# Anti-Money Laundering Act

**Purpose**

Money laundering is conducting or attempting to conduct a financial transaction knowing that the transaction is designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds for unlawful activity. The Money Laundering Control Act of 1986, The Bank Secrecy Act, and the USA PATRIOT Act of 2001 were established to enable anti-money laundering programs.

**Policy Statement**

It is the policy of HealthyHabits LLC to comply with all anti-money laundering obligations imposed by the federal government, including applicable provisions of the Money Laundering Control Act of 1986, 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 Financial Crimes Enforcement Network, and other legal requirements.

# Procedures

To assist the federal government in detecting, preventing, and eradicating criminal and terrorist financing activity, HealthyHabits LLC will take all necessary steps to comply with applicable ant-money laundering laws and regulations. The program is reasonably designed to prevent HealthyHabits LLC services from being used to facilitate money laundering and the financing of terrorist activities. The program includes the following:

* Procedures to verify member identity and retain necessary identifying information
* A designated compliance officer to coordinate compliance with the program
* Suspicious activity reporting procedures and document retention guidelines
* Training and education of appropriate personnel concerning their responsibilities under the program
* Independent review to monitor and maintain an adequate program