

Date:	02/15/2012
Decision:	Cleared
Customer ID:	159720000
Customer's Name:	Mario Lopez
Account:	362280000
Analyst:	Dave Carpenter
Alert ID	23193

Comment [1]: Concise table summaries key data, in particular the date the alert was generated, when the review was completed and the decision of the analyst.

INTRODUCTION:

Alert Advisor generated an alert on accounts 362280000, 362310000 and 362260000 for cash transactions conducted during January 2012.

Comment [2]: Clearly state the source and the type of transaction involved in the alert.

ALERTED TRANSACTION(S):

Account	Type	Date	Amount	Description
362280000	CASH	01/06/2012	\$20,000.00	Cash Check
362280000	CASH	01/13/2012	\$30,000.00	Withdrawal
362280000	CASH	01/20/2012	\$20,000.00	Cash Check
362280000	CASH	01/27/2012	\$20,000.00	Cash Check
362310000	CASH	01/09/2012	\$6,000.00	Deposit
362260000	CASH	01/30/2012	\$3,000.00	Deposit
Totals	6		\$99,000.00	

Comment [3]: Present the transactions that caused the alert (if too many to list, then present a sample summary).

CUSTOMER BACKGROUND:

According to internal bank records, Mario Lopez dba Bayside Food Store maintains checking account numbers 362280000, 36231000 and 36220000 opened on 11/19/2004, 03/28/2011 and 06/01/2004 respectively. Merio Lopez and Kelly Kapowski are listed as authorized signors on all three accounts.

Comment [4]: Describe extent of relationship with bank, including when accounts were open, how many opened, who is an authorized signer

Bank records and Internet research indicate that the business is a convenience store. No adverse information was detected for the customer through Internet research or Lexis Nexis. The business is registered with FinCEN and licensed by the state of PA for check cashing and appears to be an agent of Money Transmitter LMNO Corp.

Comment [5]: Provide description of business if its not a personal account. Where an MSB is involved state its registration status.

HISTORIC REVIEW OF TRANSACTIONS/RELATED ACCOUNTS/PREVIOUS ALERTS GENERATED:

Accounts 362280000, 362310000 and 362260000 were reviewed for the time period of 10/01/2011 through 02/12/2012.

Comment [6]: State which accounts were reviewed and the time period of activity reviewed.

- Account 362280000 is primarily funded by ACH credits from card sales, third party checks and one cash deposit of \$5,000. Debits primarily included checks to parties including Quaker Valley Foods Inc, Diaz Foods and Frito Lay, account transfers, ACH debits, checks and cash withdrawals ranging from \$5,000 to \$30,000. It appears this is the primary operating account for Bayside Foods. Account activity appears consistent with anticipated transactions for a convenience store.

Comment [7]: Describe the source and use of funds and give several examples of how funds are used to support conclusion that there is no unusual activity in account.

- Account 36231000 was primarily funded by checks from LMNO Corp, account transfers and cash ranging between \$300 and \$6,000 totaling \$18,030. Withdrawals primarily included checks to entities such as Dish and City of Pittsburgh, ACH credits to LMNO Corp (a nationally registered MSB with FinCEN) and Prepaid Network and two cash out transactions of \$2,000 each. It appears this account is used to manage the Bayside Foods MSB business and as such no unusual activity was detected.
- Account 36226000 is primarily funded via account transfers and cash deposits ranging between \$1,000 and \$3,000 totaling \$13,000. Withdrawals primarily included checks to approximately 10 individuals including Lopez and Kapowski as well as checks to the city of Pittsburgh and the State of Pennsylvania Department of Revenue. It appears this account is Bayside Food's payroll account. No unusual transactions were identified.

Comment [8]: Describe the transactions that make this account typical for an MSB.

Comment [9]: Describe the activity that explains that this account is a payroll account.

The alerted activity consisted of cash withdrawals totaling \$358,000 ranging in amounts from \$5,000 to \$30,000 and deposits totaling \$15,000. The business was identified as a registered and licensed check casher and is an agent for a nationally registered money transmitter. The transactions range in amounts under and over \$10,000 and CTRs were filed throughout the review period.

Comment [10]: Because the relationship has multiple accounts and involves a higher risk customer, write a short summary paragraph of findings.

OFAC and Lexis Nexis checks did not reveal any potentially negative information.

Comment [11]: State that there was no adverse public record information found.

No prior SARs were filed on this customer and since 01/01/2011 there have been two Alert Advisor alerts (both Cleared) and 35 CTRs.

Comment [12]: Provide context of customer's prior SAR, CTR and alert history.

CONCLUSION:

Tier I is not escalating this activity to Tier II. The alerted transactions range in amounts under and over \$10,000 and CTRs were regularly filed throughout the review period suggesting the customer is not attempting to evade CTR reporting thresholds. Cash activity appears normal for a convenience store that is also a registered and licensed MSB.

Comment [13]: Succinct summary of activity and conclusion.

QC COMMENTS:

05/07/2012 Ghaga QC Approved

Comment [14]: Not all alerts will be reviewed by a manager or QC reviewer, but where they are, that should be noted.