

# Appendices

---

---

## BSA Graduate School

January 2018

This publication is designed to provide information in regard to the subject matter covered. It is provided with the understanding that the publisher is not engaged in rendering legal, accounting, or other professional service. If legal advice or other expert assistance is required, the services of a professional competent in the area of special need should be sought.

© Copyright 2018  
Young & Associates, Inc.  
All rights reserved



Consultants to the Financial Industry

**Young & Associates, Inc.**

121 E. Main Street  
P.O. Box 711  
Kent, OH 44240

Phone: 330.678.0524  
Fax: 330.678.6219  
[www.younginc.com](http://www.younginc.com)

# Appendix A

Use this checklist to assess your readiness for an upcoming Bank Secrecy Act (BSA)/Anti-Money Laundering (AML) examination. It follows the sections of the Federal Financial Institutions Examinations Council (FFIEC) BSA/AML examination manual for the Core procedures. Review each component below and indicate your bank's readiness in the appropriate columns to the right of each component. A "comments" column is provided for space to make notes during your review.

Regulatory Component	Examination Readiness			
	Yes	No	N/A	Comments
<b>General BSA/AML Issues</b>				
<b>BSA/AML risk assessment.</b> Review BSA/AML risk assessment to assure that it addresses the bank's products, services, customers and geographic locations. Ensure that it includes an OFAC risk profile, if not separately performed				
<b>Prior BSA/AML deficiencies.</b> Review past reviews and exam reports to assure that all deficiencies have been addressed				
<b>BSA/AML Policies, Procedures, and Processes Issues</b>				
Approved by Board of Directors.				
Include the four major components (i.e., system of internal controls, annual independent testing, designation of a BSA/AML compliance officer, and staff training)				
Are commensurate with bank's most recent BSA/AML risk assessment				
Program addresses internal controls on areas such as high-risk customers, reports to board, meeting reporting and record keeping requirements, identifying and reporting suspicious activity, dual controls, monitoring systems, training and job descriptions				
Independent testing scope covers all applicable BSA/AML requirements				
Person/entity performing annual BSA/AML review/audit is independent of bank's BSA/AML program				
Currency transaction reporting system is working properly to identify reportable transactions (i.e., CTR filings)				
BSA compliance officer is competent and maintains sufficient authority and knowledge to manage program				
Training program includes all				

Regulatory Component	Examination Readiness			
	Yes	No	N/A	Comments
appropriate staff, is well documented, and covers all applicable BSA/AML issues affecting the bank				
<b>Customer Identification Program (CIP)</b>				
CIP written program includes all required elements set forth in the regulation				
CIP risk assessment is current and is reflected in the current CIP procedures				
CIP has been approved by the Board of Directors, as either part of the BSA/AML policy or separately				
New accounts are opened in accordance with the bank's CIP ( <i>Recommend limited testing to confirm this component</i> )				
Accounts opened with CIP exceptions, if applicable, follow the bank's CIP procedures				
Account files contain supporting evidence of documentary and/or nondocumentary methods relied upon to verify customer's identity				
Third parties, if applicable, that open new accounts on behalf of the bank are following bank's CIP standards				
CIP notice is being provided to all new customers at account opening				
Record retention requirements met				
<b>Customer Due Diligence</b>				
Policies and procedures reflect bank's risk assessment of customer due diligence concerns				
Risk ratings of customers or customer types are up-to-date				
Enhanced due diligence procedures are employed for higher risk types of customers				
Due diligence analysis well documented, especially for high risk customers				
Record retention requirements met				
<b>Suspicious Activity Reporting</b>				
Policies and procedures address bank's methods for identifying, referring, reviewing and reporting suspicious activity				
Procedures employed for documenting decisions not to file a SAR when considered				
Specific individual(s) identified at bank				

	<b>Examination Readiness</b>			
<b>Regulatory Component</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Comments</b>
for filing SARs				
SARs reported to board in timely manner				
Staff has received adequate training to identify suspicious activity				
SARs filed are complete, timely and fully describe suspicious activity				
Most current SAR form utilized				
Record retention requirements met				
<b>Currency Transaction Reporting</b>				
Policies and procedures address how CTRs are identified, reviewed and filed				
CTRs complete and filed in a timely manner				
IRS returned CTRs are acted upon in a timely manner				
Cash aggregation systems working properly				
Most current CTR form utilized				
Record retention requirements met				
<b>Exempt Persons</b>				
Bank's exempt person filings are up-to-date and shared with all appropriate staff				
Due diligence procedures documented for reviewing and approving exempt persons				
Biennial filings are up to date, where required				
Most current exempt filing form utilized				
Record retention requirements met				
<b>USA Patriot Act – 314(a) – Information Sharing with Government</b>				
Policies and procedures address regulatory requirements				
Bank has designated point-of-contact				
Bank receiving or accessing FinCEN information requests every two weeks or as released				
314(a) searches documented via log or retaining copies of requests, which are kept confidential and secure				
All appropriate records searched for 314(a) requests (i.e., customers in last 12 months and 6 months of transaction activity)				
Process incorporated into SAR review procedures				
Record retention requirements met				
<b>USA Patriot Act – 314(b) – Information Sharing with other Financial Institutions (if applicable)</b>				


	<b>Examination Readiness</b>			
<b>Regulatory Component</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Comments</b>
Policies and procedures address regulatory requirements				
Bank's point-of-contact designated				
Requests from other financial institutions are documented properly, including verification that the financial institution has registered with FinCEN				
Process incorporated into SAR review procedures				
Record retention requirements met				
<b>USA Patriot Act – 313 and 319(b) – Foreign Correspondent Accounts (if applicable)</b>				
Policies and procedures address regulatory requirements				
Proper certifications from foreign banks on file				
Due diligence procedures followed for foreign correspondent accounts				
Process incorporated into SAR review procedures				
Record retention requirements met				
<b>Sales of Monetary Instruments</b>				
Policies and procedures address regulatory requirements				
Sales records are retained				
Process incorporated into SAR review procedures				
Record retention requirements met				
<b>Funds Transfers</b>				
Policies and procedures address regulatory requirements				
Funds transfer records are retained				
Process incorporated into SAR review procedures				
CTRs filed when required				
Record retention requirements met				
<b>Private Banking Due Diligence (if applicable)</b>				
Policies, procedures, and controls developed for establishing, maintaining, and administering private banking accounts				
Policies and procedures reflect most recent risk assessment				
<b>Special Measures</b>				
Policies, procedures, and processes address how the bank will respond to special measures imposed by FinCEN that are applicable to its operations				
Determine whether the bank maintains any accounts or conducted transactions				

	<b>Examination Readiness</b>			
<b>Regulatory Component</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Comments</b>
by or for jurisdictions, financial institutions or transactions subject to the final special measures imposed by FinCEN <u>and</u> whether such instances were reported to FinCEN				
Record retention requirements met				
<b>Reports of Foreign Accounts (if applicable)</b>				
Policies and procedures address regulatory requirements				
Reports of Foreign Bank and Financial Accounts (TD F 90-22.1) filed when required				
Annual reports made when required				
Record retention requirements met				
<b>International Transportation of Currency</b>				
Form 105 filed when necessary				
Record retention requirements met				
<b>Office of Foreign Assets Control (OFAC)</b>				
Policies and procedures address regulatory requirements				
OFAC risk assessment performed and current				
New accounts checked against OFAC listing				
Non customer transactions checked against OFAC listing, if risk profile warrants				
Existing customer database checked against OFAC listing on periodic basis in accordance with OFAC risk profile				
Positive matches reported to OFAC				
Funds on positive matches blocked as necessary				
Record retention requirements met				
<b>Expanded Procedures (as applicable)</b>				
Review Exam Manual expanded procedures and determine applicability to bank's operations for the following areas: <ul style="list-style-type: none"> <li>• Enterprise-wide BSA/AML compliance program</li> <li>• Correspondent banking</li> <li>• Foreign branches and offices</li> <li>• Parallel banking</li> <li>• Electronic banking</li> <li>• Electronic payment services <ul style="list-style-type: none"> <li>○ Funds transfers</li> <li>○ Electronic cash</li> <li>○ 3<sup>rd</sup>-party payment processors</li> </ul> </li> </ul>				

Regulatory Component	Examination Readiness			
	Yes	No	N/A	Comments
<ul style="list-style-type: none"> <li>• Monetary instruments</li> <li>• Deposit &amp; Nondeposit services                             <ul style="list-style-type: none"> <li>○ Brokered deposits</li> <li>○ Privately-owned ATMs</li> <li>○ NDIP</li> <li>○ Insurance</li> </ul> </li> <li>• Concentration accounts</li> <li>• Lending activities</li> <li>• Trade finance activities</li> <li>• Private banking</li> <li>• Trust &amp; Asset Management</li> <li>• Nonresident Aliens &amp; Foreign Individuals</li> <li>• Politically Exposed Persons</li> <li>• Embassy &amp; Foreign Consulate Accounts</li> <li>• Non-bank Financial Institutions</li> <li>• Professional Service Providers</li> <li>• Non-governmental Organizations &amp; Charities</li> <li>• Corporate Entities</li> <li>• Cash-intensive Businesses</li> </ul>				

Currency Transaction Report

Home    Step 1. Filing Institution Contact Information    Step 2. Transaction Location(s) Information    Step 3. Person(s) Involved Information    Step 4. Amount and Type of Transaction(s)



## Currency Transaction Report

OMB No. 1506-0004, OMB No. 1506-0005, OMB No. 1506-0064

Version Number: 1.3

**Steps to Submit** Complete the report in its entirety with all requested or required data known to the filer. Click "Validate" to ensure proper formatting and that all required fields are completed. Sign with PIN. Click "Save"; filers may also "Print" a paper copy for their records. Click "Submit".

**Filing Name**

**\*1 Type of filing**     Initial report     Correct/amend prior report     FinCEN directed Backfiling

**Prior report BSA Identifier**

Save    Validate    Submit    Print

By providing my PIN, I acknowledge that I am electronically signing the BSA report submitted.

Sign with PIN

Page 1 of 5



**Currency Transaction Report**

Home    Step 1. Filing Institution Contact Information    Step 2. Transaction Location(s) Information    Step 3. Person(s) Involved Information    Step 4. Amount and Type of Transaction(s)

---

**Part IV Filing Institution Contact Information**

\*52 Type of financial institution

Other (specify)

\*43 Primary federal regulator

53 If 52a - Casino/Card Club is checked, indicate type (check only one)

State licensed casino     Tribal authorized casino     Card club     Other   

\*44 Legal name of filing institution

45 Alternate name, e.g. trade name, DBA

\*46 EIN

\*47 Address

\*48 City

\*49 State

\*50 ZIP Code

\*51 Country

54 Filing institution ID type

ID number

\*55 Contact office

\*56 Phone number  Ext.

\*57 Date filed  (Date filed will be auto-populated when the form is signed.)

**Currency Transaction Report**

Home    Step 1. Filing Institution Contact Information    Step 2. Transaction Location(s) Information    Step 3. Person(s) Involved Information    Step 4. Amount and Type of Transaction(s)

**Part III Transaction Location 1 of 1**    +    -

Would you like to insert all applicable filing institution information into Part III?

\*38 Type of financial institution

Other (specify)

\*29 Primary federal regulator

39 If 38a - Casino/Card Club is checked, indicate type (check only one)

State licensed casino     Tribal authorized casino     Card club     Other

\*30 Legal name of financial institution

31 Alternate name, e.g. trade name, DBA

\*32 EIN  Unknown

\*33 Address

\*34 City

\*35 State

\*36 ZIP Code

\*37 Country

40 Financial institution ID type

ID number

\*41 Cash in amount for transaction location

\*42 Cash out amount for transaction location

**Currency Transaction Report**

Home   
 Step 1. Filing Institution Contact Information   
 **Step 2. Transaction Location(s) Information**   
 Step 3. Person(s) Involved Information   
 Step 4. Amount and Type of Transaction(s)

---

**Part I Person Involved in Transaction(s) 1 of 1**    + -

\*2    a  Person conducting transaction on own behalf   
 b  Person conducting transaction for another   
 c  Person on whose behalf transaction was conducted   
 d  Common carrier

3     Multiple transactions

Check  If entity

\*4 Individual's last name or entity's legal name     Unknown   

\*5 First name     Unknown   

6 Middle name   

    Suffix   

7 Gender   

8 Alternate name   

9 Occupation or type of business   

9a NAICS Code   

\*10 Address     Unknown   

\*11 City     Unknown   

\*12 State     Unknown       
 \*13 ZIP/Postal Code     Unknown   

\*14 Country     Unknown   

\*15 TIN     Unknown       
 16 TIN type   

\*17 Date of birth     Unknown   

18 Contact phone number       
 Ext.   

19 E-mail address   

\*20 Form of identification used to verify identity     Unknown

Driver's license/State ID   
 Passport   
 Alien Registration   
 Other   

Number    
 Country    
 Issuing State

21 Cash in amount for individual or entity listed in Item 4    \$

    Account number     + -

22 Cash out amount for individual or entity listed in Item 4    \$

    Account number     + -

## Currency Transaction Report

Home
Step 1. Filing Institution Contact Information
Step 2. Transaction Location(s) Information
Step 3. Person(s) Involved Information
Step 4. Amount and Type of Transaction(s)

**Part II Amount and Type of Transaction(s). Check all boxes that apply.**

\*23 Date of transaction

24  Armored car (FI Contract)  ATM  Mail deposit or shipment  Night deposit  Aggregated transactions  Shared branching

*25 CASH IN: (in U.S. dollar equivalent)	*27 CASH OUT: (in U.S. dollar equivalent)
a Deposit(s) <span style="float: right;">\$ <input style="width: 100px;" type="text"/> .00</span>	a Withdrawal(s) <span style="float: right;">\$ <input style="width: 100px;" type="text"/> .00</span>
b Payment(s) <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>	b Advance(s) on credit (including markers) <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>
c Currency received for funds transfer(s) out <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>	c Currency paid from funds transfer(s) in <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>
d Purchase of negotiable instrument (s) <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>	d Negotiable instrument(s) cashed <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>
e Currency exchange(s) <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>	e Currency exchange(s) <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>
f Currency to prepaid access <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>	f Currency from prepaid access <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>
g Purchases of casinos chips, tokens and other gaming instruments <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>	g Redemption(s) of casino chips, tokens, TITO tickets and other gaming instruments <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>
h Currency wager(s) including money plays <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>	h Payment(s) on wager(s) (including race and OTB or sports pool) <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>
i Bills inserted into gaming devices <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>	i Travel and complimentary expenses and book gaming incentives <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>
z Other (specify): <input style="width: 100px;" type="text"/> <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>	j Payment for tournament, contest or other promotions <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>
	z Other (specify): <input style="width: 100px;" type="text"/> <span style="float: right;"><input style="width: 100px;" type="text"/> .00</span>
<b>Total cash in</b> <span style="float: right;"><b>\$ <input style="width: 100px;" type="text"/> .00</b></span>	<b>Total cash out</b> <span style="float: right;"><b>\$ <input style="width: 100px;" type="text"/> .00</b></span>

26 Foreign cash in  Foreign Country  + -

28 Foreign cash out  Foreign Country  + -



Important Notices to E-Filers: FinCEN Announces Update to the Currency  
Transaction Report (CTR)  
Announces Technical Webinar

**May 24, 2017** – In August of 2017, the Currency Transaction Report (CTR) available on the BSA E-Filing System will be updated to adhere to the changes defined in Federal Register notice posted on February 20<sup>th</sup>, 2016 (<https://www.federalregister.gov/documents/2016/02/02/2016-01825/proposed-collection-comment-request-bank-secrecy-act-currency-transaction-report-bctr-revised-layout>). New or updated data fields will be added to the online discrete CTR as well as the CTR batch files. The new or updated data fields are:

**Part I Person Involved in Transaction**

Renamed Item 2d from “Courier Service (private)” to “Common carrier”

**Part II Amount and Type of Transaction**

Added a checkbox to Item 24 to reflect “Shared Branching”

**Part III Transaction Location**

Added an Unknown option to Item 29, Primary Federal Regulator

Added an Unknown checkbox to Item 32, EIN

Added Item 37, Country

Added Item 41, Cash in amount for transaction location

Add Item 42, Cash out amount for transaction location

**Part IV Filing Institution Contact Information**

Added new Part IV “Filing Institution Contact Information” section to collect data about the institution that filed the CTR

Batch filers will be required to submit the updated CTR data in an XML based file, rather than the current ASCII based fixed-length delimited file. The XML User Guide can be downloaded at [FinCEN Currency Transaction Report \(CTR\) Electronic Filing Requirements for XML](#). The batch CTR XSD file can be downloaded at the following location: [FinCEN Currency Transaction Report \(CTR\) XSD](#).

**Discrete CTR Impact**

Discrete filers will be able to utilize the new online form with the new and updated fields in August 2017.

**Part I Person Involved in Transaction Changes**

**Currency Transaction Report**

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

**Part I Person Involved in Transaction(s) 1 of 1** + -

\*2  a Person conducting transaction on own behalf  b Person conducting transaction for another  c Person on whose behalf transaction was conducted  d **Common Carrier**

3  Multiple transactions

Check  If entity

\*4 Individual's last name or entity's legal name  Unknown [Text Field]

\*5 First name  Unknown [Text Field]

6 Middle name [Text Field]

Suffix [Text Field]

7 Gender [Dropdown]

8 Alternate Name [Text Field]

9 Occupation or type of business [Text Field]

9a NAICS Code [Dropdown]

\*10 Address  Unknown [Text Field]

\*11 City  Unknown [Text Field]

\*12 State  Unknown [Dropdown] \*13 ZIP/Postal Code  Unknown [Text Field]

\*14 Country  Unknown [Dropdown]

\*15 TIN  Unknown [Text Field] 16 TIN type [Dropdown]

\*17 Date of birth  Unknown [Text Field]

18 Contact phone number [Text Field] Ext. [Text Field]

19 E-mail address [Text Field]

\*20 Form of identification used to verify identity  Unknown

Driver's license/State ID  Passport  Alien Registration  Other [Text Field]

Number [Text Field] Country [Dropdown] Issuing State [Dropdown]

Part II Amount and Type of Transaction Changes

Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part II Amount and Type of Transaction(s). Check all boxes that apply.

\*23 Date of transaction

24  Armored car (FI Contract)  ATM  Mail Deposit or Shipment  Night Deposit  Aggregated transactions  Shared Branching

*25 CASH IN: (in U.S. dollar equivalent)	*27 CASH OUT: (in U.S. dollar equivalent)
a Deposit(s) \$ <input type="text"/> .00	a Withdrawal(s) \$ <input type="text"/> .00
b Payment(s) <input type="text"/> .00	b Advance(s) on credit (including markers) <input type="text"/> .00
c Currency received for funds transfer(s) out <input type="text"/> .00	c Currency paid from funds transfer(s) in <input type="text"/> .00
d Purchase of negotiable instrument (s) <input type="text"/> .00	d Negotiable instrument(s) cashed <input type="text"/> .00
e Currency exchange(s) <input type="text"/> .00	e Currency exchange(s) <input type="text"/> .00
f Currency to prepaid access <input type="text"/> .00	f Currency from prepaid access <input type="text"/> .00
g Purchases of casinos chips, tokens and other gaming instruments <input type="text"/> .00	g Redemption(s) of casino chips, tokens, TITO tickets and other gaming instruments <input type="text"/> .00
h Currency wager(s) including money plays <input type="text"/> .00	h Payment(s) on wager(s) (including race and OTB or sports pool) <input type="text"/> .00
i Bills inserted into gaming devices <input type="text"/> .00	i Travel and complimentary expenses and book gaming incentives <input type="text"/> .00
z Other (specify): <input type="text"/> <input type="text"/> .00	j Payment for tournament, contest or other promotions <input type="text"/> .00
	z Other (specify): <input type="text"/> <input type="text"/> .00
Total Cash in \$ <input type="text"/> .00	Total Cash out \$ <input type="text"/> .00

26 Foreign Cash in  Foreign Country  + -

28 Foreign Cash out  Foreign Country  + -

Part III Transaction Location Changes

Currency Transaction Report

Home Step 1. Filing Institution Contact Information Step 2. Transaction Location(s) Information Step 3. Person(s) Involved Information Step 4. Amount and Type of Transaction(s)

Part III Transaction Location 1 of 1

Would you like to insert all applicable filing institution information into Part III? Yes

\*38 Type of financial institution [dropdown]  
Other (specify) [text box]

\*29 Primary Federal regulator [dropdown]

39 If 38a - Casino/Card Club is checked, indicate type (check only one)  
 State licensed casino  Tribal authorized casino  Card club  Other [text box]

\*30 Legal name of financial institution [text box]

31 Alternate name, e.g. trade name, DBA [text box]

\*32 EIN  Unknown [text box]

\*33 Address [text box]

\*34 City [text box]

\*35 State [dropdown]

\*36 ZIP Code [text box]

\*37 Country [dropdown]

40 Financial institution ID type [dropdown]  
ID number [text box]

\*41 Cash in amount for transaction location [text box]

\*42 Cash out amount for transaction location [text box]



Filers will now be required to fill out the Financial Institution Contact Information through the addition of the Part IV to the discrete report as shown below:

The screenshot shows the 'Currency Transaction Report' interface. At the top, there are five navigation tabs: 'Home', 'Step 1. Filing Institution Contact Information', 'Step 2. Transaction Location(s) Information', 'Step 3. Person(s) Involved Information', and 'Step 4. Amount and Type of Transaction(s)'. The 'Step 1' tab is currently selected. Below the tabs, the section is titled 'Part IV Filing Institution Contact Information'. The form contains the following fields and options:

- \*52 Type of financial institution: A dropdown menu.
- Other (specify): A text input field.
- \*43 Primary Federal regulator: A dropdown menu.
- 53 If 52a - Casino/Card Club is checked, indicate type (check only one):
  - State licensed casino
  - Tribal authorized casino
  - Card club
  - Other
  - Other (specify): A text input field.
- \*44 Legal name of filing institution: A text input field.
- 45 Alternate name, e.g. trade name, DBA: A text input field.
- \*46 EIN: A text input field.
- \*47 Address: A text input field.
- \*48 City: A text input field.
- \*49 State: A dropdown menu.
- \*50 ZIP Code: A text input field.
- \*51 Country: A dropdown menu.
- 54 Financial institution ID type: A dropdown menu.
- ID number: A text input field.
- \*55 Contact office: A text input field.
- \*56 Phone number: A text input field, followed by 'Ext.' and another text input field.
- \*57 Date Filed: A text input field with the note '(Date filed will be auto-populated when the form is signed.)'

### **Batch CTR Deadlines**

The BSA E-Filing System will continue to accept ASCII based batch files until May of 2018. Batch filers will have nine months from the to be determined go-live date in August to adhere to the new XML specification.

FinCEN will host a technical webinar on June 21<sup>st</sup>, 2017 to provide an overview of the XML specifications and also address any questions regarding the XML User Guide. Application developers and programmers are urged to register and attend this webinar. Participants can register for the webinar below:

**Register now!**

<https://attendee.gotowebinar.com/register/8816599296795401730>


After registering, you will receive a confirmation email containing information about joining the webinar.

[View System Requirements](#)

We would request any initial questions be submitted via email at [BSAEFilingHelp@fincen.gov](mailto:BSAEFilingHelp@fincen.gov) prior to the webinar. Please indicate “FinCEN CTR Update Questions” in the subject heading of your email.

Suspicious Activity Report

Home   Step 1. Filing Institution Contact Information   Step 2. Filing Institution Where Activity Occurred   Step 3. Subject Information   Step 4. Suspicious Activity Information   Step 5. Narrative

 **Suspicious Activity Report** Version Number: 1.0

Filing name

\*1 Type of filing (Check all that apply)

Initial report                       Correct/Amend prior report

Continuing activity report            Joint report

Prior report Document Control Number/BSA Identifier

Attachment

Under penalties of perjury, I declare that I have examined this transmittal, including accompanying documents, and to the best of my knowledge and belief it is correct and complete. In the case of documents without recipient's identifying numbers, I have complied with the requirements of the law in attempting to secure such numbers from the receipts. I declare that this filing represents all Documents filed during this reporting period except for those transactions reported on paper.

## Suspicious Activity Report

Home
Step 1. Filing Institution Contact Information
Step 2. Filing Institution Where Activity Occurred
Step 3. Subject Information
Step 4. Suspicious Activity Information
Step 5. Narrative

### Part IV Filing Institution Contact Information

\*82 Type of financial institution

\*78 Primary federal regulator

\*79 Filer name (Holding company, lead financial institution, or agency, if applicable)

\*80 TIN  \*81 TIN type

83 Type of Securities and Futures institution or individual filing this report - check box(es) for functions that apply to this report

<input type="checkbox"/> Clearing broker-securities	<input type="checkbox"/> Introducing broker-securities	<input type="checkbox"/> SRO Securities
<input type="checkbox"/> CPO/CTA	<input type="checkbox"/> Investment Adviser	<input type="checkbox"/> Subsidiary of financial/bank holding company
<input type="checkbox"/> Futures Commission Merchant	<input type="checkbox"/> Investment company	<input type="checkbox"/> Other <input style="width: 50px;" type="text"/>
<input type="checkbox"/> Holding company	<input type="checkbox"/> Retail foreign exchange dealer	
<input type="checkbox"/> Introducing broker-commodities	<input type="checkbox"/> SRO Futures	

84 Financial institution identification Type

Number

\*85 Address

\*86 City

\*87 State  \*88 ZIP/Postal Code  \*89 Country

90 Alternate name, e.g., AKA - individual or trade name, DBA - entity

91 Internal control/file number

92 LE contact agency

93 LE contact name

94 LE contact phone number (Include Area Code)  Ext.

95 LE contact date

\*96 Filing institution contact office

97 Filing institution contact phone number (Include Area Code)  Ext.

98 Date filed  (Date filed will be auto-populated when the form is signed)

## Suspicious Activity Report

Home
Step 1. Filing Institution Contact Information
Step 2. Filing Institution Where Activity Occurred
Step 3. Subject Information
Step 4. Suspicious Activity Information
Step 5. Narrative

**Part III Information about Financial Institution Where Activity Occurred** 1 of 1 + -

Would you like to insert all applicable filing institution information into Part III? Yes

\*47 Type of financial institution

\*48 Primary federal regulator

49 Type of gaming institution

State licensed casino  Tribal authorized casino  Card club  Other (specify)

50 Type of Securities and Futures institution or individual where activity occurred - check box(es) that apply to this report

<input type="checkbox"/> Clearing broker-securities	<input type="checkbox"/> Introducing broker-securities	<input type="checkbox"/> Subsidiary of financial/bank holding company
<input type="checkbox"/> Futures Commission Merchant	<input type="checkbox"/> Investment Adviser	<input type="checkbox"/> Other <input style="width: 100px; background-color: #d3d3d3;" type="text"/>
<input type="checkbox"/> Holding company	<input type="checkbox"/> Investment company	
<input type="checkbox"/> Introducing broker-commodities	<input type="checkbox"/> Retail foreign exchange dealer	

51 Financial institution identification

Type

Number

52 Financial institution's role in transaction  Selling location  Paying location  Both

\*53 Legal name of financial institution  Unknown

54 Alternate Name, e.g., AKA - individual or trade name, DBA - entity

\*55 TIN  Unknown  56 TIN type

\*57 Address  Unknown

\*58 City  Unknown

59 State

\*60 ZIP/Postal Code  Unknown

\*61 Country  Unknown

62 Internal control/file number

63 Loss to financial institution \$  .00

**Branch where activity occurred information** If no branch activity involved, check this box

**Branch Information** + -

64 Branch's role in transaction  Selling location  Paying location  Both

65 Address of branch or office where activity occurred

67 City  66 RSSD Number

68 State  69 ZIP/Postal Code  \*70 Country

**Suspicious Activity Report**

Home  
 Step 1. Filing Institution Contact Information  
 Step 2. Filing Institution Where Activity Occurred  
 Step 3. Subject Information  
 Step 4. Suspicious Activity Information  
 Step 5. Narrative

**Part I Subject Information 1 of 1** + -

2 Check:  if entity,  if all critical\* subject information is unavailable (Does not include item 24)

\*3 Individual's last name or entity's legal name  Unknown

\*4 First name  Unknown

5 Middle name/initial

Suffix  Gender

\*16 Date of birth  Unknown

6 Alternate name, e.g., AKA - individual or trade name, DBA - entity + -

7 Occupation or type of business

7a NAICS Code

\*13 TIN  Unknown  14 TIN type

18 Phone number + -  Ext.  17 Type

19 E-mail address + -

19a Website (URL) address + -

20 Corroborative statement to filer?  25 Subject's role in suspicious activity

---

**Subject Address Information** + -

\*8 Address  Unknown

\*9 City  Unknown

\*10 State  Unknown  \*11 ZIP/Postal Code  Unknown

\*12 Country  Unknown

---

\*15 Form of identification for subject  Unknown  + -

Type

Number  Issuing State  Country

---

**21 Relationship of the subject to an institution listed in Part III or IV (check all that apply)** + -

a  Institution TIN

b  Accountant    e  Attorney    h  Director    k  Officer

c  Agent    f  Borrower    i  Employee    l  Owner or Controlling Shareholder

d  Appraiser    g  Customer    j  No relationship to institution    z  Other

22 Status of relationship  23 Action date

---

\*24 Financial institution TIN and account number(s) affected that are related to subject  No known accounts involved  + -

Institution TIN   Non-US Financial Institution

+ - account number  Closed? Yes

Suspicious Activity Report					
Home	Step 1. Filing Institution Contact Information	Step 2. Filing Institution Where Activity Occurred	Step 3. Subject Information	Step 4. Suspicious Activity Information	Step 5. Narrative
<b>Part II Suspicious Activity Information</b>					
*26 Amount involved in this report	<input type="checkbox"/> Amount Unknown	<input type="checkbox"/> No amount involved	\$	<input type="text"/>	.00
*27 Date or date range of suspicious activity for this report	From	<input type="text"/>	To	<input type="text"/>	
28 Cumulative amount (only applicable when "Continuing activity report" is checked in Item 1)			\$	<input type="text"/>	.00
<b>When completing item 29 through 38, check all that apply</b>					
<b>29 Structuring</b>					
a <input type="checkbox"/>	Alters transaction to avoid BSA recordkeeping requirement		e <input type="checkbox"/>	Multiple transactions below CTR threshold	
b <input type="checkbox"/>	Alters transaction to avoid CTR requirement		f <input type="checkbox"/>	Suspicious inquiry by customer regarding BSA reporting or recordkeeping requirements	
c <input type="checkbox"/>	Customer cancels transaction to avoid BSA reporting and recordkeeping requirements		z <input type="checkbox"/>	Other <input type="text"/>	
d <input type="checkbox"/>	Multiple transactions below BSA recordkeeping threshold				
<b>30 Terrorist Financing</b>					
a <input type="checkbox"/>	Known or suspected terrorist/terrorist organization		z <input type="checkbox"/>	Other <input type="text"/>	
<b>31 Fraud (Type)</b>					
a <input type="checkbox"/>	ACH	d <input type="checkbox"/>	Consumer loan	g <input type="checkbox"/>	Mail
b <input type="checkbox"/>	Business loan	e <input type="checkbox"/>	Credit/Debit card	h <input type="checkbox"/>	Mass-marketing
c <input type="checkbox"/>	Check	f <input type="checkbox"/>	Healthcare	i <input type="checkbox"/>	Pyramid scheme
				j <input type="checkbox"/>	Wire
				z <input type="checkbox"/>	Other <input type="text"/>
<b>32 Casinos</b>					
a <input type="checkbox"/>	Inquiry about end of business day		d <input type="checkbox"/>	Suspicious use of counter checks or markers	
b <input type="checkbox"/>	Minimal gaming with large transactions		z <input type="checkbox"/>	Other <input type="text"/>	
c <input type="checkbox"/>	Suspicious intra-casino funds transfers				
<b>33 Money Laundering</b>					
a <input type="checkbox"/>	Exchange small bills for large bills or vice versa		g <input type="checkbox"/>	Suspicious receipt of government payments/benefits	
b <input type="checkbox"/>	Suspicion concerning the physical condition of funds		h <input type="checkbox"/>	Suspicious use of multiple accounts	
c <input type="checkbox"/>	Suspicion concerning the source of funds		i <input type="checkbox"/>	Suspicious use of noncash monetary instruments	
d <input type="checkbox"/>	Suspicious designation of beneficiaries, assignees or joint owners		j <input type="checkbox"/>	Suspicious use of third-party transactors (straw-man)	
e <input type="checkbox"/>	Suspicious EFT/wire transfers		k <input type="checkbox"/>	Trade Based Money Laundering/Black Market Peso Exchange	
f <input type="checkbox"/>	Suspicious exchange of currencies		l <input type="checkbox"/>	Transaction out of pattern for customer(s)	
			z <input type="checkbox"/>	Other <input type="text"/>	
<b>34 Identification/Documentation</b>					
a <input type="checkbox"/>	Changes spelling or arrangement of name		d <input type="checkbox"/>	Refused or avoided request for documentation	
b <input type="checkbox"/>	Multiple individuals with same or similar identities		e <input type="checkbox"/>	Single individual with multiple identities	
c <input type="checkbox"/>	Provided questionable or false documentation		z <input type="checkbox"/>	Other <input type="text"/>	
<b>35 Other Suspicious Activities</b>					
a <input type="checkbox"/>	Account takeover		k <input type="checkbox"/>	Suspected public/private corruption (domestic)	
b <input type="checkbox"/>	Bribery or gratuity		l <input type="checkbox"/>	Suspected public/private corruption (foreign)	
c <input type="checkbox"/>	Counterfeit instruments		m <input type="checkbox"/>	Suspicious use of informal value transfer system	
d <input type="checkbox"/>	Elder financial exploitation		n <input type="checkbox"/>	Suspicious use of multiple transaction locations	
e <input type="checkbox"/>	Embezzlement/theft/disappearance of funds		o <input type="checkbox"/>	Transaction with no apparent economic, business, or lawful purpose	
f <input type="checkbox"/>	Forgeries		p <input type="checkbox"/>	Two or more individuals working together	
g <input type="checkbox"/>	Identity theft		q <input type="checkbox"/>	Unauthorized electronic intrusion	
h <input type="checkbox"/>	Little or no concern for product performance penalties, fees, or tax consequences		r <input type="checkbox"/>	Unlicensed or unregistered MSB	
i <input type="checkbox"/>	Misuse of "free look"/cooling-off/right of rescission		z <input type="checkbox"/>	Other <input type="text"/>	
j <input type="checkbox"/>	Misuse of position or self-dealing				

## Suspicious Activity Report

Home
Step 1. Filing Institution Contact Information
Step 2. Filing Institution Where Activity Occurred
Step 3. Subject Information
Step 4. Suspicious Activity Information
Step 5. Narrative

**36 Insurance** Enable this block

<p>a <input type="checkbox"/> Excessive insurance</p> <p>b <input type="checkbox"/> Excessive or unusual cash borrowing against policy/annuity</p> <p>c <input type="checkbox"/> Proceeds sent to or received from unrelated third party</p> <p>d <input type="checkbox"/> Suspicious life settlement sales insurance (e.g., STOLI's, Viaticals)</p>	<p>e <input type="checkbox"/> Suspicious termination of policy or contract</p> <p>f <input type="checkbox"/> Unclear or no insurable interest</p> <p>z <input type="checkbox"/> Other <input style="width: 100%;" type="text"/></p>
--	---

**37 Securities/Futures/Options** Enable this block

<p>a <input type="checkbox"/> Insider trading</p> <p>b <input type="checkbox"/> Market manipulation/wash trading</p> <p>c <input type="checkbox"/> Misappropriation</p>	<p>d <input type="checkbox"/> Unauthorized pooling</p> <p>z <input type="checkbox"/> Other <input style="width: 100%;" type="text"/></p>
---	--

**38 Mortgage Fraud**

<p>a <input type="checkbox"/> Appraisal fraud</p> <p>b <input type="checkbox"/> Foreclosure fraud</p> <p>c <input type="checkbox"/> Loan Modification fraud</p>	<p>d <input type="checkbox"/> Reverse mortgage fraud</p> <p>z <input type="checkbox"/> Other <input style="width: 100%;" type="text"/></p>
---	--

**39 Were any of the following product type(s) involved in the suspicious activity? (Check all that apply)**

<p>a <input type="checkbox"/> Bonds/Notes</p> <p>b <input type="checkbox"/> Commercial mortgage</p> <p>c <input type="checkbox"/> Commercial paper</p> <p>d <input type="checkbox"/> Credit card</p> <p>e <input type="checkbox"/> Debit card</p> <p>f <input type="checkbox"/> Forex transactions</p>	<p>g <input type="checkbox"/> Futures/Options on futures</p> <p>h <input type="checkbox"/> Hedge fund</p> <p>i <input type="checkbox"/> Home equity loan</p> <p>j <input type="checkbox"/> Home equity line of credit</p> <p>k <input type="checkbox"/> Insurance/Annuity products</p> <p>l <input type="checkbox"/> Mutual fund</p>	<p>m <input type="checkbox"/> Options on securities</p> <p>n <input type="checkbox"/> Penny stocks/Microcap securities</p> <p>o <input type="checkbox"/> Prepaid access</p> <p>p <input type="checkbox"/> Residential mortgage</p> <p>q <input type="checkbox"/> Security futures products</p> <p>r <input type="checkbox"/> Stocks</p>	<p>s <input type="checkbox"/> Swap, hybrid, or other derivatives</p> <p>z <input type="checkbox"/> Other (List below) <input style="width: 100%;" type="text"/></p>
--	--	---	---

**40 Were any of the following instrument type(s)/payment mechanism(s) involved in the suspicious activity? (Check all that apply)**

<p>a <input type="checkbox"/> Bank/Cashier's check</p> <p>b <input type="checkbox"/> Foreign currency</p> <p>c <input type="checkbox"/> Funds transfer</p>	<p>d <input type="checkbox"/> Gaming instruments</p> <p>e <input type="checkbox"/> Government payment</p> <p>f <input type="checkbox"/> Money orders</p>	<p>g <input type="checkbox"/> Personal/Business check</p> <p>h <input type="checkbox"/> Travelers checks</p> <p>i <input type="checkbox"/> U.S. Currency</p>	<p>z <input type="checkbox"/> Other (List below) <input style="width: 100%;" type="text"/></p>
--	--	--	--

**41 Commodity type (If applicable)**

+ -

**42 Product/Instrument description (If needed)**

+ -

**43 Market where traded i**

+ -

**44 IP address (If available)**

+ -

**45 CUSIP® number**

+ -



Suspicious Activity Report

Home   Step 1. Filing Institution Contact Information   Step 2. Filing Institution Where Activity Occurred   Step 3. Subject Information   Step 4. Suspicious Activity Information   Step 5. Narrative

**Part V Suspicious Activity Information - Narrative\***   [See instructions](#)