



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

March 30, 2011

Pamela H. Patsley  
Chairman and Chief Executive Officer  
MoneyGram International, Inc.  
2828 North Harwood Street, 15<sup>th</sup> Floor  
Dallas, Texas 75201

**Re: MoneyGram International, Inc.  
Form 10-K for the Fiscal Year Ended December 31, 2009  
Filed March 15, 2010  
File No. 1-31950  
Response Letters Dated January 28, 2011, March 7, 2011,  
and March 24, 2011**

Dear Ms. Patsley:

We refer you to our comment letters dated December 23, 2011, February 24, 2011, and March 17, 2011 regarding business contacts with Cuba, Iran, Sudan, and Syria. We have completed our review of this subject matter and have no further comments at this time.

Sincerely,

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Barbara Jacobs  
Assistant Director  
Division of Corporation Finance