



ANTI-MONEY LAUNDERING POLICY

Revision Date: October 8, 2007

Policy Statement

It is the policy of Merchant Processing International, Inc. to comply with the Bank Secrecy Act, the USA PATRIOT Act of 2001, the rules and regulations overseen by the United States Treasury Department's Office of Foreign Assets Control, and other anti-money laundering obligations imposed by federal and other applicable laws. This policy forms an integral part of Merchant Processing International, Inc.'s Anti-Money Laundering Program, which includes procedures and personnel responsible for complying with this policy and applicable laws.

Reason for Policy/Purpose

The purpose of this policy is to enhance Merchant Processing International, Inc.'s compliance with anti-money laundering laws and regulations, to assist law enforcement in combating illegal money laundering, and to minimize the risk of University resources being used for improper purposes. Failure to comply with anti-money laundering regulations could result in civil and criminal penalties to Merchant Processing International, Inc. and/or individual employees.

Who Needs to Know This Policy

All Merchant Processing International's staff.

Policy/Procedures

Money laundering is the process of concealing the existence, illegal source, or application of income derived from criminal activity, and the subsequent disguising of the source of that income to make it appear legitimate. To assist the federal government in detecting, preventing and eradicating terrorist financing and terrorist and criminal activity, Merchant Processing International, Inc. will evaluate all financial transactions and take all necessary steps to comply with anti-money laundering laws and regulations.

Client Identification Procedures

As part of Merchant Processing International, Inc.'s AML program, the firm has established procedures to ensure that all clients' identities are verified prior to opening an account. Before opening an account for an individual client, Merchant Processing International, Inc. will require satisfactory documentary evidence of a client's name, address, date of birth, and either but not limited to the following forms of identification:

- Social Security Number
- Driver's License
- Passport ID number



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- Valid green card number

For a corporation or other legal entity, Merchant Processing International, Inc. will require satisfactory legal evidence of the entity's name, address and that the acting principal has been duly authorized to open the account. The AML Compliance Officer will retain records of all documentation that have been relied upon for client/corporation identification.

Prohibited Clients

Merchant Processing International, Inc. will not open accounts or accept funds or securities from, or on behalf of, any person or entity whose name appears on the List of Specially Designated Nationals and Blocked Persons maintained by the U.S. Office of Foreign Assets Control, from any Foreign Shell Bank or from any other prohibited persons or entities as may be mandated by applicable law or regulation. Merchant Processing International, Inc. will also not accept high-risk clients (with respect to money laundering or terrorist financing) without conducting enhanced, well-documented due diligence regarding such prospective client.

Concerns regarding transactions that are unusually large or that appear suspicious and questions regarding money laundering in general should be directed to Merchant Processing International, Inc.'s Compliance Officer's Desk at (949) 250-9556 x123. Potential violations of this policy should be reported to the Compliance Office at (949) 250-9556 x123 or at gjones@bankmpi.com.

Annual Training and Review

The AML Compliance Officer will conduct annual employee training programs for appropriate personnel regarding the AML program. Such training programs will review applicable laws, regulations and recent trends in money laundering and their relation to Merchant Processing International, Inc.'s business. Attendance at these programs is mandatory for appropriate personnel, and session and attendance records will be retained for a five-year period. The AML program will be audited annually by a qualified individual other than the AML Compliance Officer or independent auditors. The audit will evaluate Beacon Investment Management, Inc.'s AML program for compliance with current AML laws and regulations.

Website Addresses for This Policy

<http://www.bankmpi.com/privacy.html>

Who Approved This Policy

Bruce A. Berman - CEO

Robert Christiansen - Vice President