

Suspicious Activity Reports by Casinos and Card Clubs (SAR-C) (FinCEN Form 102)



DEPARTMENT OF THE TREASURY

These Specifications for Electronic Filing of Suspicious Activity Reports by Casinos and Card Clubs (SAR-C) (FinCEN Form 102) 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	
Record Layouts	3
Transmitter (1A) Record - Required	
Casino/Card Club (2A) Record - Required	5
Suspicious Activity (3A) Record - Required	7
Subject Information (4A) Record - Required	
Narrative Description (6A) Record - Required	14
Casino/Card Club Summary (9A) Record - Required	15
File Summary (9Z) Record - Required	
Attachment A - Definitions	
Attachment B - Name Editing Instructions	18
J	

Revision History

Version Number	Date	Reason for Change
1.1	3/31/08	State, Country and ZIP Code reference central lists on FinCEN.gov. Removed references to 9 Track Tape.
1.2	7/19/08	Replaces references to magnetic media with references to electronic filing using the BSA E-Filing System.
		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.

Purpose

The purpose of this specification is to provide the requirements and conditions for electronically filing Suspicious Activity Report by Casinos and Card Clubs (SAR-C), Form FinCEN 102. 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/General BSA Reports E-Filing Specs 020907.pdf. It is recommended that you refer to the General Specifications first, and then the specific information contained in this document.

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 Casino is the organization responsible for filing the SAR-C, and the transmitter is the organization preparing the electronic files. The Casino and transmitter may be the same or different organizations.

Generally, card clubs are subject to the same rules as Casinos, unless a different requirement for card clubs is explicitly stated in 31 CFR Part 103. Therefore, the term 'Casino' when used in this document includes a reference both to a Casino and to a Card Club.

Filers are required to retain a copy of the SAR-C 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-C 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.

Casino or Card Club (2A)

There can be more than one of this record type depending on the number of different Casinos or Card Clubs, which are included on the file. This record type will immediately precede all records which relate to the Casino or Card Club.

Suspicious Activity (3A)

There can be more than one of this record type on the file depending on the number of suspicious activities being reported for a Casino or Card Club.

Subject Information (4A)

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

Narrative Description (6A): There can be more than one of this record type depending on the length of the explanation given for the suspicious activity.

Casino/Card Club Summary (9A): There must be one of this record type for each Casino/Card Club reporting. It must be the last record associated with the Casino/Card Club.

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, which 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. All data elements for this record are required.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter `1A`.
3-37	Transmitter Name	35	REQUIRED. Enter the name of an individual or an organization that is transmitting the transactions on this file.
38-67	Transmitter Address	30	REQUIRED. Enter the street address of the transmitter.
68-92	Transmitter City	25	REQUIRED. Enter the city of the transmitter.
93-94	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 .
95-103	Transmitter Zip Code	9	REQUIRED. Enter the transmitter Zip Code.
104-106	Transmitter Area Code	3	REQUIRED. Enter the transmitter area code.
107-113	Transmitter Telephone	7	REQUIRED. Enter the telephone number.
114-148	Transmitter Contact	35	REQUIRED. Enter the name of an official contact for the transmitter.

Field Position	Field Name	Length	Description and Remarks
149-157	Transmitter EIN	9	REQUIRED. This must be the valid nine-digit number assigned to the transmitter by IRS. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines or all zeroes.
158-165	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: century, year, month, day (CCYYMMDD).
166-173	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: century, year, month, day (CCYYMMDD).
174-181	Transmitter Control Code (TCC)	8	REQUIRED. Enter your assigned 8-character TCC.
182-409	Filler	228	Space Filled.
410	Format Indicator	1	REQUIRED. Enter '1'.
411-420	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Casino/Card Club (2A) Record - Required

This record identifies information regarding the Casino or Card Club. The number of Casino or Card Club records will depend on the number of different Casinos or Card Clubs that are included on the file. The 2A Record item numbers refer to the SAR-C Form Part IV and Part V.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '2A'.
3-7	Transaction Sequence	5	REQUIRED. Enter a sequential number starting with 00001 and increment by 1 for each suspicious transaction (3A) record.
8-42	Casino/Card Club Trade Name (Item 32)	35	REQUIRED. Enter the Casino or Card Club's full trade name.
43-77	Casino/Card Club Legal Name (Item 33)	35	REQUIRED. Enter the Casino or Card Club's full legal name.
78-07	Casino/Card Club Address (Item 35)	30	REQUIRED. Enter the address of the Casino or Card Club. Do not abbreviate.
108-132	Casino/Card Club City (Item 36)	25	REQUIRED. Enter the city where the Casino/Card Club is located.
133-134	Casino/Card Club State (Item 37)	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 .
135-143	Casino/Card Club Zip Code (Item 38)	9	REQUIRED. Enter the zip code for the Casino or Card Club.
144-152	Casino/Card Club EIN (Item 34)	9	REQUIRED. Enter the EIN of the Casino or Card Club. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines or all zeroes.

Field Position	Field Name	Length	Description and Remarks
153-154	Type of Gaming Casino or Card Club (Item 39)	2	Enter the type of gaming Casino or Card Club as follows: Code Description A State Licensed Casino B Tribal Licensed Casino C Card Club D Other
155-174	Type of Gaming Other Description (Item 39d)	20	If 'D' - Other enter a description of the gaming type.
175-209	Contact Name (Item 40, 41, 42)	35	REQUIRED. Enter the individual's name to be contacted regarding this report in the format last name/first name/middle initial. Left justified and space filled. Follow the Name Editing Conventions shown in the attachment.
210-249	Contact Title/Position (Item 43)	40	REQUIRED. Contact person's Title/Position.
250-252	Contact Area Code (Item 44)	3	REQUIRED. Contact person's area code.
253-259	Contact telephone (Item 44)	7	REQUIRED. Contact person's telephone number.
260-267	Prepared Date (Item 45)	8	REQUIRED. Date Report prepared. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
268-410	Filler	143	Space Filled.
411-420	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Suspicious Activity (3A) Record - Required

This record identifies and describes the suspicious activity report. It occurs one time per suspicious activity. The 3A Record item numbers refer to the SAR-C Form Part II and Part III.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '3A'.
3-7	Transaction Sequence	5	REQUIRED. Enter a sequential number starting with 00001 and increment by 1 for each suspicious transaction (3A) record.
8-8	Enforcement Agency Code (Item 27)	1	Enter the agency contacted: Code Description A DEA B US Attorney C IRS D FBI E US Customs F US Secret Service G Local law enforcement H State gaming commission I State law enforcement J Tribal gaming commission K Tribal law enforcement L Other (List in enforcement agency name)
9-43	Enforcement Agency Name (Item 27)	35	Enter the name of the Law Enforcement Agency already contacted, if 'B', 'G' through 'I', or 'L' entered above. List U.S. Attorney office here.
44-78	Enforcement Agency Person Contacted (Item 29)	35	Enter the name of the person contacted at the Enforcement Agency in the format last name/first name/middle initial, left justified and space filled. Follow the Name Editing Conventions shown in the attachment.

Field Position	Field Name	Length	Description and Remarks
79-81	Enforcement Agency Contact Area Code (Item 30)	3	Enter the area code of the contact person at the Enforcement Agency.
82-88	Enforcement Agency Contact Phone Number (Item 30)	7	Enter the phone number of the contact person at the Enforcement Agency.
89-96	Enforcement Agency Contact Date (Item 31)	8	Enter the date Enforcement Agency contacted. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
97-104	From Suspicious Activity Date (Item 24)	8	REQUIRED. Enter the suspicious activity date or beginning suspicious activity date (if including a range of activity dates). Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
105-112	To Suspicious Activity Date (Item 24)	8	REQUIRED. Enter the ending date of suspicious activity (if including a range of violation date) or leave blank. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD)
113-122	Suspicious Activity Amount (Item 25)	10	REQUIRED. Enter the total dollar amount involved in known or suspected suspicious activity. Must be numeric, dollars and no cents, right justified, and zero filled.
123 - 139	Suspicious Activity Type (Item 26)	17	REQUIRED. A maximum of 17 suspicious activity types as follows: Code Description A Bribery/Gratuity B Check Fraud (includes counterfeit) C Credit/Debit Card Fraud (inc. counterfeit) D Embezzlement/theft E Large currency exchange(s) F Minimal gaming with large transactions G Misuse of position H Money laundering I No apparent business or lawful purpose J Structuring K Unusual use of negotiable instruments (checks) L Use of multiple credit or deposit accounts

Field Position	Field Name	Length	Description and Remarks
			M Unusual use of wire transfers N Unusual use of counter checks (markers) O False or conflicting ID(s) P Terrorist financing Q Other (describe on 6A record)
140 - 141	Number of Subjects	2	REQUIRED. Number of Subject Records. Must be equal to the number of Subject Information (4A) Records.
142 - 143	Number of Explanation/ Description Records	2	Required. Number of Explanation/Description records Must be equal to the number of Explanation/Description (6A) Records.
144 - 144	Corrects Prior Report Indicator	1	Enter 'X' if corrects prior report.
145 - 145	Subject Information Unavailable	1	Enter 'X' if all of the Subject's information is unavailable. If this box is checked, there will be no 4A record.
146 - 146	Multiple Subject indicator	1	Enter 'X' if there is more than one Subject.
147 - 410	Filler	264	Space Filled.
411 - 420	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 Subjects for the same suspicious activity. The 4A Record item numbers refer to the SAR-C Form Part I.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '4A'.
3-7	Transaction Sequence Number	5	REQUIRED. Enter the transaction sequence number from the associated 3A record.
8-42	Subject's Name (Item 3, 4, 5)	35	REQUIRED. Enter the name of the Subject in the format last name/first name/middle initial, left justified and space filled. Follow the Name Editing Conventions shown in the attachment.
43-77	Subject's AKA /DBA Name (Item 6)	35	REQUIRED. Enter the name of the Subject in the format last name/first name/middle initial. Left justified and space filled. Follow the Name Editing Conventions shown in the attachment.
78-107	Subject's Address (Item 8)	30	REQUIRED. Enter the street address of the Subject. Left justified and space filled.
108-132	Subject's City (Item 9)	25	REQUIRED. Enter the Subject's city. Left justified and space filled.
133-134	Subject's State (Item 10)	2	REQUIRED. Enter the appropriate state code for the Subject. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf
135-143	Subject's Zip Code (Item 11)	9	REQUIRED. Enter the zip code for the Subject.
144-145	Subject's Country (Item 12)	2	REQUIRED. Enter the appropriate country code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf
146-154	Subject's TIN (Item 14)	9	REQUIRED. Enter the SSN/ITIN/TIN of Subject.

Field Position	Field Name	Length	Description and Remarks
155-162	Subject's Date of Birth (Item 16)	8	Enter Subject's date of birth. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
163-165	Subject's Home Area Code (Item 19)	3	Enter Subject's home area code.
166-172	Subject's Home Phone Number (Item 19)	7	Enter Subject's home telephone number.
173-175	Subject's Work Area Code (Item 18)	3	Enter Subject's work area code.
176-182	Subject's Work Phone Number (Item 18)	7	Enter Subject's work telephone number.
183-212	Subject's E- mail Address (Item 20)	30	Enter the E-mail address of the Subject if available.
213-242	Subject's Occupation (Item 7)	30	Enter the occupation, profession, or business of the Subject (e.g. attorney, securities broker, auto dealer)
243-243	Subject's Identification (Item 17)	1	REQUIRED. Enter the appropriate code for the method by which the individual's identity was verified. Code Description A Driver's License/State ID B Passport C Alien Registration D Other Identification
244-263	Subject's ID Other Description (Item 17d)	20	REQUIRED. If 'D' - Other enter the description of Identification.
264-285	Subject's Identification Number (Item 17c)	22	REQUIRED. Enter the number used for identification.

Field Position	Field Name	Length	Description and Remarks
286-287	Subject Issuing Authority (Item 17F)	2	REQUIRED. Enter the appropriate code to designate the state/country where the identification was issued. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf
288-295	Subject's Vehicle License Number (Item 13a)	8	Enter the Subject's number on the vehicle's license.
296-297	Subject's Vehicle State Code (Item 13b)	2	Enter the Subject's vehicle's state code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf
298-319	Subject's Account Number (Item 15)	22	REQUIRED. Account number affected, if any.
320	Subject No Account Affected Indicator (Item 15)	1	REQUIRED. Enter 'X' if no account is affected.
321	Subject Account Opened Indicator (Item 15)	1	REQUIRED. Enter: A - Yes B - No
322-327	Subject's Relationship Code (Item 21)	6	Enter the appropriate code(s) from the list below of the Subject's affiliation or relationship to the Casino or Card Club. Include 6 applicable items. Left justify and space fill if less than 6 items: Code Description A Customer B Agent C Junket/Tour Operator D Employee E Check Cashing Operator F Supplier G Concessionaire H Other (describe on 6A record)

Field Position	Field Name	Length	Description and Remarks
328	Subject's Affiliation Indicator (Item 22)	1	Subject currently affiliated with the Casino or Card Club. Enter: A - Yes B - No
329	Subject's Affiliation Code (Item 22)	1	If No indicated in position 328, enter the appropriate code from the list below: Code Description C Barred D Resigned E Terminated F Other (describe on 6A record)
331-338	Subject Action Date (Item 23)	8	Enter date affiliation action was taken. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
339-410	Filler	73	Space Filled.
411-420	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Narrative Description (6A) Record - Required

This record contains a detailed Explanation/Description of known or suspected violation of law. This record may occur multiple times. The 6A Record item numbers refer to the SAR-C Form Part V and Part VI.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter '6A'.
3-7	Transaction Sequence Number	5	REQUIRED. Enter the transaction sequence number from the associated 3A record.
8-403	Explanation/ Description (Part VI)	396	REQUIRED. Enter a detailed explanation/description of the Suspicious Activity. Upper case characters only. Do not use low values or special characters.
404-410	Filler	7	Space Filled.
411-420	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Casino/Card Club Summary (9A) Record - Required

This record is required. There should be one of these records on the file for each Casino/Card Club that is being reported. This record contains counts of the number of each type of record for the Casino/Card Club.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter `9A'.
3-9	Casino SAR Count	7	REQUIRED. Enter number of Casino SAR documents filed.
10-6	Suspicious Activity Count	7	REQUIRED. Enter a count of the number of Suspicious Activity Records (3A) for the branch.
17-23	Subject Record Count	7	REQUIRED. Enter the number of Subject (4A) records for the branch.
24-30	Explanation/ Description	7	REQUIRED. Enter the number of explanation/description (6A) records for the branch.
31-410	Filler	380	Space Filled.
411-420	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 that are on the file. These records should contain the following:

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter `9Z'.
3-9	Casino/Card Club Record Count	7	REQUIRED. Enter count of Casino/Card Club (2A) records.
10-16	Suspicious Record count	7	REQUIRED. Enter count of suspicious activity (3A) records.
17-23	Subject Record Count	7	REQUIRED. Enter count of Subject (4A) records.
24-30	Explanation/Description	7	REQUIRED. Enter count of explanation/description (6A) records.
31-410	Filler	380	Space Filled.
411-420	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
Card Club	Any organization duly licensed or authorized to do business as a card club, gaming club, card room, gaming room, or similar gaming establishment in the United States, including tribal card clubs, and having gross annual gaming revenue in excess of \$1,000,000. The term includes the principal headquarters and every domestic branch or place of business of the establishment.
Casino	Any organization duly licensed or authorized to do business as a casino or gambling casino, including a tribal casino, in the United States (except casinos located in Nevada under Regulation 6A) and having gross annual gaming revenues in excess of \$1 million. This includes the principal headquarters and every domestic branch or place of business of the casino.
SAR-C	Suspicious Activity Report by Casinos and Card Clubs (Form FinCEN 102).
Supplemental	A SAR-C Report that is used as an addition or extension to the original SAR-C Report.
Subject	For SAR-C purposes, a subject is a person with questionable/suspicious activities.

Attachment B - Name Editing Instructions

- A. Delete any titles, prefixes, suffixes or other descriptive information such as Mr., Mrs., Dr., Reverend, Partner, or Trustee. Do not delete suffixes that distinguish family members such as Jr., Sr., III or IV. Suffixes should be edited to follow the middle initial (e.g. Doe/ John/L Jr).
- B. Delete all punctuation (e.g., 'JR.' would be submitted as 'JR').
- C. Do not use the following words in fields:
 - a. THE
 - b. SEE ABOVE
 - c. SAME AS ABOVE
 - d. SAME
 - e. COMPUTER GENERATED
 - f. SIGNATURE CARD
 - g. NONE
 - h. NON CUSTOMER
 - i. CUSTOMER
 - j. T/A
 - k. VARIOUS
 - 1. OTHER
 - m. N/A
 - n. UNKNOWN
- D. Spanish surnames. Care must be taken in formatting Spanish surnames as the names are usually written in the order of first name, father's last name, and then mother's last name, e.g., Juan Vega Santiago. The father's last name, Vega would be used as the last name; however, both last names should be retained. Example: Vega/Santiago/Juan.
- E. Place a slash ('/') before each name (including suffixes) except the first surname (e.g., White/Elizabeth/A) but not between compound names such as 'Van Gogh'.

- F. If only the surname of an individual is present, then place a slash after it (e.g., <u>Jones/</u>).
- G. If a non-individual is listed, do not enter slashes between names. Delete the word, 'The' whenever it appears.
- H. If an organization has a separate 'doing business as' (DBA) name, enter the organization's legal and business names (e.g., 'Smith Enterprises, Inc., DBA Smith Casino Tours').