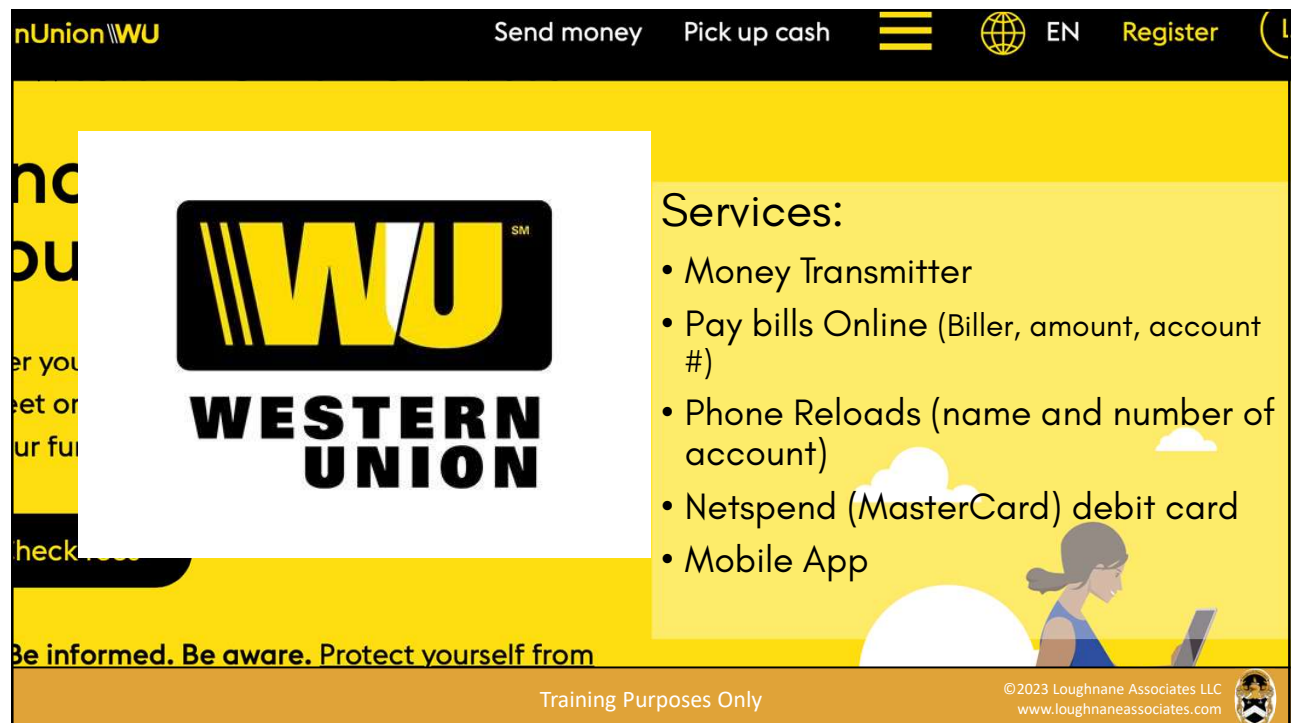
Large Money Transmitters

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Western Union website header: nUnion WU Send money Pick up cash [Menu] [Globe] EN Register

Services:

- Money Transmitter
- Pay bills Online (Biller, amount, account #)
- Phone Reloads (name and number of account)
- Netspend (MasterCard) debit card
- Mobile App


Be informed. Be aware. Protect yourself from

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Ways to send money


Ways to receive money



Send online

[Log in](#) or [sign up](#) and create your profile for free to send money online.


[Learn more](#)



Send with our app

Send money, pay bills, check exchange rates, or start a transfer in the app and pay in-store—all on the go.


[Find out more](#)



Send in person

Transfer money in person from more than 57,000 Western Union® U.S. agent locations³.

[Find locations](#)

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Send Money Online

Your receiver's country and send amount

Send to Philippines

Send amount
400 USD

⇌

Receive amount
100.00 PHP

Send up to 5,000.00 USD

How does your receiver want the money?

Cash pick up

Bank Deposit^{10, 21}

How would you like to pay?³¹

Pay online
 Pay cash in-store

Credit Card

1 Business days^{1, 3}
Fee² 12.50 USD

Debit Card

1 Business days^{1, 3}
Fee² 3.00 USD

Bank account

0-5 Business days¹
Fee : NA

Wire transfer

service time
Fee : NA


I have a promo code

Continue

Send money from your smartphone with our money transfer app


Track your transfer


Easily [track your transfer](#) on our app using your tracking number (MTCN) and get notified when your recipient collects the funds.



Simple card scanning

Quickly set up your card payment and avoid mistakes by simply scanning your credit or debit card using the camera on your device.



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Pick up cash much faster
No need to fill out forms anymore

1. Answer our questions about your transfer on the app to get started.
2. Go to a participating Western Union agent location.

+

MTCN

Tracking number

3. Bring your ID and MTCN. You will receive your cash faster.

Don't show me again.

Continue

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1800 501 500

CUSTOMER NAME PLEASE PRINT CLEARLY. Identification is required for all customers. Current Passport, Australian Drivers License or Proof of Age Card.

Full Name: _____ Surname: _____ Last: _____

Phone Number: _____ MTCN: _____ Western Union Customer Number: _____

EXISTING CUSTOMERS

NEW CUSTOMERS Address (Post office box addresses are not permitted): _____

Suburb: _____ State: _____ Postcode: _____ Country of Citizenship (United States): _____

Mobile Number: _____ Date of Birth (DD-MMM-YYYY): _____ Country of Birth (United States): _____

To send money, complete this section

TRANSACTION DETAILS

Destination Country: _____ Amount to be Sent: _____ Recipient Details: _____ Total Amount at Destination: _____

OPTIONAL SERVICES FOR SENDER

I want the money sent about in a 24 hour period. Bank Name: _____ Bank Code / BIC: _____

I want the money sent about in a 48 hour period. Bank Location (City): _____ Account Number / IBAN: _____

I want the money sent as a transfer. Country Code: _____ Mobile Number: _____

RECEIVER'S DETAILS

Western Union wants to help you send money abroad to help if you don't know the person you're sending to, we recommend you do not send Western Union Cheques to its Agents only (not a companion of the "To Send Money" form against the "To Receive Money" form to verify the address given for the receiver).

Full Name: _____ Surname: _____ Last: _____

Current Address (Post office box addresses are not permitted): _____

City/Town/Village: _____ State/Province: _____ Postcode: _____ Country: _____

TEST QUESTION

Question: _____ Answer: _____

To receive money, complete this section

RECEIVER'S DETAILS

Money Transfer Control Number: _____ Amount Expected: _____ Signatory Country: _____

Sender's First Name: _____ Surname: _____ Mobile: _____ Last: _____

CUSTOMER'S SIGNATURE

All customers to complete this section

Signature: _____ Date (DD-MMM-YYYY): _____

OFFICE USE ONLY

Amount/Transfer Transaction Receipt To This Copy: _____ Money Transfer Control Number: _____ Staff Name: _____ Staff Signature: _____ Date (DD-MMM-YYYY): _____

Office copy: _____

- You may be required to provide government-issued identification, depending on the service, sent amount, and the destination of the money transfer. Secondary ID may also be required for some transactions (e.g., residence status document or country of birth information)
- "Test Question"

- Originator First/Last Name
- Originator Address
- Originator Phone
- Originator Signature
- Amount
- Loyalty/Rewards Info

- Receiver's First/Last Name
- Receiver's phone number
- Receiver's country code
- Loyalty/Rewards Info

**Under \$999: No photo id required
Cash to Mobile limited to \$500**

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Western Union Subpoenas

A. Service and Processing of Subpoenas from federal, state and local law enforcement agencies in the United States requesting records relating to money transfers or money orders must name "Western Union Financial Services, Inc." and may be served by emailing a signed PDF copy of the subpoena to subicw@westernunion.com OR mailing them to:

Western Union Financial Services, Inc. Custodian of Records
Legal - HQ 8
7001 E Belleview Ave
Denver, CO 80237

Western Union does not accept service of subpoenas via facsimile.

All subpoenas must be accompanied by the full name, title, mailing address, email address, phone number and facsimile number of the person and/or entity issuing the subpoena

Full name, title, mailing address, email address, phone number and facsimile number of the person to whom documents should be sent.

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MoneyGram Subpoena

1.1. U.S. Law Enforcement must serve their Request on **MoneyGram Payment Systems, Inc.** and may be e-mailed to: Subpoena@moneygram.com

1.2. While e-mail is preferred, MoneyGram also accepts service from U.S. Law Enforcement by facsimile (866) 955-6406 or by mail to:

MoneyGram Payment Systems, Inc.

Subpoena Operations
1550 Utica Avenue South
Minneapolis, MN 55416

1.3. MoneyGram's U.S. Law Enforcement contact phone number: +1 (952) 541-4070

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MoneyGram (Legal Agreement)

Single Maximum: \$10,000
Two Transfers/Day Maximum

- 2.4. In order to use the Service, the Sender must set up a profile through our Website or the App ("**Profile**"). The Sender is required to update their personal information contained in the Profile in case of any changes before making a Transfer. To close a Profile please contact our customer service helpline.
- 5.3. To collect the Receive Amount, the intended Recipient will be asked to identify themselves by providing an identification document and their own details, the Sender's name, country of origin, the Receive Amount and the Reference Number ("**Collection Details**"). Cash payment shall be made to the person that our agents and partners deem entitled to receive the Receive Amount after examination of the identification document. The identification requirements for Recipients vary by country.

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Records for Subpoena Network and/or Agent

- Verify if the scope includes any agents
- Electronic Wire Transfer Data
- Copies of MoneyGram Money Orders
- Original Send and Receive Forms
- Money Order Transaction Logs
- Currency Transaction Reports
- Communications and emails with agents
- Suspicious Activity Reports and Support Records
- AML Compliance Program
- Other

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Smaller Money Transmitters

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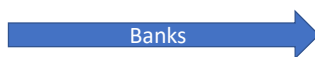


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Smaller Payment Services

Transactions more than \$550 should be made in Personal, Official, or Cashier's check

Official checks should not be more than \$3,000



The Reputable
Money Transmitter
in the U.S.

Welcome to

First African Remittances

An Authorized Delegate of Shaka Express Corp.
Transmitting Money To Ghana and Other African Countries
From Maryland

CASH TRANSACTION: Transactions more than \$550.00 should be made in Personal, Official or Cashier's check.

CHECK TRANSACTION: Personal, Cashier's or Bank Official checks should not be more than \$3,000.00 for the transmitted amount.

Maryland Address
3321 Toledo Terrace, #202
Hyattsville, Maryland 20782

Tel: (301) 853-7245, 301-853-7246

Email: info@firstafricanremittancesus.com

WORKING HOURS:
Monday - Friday 10:00 am to 6:00 pm
Saturday 10:00 am to 2:00 pm
Sunday closed

PAYMENT LOCATIONS OR PICKUP BANKS

Access Bank, Agricultural Development Bank (ADB), First Atlantic Bank, ECO Bank and OmniBSIC Bank

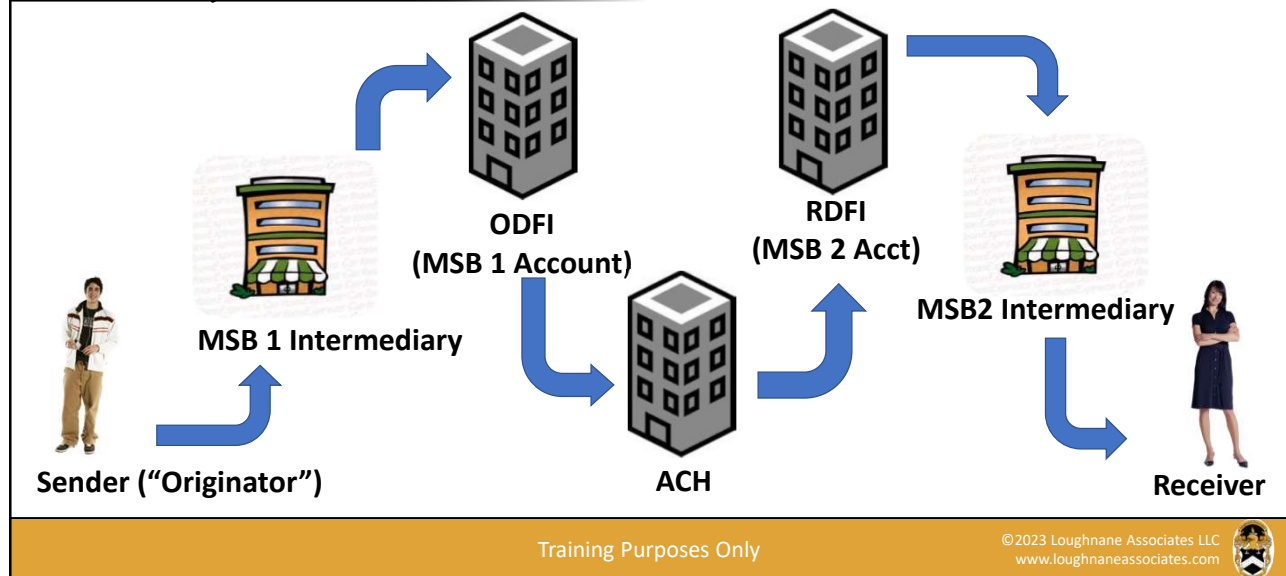
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Smaller Payment Services Providers Likely Use Financial Institutions/ACH



41

TRAC

42

Southwest Border Transaction Record Analysis Center

"Data is just that, it's data...How you use it in conjunction with your other investigative resources, then it becomes intelligence."

- Rich Lebel, director of the Southwest Border Transaction Records Analysis Center (2020)



Transaction Record Analysis Center Intelligence Report
TRAC Data System-User Interface

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The TRAC Data System

- Transactions in amounts of \$500 or more.
- Person to Person transactions (not commercial) in identified Southwest Border Area:
 - California
 - Arizona
 - New Mexico
 - Texas
 - Country of Mexico
- The **TRAC Data System** is a centralized searchable database containing subpoenaed financial transactions (money transfers) from several global money services businesses (MSBs).

Portal: <https://www.swbtrac.com>



Transaction Record Analysis Center Intelligence Report
TRAC Data System-User Interface

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Hawala

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Hawala

- Name
- Identifier (Code)
- Amount



Balance Books
Anything of
Value



Settlement methods may be outside the banking system, including trade, cash and long-term net settlement.

Subject to their registration, IVTS can operate legally in the UK.

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Currency Dealers And Exchanges

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Currency Dealers Or Exchangers

- Provides many of the services of a bank or other financial institutions
 - Funds transmission, check cashing, money orders, temporary custody of funds on deposit
 - "Retail" "Over the Counter" "Vault"
- BSA requires maintenance of information concerning currency dealing starting at \$1,000



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Information Maintained For Exchanges Over \$1000

- Customer's name and address
- Passport number or Taxpayer Identification Number
- Date and amount of the transaction
- Currency name, country, and total amount of each foreign currency



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Check Cashers, Money Orders, Mobile Banking, ATMs

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Check Cashers



- Defined as a person engaged in the business of cashing checks
- Other Services - In many cases, the check casher acts as an agent of a money transmitter (or several money transmitters for different services, e.g., remittances, bill paying, and sale of money orders) to complement check cashing services

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Money Orders/Traveler's Checks

- A Seller or Redeemer of Money Orders/Traveler's Checks is an MSB
- These are negotiable instruments sold through Sales Agents
- Generally issued by national companies, but small businesses may issue their own money orders
- Money orders are sold through agents
 - Amount is usually limited by policy
 - Sales Agent must maintain sales record
- **Money Orders: Postal 70% of US Market \$165 billion in 2014**



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Money Order USPS Case Study: Cindy Omidi

- Cindy Omidi, 66
- Convicted in October 2014 of structuring
- Mother to Michael and Julian Omidi, once operated 1-800-GET-THIN
- USPS provided evidence to this case – testified at trial

6
7
8 UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA
10 June 2013 Grand Jury
11 UNITED STATES OF AMERICA,) CR No. 13)
12 Plaintiff,) INDI 13 00739
13 v.) I N D I C T M E N T
14 CINDY OMIDI,) [31 U.S.C. § 5324(a)(3),
15 aka "Nahid Omidi,") (d)(2): Structuring
16 aka "Nahid Pezeshek,") Transactions to Evade Reporting
17 aka "Cindy Pezeshek,") Requirements; 18 U.S.C. § 2:
) Aiding and Abetting and Causing
) an Act to be Done; 21 U.S.C.
) § 5317(c): Criminal Forfeiture
)
18 The Grand Jury Charges:
19 [31 U.S.C. § 5324(a)(3), (d)(2); 18 U.S.C. § 2]
20 A. INTRODUCTORY ALLEGATIONS
21 At all times relevant to this Indictment:
22 1. The Bank Secrecy Act ("BSA") was a set of laws and
23 regulations enacted to address an increase in criminal money
24 laundering through financial institutions. In order to combat
25 money laundering, the BSA required domestic financial
26 institutions to file reports and maintain customer information
27 for cash transactions that exceeded certain amounts.

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Detail Of Money Order Purchase

6 B. DEFENDANT C. OMIDI'S STRUCTURING
7 7. Between in or about July 2008 through in or about
8 December 2009, in Los Angeles County, within the Central
9 District of California, and elsewhere, defendant C. OMIDI,
10 together with others known and unknown to the Grand Jury,
11 knowingly and for the purpose of evading the reporting
12 requirements of Sections 5312(a) and 5325 of Title 31, United
13 States Code, and the regulations promulgated thereunder,
14 structured, assisted in structuring, attempted to structure and
15 assist in structuring, and aided and abetted in structuring and
16 caused to be structured, the following transactions, among
17 others, with a domestic financial institution, namely, the USPS,
18 as part of a pattern of illegal activity involving more than
19 \$100,000 in a 12-month period:

Date	Subtotal Amount	Money Order Amount	Money Order Serial #	Post Office
8/14/08	\$900	\$900	12656224113	Village Station
	\$2,900	\$1,000	93648743548	Wilshire Business Center
		\$1,000	93648743550	Center
		\$900	93648743561	Center
9/25/08	\$1,000	\$1,000	12656222886	Village Station
	\$2,900	\$1,000	93648745484	Wilshire Business Center
		\$1,000	93648745495	Center
		\$900	93648745506	Center
9/16/08	\$900	\$900	12656228207	Village Station
	\$2,900	\$1,000	93648748151	Wilshire Business Center
		\$1,000	93648748162	Center
		\$900	93648748173	Center

Case 2:13-cr-00739-SVW Document 1 Filed 10/11/13 Page 4 of 7 Page ID #:4

Date	Subtotal	Money Order Amount	Money Order Serial #	Post Office
9/24/08	\$2,900	\$1,000	12332452476	Beverly Hills Main
		\$1,000	12332452487	Center
		\$900	12332452498	Center
	\$2,900	\$1,000	12656794781	West LA Finance Station
		\$1,000	12656794792	Center
		\$900	12656794803	Center
9/27/08	\$2,900	\$1,000	12655758936	Beverly Hills Main
		\$1,000	12655758947	Center
		\$900	12655758958	Center
	\$2,900	\$1,000	13013233200	West LA Finance Station
		\$1,000	13013233211	Center
		\$900	13013233222	Center
10/15/08	\$2,900	\$1,000	13013240534	West LA Finance Center
		\$1,000	13013240536	Center
	\$2,900	\$1,000	93648815807	Wilshire Business Center
		\$1,000	93648815818	Center
		\$900	93648815820	Center
10/17/08	\$2,900	\$900	12656229704	Village Station
		\$1,000	12655770592	Beverly Hills Main
		\$1,000	12655770603	Center
		\$900	12655770614	Center
10/20/08	\$2,900	\$1,000	12655766643	Beverly Hills Main
		\$1,000	12655766654	Center
		\$900	12655766665	Center
	\$2,900	\$1,000	13013248140	West LA Finance Center
		\$1,000	13013248151	Center
		\$900	13013248162	Center
10/22/08	\$2,900	\$1,000	09102144690	Beverly Hills Main
		\$1,000	09102144701	Center
		\$900	09102144712	Center
	\$2,900	\$1,000	93648817945	Wilshire Business Center
		\$1,000	93648817956	Center
		\$900	93648817967	Center


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Mobile Money Banking For The “Unbanked”



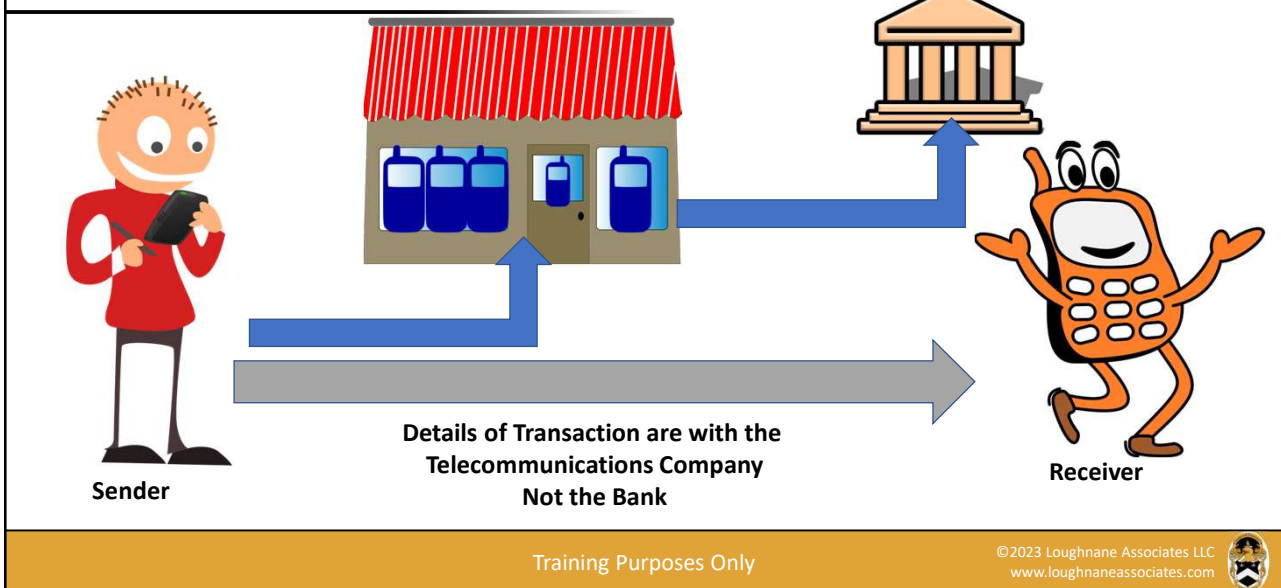
The advertisement features a man and a woman in a futuristic setting, each holding a large mobile phone. A red banner at the top reads "m-pesa™ makes sending money home easy". Below them are four speech bubbles with questions: "What is m-pesa™?", "What can you do with m-pesa™?", "Benefits of m-pesa™", and "How to get m-pesa™". The "infamous STUDIOS" logo is in the top right corner.

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Mobile Banking Process



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Department of Justice
U.S. Attorney's Office
Central District of California

SHARE

FOR IMMEDIATE RELEASE Friday, August 23, 2019

Westwood Man Agrees to Plead Guilty to Federal Narcotics, Money Laundering Charges for Running Unlicensed Bitcoin Exchange and ATM

LOS ANGELES – A Westwood man has agreed to plead guilty to federal criminal charges for owning and operating an unlicensed money transmitting business where he exchanged up to \$25 million in cash and virtual currency for individuals, including Darknet drug dealers and other criminals, some of whom used his Bitcoin ATM kiosk.




Case 2:19-cr-00484-PSG Document 1 Filed 08/23/19 Page 2 of 5 Page ID #:2

COUNT TWO

[18 U.S.C. §§ 1960(a), (b)(1)(B)]

Beginning in or about May 2015, and continuing until on or about October 12, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant KUNAL KALRA, also known as "Kumar," "shecklemayne," and "coinman," knowingly conducted, controlled, managed, supervised, directed, and owned an unlicensed money transmitting business affecting interstate and foreign commerce, namely, a virtual currency exchange business, that failed to comply with the money transmitting business registration requirements under Section 5336 of Title 31, United States Code, and

On or about June 22, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant KUNAL KALRA, also known as "Kumar," "shecklemayne," and "coinman," with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of specified unlawful activity, that is, the felonious importation, receiving, buying, selling, and otherwise dealing in controlled substances punishable under a law of the United States ("drug trafficking"), knowingly conducted a financial transaction, affecting interstate commerce, involving property represented by an authorized agent of the United States government to be proceeds of specified unlawful activity, that is, drug trafficking, namely, the exchange of 38.55331617 Bitcoin for \$98,372.00 in United States dollars, plus fees (Blockchain transaction ID 76ff13ce53c71db174133df664126e20d48743b7e3739c229141f508981917).

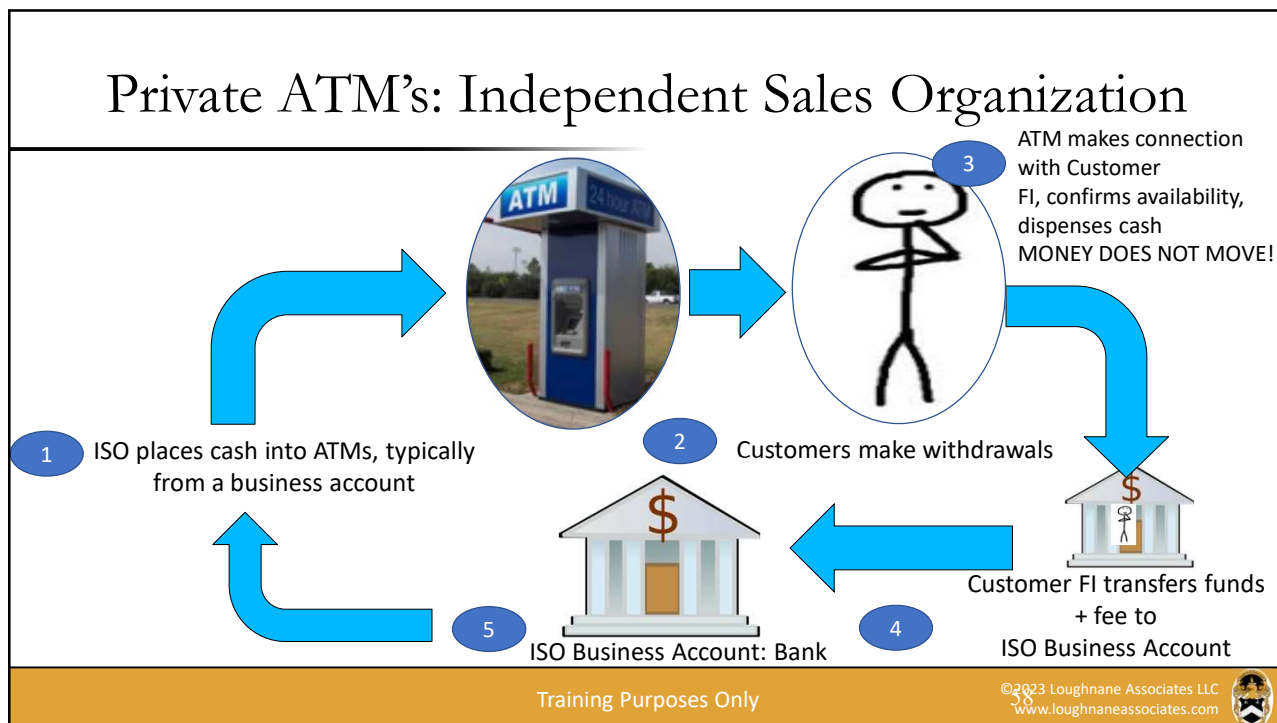


<https://www.mysanantonio.com/news/local/article/IA-man-to-admit-laundering-more-than-half-a-14379989.php>

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Questions?

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Value Touches Everything

