

**BSA Electronic Filing
Requirements For**

***Suspicious Activity Reports
by Money Services Business (SAR-MSB)
(FinCEN Form 109)***



Revised Date July 2008

DEPARTMENT OF THE TREASURY

These Specifications for Electronic Filing of Suspicious Activity Reports by Money Services Business (SAR-MSB) (FinCEN Form 109) were developed under the sponsorship of the following:

**Financial Crimes Enforcement Network
Internal Revenue Service**

Table of Contents

Purpose	1
Electronic Filing	1
File Organization	2
Record Layouts	5
Transmitter (1A) Record - Required	5
Parent Reporting Business Headquarters (2A) Record - Required	7
Transaction Location Information (2B) Record - Required	9
Transaction Location Information (2C) Record - Multiple Selling and/or Paying Business Locations	11
Suspicious Activity Report (3A) Record - Required	13
Subject Information (4A) Record - Required	16
Money Orders Information (5A) Record	19
Traveler's Checks Information (5B) Record	21
Money Transfers Information (6A) Record	23
Currency Exchange Information (6B) Record	25
Explanation/Description (7A) Record - Required	27
Transaction Summary (9A) Record - Required	28
Parent Money Services Business Summary (9B) Record - Required	29
File Summary (9Z) Record - Required	30
Attachment A - Definitions	31

Revision History

Version Number	Date	Reason for Change
1.0	7/19/08	<p>Replaces references to magnetic media with references to electronic filing using the BSA E-Filing System.</p> <p>General information has been moved from this document to the General Specifications For Electronic Filing Of Bank Secrecy Act (BSA) Reports (General Specifications). Only specific information regarding this form has been retained in this document.</p> <p>Adds a link to FinCEN's Preparation Guidelines for Use of Special Response "XX" in FinCEN Form 109.</p> <p>Specifies that in the Suspicious Activity (3A) Record, the Number of Subjects and Number of Explanation/Description Records fields should be right justified and zero filled. Note that any electronic or magnetic media filer currently filing SAR MSBs successfully with ECC-D will already have this field correctly formatted.</p> <p>Corrects the specification to indicate that the 5A, 5B, 6A and 6B records are not required records.</p> <p>Clarifies that the 2C Record, Field Position 8, is in reference to multiple transaction locations.</p>

Purpose

The purpose of this specifications document is to provide the requirements and conditions for electronically filing Suspicious Activity Report by Money Services Business (SAR-MSB), FinCEN Form 109. For the purpose of these specifications, electronic filing of this report will be through the BSA E-Filing System operated by the Financial Crimes Enforcement Network (FinCEN). For more information on the BSA E-Filing System and to register, please go to <http://bsaefiling.fincen.treas.gov>. This document should be used in conjunction with the 'General Specifications for Electronic Filing of Bank Secrecy Act (BSA) Reports' (General Specifications) available at http://www.fincen.gov/forms/files/General_BSA_Reports_E-Filing_Specs.pdf. It is recommended that you refer to the General Specifications first, and then the specific information contained in this document.

For additional guidance, refer to 'FinCEN's Preparation Guidelines for Use of Special Response "XX" in FinCEN Form 109, Suspicious Activity Report by Money Services Business (Form Date March 31, 2007' available at http://www.fincen.gov/statutes_regs/guidance/pdf/fin-2008-g006.pdf.

Electronic Filing

The BSA E-Filing System Batch File Testing Procedures are detailed in a separate document that can be accessed on the BSA E-Filing System web site at <http://bsaefiling.fincen.treas.gov> under Quick Links.

For purposes of these specifications, the filer is the organization responsible for filing the SAR-MSB and the Transmitter is the organization responsible for preparing the electronic files. The filer and transmitter may be the same or different organizations.

Filers are required to retain a copy of the SAR-MSB data and all original supporting documentation or business record equivalent for five years from the date of the suspicious activity report. All supporting documentation must be made available to appropriate authorities upon request.

File Organization

The following data controls must be followed or the SAR-MSB electronic file will be rejected. The data records must be in the following sequence:

Transmitter (1A)

There can only be one of this record type and it must be the first record on the file.

Parent Reporting Business Headquarters (2A)

There can be more than one of this record type depending on the number of different financial institutions which are included on the file. This record type will immediately precede all records which relate to the financial institution. **Include this record with only the first two fields completed if it is the same as the Transaction Location Information (2B) record.**

Transaction Location Information (2B)

There can be more than one of this record type depending on the number of transaction locations which are being reported. One of these records will immediately precede all SAR-MSB records for the Transaction.

Multiple Transaction Location Information (2C)

This is for multiple locations being reported for the same SAR-MSB. There can be more than one of this record type depending on the number of transaction locations which are being reported.

Suspicious Activity (3A)

There can be more than one of this record type on the file depending on the number of suspicious activities documents being reported for a financial institution transaction.

Subject Information (4A)

There can be more than one of this record type depending on the number of persons involved in this suspicious activity.

Money Order Information (5A)

There can only be one of this record type per document. If more than three money orders need to be listed, record the additional information in the Narrative Description (7A) Record.

Travelers Checks Information (5B)

There can only be one of this record type per document. If more than three travelers checks need to be listed, record the additional information in the Narrative Description (7A) Record.

Money Transfer Information (6A)

There can only be one of this record type per document. If more than three money transfers need to be listed, record the additional information in the Narrative Description (7A) Record.

Currency Exchange Information (6B)

There can only be one of this record type per document. If more than two currency exchanges need to be listed, record the additional information in the Narrative Description (7A) Record.

Narrative Description (7A)

There can be multiple occurrences of this record, depending on the length of the explanation given for the suspicious activity.

Transaction Location Summary (9A)

There must be one of these records for each Transaction Location Information (2B) record of a reporting business being reported. It is to be the last record associated with the 2B record.

Parent Money Services Summary (9B)

There must be one of these records for each reporting business being reported. It is to be the last record associated with the reporting business and will follow the Transaction Location Summary (9A) Record for the last transaction location reported.

File Summary (9Z)

There must be one of these records on the file and it must be the last record on the file.

Record Layouts

Transmitter (1A) Record - Required

The first record on each file is to be the transmitter record. It will contain information identifying the transmitter (person or organization handling the data accumulation and formatting). There will be only one transmitter record on each electronic file. Please note: These records are not found on the paper version of the SAR-MSB form.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '1A'.
3-57	Transmitter Name	55	REQUIRED. Enter the name of the individual or organization transmitting the transactions on this file. Individual names should be entered as Last Name b First Name b Middle Initial. NOTE: <i>b</i> indicates a space.
58-107	Transmitter Address	50	REQUIRED. Enter the street address of the transmitter.
108-132	Transmitter City	25	REQUIRED. Enter the city of the transmitter.
133-134	Transmitter State	2	REQUIRED. Enter the transmitter state code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .
135-143	Transmitter ZIP Code	9	REQUIRED. Enter the transmitter ZIP Code. (ZIP +4 if known. Space fill as required).
144-153	Transmitter Telephone Number	10	REQUIRED. Enter the entire phone number of the Transmitter, including the area code.
154-208	Transmitter Contact Name	55	REQUIRED. Enter the name of an official contact for the transmitter.

Field Position	Field Name	Length	Description and Remarks
209-217	Transmitter EIN	9	REQUIRED. Must be the valid nine-digit number assigned to the transmitter by the IRS. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines or all zeroes.
218-225	Coverage Beginning Date	8	REQUIRED. This will be the date of the earliest original transaction on the file. Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY).
226-233	Coverage Ending Date	8	REQUIRED. This will be the date of the latest original transaction on the file. Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY).
234-241	Transmitter Control Code (TCC)	8	REQUIRED. Enter your assigned 8-character TCC.
242-245	New Format Indicator	4	REQUIRED. Enter '0051' to indicate FinCEN Form 109.
246-470	Filler	225	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Parent Reporting Business Headquarters (2A) Record - Required

This record identifies information regarding the reporting business headquarters. **If the reporting business is the same as the Transaction Location (2B) Record, only the FIRST TWO (2) FIELDS should be completed. No other entries are required.** The number of business headquarters (parent) records will depend on the number of different reporting business headquarters which are included on the file. The 2A Record item numbers refer to the SAR-MSB Form Part IV.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '2A'.
3	Reporting Business same as Transaction Location Indicator (Item 34)	1	Enter an 'X' if this is true and leave items 35 through 44 blank.
4-58	Reporting Business Name (Item 35)	55	REQUIRED unless item 34 has an 'X' entry. Enter the reporting businesses full legal name.
59-113	Reporting Business Doing Business As Name (Item 36)	55	Enter the doing business as name.
114-163	Reporting Business Address (Item 37)	50	REQUIRED unless item 34 has an 'X' entry. Enter the entire address of the reporting business, including number, address, and suite number. Do not abbreviate or use punctuation.
164-188	Reporting Business City (Item 38)	25	REQUIRED unless item 34 has an 'X' entry. Enter the city where the reporting business is located.

Field Position	Field Name	Length	Description and Remarks
189-190	Reporting Business State (Item 39)	2	REQUIRED unless item 34 has an 'X' entry. Enter the two (2) character state code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .
191-199	Reporting Business ZIP Code (Item 40)	9	REQUIRED unless item 34 has an 'X' entry. Enter the ZIP Code for the reporting business. (ZIP+4 if known. Space fill as required).
200-201	Reporting Business Country (Item 43)	2	Enter the reporting business country, if other than US. Use the valid country and state standard abbreviations from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .
202-210	Reporting Business EIN or SSN/ITIN (Individual) (Item 41)	9	REQUIRED unless item 34 has an 'X' entry. Enter the EIN of the reporting business or the SSN/ITIN if an individual. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines or all zeroes.
211-220	Reporting Business Phone number (Item 42)	10	REQUIRED unless item 34 has an 'X' entry. Enter the entire phone number of the reporting business, including the area code.
221-242	Internal File/Report Number (Item 44)	22	Enter the tracking/identification number used by your internal system, if available.
243-470	Filler	228	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Transaction Location Information (2B) Record - Required

This record identifies information on the transaction location where the activity occurred. The number of transaction location records is dependent on the number of different transaction locations being reported on the electronic file. There must be at least one 2B record. **For any required item that is unknown, enter 'XX'.** The 2B Record item numbers refer to the SAR-MSB Form Part III.

Field Position	Field Name	Length	Description and Remarks								
1-2	Record Type	2	REQUIRED. Enter '2B'.								
3-7	Transaction Location Code	5	REQUIRED. Enter a unique numeric code for the different locations submitting SARs. This is to be right justified, and zero filled.								
8	Multiple Transaction Locations (Item 22)	1	Enter 'Y' if multiple locations were involved.								
9	Type of Business Location (Item 23)	1	Enter one of the following: <table style="margin-left: 20px; border: none;"> <tr> <td style="border-bottom: 1px solid black; padding-right: 10px;">Code</td> <td style="border-bottom: 1px solid black; padding-right: 10px;">Description</td> </tr> <tr> <td>A</td> <td>Selling business location</td> </tr> <tr> <td>B</td> <td>Paying business location</td> </tr> <tr> <td>C</td> <td>Both</td> </tr> </table>	Code	Description	A	Selling business location	B	Paying business location	C	Both
Code	Description										
A	Selling business location										
B	Paying business location										
C	Both										
10-64	Transaction Location Legal Name (Item 24)	55	REQUIRED. Enter the legal name of the transaction location.								
65-119	Doing Business As Name (Item 25)	55	Enter the doing business as name.								
120-169	Transaction Location Permanent Address (Item 26)	50	REQUIRED. Enter the permanent address of the transaction location.								
170-194	Transaction Location City (Item 27)	25	REQUIRED. Enter the transaction location city.								

Field Position	Field Name	Length	Description and Remarks
195-196	Transaction Location State (Item 28)	2	REQUIRED. Enter the two (2) character state code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .
197-205	Transaction Location ZIP Code (Item 29)	9	REQUIRED. Enter the ZIP Code for the transaction location. (ZIP+4 if known. Space fill as required).
206-207	Transaction Location Country (Item 32)	2	Enter the country code for the transaction location, if other than U.S. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .
208-216	Transaction Location EIN or SSN/ITIN (Individual) (Item 30)	9	REQUIRED. Enter the EIN of the transaction location or the SSN/ITIN if an individual. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines or all zeroes.
217-226	Transaction Location Business Phone Number (Item 31)	10	REQUIRED. Enter the entire phone number of the transaction location, including area code.
227-248	Internal File/Report Number	22	Enter the tracking/identification number used by your internal system, if available.
249-470	Filler	222	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Transaction Location Information (2C) Record - Multiple Selling and/or Paying Business Locations

This record identifies information on the transaction location where the activity occurred. The number of transaction location records is dependent on the number of different transaction locations being reported on the electronic file. If the reported activity occurred at multiple selling and/or business locations provide the information. **For any required item that is unknown, enter 'XX'.** The 2C Record item numbers refer to the SAR-MSB Form Part III.

Field Position	Field Name	Length	Description and Remarks								
1-2	Record Type	2	REQUIRED. Enter '2C'.								
3-7	Transaction Location Code	5	REQUIRED. Enter a unique number for the different locations submitting SARs. This is to be right justified, and zero filled.								
8	Multiple Transaction Locations (Item 22)	1	REQUIRED. Enter 'Y' if multiple transaction locations were involved.								
9	Type of Business Location (Item 23)	1	Enter one of the following: <table border="0" style="margin-left: 20px;"> <tr> <td><u>Code</u></td> <td><u>Description</u></td> </tr> <tr> <td>A</td> <td>Selling business location</td> </tr> <tr> <td>B</td> <td>Paying business location</td> </tr> <tr> <td>C</td> <td>Both</td> </tr> </table>	<u>Code</u>	<u>Description</u>	A	Selling business location	B	Paying business location	C	Both
<u>Code</u>	<u>Description</u>										
A	Selling business location										
B	Paying business location										
C	Both										
10-6	Transaction Location Legal Name (Item 24)	55	REQUIRED. Enter the legal name of the transaction location.								
65-119	Doing Business As Name (Item 25)	55	Enter the doing business as name.								
120-169	Transaction Location Permanent Address (Item 26)	50	REQUIRED. Enter the permanent address of the transaction location.								

Field Position	Field Name	Length	Description and Remarks
170-194	Transaction Location City (Item 27)	25	REQUIRED. Enter the transaction location city.
195-196	Transaction Location State (Item 28)	2	REQUIRED. Enter the two (2) character state code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .
197-205	Transaction Location ZIP Code (Item 29)	9	REQUIRED. Enter the ZIP code for the transaction location. (Zip+4 if known. Space fill as required).
206-207	Transaction Location Country Code (Item 32)	2	Select the appropriate country code, if other than US. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf
208-216	Transaction Location EIN (Item 30)	9	REQUIRED. Enter the EIN of the transaction location. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines or all zeroes.
217-226	Transaction Location Phone Number (Item 30)	10	REQUIRED. Enter the entire phone number of the transaction location, including area code.
227-248	Internal File/Report Number	22	Enter the tracking/identification number used by your internal system if available.
249-470	Filler	222	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Suspicious Activity Report (3A) Record - Required

This record identifies and describes the suspicious activity report. It occurs one time per suspicious activity. **For any required item that is unknown, enter 'XX'.** The 3A Record item numbers refer to the SAR-MSB Form Part II and Part V.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '3A'.
3-7	Transaction Code	5	REQUIRED. Enter the transaction number for the submitting transaction. This is to be right justified, and zero filled.
8-12	Suspicious Activity Record Sequence Number	5	REQUIRED. Enter a sequential number for each Suspicious Activity Report (3A) Record, starting with 00001 and incrementing by 1 for each different suspicious activity record. This field is to be right justified, and zero filled.
13-20	From Violation Date (Item 16)	8	REQUIRED. Enter the violation date or beginning violation date (if including a range of violation dates). Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY).
21-28	To Violation Date (Item 16)	8	Enter the ending date of violation (if including a range of violation dates) or leave blank. Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY).
29-43	Violation Amount (Item 17)	15	REQUIRED - unless item 17a is completed. Enter the total dollar amount involved in suspicious activity (must be numeric). If dollar amount is unknown, leave field blank and enter an 'X' in item 17a.
44	Violation Amount Unknown (Item 17a)	1	REQUIRED if item 17 is unknown. If so, enter an 'X'.

Field Position	Field Name	Length	Description and Remarks																
45-48	Category of Suspicious Activity (Item 18)	4	REQUIRED. Enter all that apply: <table border="0"> <tr> <td><u>Code</u></td> <td><u>Description</u></td> </tr> <tr> <td>A</td> <td>Money Laundering</td> </tr> <tr> <td>B</td> <td>Structuring</td> </tr> <tr> <td>C</td> <td>Terrorist Financing</td> </tr> <tr> <td>Z</td> <td>Other</td> </tr> </table>	<u>Code</u>	<u>Description</u>	A	Money Laundering	B	Structuring	C	Terrorist Financing	Z	Other						
<u>Code</u>	<u>Description</u>																		
A	Money Laundering																		
B	Structuring																		
C	Terrorist Financing																		
Z	Other																		
49-73	Other category of Suspicious Activity (Item 18z)	25	REQUIRED, if 'Z' - Other Category of Suspicious Activity (Item 18) selected. Enter description of activity.																
74-78	Financial Services Involved (Item 19)	5	REQUIRED, enter all that apply: <table border="0"> <tr> <td><u>Code</u></td> <td><u>Description</u></td> </tr> <tr> <td>A</td> <td>Money Order</td> </tr> <tr> <td>B</td> <td>Traveler's Check</td> </tr> <tr> <td>C</td> <td>Money Transfer</td> </tr> <tr> <td>E</td> <td>Currency Exchange</td> </tr> <tr> <td>Z</td> <td>Other</td> </tr> </table>	<u>Code</u>	<u>Description</u>	A	Money Order	B	Traveler's Check	C	Money Transfer	E	Currency Exchange	Z	Other				
<u>Code</u>	<u>Description</u>																		
A	Money Order																		
B	Traveler's Check																		
C	Money Transfer																		
E	Currency Exchange																		
Z	Other																		
79-103	Other (Item 19z)	25	REQUIRED, if 'Z' - Other Financial Services Involved (Item 19) selected. Enter description of activity.																
104-113	Character of Suspicious Activity Continued (Item 19)	10	Enter all the numbers that apply. <table border="0"> <tr> <td><u>Code</u></td> <td><u>Description</u></td> </tr> <tr> <td>1</td> <td>Alters transaction to avoid completion of fund transfer, money order or traveler's check (\$3,000 or more)</td> </tr> <tr> <td>2</td> <td>Alters transaction to avoid filing a CTR form</td> </tr> <tr> <td>3</td> <td>Comes in frequently and purchases less than \$3,000</td> </tr> <tr> <td>4</td> <td>Changes spelling or arrangement of name</td> </tr> <tr> <td>5</td> <td>Individual(s) using multiple or false identification</td> </tr> <tr> <td>6</td> <td>Two or more individuals using the same identification</td> </tr> <tr> <td>7</td> <td>Two or more individuals working together</td> </tr> </table>	<u>Code</u>	<u>Description</u>	1	Alters transaction to avoid completion of fund transfer, money order or traveler's check (\$3,000 or more)	2	Alters transaction to avoid filing a CTR form	3	Comes in frequently and purchases less than \$3,000	4	Changes spelling or arrangement of name	5	Individual(s) using multiple or false identification	6	Two or more individuals using the same identification	7	Two or more individuals working together
<u>Code</u>	<u>Description</u>																		
1	Alters transaction to avoid completion of fund transfer, money order or traveler's check (\$3,000 or more)																		
2	Alters transaction to avoid filing a CTR form																		
3	Comes in frequently and purchases less than \$3,000																		
4	Changes spelling or arrangement of name																		
5	Individual(s) using multiple or false identification																		
6	Two or more individuals using the same identification																		
7	Two or more individuals working together																		

Field Position	Field Name	Length	Description and Remarks
			8 Same individual(s) using multiple locations over a short period 9 Offers a bribe in form of tip/gratuity 0 Exchanges small bills for large bills or vice versa
114-168	Contact Office (Item 45)	55	REQUIRED. Complete name of designated contact office.
169-178	Contact Telephone Number (Item 46)	10	REQUIRED. Enter the entire phone number of the contact office, including the area code.
179-186	Date Filed (Item 47)	8	REQUIRED. Date report filed. Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY).
187-241	Contact Agency (Item 48)	55	Complete name of contact agency, if not filed by a money service business.
242-244	Number of Subjects	3	REQUIRED. Number of subject records. Must be equal to the number of Subject (4A) Records. Right justify and zero fill.
245-247	Number of Explanation/Description Records	3	REQUIRED. The number of explanation/description records. Must be equal to the number of Explanation/Description (7A) Records. Right justify and zero fill.
248	Amending/Correcting Indicator (Item 1)	1	Enter an 'X' if this report amends or corrects a prior report.
249	Recurring Report Indicator (Item 1a)	1	Enter an 'X' if this is a recurring report.
250-470	Filler	221	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Subject Information (4A) Record - Required

This record contains information related to the subject’s identity. There can be more than one of these records if there are multiple Subject’s for the same suspicious activity (if Item 2 has an entry of ‘X’). **For any required item that is unknown, enter ‘XX’.** The 4A Record item numbers refer to the SAR-MSB Form Part I.

Field Position	Field Name	Length	Description and Remarks										
1-2	Record Type	2	REQUIRED. Enter ‘4A’.										
3-7	Transaction Code	5	REQUIRED. Enter the transaction numeric code for the submitting transaction.										
8-12	Transaction Sequence Number	5	REQUIRED. Enter the transaction sequence number from the associated 3A record.										
13	Multiple Subjects Indicator (Item 2)	1	Enter an ‘X’ if there are multiple Subjects.										
14	Subject’s Type (Item 3)	1	Enter one of the following: <table style="margin-left: 20px; border-collapse: collapse;"> <tr> <td style="border-bottom: 1px solid black; padding-right: 10px;"><u>Code</u></td> <td style="border-bottom: 1px solid black; padding-right: 10px;"><u>Description</u></td> </tr> <tr> <td>A</td> <td>Purchaser/Sender</td> </tr> <tr> <td>B</td> <td>Payee/Receiver</td> </tr> <tr> <td>C</td> <td>Both A & B</td> </tr> <tr> <td>Z</td> <td>Other</td> </tr> </table>	<u>Code</u>	<u>Description</u>	A	Purchaser/Sender	B	Payee/Receiver	C	Both A & B	Z	Other
<u>Code</u>	<u>Description</u>												
A	Purchaser/Sender												
B	Payee/Receiver												
C	Both A & B												
Z	Other												
15-49	Subject’s Last Name or Entity Full Name (Item 4)	35	REQUIRED. Enter the last name of the subject or entity’s full name.										
50-68	Subject’s First Name (Item 5)	19	REQUIRED. Enter the first name of the Subject. If item 4 is an entity, enter ‘XX’ in this item.										
69	Subject’s Middle Initial (Item 6)	1	Enter the middle initial of the subject.										
70-119	Subject’s Address (Item 7)	50	REQUIRED. Enter the street address of the subject. Left justified and space filled.										

Field Position	Field Name	Length	Description and Remarks										
120-144	Subject's City (Item 8)	25	REQUIRED. Enter the city of the subject.										
145-146	Subject's State (Item 9)	2	REQUIRED. Enter the subject's state code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .										
147-155	Subject's ZIP Code (Item 10)	9	REQUIRED. Enter the ZIP Code for the subject. (Zip+4 if known. Space fill as required).										
156-157	Subject's Country (Item 11)	2	REQUIRED. Enter the appropriate country code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .										
158	Subject's Identification (Item 12)	1	REQUIRED. Enter the appropriate code for identification provided as follows: <table style="margin-left: 20px; border-collapse: collapse;"> <thead> <tr> <th style="text-decoration: underline;">Code</th> <th style="text-decoration: underline;">Description</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Driver's License/State ID</td> </tr> <tr> <td>B</td> <td>Passport</td> </tr> <tr> <td>C</td> <td>Alien Registration</td> </tr> <tr> <td>Z</td> <td>Other</td> </tr> </tbody> </table>	Code	Description	A	Driver's License/State ID	B	Passport	C	Alien Registration	Z	Other
Code	Description												
A	Driver's License/State ID												
B	Passport												
C	Alien Registration												
Z	Other												
159-198	Subject's ID Other Description (Item 12z)	40	REQUIRED. If 'Z' - Other enter the description of identification. Use option 'Z' if ID is unavailable.										
199-220	Subject's Identification Number (Item 12e)	22	REQUIRED. Enter the number used for identification.										
221-222	Subject's Issuing State/Country (Item 12f)	2	REQUIRED. Enter the appropriate code to designate the state or country where the identification was issued. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .										

Field Position	Field Name	Length	Description and Remarks
223-231	Subject's SSN/ITIN/EIN (Item 13)	9	REQUIRED. Enter the subject's ITIN, EIN or SSN. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines or all zeroes.
232-239	Subject's Date of Birth (Item 14)	8	REQUIRED. Enter the subject's date of birth. Enter as a numeric 8-position field in format: month, day, century, year (MMDDCCYY). If month and/or day is not available or unknown, fill in with zeroes (e.g., 01/00/1969). If entire date is unknown, enter 'XX' in the MM part of the date field.
240-249	Subject's Telephone Number (Item 15)	10	Enter the entire phone number of the subject, including the area code.
250-470	Filler	221	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Money Orders Information (5A) Record

This record contains information related to the money orders used. This record can hold multiple instrument information. If there are more than three money orders used for the same activity, record the additional information in the Explanation/Description (7A) Record. The 5A Record item numbers refer to the SAR-MSB Form Part II.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '5A'.
3-7	Transaction Code	5	REQUIRED. Enter the transaction numeric code for the submitting transaction.
8-12	Transaction Sequence Number	5	REQUIRED. Enter the transaction sequence number from the associated 3A record.
13	Money Order1 (Item 20)	1	Enter a 'P' for Purchases or an 'R' for Redemptions for issuer 1.
14-68	Issuer Name1 (Item 20)	55	Enter the name of the issuer of the instrument(s).
69-71	Total Instruments1 (Item 20)	3	Enter the total number of money orders for issuer 1.
72-86	Total US Dollars Amount1 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 1.
87	Money Orders2 (Item 20)	1	Enter 'P' for Purchases or an 'R' for Redemptions for issuer 2.
88-142	Issuer Name2 (Item 20)	55	Enter the name of the issuer of the instrument(s).
143-145	Total Instruments2 (Item 20)	3	Enter the total number of money orders for issuer 2.
146-160	Total US Dollars Amount2 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 2.
161	Money Orders3 (Item 20)	1	Enter 'P' for Purchases or an 'R' for Redemptions for issuer 3.

Field Position	Field Name	Length	Description and Remarks
162-216	Issuer Name3 (Item 20)	55	Enter the name of the issuer of the instrument(s).
217-219	Total Instruments3 (Item 20)	3	Enter the total number of money orders for issuer 3.
220-234	Total US Dollars Amount3 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 3.
235-470	Filler	236	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Traveler’s Checks Information (5B) Record

This record contains information related to the travelers check used. This record can hold multiple instrument information. If there are more than three traveler’s checks used for the same activity, record the additional information in the Explanation/Description (7A) Record. The 5B Record item numbers refer to the SAR-MSB Form Part II.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter ‘5B’.
3-7	Transaction Code	5	REQUIRED. Enter the transaction numeric code for the submitting transaction.
8 -12	Transaction Sequence Number	5	REQUIRED. Enter the transaction sequence number from the associated 3A record.
13	Traveler’s Checks1 (Item 20)	1	Enter ‘P’ for Purchases or an ‘R’ for Redemptions for issuer 1.
14-68	Issuer Name1 (Item 20)	55	Enter the name of the issuer of the instrument.
69-71	Total Instruments1 (Item 20)	3	Enter the total number of traveler’s checks for issuer 1.
72-86	Total US Dollars Amount1 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 1.
87	Traveler’s Checks2 (Item 20)	1	Enter ‘P’ for Purchases or an ‘R’ for Redemptions for issuer 2.
88-142	Issuer Name2 (Item 20)	55	Enter the name of the issuer of the instrument.
143-145	Total Instruments2 (Item 20)	3	Enter the total number of traveler’s checks for issuer 2.
146-160	Total US Dollars Amount2 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 2.

Field Position	Field Name	Length	Description and Remarks
161	Traveler's Checks3 (Item 20)	1	Enter 'P' for Purchases or an 'R' for Redemptions for issuer 3.
162-216	Issuer Name3 (Item 20)	55	Enter the name of the issuer of the instrument.
217-219	Total Instruments3 (Item 20)	3	Enter the total number of traveler's checks for issuer 3.
220-234	Total US Dollars Amount3 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 3.
235-470	Filler	236	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Money Transfers Information (6A) Record

This record contains information related to the money transfers used. This record can hold multiple money transfer information. If more than three money transfers occurred for the same activity, record the additional information in the Explanation/Description (7A) Record. The 6A Record item numbers refer to the SAR-MSB Form Part II.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '6A'.
3-7	Transaction Code	5	REQUIRED. Enter the transaction numeric code for the submitting transaction.
8-12	Transaction Sequence Number	5	REQUIRED. Enter the transaction sequence number from the associated 3A record.
13	Money Transfers1 (Item 20)	1	Enter 'P' if subject is sending money or an 'R' if subject is receiving money.
14-68	Issuer Name1 (Item 20)	55	Enter the name of the issuer of the transfer.
69-71	Total Instruments1 (Item 20)	3	Enter the total number of money transfers.
72-86	Total US Dollars Amount1 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 1.
87	Money Transfers2 (Item 20)	1	Enter 'P' if subject is sending money or an 'R' if subject is receiving money.
88-142	Issuer Name2 (Item 20)	55	Enter the name of the issuer of the transfer.
143-145	Total Instruments2 (Item 20)	3	Enter the total number of money transfers.
146-160	Total US Dollars Amount2 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 2.
161	Money Transfers3 (Item 20)	1	Enter 'P' if subject is sending money or an 'R' if subject is receiving money.

Field Position	Field Name	Length	Description and Remarks
162-216	Issuer Name3 (Item 20)	55	Enter the name of the issuer of the transfer.
217-219	Total Instruments3 (Item 20)	3	Enter the total number of money transfers.
220-234	Total US Dollars Amount3 (Item 20)	15	Enter the total dollar amount rounded up to the nearest whole dollar involved (must be numeric) for issuer 3.
235-470	Filler	236	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Currency Exchange Information (6B) Record

This record contains information related to the currency exchanges used. This record can hold multiple currency exchange information. If more than two currency exchanges occurred for the same activity, record the additional information in the Explanation/Description (7A) Record. The 6B Record item numbers refer to the SAR-MSB Form Part II.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '6B'.
3-7	Transaction Code	5	REQUIRED. Enter the transaction numeric code for the submitting transaction.
8-12	Transaction Sequence Number	5	REQUIRED. Enter the transaction sequence number from the associated 3A record.
13	Bulk Small Indicator1 (Item 21)	1	Enter an 'X' if bulk small currency.
14-33	Tendered Currency/ Instrument1 (Item 21)	20	Enter the name of the tendered currency or type of monetary instrument used to pay for the exchange.
34-35	Country1 (Item 21)	2	Enter the appropriate country code for the country that issued the currency. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .
36-55	Received Currency1 (Item 21)	20	Enter the name of the currency received in the exchange.
56-57	Country1 (Item 21)	2	Enter the appropriate country code for the country that issued the currency. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .
58-72	US Dollars Amount1 (Item 21)	15	Enter total US Dollar amount rounded up to the nearest whole dollar (must be numeric) in the exchange.

Field Position	Field Name	Length	Description and Remarks
73	Bulk Small Indicator2 (Item 21)	1	Enter an 'X' if bulk small currency.
74-93	Tendered Currency/ Instrument2 (Item 21)	20	Enter the name of the tendered currency or type of monetary instrument used to pay for the exchange.
94-95	Country2 (Item 21)	2	Enter the appropriate country code for the country that issued the currency. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .
96-115	Received Currency2 (Item 21)	20	Enter the name of the currency received in the exchange.
116-117	Country2	2	Enter the appropriate country code for the country that issued the currency. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .
118-132	US Dollars Amount2	15	Enter total US Dollar amount rounded up to the nearest whole dollar (must be numeric) in the exchange.
133-470	Filler	338	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Explanation/Description (7A) Record - Required

This record contains a detailed explanation/description of known or suspicious violation of law. There may be multiple occurrences of this record. **NO CARRIAGE RETURNS ALLOWED.** The 7A Record item number refers to the SAR-MSB Form Part VI.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '7A'.
3-7	Transaction Code	5	REQUIRED. Enter the transaction numeric code for the submitting transaction.
8-12	Transaction Sequence Number	5	REQUIRED. Enter the transaction sequence number from the associated 3A record.
13-470	Explanation/Description of the suspicious activity (Part VI)	458	REQUIRED. Enter a detailed Explanation/Description of the Suspicious Activity. Upper case characters only. Do not use low values, special characters or charts/tables.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Transaction Summary (9A) Record - Required

There should be one of these records on the file for each MSB transaction which is being reported. This record contains counts of the number of each type record associated with the transaction.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '9A'.
3-7	Transaction Code	5	REQUIRED. Enter the transaction number for the submitting transaction. Right justified and zero filled.
8-14	Transaction Location Count	7	REQUIRED. Enter a count of the number of Transaction Location (2B) Records for the transaction.
15-21	Suspicious Activity Count	7	REQUIRED. Enter a count of the number of Suspicious Activity (3A) Records for the transaction.
22-28	Subject Record Count	7	REQUIRED. Enter the number of Subject (4A) Records for the transaction.
29-35	Explanation/Description	7	REQUIRED. Enter the number of Explanation /Description (7A) Records for the transaction.
36-470	Filler	435	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Parent Money Services Business Summary (9B) Record - Required

There should be one of these records on the file for each MSB which is being reported. This record is to follow the last reported Transaction Summary (9A) Record for the MSB. This record contains counts of the number of each type record associated with the financial institutions.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '9B'.
3-9	Transaction Record Count	7	REQUIRED. Enter count of Transaction Location Information (2B) Records for the financial institution.
10-16	SAR-MSB Count	7	REQUIRED. Enter count of Suspicious Activity (3A) Records.
17-23	Subject Record Count	7	REQUIRED. Enter count of Subject Information (4A) Records.
24-30	Explanation/Description Count	7	REQUIRED. Enter count of Explanation /Description (7A) Records.
31-470	Filler	440	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

File Summary (9Z) Record - Required

There should only be one of these records on the file and it must be the very last record on the file. This record contains counts of the number of the various record types which are on the file.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '9Z'.
3-9	Parent Institution Record Count	7	REQUIRED. Enter count of Parent Money Services Business Summary (9B) Records.
10-16	Transaction Record Count	7	REQUIRED. Enter count of Transaction Location Information (2B) Records.
17-23	SAR-MSB Count	7	REQUIRED. Enter count of Suspicious Activity (3A) Records.
24-30	Subject Record Count	7	REQUIRED. Enter count of Subject Information (4A) Records.
31-37	Explanation/Description	7	REQUIRED. Enter count of Explanation /Description (7A) Records.
38-470	Filler	433	Space Filled.
471-480	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Attachment A – Definitions

Below are the definitions for terms specific to this document. General definitions are contained in the General Specifications document.

Term	Description
Instruments	As used in this form includes Money Order(s) and/or Traveler's Check(s).
Subject	A Subject is a person with questionable/suspicious activities.