

Money Services Businesses

Loughnane Associates LLC
Value Touches Everything



Learning Objectives:

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

- | | |
|-------|---|
| ELO 1 | Describe the role of remittance systems. |
| ELO 2 | Explain the FinCEN process and oversight of MSBs. |
| ELO 3 | Explain the process of MSB approval at the state level. |
| ELO 4 | Explain the BSA regulations with regard to MSB reporting. |
| ELO 5 | Describe the process of large money transmitters, small money transmitters, and hawala systems. |
| ELO 6 | Explain the Southwest Border Record Analysis Center. |



The Value of Alternate Remittance

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Legitimate Purposes of Remittance OECD

- 🌐 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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Banking For The Unbanked. Pew Institute (2019 data)

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	\$1,310,000,000	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		

Remittance flows worldwide in 2017. (2020, October 20). Pew Research Center's Global Attitudes Project. <https://www.pewresearch.org/global/interactives/remittance-flows-by-country/>

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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 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:
 - 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 editions will not be processed after September 30, 2011.
Please type or print. Always complete entire report.
See instructions for items marked with an asterisk (*).
OMB No. 1568-0013

Complete and send to: Enterprise Computing Center-Detroit, Attn: Money Services Business Registration, P. O. Box 31916, Detroit, MI 48231-0196

Part I Filing Information

1 Indicate the type of filing by checking a, b, or c below (Check only one). If filing a 20230323, check "1" and either a, b, or c.
 Initial registration Renewal Correcting a prior filing Re-registration
 * If you checked item 1, please indicate the reason(s). Check all that apply.
 Re-registration under state law More than 10 percent transfer of equity interest More than 50 percent increase in agents

Part II Registrant Information

*2 Legal name of the money services business
 4 Doing business as
 *5 Address City State ZIP Code
 *6 EIN (entity), SSAN/EIN (individual) *7 Telephone number (include area code) *8 E-mail address (if available)
Part III Owner or Controlling Person
 *9 Individual's last name, or organization's name *13 First name *14 Middle initial
 *15 Address City State ZIP Code Postal Code *16 Country (if other than US)
 *20 Telephone number - (include area code) *21 Date of birth *22 SSAN/EIN (individual), EIN (entity)
 *23 Has the filer ever been convicted?
 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
 ID number Issuing state or country

Part IV Money Services and Product Information

*24 Some entities/branches within the registrant, its agents or branches are located. Check box a, b, or c as appropriate. (Check only one) and do not check individual distributory boxes. If box a, b, or c does not apply, check as many distributory boxes as necessary.
 All States & Territories All States All Territories

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

Revised 3/11

Part IV (continued)

25 Enter the number of branches of the registrant. **Remitter: 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".
 Issuer of traveler's checks Issuer of money orders Currency dealer or exchanger
 Seller of traveler's checks Seller of money orders Check casher
 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 mobile operation? 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".

4 Traveler's check sales	<input type="checkbox"/>	g Currency exchange or dealer	<input type="checkbox"/>
5 Traveler's check redemption	<input type="checkbox"/>	f Check cashing	<input type="checkbox"/>
6 Money order sales	<input type="checkbox"/>	g Money transmission	<input type="checkbox"/>
7 Money order redemption	<input type="checkbox"/>		

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.
 The registrant's primary transaction account is the one that has the greatest annual dollar amount of money services business activity in items 33 through 36 or other 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 City State ZIP Code
 34 State 35 ZIP Code 36 Primary transaction account number

Part VI Location of Supporting Documentation

If the supporting documentation is kept in the U.S. location reported in Part V, check here and continue to Part VII.

37 Address City State ZIP Code
 38 State 39 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 101. The money services business listed in Part I is a financial institution as defined in 31 U.S.C. 5330 and the regulations thereunder. The signature of the owner, controlling person, or authorized corporate officer is mandatory.

41 Signature
 42 Print 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 <input type="checkbox"/> Initial registration b <input type="checkbox"/> Renewal c <input type="checkbox"/> Correcting a prior filing d <input type="checkbox"/> Re-registration *2 If you checked item 1 d please indicate the reason(s). Check all that apply. a <input type="checkbox"/> Re-registered under state law b <input type="checkbox"/> More than 10 percent transfer of equity interest c <input type="checkbox"/> 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 <input type="checkbox"/> Driver's license/state ID b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration z <input type="checkbox"/> Other _____ e ID number _____ f Issuing state or country _____		

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Federal MSB Registration

- Number of branches
- Type(s) of service
 - Include any "informal value transfer systems"
 - Operation as a mobile operator
- 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," "endorser," "check casher," and "money transmitter." a <input type="checkbox"/> Issuer of traveler's checks b <input type="checkbox"/> Issuer of money orders c <input type="checkbox"/> Currency dealer or exchanger d <input type="checkbox"/> Casher of traveler's checks e <input type="checkbox"/> Casher of money orders f <input type="checkbox"/> Check casher g <input type="checkbox"/> Endorser of traveler's checks h <input type="checkbox"/> Endorser of money orders i <input type="checkbox"/> Money transmitter *27 Is any part of the registrant's money services business an informal value transfer system? a <input type="checkbox"/> Yes b <input type="checkbox"/> No *28 Is any part of the registrant's money services business conducted as a mobile operation? a <input type="checkbox"/> Yes b <input type="checkbox"/> 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 _____ e Currency exchange or dealer _____ b Traveler's check redemption _____ f Check cashing _____ c Money order sales _____ g 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 <input type="checkbox"/> 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 33. 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 If the supporting documentation is kept at the U.S. location reported in Part V, check here <input type="checkbox"/> and continue to Part VII. 37 Address _____ 38 City _____ 39 State _____ 40 ZIP Code _____
Part VII Authorized Signature *41 Signature _____ *42 Print name _____ *43 Title _____ *44 Date of signature _____ _____ _____

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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	<input type="text"/>
LEGAL NAME	<input type="text"/>
DBA NAME	<input type="text"/>
STREET ADDRESS	<input type="text"/>
CITY	<input type="text"/>
STATE	<input type="text" value=""/>
ZIP	<input type="text"/>
MSB ACTIVITIES (MSB Services Key List)	<input type="text" value=""/>
STATES OF MSB ACTIVITIES	<input type="text" value=""/>
FOREIGN LOCATION	<input type="text" value=""/>

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

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	408 408	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	408 408	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: 3100010088686
 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

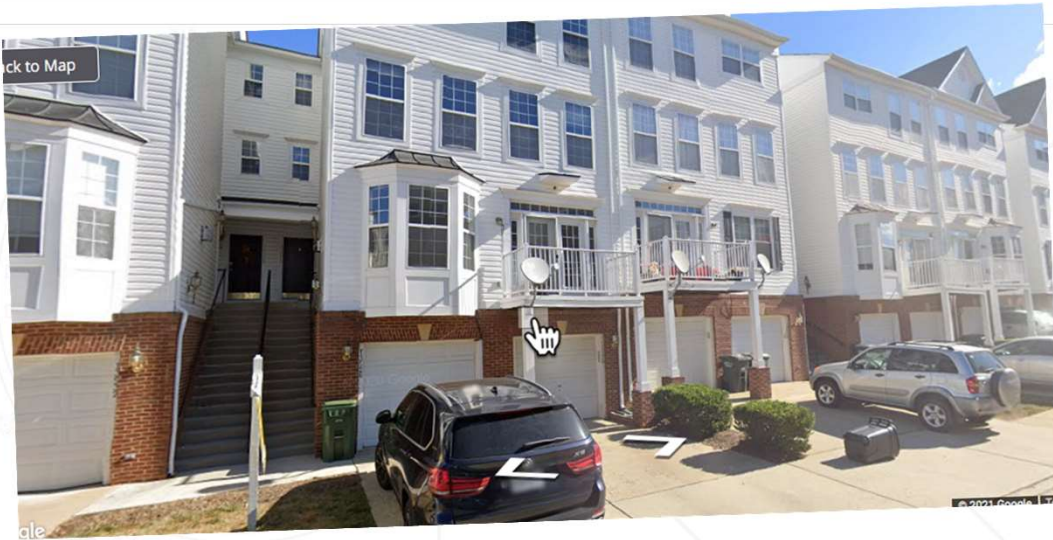
Entity Name: Kelvin Boon LLC	Entity ID: S4631281
Entity Type: Limited Liability Company	Entity Status: Active
Formation Date: 07/16/2013	Reason for Status: Active
VA Qualification Date: 07/16/2013	Status Date: 08/19/2019
Industry Code: 0 - General	Period of Duration: Perpetual
Jurisdiction: VA	Annual 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

[Privacy Policy](#) | [Contact Us](#)  

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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

FD-109
March 2011
Previous editions will not be accepted after December 31, 2011.

Suspicious Activity Report by Money Services Business

Please type or print. Always complete entire report. Items marked with an asterisk * are considered critical. (See instructions.)

OMB No. 1550-0045

1 Check this box only if preparing or correcting a prior report (see item 1 instructions) or Check this box if this is a recurring report.

Part I Subject Information Multiple subjects (see item instructions)

3 Subject type (check only one box) a Purchaser/sender b Payee/recipient c Both a & b d Other

*4 Individual's last name or entity's full name e First name f Middle initial

*7 Address

*8 City *9 State *10 Zip Code *11 Country Code (if not US)

*12 Government issued identification (if available)
a Driver's license/state I.D. b Passport c Alien registration d Other
e Number f Issuing state/country

*13 SSN/ITIN (individual) or EIN (entity) *14 Date of birth *15 Telephone number

Part II Suspicious Activity Information

*16 Date or date range of suspicious activity From To *17 Total amount involved in suspicious activity a Amount unknown b \$: c :00

*18 Category of suspicious activity (check all that apply)
 Money laundering Structuring Terrorist financing Other (specify)

*19 Financial services involved in the suspicious activity and character of the suspicious activity including unusual use (check all that apply)
a Money order b Traveler's check c Money transfer
d Other e Currency exchange

Check all of the following that apply

(1) Alters transaction to avoid completing funds transfer record or money order or traveler's check record (\$3,000 or more) (2) Individual(s) using multiple or false identification documents
(3) Alters transaction to avoid filing CTR form (more than \$10,000) (4) Two or more individuals using the similar name identification
(5) Comes in frequently and purchases less than \$3,000 (6) Same individual(s) using multiple locations over a short time period
(7) Changes spelling or arrangement of name (8) Offers a bribe in the form of a tip/gratuity
(9) Exchanges small bills for large bills or vice versa

If mailing, send each completed SAR report to: Electronic Reporting Center - Deposit Only (SAR-EDRO)
P.O. Box 23187
Detroit, MI 48222-8980

A free online SAR system is available for the report. Go to <http://www.frb.org/sars> for more information and to register.

Catalog No. 34644N Rev. 3/01/11

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- Location(s)
- Reporting Business
- Contact information

Part II Suspicious Activity Information, Continued 2

*20 Purchases and redemptions (check box "P" for purchase or box "R" for redemption)

Instrument	P	R	Issues	Total Instruments	Total Amount (US Dollars)
Money Orders:	<input type="checkbox"/>	<input type="checkbox"/>			\$.00
	<input type="checkbox"/>	<input type="checkbox"/>			\$.00
Traveler's Checks:	<input type="checkbox"/>	<input type="checkbox"/>			\$.00
	<input type="checkbox"/>	<input type="checkbox"/>			\$.00
Money Transfers:	<input type="checkbox"/>	<input type="checkbox"/>			\$.00
	<input type="checkbox"/>	<input type="checkbox"/>			\$.00

*21 Currency Exchanges: Tended Currency/Instrument Country Received currency Country Amount (US Dollars)
 If bulk small currency \$.00
 If bulk small currency \$.00

Part III Transaction Location Multiple transaction locations

23 Type of business location (check only one) a Selling location b Paying location c Both

*24 Legal name of business 25 Doing business as

*26 Permanent address (number, street, and suite no.) *27 City *28 State *29 Zip Code

*30 EIN (entity) or SSN/ITIN (individual) *31 Business telephone number *32 Country Code (if not US) *33 Internal control file number (if available)

Part IV Reporting Business 34 The Reporting Business is the same as the Transaction Location (go to Part V)
35 Legal name of business 36 Doing business as

*37 Permanent address (number, street, and suite no.) *38 City *39 State *40 Zip Code

*41 EIN (entity) or SSN/ITIN (individual) *42 Business phone number (include area code) *43 Country Code (if not US) *44 Internal control file number (if available)

Part V Contact for Assistance

46 Designated contact office 46 Designated phone number (include area code) 47 Date Filed (See instructions)
(:) ; : - : / /
MM DD YYYY

48 Agency (if not filed by a Money Services Business)

- 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. Go to page 4, 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>date</u> such documentation (month) 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 for a foreign national any available information on subject's (suspect(s), victim) and/or identification card(s). Include date, country, city of issue, issuing authority, and nationality.</p> <p>j. Indicate whether any information has been excluded from this report. If so, state reasons.</p> <p>k. Indicate whether any U.S. or foreign instrument(s) were involved.</p> <p>l. So, provide the amount, name of currency, and country of origin.</p> <p>l. 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>m. Indicate any additional account number(s), and any foreign account numbers which may be involved in transfer of money.</p> <p>n. Identify any employee or other individual or entity (e.g., agent) suspected of improper involvement in the transaction(s).</p> <p>o. 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>p. For selling or paying locations, indicate if there is a video recording medium or surveillance photograph of the customer.</p> <p>q. 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>r. 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>s. If attending a prior report, complete the form in its entirety and note the changes here in Part VI.</p> <p>t. 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>		

State Registration Information



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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shipkevich
ATTORNEYS AT LAW



REGULATORY GUIDE TO MONEY TRANSMISSION & PAYMENT LAWS IN THE U.S.®



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eBook | Regulatory Guide To Money Transmission & Payment Laws In The U.S

Download Now

Virginia Money Transmitter Laws

Who needs to register?

Under Virginia statute, those who are selling money orders or engaging in the business of money transmission, whether or not they are physically located in Virginia, must obtain a money transmitter license. Money transmission is defined as receiving money or monetary value for transmission by wire, facsimile, electronic means or other means or selling or issuing stored value.

Who is the regulator?

Virginia Bureau of Financial Institutions

Alabama

Alabama

Alaska

Arizona

Arkansas

California

Colorado

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

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Virginia

Chapter 19 of Title 6.2 of the Code of Virginia requires the licensing of persons wishing to engage in the business of selling money orders or providing money transmission services to any consumer residing in the Commonwealth of Virginia, whether or not the person has a location in the Commonwealth.

Nationwide Licensing System Resource Center (NMLS)

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Who Is Required to Have This License in VA?

- Any person who engages in the business of selling money orders or providing money transmission services to a resident of the Commonwealth of Virginia, whether or not the money order seller or money transmitter has a location in the Commonwealth.
- Who Is Not Required to Have This License?
 1. The United States, or any department, instrumentality or agency thereof;
 2. Any state, or any department, instrumentality, agency, locality, municipality, or political subdivision
 3. Any bank, trust company, savings institution, or credit union operating under the laws of the United States or any state or territory thereof, or other person to the extent the person provides money transmission services as an agent of one or more banks, trust companies, savings institutions, or credit unions operating under the laws of the United States or any state or territory thereof;
 4. Any private security services business, licensed under § 9.1-139, that transports or offers to transport money;
 5. Any entity that has been explicitly designated in a written agreement as an agent of any governmental authority or unit identified in subdivision 1 or 2, provided that any funds collected by the agent shall be deemed for all purposes to be received by the governmental authority or unit; or
 6. Any authorized delegate of a licensee.

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Some (not all) that is needed for VA

- Submission of Company Form
- Financial Statements (audited)
- If a start-up, audited beginning balance sheet showing \$200,000 net worth
- Authorized Agents (Delegates)
- Locations (branches)
- Other Trade Name/Forced Trade Name
- Registered Agent
- Primary Contact Employees
- Non-Primary Contact Employees
 - Accounting, Exam Billing, Licensing, Consumer Complaint (Public), Exam Delivery, Litigation, Consumer Complaint (Regulatory) Legal, Pre-Exam Contact
- Approvals and Designations (FinCEN confirmation number)
- Credit Reports
- Criminal History Checks
- Surety Bond **

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Large Money Transmitters

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Western Union WU

Send money Pick up cash

EN Register



Services:


- Money Transmitter
- Pay bills Online (Billers, 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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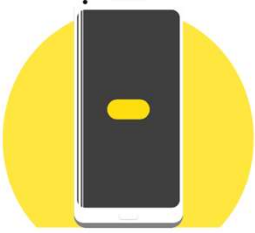
Ways to send money Ways to receive money



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 8.00 USD

🏦
Bank account
0-5 Business days¹
8, 33

🌐
Wire transfer
service time
Fee : NA

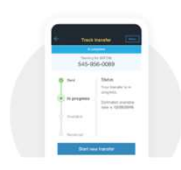
I have a promo code

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.

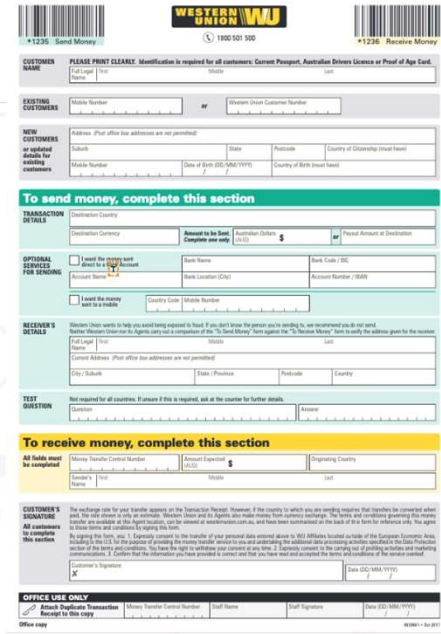


Simple card scanning

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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WESTERN UNION WU

1236 Send Money | 1800 501 500 | 1236 Receive Money

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

EXISTING CUSTOMERS (Fields for Name, Address, Phone, etc.)

NEW CUSTOMERS (Fields for Name, Address, Phone, etc.)

To send money, complete this section

TRANSACTION DETAILS (Fields for Destination Country, Currency, Amount, etc.)

OPTIONAL SERVICES FOR SENDING (Checkboxes for Insurance, etc.)

RECEIVER'S DETAILS (Fields for Name, Address, Phone, etc.)

TEST QUESTION (Field for Question)

To receive money, complete this section

RECEIVER'S DETAILS (Fields for Name, Address, Phone, etc.)

OFFICE USE ONLY (Fields for Staff Name, Signature, etc.)

- 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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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

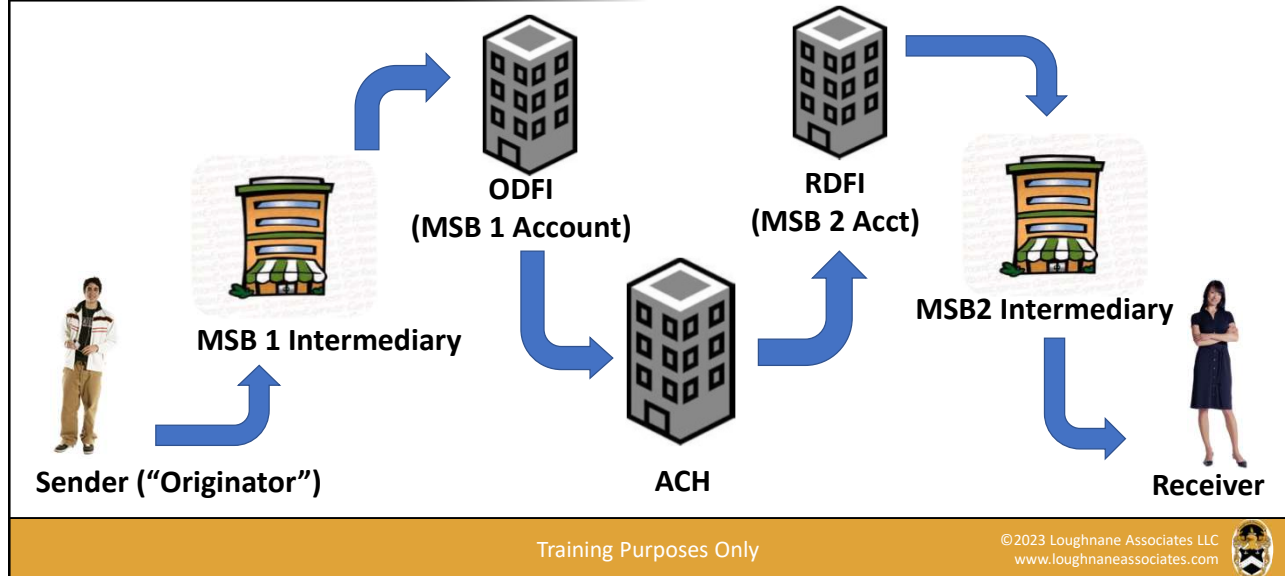
CASH TRANSACTION: Transactions more than \$550.00 should be made in Personal, Official or Cashier's check.
CHECK TRANSACTION: Personal, Cashier's or Bank Official checks should not be more than \$3,000.00 for the transmitted amount.

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

Smaller Payment Services Providers Likely Use Financial Institutions/ACH



TRAC

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Southwest Border Transaction Record Analysis Center

- “Data is just that, its 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).



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

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

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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, and 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 a 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 Omid

- Cindy Omid, 66
- Convicted in October 2014 of structuring
- Mother to Michael and Julian Omid, 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,)) **CR 13 00739**
13)) **I N D I C T M E N T**
14 v.))
15 CINDY OMIDI,) [31 U.S.C. § 5324(a)(3),
16 aka "Nahid Omid,") (d)(2): Structuring
17 aka "Nahid Pezeshk,") Transactions to Evade Reporting
18 aka "Cindy Pezeshk,") Requirements; 18 U.S.C. § 2:
19) Aiding and Abetting and Causing
20) an Act to be Done; 21 U.S.C.
21) § 5317(c): Criminal Forfeiture]
22 Defendant.))

The Grand Jury Charges:
[31 U.S.C. § 5324(a)(3), (d)(2); 18 U.S.C. § 2]

A. INTRODUCTORY ALLEGATIONS
At all times relevant to this Indictment:
1. The Bank Secrecy Act ("BSA") was a set of laws and regulations enacted to address an increase in criminal money laundering through financial institutions. In order to combat money laundering, the BSA required domestic financial institutions to file reports and maintain customer information for cash transactions that exceeded certain amounts.

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Detail Of Money Order Purchase

B. DEFENDANT C. OMIDI'S STRUCTURING
7. Between in or about July 2008 through in or about December 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendant C. OMIDI, together with others known and unknown to the Grand Jury, knowingly and for the purpose of evading the reporting requirements of Sections 5313(a) and 5325 of Title 31, United States Code, and the regulations promulgated thereunder, structured, assisted in structuring, attempted to structure and assist in structuring, and aided and abetted in structuring and caused to be structured, the following transactions, among others, with a domestic financial institution, namely, the USPS, as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period:

Date	Subtotal	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
8/25/08	\$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-SW 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	Station
		\$900	12332452498	Station
	\$2,900	\$1,000	12656794781	West LA Finance
		\$1,000	12656794792	Station
		\$900	12656794803	Station
9/27/08	\$2,900	\$1,000	12655758936	Beverly Hills Main
		\$1,000	12655758947	Station
		\$900	12655758958	Station
	\$2,900	\$1,000	13013233200	West LA Finance
		\$1,000	13013233211	Station
		\$900	13013233222	Station
10/15/08	\$2,900	\$1,000	13013240534	West LA Finance
		\$1,000	13013240545	Center
		\$900	13013240556	Center
	\$2,900	\$1,000	93648815807	Wilshire Business
		\$1,000	93648815818	Center
		\$900	93648815820	Center
	\$900	\$900	12656229704	Village Station
10/17/08	\$2,900	\$1,000	12655770592	Beverly Hills Main
		\$1,000	12655770603	Station
		\$900	12655770614	Station
10/20/08	\$2,900	\$1,000	12655766643	Beverly Hills Main
		\$1,000	12655766654	Station
		\$900	12655766665	Station
	\$2,900	\$1,000	13013248140	West LA Finance
		\$1,000	13013248151	Center
		\$900	13013248162	Center
10/22/08	\$2,900	\$1,000	09102144690	Beverly Hills Main
		\$1,000	09102144701	Station
		\$900	09102144712	Station
	\$2,900	\$1,000	93648817945	Wilshire Business
		\$1,000	93648817956	Center
		\$900	93648817967	Center

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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)]

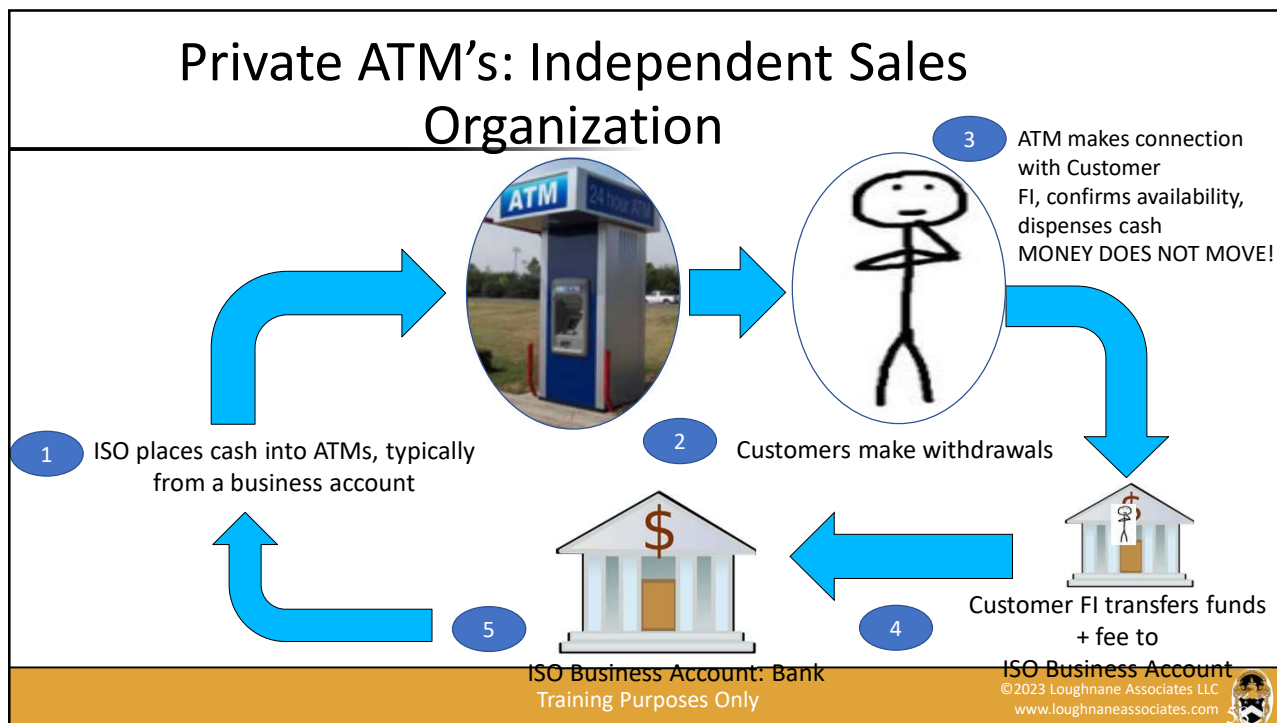
Beginning in or about May 2015, and continuing until on or about October 12, 2017, in Los Angeles County, within the Central District of California, and elsewhere, defendant KUNAL KALRA, also known as "Kumar," "shecklemayne," and "coinman," knowingly conducted, controlled, managed, supervised, directed, 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 a76ff13ce53c71db174133df664126e20d48743b7f3739c229141f508981917).

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

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