
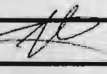
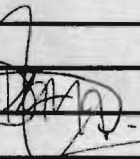

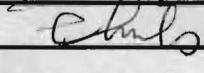
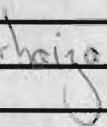


SUPER STOP
Anti-Money Laundering Compliance Program
Policies and Procedures

Effective date: 04-01-2011

I have read and understand these Anti Money Laundering Policies and Procedures.

Name	Signature	Date
Edward Dana		4-1-2011
Irina Khramova		4-5-2011
Ali Dana		4-7-11
Ahmad Jantou		4-9-11
Charles Agyei		6-28-11
		4-20-11
Julio Norberto		4-20-11

	Introduction
Purpose	To evidence the Company’s general understanding of its BSA and AML obligations.
General	As an agent offering Western Union money transfer and money order products and services, Super Stop (the “Company”) qualifies as a “money services business” under the Bank Secrecy Act (“BSA”). The BSA imposes certain obligations on U.S. financial institutions, including money services businesses, in order to prevent money laundering, terrorist financing, and the use of the U.S. financial system to facilitate criminal activity. In addition to various recordkeeping and reporting requirements, the BSA requires money services businesses to establish and maintain an Anti-Money Laundering (“AML”) Compliance Program reasonably designed to ensure that the business complies with all applicable BSA requirements and that its services are not used to facilitate money laundering, terrorist financing or other criminal or fraudulent activity.
Important Terms	<p>The following are important terms as used in these policies and procedures:</p> <p>Money laundering is the process by which criminals attempt to disguise the illegal origins of the proceeds of their criminal activities and to introduce those proceeds into the financial system as legitimate funds.</p> <p>Terrorist financing generally involves the movement of funds by terrorists and terrorist groups in order to support their activities. Terrorist financing can involve the movement of funds derived from legal activity as well as funds derived from illegal activity.</p> <p>The Bank Secrecy Act (“BSA”) is a federal law that imposes recordkeeping, reporting and other obligations on U.S. financial institutions in order to detect and prevent money laundering, terrorist financing and other illegal activity. The purpose of the BSA is to prevent U.S. financial institutions from being used by criminals to facilitate their illegal activities and to help law enforcement detect and prosecute criminal activity.</p>

Money services businesses, as defined by the BSA, include (1) money transmitters, (2) issuers, sellers and redeemers of money orders, (3) check cashers, (4) currency dealers and exchangers, and (5) issuers, sellers and redeemers of stored value products, such as gift cards. Companies that act as agents of other money services businesses are considered money services businesses in their own right under the BSA.

Currency Transaction Report (“CTR”): A CTR is a report that must be filed with the federal government for all cash transactions by or on behalf of the same person on the same day that exceed \$10,000 either singly or in the aggregate.

Suspicious Activity Report (“SAR”): A SAR is a report that must be filed with the federal government whenever a financial institution knows, suspects or has reason to suspect that a transaction or group of transactions (i) involves funds derived from illegal activity, (ii) is intended to evade any BSA reporting or recordkeeping requirement, (iii) has no apparent legitimate legal or business purpose, or (iv) is intended to facilitate criminal activity. For money services businesses, a SAR must be filed whenever the transaction or transactions at issue involve \$2,000 or more. For transactions below \$2,000, a money services business may, but is not required to, file a SAR.

Structuring: Designing and conducting a transaction to evade triggering a reporting or recordkeeping requirement. Structuring is a federal crime and must be reported by filing a SAR-MSB.

General Policy	
Purpose	To describe the Company’s general policy of complying with all applicable BSA requirements and maintaining an AML Compliance Program.
Policy	<p>All activities by the Company as an agent of Western Union will be conducted in a lawful manner and in compliance with all applicable legal and regulatory requirements. It is the policy of the Company to comply with all applicable anti-money laundering laws and regulations, including all applicable BSA recordkeeping, reporting and AML Compliance Program requirements.</p> <p>The Company has established and will maintain an AML Compliance Program covering the activities it performs as an agent of Western Union. The Company’s AML Compliance Program consists of the following elements:</p> <ul style="list-style-type: none"> (1) The appointment of an AML Compliance Officer. (2) Policies and procedures reasonably designed to ensure that the Company complies with all applicable BSA requirements and that its money transfer and money order services are not used to facilitate money laundering, terrorist financing or other illegal activity. (3) An AML education and training program for all new and existing employees who handle Western Union products and services. (4) Periodic independent review to monitor and maintain the adequacy of the AML Compliance Program.

	Compliance Officer Position
Purpose:	To identify the Compliance Officer and define the Compliance Officer's responsibilities.
Procedures:	<p><u>Compliance Officer Information</u></p> <p>The Compliance Officer is:</p> <p>Name: Edward Dana</p> <p>Address: 7303 Preston Hwy. Louisville, KY 40219</p> <p>Phone: (502) 968-9159</p> <p><u>Compliance Officer Job Description/Roles and Responsibilities</u></p> <p>The Compliance Officer has the overall responsibility for instituting and maintaining the Company's AML Compliance Program, with the following specific responsibilities:</p> <p><u>Policies and Procedures</u></p> <ol style="list-style-type: none"> 1. Establishes and updates policies and procedures for the completion, review, filing and retention of all reports and records required under the BSA. 2. Establishes and updates policies and procedures for compliance matters, such as handling suspicious transactions, responding to requests and inquiries from government and law enforcement officials (including IRS examination notices), and conducting AML program reviews. 3. Works with Company management to implement policies, procedures and internal controls to correct any compliance deficiencies, enhance compliance performance, and respond to regulatory changes. <p><u>Training</u></p> <ol style="list-style-type: none"> 1. Manages and updates the Employee Training Program to ensure that employees receive, at a minimum, initial and ongoing training on BSA, anti-money laundering, currency transaction reporting, suspicious activity reporting and recordkeeping requirements. 2. Provides supplemental training as needed to address and

correct any compliance deficiencies noted through monitoring and audit activities.

Monitoring

1. Monitors daily reports and investigates any unusual changes or patterns in transaction or consumer activity.
2. Reviews all currency transaction and suspicious activity reports for accuracy and completeness before filing them with the IRS.
3. Monitors employee compliance with policies and procedures.
4. Identifies need for and implements corrective action.
5. Ensures that periodic independent compliance program reviews (either internal or external) are conducted at least annually and that any necessary corrective actions are taken.

Recordkeeping

1. Maintains compliance manuals and program materials.
2. Maintains monitoring records and logs.
3. Maintains documented records of training.
4. Maintains all required documents as outlined in the record retention policy.

Other

1. Serves as the primary contact between the Company and examiners, Western Union, and state and IRS officials during regulatory audits or compliance examinations.
2. Coordinates the process for identifying unusual transactions and completing and filing Suspicious Activity Reports (“SAR-MSBs”) involving known or suspected illegal transactions.

Consumer Identification and Recordkeeping Requirements for Money Transfers	
Purpose:	To establish policies and procedures for the consistent review, verification and recording of consumer identification and transaction information for money transfers of \$1000 or more and \$3,000 or more.
Procedures:	<p><u>Consumer Identification Requirements for Money Transfers -- \$1,000 or more</u></p> <ol style="list-style-type: none"> 1. Employees are required to review an acceptable form of consumer identification and ensure that the identification: <ul style="list-style-type: none"> • Is currently valid (i.e., has not expired) • Is government issued • Contains a photograph of the consumer • Contains the consumer's name • Contains the consumer's address (preferred) 2. Employees must determine that the form of identification is acceptable by Western Union policy. Examples of acceptable forms of identification include the following: <ul style="list-style-type: none"> • Driver's License • Passport • US Permanent Resident Card (green card) • Military I.D. Card • Mexican Consulate Issued Matricula Card 3. Employees must look at and handle the consumer's ID to verify the consumer's identity and the ID's authenticity. If an ID is not provided, does not match the consumer, or appears to be fake the employee must refuse the transaction. 4. Employees must ensure proper identification is recorded on the Send or Receive transaction record. 5. Employees must ensure that the following information has been obtained from the consumer and entered into the Western Union terminal: <ul style="list-style-type: none"> • The consumer's name • The consumer's current residential address. PO Boxes are acceptable only when consumer provides a residential address in addition to the PO Box • The type of identification document presented (i.e., driver's license)

	<ul style="list-style-type: none">• The document number and issuer (state or foreign country) of the identification• The receiver's name <p>6. Employees must ensure that the consumer has signed the Send or Receive transaction record. If an Automated Sales Receipt is available, as a best practice, the consumer should also sign the Automated Sales Receipt.</p> <p>7. If an Automated Sales Receipt is available, the employee will staple a copy to the Send or Receive transaction record and retain a copy of both. If an Automated Sales Receipt is not available, the employee must retain a copy of the Send or Receive transaction record. All such copies must be retained for 6 months (Western Union will maintain information for wire transfers for the five year period required by the BSA).</p> <p><u>Money Transfer - \$3,000 or more - \$1,000 or more for transactions in Oklahoma</u></p> <p>For Money Transfers of \$3,000 (\$1,000 in OK) or more, the same procedures described above should be followed, except that the following additional information must be obtained and entered into the Western Union terminal:</p> <ul style="list-style-type: none">• The consumer's Social Security Number (if sender does not have a Social Security Number, then obtain Passport Number or US Permanent Resident Card (green card))• The consumer's date of birth• The consumer's occupation <p>When a consumer presents a Social Security Number, the primary ID must be a US issued ID.</p>
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	Money Order Record – Consumer Identification and Recordkeeping Requirements for Money Orders
Purpose:	To establish policies and procedures for the consistent review, verification, and recording of consumer identification and transaction information for money order purchases of \$3,000 or more (inclusive of fees) by or on behalf of a single consumer in any one day.
Procedures:	<p><u>Consumer Identification Requirements for Money Orders -- \$3,000 or more</u></p> <ol style="list-style-type: none"> 1. For all Money Order purchases of \$3,000 or more (inclusive of fees), whether purchased singly or in the aggregate, by or on behalf of a consumer in any one day, employees must obtain and record the following consumer and transaction information. 2. Employees are required to review an acceptable form of consumer identification and ensure that the identification: <ul style="list-style-type: none"> • Is currently valid (i.e., has not expired) • Is government issued • Contains a photograph of the consumer • Contains the consumer’s name • Contains the consumer’s address (preferred) 3. Employees must determine that the form of identification is acceptable by Western Union policy. Examples of acceptable forms of identification include the following: <ul style="list-style-type: none"> • Driver’s License • Passport • US Permanent Resident Card (green card) • Military I.D. Card • Mexican Consulate Issued Matricula Card 4. Employees must look at and handle the consumer’s ID to verify the consumer’s identity and the ID’s authenticity. If an ID is not provided, does not match the consumer, or appears to be fake the employee must refuse the transaction. 5. Employees must obtain and record the following information on the Money Order Record: <ul style="list-style-type: none"> • Purchase Date • Total number of Money Orders sold

- Complete serial number of each Money Order
- Amount of each Money Order

The employee must also obtain and record on the Money Order Record, the consumer's:

- The consumer's name
- The consumer's current residential address
- The type and number of the identification document presented
- In addition, the consumer's Social Security Number (if purchaser does not have a Social Security Number, then obtain Passport Number or US Permanent Resident Card –green card)
- The consumer's date of birth
- The seller's initials

6. When a consumer presents a Social Security Number, the primary ID must be a US issued ID.

7. All Money Order Records must be retained for 5 years.

Currency Transaction Reports (CTRs)	
Purpose:	To establish policies and procedures for the consistent handling of single and multiple money transfer and/or money order transactions involving over \$10,000 in cash and for the proper filing of Currency Transaction Reports.
Procedures	<ol style="list-style-type: none"> 1. The Compliance Officer is responsible for ensuring that Currency Transaction Reports (“CTRs”) are properly and timely filed for all cash transactions/sales over \$10,000 (inclusive of fees) by or on behalf of a single consumer in any one business day. A CTR must be filed for any single cash transaction over \$10,000 by a consumer, as well as for multiple cash transactions by or on behalf of the same consumer in any one business day that in the aggregate exceed \$10,000. 2. Employees should notify the Compliance Officer whenever they handle or are otherwise aware of any transaction or transactions for which a CTR must be filed. 3. The CTR may be prepared by an employee or by the Compliance Officer. In either case, the Compliance Officer is responsible for reviewing the CTR before it is filed to ensure that all required information has been included and that the information is accurate. 4. The Compliance Officer will send a copy of the completed CTR to the Internal Revenue Service (“IRS”) within 15 days of the transaction(s), addressed as follows or as otherwise directed on the CTR form: IRS Detroit Computing Center Attn: CTR P.O. Box 33604 Detroit, MI 48232-5604 5. The Compliance Officer will retain a copy of the CTR for 5 years. 6. In some instances, Western Union may complete a CTR and file it with the IRS on the Company’s behalf.

Suspicious Activity Reports (SAR-MSBs)	
Purpose:	To establish policies and procedures for the consistent identification of suspicious money transfer and/or money order transactions and for the proper filing of Suspicious Activity Reports.
Procedures:	<ol style="list-style-type: none"> 1. The Company will file a Suspicious Activity Report (“SAR-MSB”) whenever it knows, suspects, or has reason to suspect that a transaction or pattern of transactions is suspicious and involves \$2,000 or more. The Company may voluntarily file a SAR-MSB with respect to any suspicious transaction whose value falls below the \$2,000 reporting threshold. 2. Suspicious activity includes but is not limited to: <ul style="list-style-type: none"> • Possible attempts to launder money. • Transactions that appear to have been structured to avoid BSA reporting or recordkeeping requirements • Transactions that serve no apparent business or lawful purpose. • Transactions that are unusual for the consumer and for which the Company knows of no reasonable explanation. • The use or attempted use by a consumer of altered or false identification. • The provision by a consumer of inconsistent information. • Any other transaction that, in the opinion of the Company, appears to involve criminal or illegal activity. 3. All employees are responsible for exercising reasonable diligence in identifying potentially suspicious activity. If an employee becomes aware of activity that he or she believes is suspicious, he or she must notify the Compliance Officer as soon as possible. 4. The Compliance Officer is responsible for determining whether a SAR-MSB should be filed with respect to any potentially suspicious activity and, if so, for ensuring that the SAR-MSB is properly completed and filed in a timely manner. 5. Both employees and the Compliance Officer should attempt to obtain as much information as possible about the suspicious transaction(s), including information about the consumer or consumers involved, in order to assist in preparing the SAR-

MSB. Any information or records relating to the suspicious transaction(s) should be collected and maintained in the file along with the completed SAR-MSB form.

6. A SAR-MSB may be prepared by an employee or the Compliance Officer. In either case, the Compliance Officer is responsible for reviewing the SAR-MSB before it is filed to ensure that all required information has been included and that the information is accurate.
7. The Compliance Officer will send the completed SAR-MSB form to the IRS within 30 days of detecting the suspicious activity, addressed as follows or as otherwise directed on the SAR-MSB form:

Enterprise Computing Center-Detroit
Attn: SAR-MSB
P.O. Box 33117
Detroit, MI 48232-5980

8. The Compliance Officer will retain a copy of the completed SAR-MSB form along with any supporting documentation for 5 years. Copies of SAR-MSBs must be retained in a way to ensure that they remain confidential (e.g., in a locked drawer).
9. All SAR-MSBs are considered strictly confidential and cannot be disclosed to or shared with anyone outside the Company except for the Western Union AML Compliance Department and appropriate federal and state governmental agencies and law enforcement authorities. In particular, under no circumstances may a SAR-MSB, or the fact that a SAR-MSB was filed, be disclosed to a consumer or anyone else who was involved in the suspicious transaction(s).
10. The Compliance Officer shall be responsible for handling any requests from law enforcement authorities or regulatory agencies regarding a SAR-MSB, including requests for copies of SAR-MSBs and/or supporting documentation. In the event such a request is received, the Compliance Officer shall immediately contact a Western Union Compliance Officer at 866-633-2247.

	Program Monitoring
Purpose:	To establish policies and procedures to ensure that the AML Compliance Program is properly monitored on an ongoing basis.
Procedures:	<ol style="list-style-type: none"> 1. The Compliance Officer is responsible for ensuring that the AML Compliance Program is being properly followed. In particular, the Compliance Officer is responsible for ensuring that: <ul style="list-style-type: none"> • CTRs are being properly completed and filed within the required time. • Employees are reporting suspicious activity according to the training they received. • SAR-MSBs are being properly completed and filed within the required time. • ID and recordkeeping requirements for money transfer and money order transactions are being met. • Any records, logs or other forms are being properly and accurately completed. • New compliance information is being provided to employees. • New and existing employees are receiving initial, refresher and ongoing compliance training as specified in the training section. 2. The Compliance Officer will fulfill these responsibilities both through the exercise of general oversight in carrying out his or her day-to-day activities and by conducting a periodic review of the operations of the AML Compliance Program. The periodic review will be conducted on a daily basis and will include a review of transaction records for the period in question. 3. In conducting the periodic review, The Compliance Officer will complete one or more of the following: <ul style="list-style-type: none"> • Review, initial and date transaction forms and or logs to document the monitoring process. • Fill out a monitoring checklist on a monthly basis. • Review, initial and date the weekly Compliance Monitoring Report (CMR) provided by Western Union. • Review, initial and date any Company supported computer generated reports or other monitoring reports or logs. 4. All monitoring documentation will be filed and retained in the Monitoring Folder for 5 years.

	Employee Training
Purpose:	To establish policies and procedures for the consistent compliance training of all employees.
Procedures:	<p><u>Initial Training</u></p> <ol style="list-style-type: none"> 1. The Compliance Officer will provide compliance training to all new employees before allowing them to conduct or handle Western Union transactions. The Compliance Officer is responsible for ensuring that the training of each employee has been properly documented. 2. To satisfy initial training requirements each employee will complete one or more of the following: <ul style="list-style-type: none"> • Read the Compliance training materials and sign and date a training log. • Read the Compliance training materials and take a Compliance Quiz. Employee will sign and date the quiz. • Participate in Internet based training or other training sessions offered through Western Union or other appropriate BSA/AML training entity. 3. Documentation of initial training will be retained for 5 years. <p><u>Ongoing Training</u></p> <p>The Compliance Officer and each employee who handles Western Union Money Transfer and/or Money Order transactions must complete one or more of the following to satisfy ongoing compliance training:</p> <ul style="list-style-type: none"> • Re-read the Compliance training materials and sign and date a training log. • Re-read the Compliance training materials and take a Compliance Quiz. Employee will sign and date the quiz. • Read Western Union newsletter compliance articles. Initial and date the article as proof of ongoing training. • Read, sign or initial and date all correspondence from the State that applies to compliance. • Participate in Internet based training or other training

	<p>sessions offered through Western Union or other appropriate BSA/AML training entity.</p> <p>The Compliance Officer will file these documents with the Company's training records and retain them for 5 years.</p>
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Independent Review Plan	
Purpose:	To establish policies and procedures for independent review to monitor and maintain an adequate AML Compliance Program.
Procedures:	<ol style="list-style-type: none"> 1. On a periodic basis, the Compliance Officer will arrange to have the AML Compliance Program independently reviewed to ensure that it is being properly maintained and continues to be adequate in light of the money services activities the Company provides as a Western Union Agent. 2. The Review will be conducted by an independent source. 3. The Review will occur annually. 4. The Compliance Officer may not serve as the reviewer. The reviewer may not be a subordinate of the Compliance Officer. 5. The Compliance Officer will provide the reviewer a copy of an Independent Review Checklist. 6. The reviewer will record on the Independent Review Checklist any corrective actions that are required. 7. The Compliance Officer will complete any required corrective actions as soon as possible after the review and will document the corrective actions taken. 8. Copies of all Independent Reviews and any documented corrective actions taken in response will be retained for 5 years.

IRS Compliance Examination (Title 31)	
Purpose:	To establish policies and procedures for responding to IRS Title 31 compliance examinations and authorized requests from the IRS.
Procedures:	<ol style="list-style-type: none"> 1. The Compliance Officer is responsible for coordinating IRS compliance examinations and responding to authorized requests for information from the IRS. 2. The Compliance Officer will notify Western Union’s AML Compliance Department of any IRS examinations and any authorized requests for information from the IRS. <ul style="list-style-type: none"> For Money Transfers: <ul style="list-style-type: none"> • The Company will call the Western Union Compliance Department at (866) 633-2247 option 4. • To assist in preparing for the examination, Western Union can provide the Compliance Officer with a copy of all sender/receiver records for transactions of \$3,000 or more. For Money Orders: <ul style="list-style-type: none"> • The Company will call the Western Union Compliance Department at (866) 633-2247 option 4. • To assist in preparing for the examination, Western Union can fulfill requests for copies of documents that are not otherwise available at the Company and provide them to the Compliance Officer or IRS, as directed. 3. The Compliance Officer is responsible for completing a pre-examination questionnaire and gathering all requested documentation. 4. The Compliance Officer is responsible for documenting and addressing any examination issues identified in the examination or review. Documented issues and resolutions will be retained by the Company in its AML Compliance Program files for 7 years. 5. The Compliance Officer is responsible for following up on any corrective action that is required as a result of the examination. Documented issues and resolutions will be retained by the Company in its AML Compliance Program files for 7 years.

Document Retention	
Purpose:	To describe the responsibilities for record retention and outline the necessary retention timeline for each type of record.
Procedures:	<p><u>Documents and Timelines</u></p> <ul style="list-style-type: none"> • Domestic Money Transfer Forms – 6 months • International Money Transfer Forms – 6 months • Commission Statements – 5 years • Money Order Records – 5 years • Money Order Close Out Reports – 5 years • CTRs – 5 years • SAR-MSBs (including backup documentation) – 5 years • Documentation of Training – 5 years • Monitoring – 5 years • Independent Review Documentation – 5 years • Title 31 Exam Documentation – 7 years <p>1. The Compliance Officer is responsible for filing and retaining all documents listed above.</p>

Miscellaneous	
Purpose:	To describe any additional policies and procedures.
Procedures:	<ol style="list-style-type: none"> 1. Each employee will have their own username and passcode for the Western Union system(s). Each employee must use his or her own username and passcode when conducting a Western Union transaction. Under no circumstances may an employee use another employee's username and passcode when conducting a Western Union transaction. 2. The Compliance Officer will delete the employee user ID and password immediately after an employee leaves. 3. Each employee is responsible for adhering to the Agent's Policies and Procedures. 4. The Compliance Officer will be available to provide assistance and additional training if necessary. 5. Owners and employees cannot conduct personal transactions through Western Union at their location.

Geographical Targeting Orders (GTO)	
Purpose:	To outline the procedures to be followed if a Geographic Targeting Order (GTO), as required by 31 CFR 103.26, is issued.
Procedures:	<ol style="list-style-type: none"> 1. The federal or state government may from time to time issue a Geographic Targeting Order (“GTO”) that requires money services businesses to comply with special measures, such as additional recordkeeping or reporting requirements. 2. The Compliance Officer will ensure that any special measures contained in a GTO are understood and complied with. 3. The Compliance Officer will inform and train all employees about the GTO. 4. The Compliance Officer will ensure that employees are following the GTO for the period that it is in place. 5. The Compliance Officer will serve as the contact between Western Union, the State or US Government with respect to the GTO.

