



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

DIVISION OF  
CORPORATION FINANCE

November 30, 2016

Via E-mail

W. Alexander Holmes  
Director and Chief Executive Officer  
MoneyGram International, Inc.  
2828 N. Harwood St., 15th Floor  
Dallas, Texas 75201

**Re: MoneyGram International, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2015**  
**Filed March 2, 2016**  
**File No. 1-31950**

Dear Mr. Holmes:

We refer you to our comment letter dated October 27, 2016, regarding business contacts with Sudan and Syria. We have completed our review of this subject matter. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Barbara Jacobs  
Assistant Director  
Division of Corporation Finance