

## Anti-Money Laundering Review worksheet

Please provide the following information **prior** to your review. Information can be either mailed, faxed, e-mailed, or phoned in, but should be received two weeks prior to your review to be most helpful.

Average Loan \$ amount? \_\_\_\_\_

How many loans (including renewals) did you do in the last full month? \_\_\_\_\_ Buys? \_\_\_\_\_

How many loans (including renewals) did you do in January 2020? \_\_\_\_\_ Buys? \_\_\_\_\_

# of 8300 forms filed in the last calendar year \_\_\_\_\_ SAR's \_\_\_\_\_ 1099-B's \_\_\_\_\_

Current # of staff \_\_\_\_\_ New hires since your last review \_\_\_\_\_

Did your high dollar tracking number change this year? \_\_\_\_\_ To what? \_\_\_\_\_

How many SDN potential matches this year? \_\_\_\_\_ Are they printed out? \_\_\_\_\_

*Approximate* # of MLA loans since the last review? \_\_\_\_\_

Are defaults and buy fallout put in bins or buckets prior to scrap or placement in inventory? \_\_\_\_\_

If yes, are you able to source every item in these bins/buckets? \_\_\_\_\_

Describe \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## Coin & bullion transactions only

Do you collect any identifying info from customers when you **sell** these items? \_\_\_\_\_

Describe \_\_\_\_\_

If yes, are there \$ limits for collecting identification on sales? \_\_\_\_\_

Describe \_\_\_\_\_

Are there \$ limits in place for cash transactions? \_\_\_\_\_

Describe \_\_\_\_\_

Do you check these customers against the SDN list? \_\_\_\_\_

Describe \_\_\_\_\_

What % of these transactions are done online (vs in store)? Buys \_\_\_\_\_ Sales \_\_\_\_\_

What % of your overall business is made up of these transactions? \_\_\_\_\_

If online, how many annually are done with clients outside the US? \_\_\_\_\_

List countries \_\_\_\_\_

Please have the following items set aside for us to review on the day of the review.

\_\_\_\_\_ AML Program

\_\_\_\_\_ Previous Independent AML review

\_\_\_\_\_ Compliance Officer Designation Form, along with annual supporting corporate resolution, if any

\_\_\_\_\_ Current licenses (business, tax, pawn, secondhand, FFL, etc.)

\_\_\_\_\_ Training records and documentation since last review

\_\_\_\_\_ Names of staff hired since last review along with dates of hire

\_\_\_\_\_ Any external audit reports (bank, IRS, MSB, other) since last review

\_\_\_\_\_ All 8300's filed since last review

\_\_\_\_\_ All SAR's filed since last review

\_\_\_\_\_ All customer 8300 notification letters since last review (if you mail these in late January, then provide only those letters that pertain to 8300's filed the prior year. If you send notification when you file the 8300, then provide only those that pertain to the 8300's referenced above

\_\_\_\_\_ Internal monitoring records (monthly, quarterly, semi-annually etc.)

\_\_\_\_\_ High Dollar tracking logs (Pawn (related transactions), Buys, Currency etc...) along with any supporting reports from proprietary software programs. (Call me if you are unsure)

\_\_\_\_\_ SDN report for the last year. (Call me if you are unsure)

\_\_\_\_\_ Current blank pawn contract