

Updated Guidance Issued For Reporting Suspicious Orders and Customer Due Diligence

On May 14, 2019, the Board issued an update to its <u>guidance for suspicious order monitoring and due diligence</u>. Licensees are strongly encouraged to review the following updates to the guidance:

- Question 3 Provides further clarification on the level of detail expected for all suspicious order submissions.
- Reporting Customers (page 13) Clarifies that a licensee that has not refused to sell to or stopped selling to an Ohio customer within the past three years, is not required to report anything at this time.
- Question 26 (NEW) Allows for an additional reporting exemption for entities using an Ohio-licensed third-party logistics provider to conduct suspicious order monitoring.