BSA Electronic Filing
Requirements For

Suspicious Activity Reports
by The Securities and Futures Industries (SAR-SF)
(FinCEN Form 101)

Revised Date July 2008

DEPARTMENT OF THE TREASURY

These Specifications for Electronic Filing of Suspicious Activity Reports by the Securities and Futures Industry (SAR-SF) (FinCEN Form 101) were developed under the sponsorship of the following:

Financial Crimes Enforcement Network

Internal Revenue Service

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Revision History

Version Number	Date	Reason for Change
1.1	3/31/08	State, Country and ZIP Code reference central lists on FinCEN.gov.
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.

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Purpose

The purpose of this specification is to provide the requirements and conditions for electronically filing Suspicious Activity Reports by the Securities and Futures Industry (SAR-SF), FinCEN Form 101. 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.

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 the purpose of this specification, the filer is the organization responsible for filing the SAR-SF.

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

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File Organization

The following data controls must be followed or the SAR-SF 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 Financial Institution (2A)

There can be more than one of this record type depending on the number of different broker-dealers which are included on the file. This record type will immediately precede all records which relate to the broker-dealer.

Financial Institution Branch (2B)

There can be more than one of this record type depending on the number of broker-dealer branches which are being reported. One of these records will immediately precede all SAR-SF records for the branch.

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 broker-dealer branch.

Subject Information (4A)

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

Explanation/Description (5A)

There can be more than one of this record type depending on the length of the explanation given for the suspicious activity.

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Branch Summary (9A)

There must be one of these records for each branch (2B record) of a broker-dealer being reported. It is to be the last record associated with the branch.

Financial Institution Summary (9B)

There must be one of these records for each broker-dealer being reported. It is to be the last record associated with the broker-dealer and will follow the Branch Summary (9A) Record for the last branch reported.

File Summary (9Z)

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

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Record Layouts

Transmitter (1A) Record - Required

The first record on each file is to be the transmitter record that 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 individual or 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 correct 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 Number	7	REQUIRED. Enter the telephone number.
114 – 148	Transmitter Contact	35	REQUIRED. Enter the name of an official contact for the transmitter.
149 – 157	Transmitter EIN	9	REQUIRED. Must be a 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.

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Field Position	Field Name	Length	Description and Remarks
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 – 509	Filler	328	Space Filled.
510	Format Indicator	1	REQUIRED. Enter '1'.
511 – 520	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

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Parent Financial Institution (2A) Record - Required

This record identifies information regarding the Financial Institution Headquarters. The number of Financial Institution (Parent) records will depend on the number of different Financial Institutions which are included on the file. The 2A Record item numbers refer to the SAR-SF Form Part IV.

Field Position	Field Name	Length	Description and Remarks
1 – 2	Record Type	2	REQUIRED. Enter '2A'.
3 – 37	Institution Name (Item 36)	35	REQUIRED. Enter the Institution's full legal name.
38 – 67	Institution Address (Item 38)	30	REQUIRED. Enter the address of the Institution. Do not abbreviate.
68 – 92	Institution City (Item 39)	25	REQUIRED. Enter the city where the Institution is located.
93 – 94	Institution State (Item 40)	2	REQUIRED. Enter the two (2) character state code. Use the correct abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf.
95 - 103	Institution Zip Code (Item 41)	9	REQUIRED. Enter the zip code for the Institution.
104 - 112	Institution EIN (Item 37)	9	REQUIRED. Enter the EIN of the Parent Broker-dealer. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines or all zeroes.
113 – 120	Transmitter Control Code (TCC)	8	REQUIRED. Enter your assigned 8-character TCC.
121 – 131	Central Registration Depository Number (Item 47)	11	REQUIRED. Enter the Central Registration Depository Number.

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Field Position	Field Name	Length	Description and Remarks
132 – 140	SEC ID Number (Item 48)	9	REQUIRED. Enter the SEC ID number. Do not include dash.
141 – 148	National Futures Association ID Number (Item 49)	8	REQUIRED. Enter the National Futures Association ID number.
149 – 510	Filler	362	Space Filled.
511 – 520	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

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Broker-dealer Branch (2B) Record - Required

This record identifies information on the Financial Institution (FI) branch where the activity occurred. The number of FI Branch records is dependent on the number of branches the FI is reporting on the electronic file. The 2B Record item numbers refer to the SAR-SF Form Part IV.

Field Position	Field Name	Length	Description and Remarks
1 – 2	Record Type	2	REQUIRED. Enter '2B'.
3 – 7	Branch Code	5	REQUIRED. Enter the Branch number for the submitting Branch. This is to be right justified, and zero filled.
8 – 37	Branch Office Address (Item 42)	30	REQUIRED. Enter the branch office address.
38	Multiple Branches (Item 43)	1	REQUIRED. Enter 'Y' if multiple branch locations were involved.
39 – 63	Branch Office City (Item 44)	25	REQUIRED. Enter the branch office city.
64 – 65	Branch Office State (Item 45)	2	REQUIRED. Enter the two (2) character state code. Use the correct abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf
66 – 74	Branch Office Zip Code (Item 46)	9	REQUIRED. Enter the zip code for the branch office.
75 - 510	Filler	437	Space Filled.
511 - 520	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

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Suspicious Activity (3A) Record - Required

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

Field Position	Field Name	Length	Description and Remarks
1 – 2	Record Type	2	REQUIRED. Enter '3A'.
3 – 7	Branch Code	5	REQUIRED. Enter the Branch Number for the submitting Branch. This is to be right justified, and zero filled.
8 – 12	Transaction Sequence	5	REQUIRED. Enter a sequential number starting with 0001 and increment by 1 for each suspicious transaction (3A) record.
13	Report Indicator (Item 1)	1	REQUIRED. Enter: Code Description A For Initial Report B For Corrects Prior Report
14	Multiple Subject or Subject Information Unavailable (Item 2)	1	REQUIRED. Enter: Code Description A For Multiple Subjects B For Subject information unavailable
15 – 22	From Violation Date (Item 21)	8	Enter the violation date or from violation date (if including a range of violation dates). Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
23 – 30	To Violation Date (Item 21)	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: century, year, month, day (CCYYMMDD).
31 – 40	Total Dollar Amount (Item 22)	10	Enter the total dollar amount involved in suspected violation (must be numeric).

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Field Position	Field Name	Length	Description and Remarks
41 – 60	Type of Instrument (Item 23)	20	A maximum of 20 instrument types as follows: Code Description A Bonds/Notes B Cash or Equiv. C Commercial Paper D Commodity Future E Money Market F Mutual Fund G OTC Derivatives H Other Derivatives I Commodity Options J Security Futures Products K Stocks L Warrants M Other Securities N Other Non-Securities O Foreign Currency Futures P Foreign Currencies Q Commodity Type R Instrument Description S Market where traded T Other
61 – 80	Commodity Type (Item 23q)	20	Identify the commodity type.
81 – 100	Instrument Description (Item 23r)	20	Instrument description
101 – 104	Market Where Traded (Item 23s)	4	Three or four digit code
105 – 116	CUSIP Number 1 (Item 24)	12	Committee on Uniform Securities Identification Procedures (CUSIP) number affected. CUSIP numbers must NOT contain leading zeroes unless they are part of the actual CUSIP number.
117 – 128	CUSIP Number 2 (Item 25)	12	Additional CUSIP number affected. CUSIP numbers must NOT contain leading zeroes unless they are part of the actual CUSIP number.

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Field Position	Field Name	Length	Description and Remarks
129 – 140	CUSIP Number 3 (Item 26)	12	Additional CUSIP number affected. CUSIP numbers must NOT contain leading zeroes unless they are part of the actual CUSIP number.
141 – 152	CUSIP Number 4 (item 27)	12	Additional CUSIP number affected. CUSIP numbers must NOT contain leading zeroes unless they are part of the actual CUSIP number.
153 – 164	CUSIP Number 5 (Item 28)	12	Additional CUSIP number affected. CUSIP numbers must NOT contain leading zeroes unless they are part of the actual CUSIP number.
165 – 176	CUSIP Number 6 (Item 29)	12	Additional CUSIP number affected. CUSIP numbers must NOT contain leading zeroes unless they are part of the actual CUSIP number.
177 – 196	Violation Type (Item 30)	20	A maximum of 20 violation types as follows: Code Description A Bribery/Gratuity B Check fraud C Computer Intrusion D Credit/debit card fraud E Embezzlement/theft F Futures fraud G Forgery H Identity theft I Insider trading J Mail fraud K Money manipulation L Money laundering/structuring M Prearranged or other non-competitive trading N Securities fraud O Significant wire P Suspicious documents Q Terrorist financing R Fictitious trading S Wire fraud T Other

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Field Position	Field Name	Length	Description and Remarks
197 - 214	Enforcement Agency Contacted (Item 31)	18	Enter all the letters that apply: Code Description A DEA B US Attorney C IRS D FBI E US Customs F Secret Service G CFTC H SEC I NASD J NFA K NY Stock Exchange L Other Registered Futures Assoc M Other registered entity-futures N Other state/local O Other SRO (PHLX, PCX, CBOE, AMEX, etc.) P State securities regulator Q Foreign R Other
215 – 249	Other Authority Contacted Or US Attorney Office (Item 32)	35	Enter the name of the Enforcement Agency already contacted, if 'L' through 'R' or 'B' (US Attorney Office) entered in positions 197 - 214.
250 – 284	Name of Individual Contacted (Item 33)	35	Enter the person contacted from the Enforcement Agency.
285 – 294	Contact Phone Number (Item 34)	10	Enter the phone number including area code of the contact person.
295 – 302	Date Contacted (Item 35)	8	Date contacted. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).

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Field Position	Field Name	Length	Description and Remarks
303	Has Reporting Individual/Entity Coordinated This Report With Another Individual/Entity (Item 50)	1	Enter: A - Yes B – No
304 – 357	Type of Institution (Item 51)	54	Enter two digits for each letter that applies, space fill. Code Description A Agriculture trade B Affiliate of bank C Commodity pool D Commodity trading advisor E Direct participation program F Futures commission merchant G Futures floor broker H Futures floor trader I Introducing Broker-Futures J Investment advisor K Investment Company L Market Maker M Municipal securities dealer N National Futures Assoc. O Registered Entity-futures P Other Registered Futures Q Securities broker – clearing R Securities broker – introducing S Securities dealer T Securities floor broker U Securities options broker-dealer V Self regulatory organization (SRO) W Specialist X Subsidiary of bank Y US government broker-dealer Z US government interdealer broker AA Other
358 - 392	Contact for Assistance Name (Item 52, 53, 54)	35	Complete name of Contact person (Last name/first name/middle initial format)

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Field Position	Field Name	Length	Description and Remarks
393 - 417	Contact Title/Position (Item 55)	25	Contact Title/Position
418 - 420	Contact Area Code (Item 56)	3	Contact area code
421 - 427	Contact Work Phone Number (Item 56)	7	Contact phone number
428 - 435	Prepared Date (Item 57)	8	Date Report prepared. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
436 - 437	Number of Subjects	2	REQUIRED. Number of Subject Records. Must be equal to the number of Subject (4A) Records.
438 - 439	Number of Explanation/ Description Records	2	REQUIRED. Number of Explanation/Description records. Must be equal to the number of Explanation/Description (6A) Records.
440 – 510	Filler	71	Space Filled.
511 – 520	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

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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-SF Form Part I.

Field Position	Field Name	Length	Description and Remarks
1 – 2	Record Type	2	REQUIRED. Enter '4A'.
3 – 7	Branch Code	5	REQUIRED. Enter the branch number for the submitting branch.
8 – 12	Transaction Sequence Number	5	REQUIRED. Enter the transaction sequence number from the associated (3A) record.
13 – 47	Subject's Name (Item 3, 4, 5)	35	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.
48 – 82	AKA or DBA Name (Item 6)	35	Enter the AKA or DBA name of the Subject. Individuals name should follow the format last name/first name/middle initial. Left justified and space filled. Follow the Name Editing Conventions shown in the attachment.
83 –112	Subject's Occupation (Item 7)	30	Enter the occupation, profession, or business of the Subject (e.g. attorney, securities broker, auto dealer).
113 - 142	Subject's Address (Item 8)	30	Enter the street address of the Subject. Left justified and space filled.
143 - 167	Subject's City (Item 9)	25	Enter the Subject's city. Left justified and space filled.
168 - 169	Subject's State (Item 10)	2	Enter the appropriate state code for the Subject. Use the correct abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf

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Field Position	Field Name	Length	Description and Remarks
170 – 178	Subject's Zip Code (Item 11)	9	Enter the zip code for the Subject.
179 – 180	Subject's Country (Item 12)	2	Enter the appropriate country code. Use the correct abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf.
181 – 210	Subject's Email Address (Item 13)	30	Enter the Email address of the Subject.
211 – 219	Subject's TIN (Item 14)	9	Enter the SSN/TIN of Subject.
220 – 237	Subject Account Number 1 (Item 15)	18	Enter the account number affected.
238	Subject Account Number 1 Closed (Item 15)	1	Enter 'Y', if the account number is closed.
239 – 256	Subject Account Number2 (Item 15)	18	Enter the account number affected.
257	Subject Account Number 2 Closed (Item 15)	1	Enter 'Y', if the account number is closed.
258 – 275	Subject Account Number 3 (Item 15)	18	Enter the account number affected.

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Field Position	Field Name	Length	Description and Remarks
276	Subject Account Number 3 Closed (Item 15)	1	Enter 'Y', if the account number is closed.
277 – 294	Subject Account Number 4 (Item 15)	18	Enter the account number affected.
295	Subject Account Number 4 Closed (Item 15)	1	Enter 'Y', if the account number is closed.
296 – 303	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).
304	Subject's ID (Item 17)	1	Enter the appropriate code for identification provided as follows: Code Description A Driver's License/State ID B Passport C Alien Registration D Corporate/Partnership Resolution E Other
305 – 344	Subject's ID Other Description (Item 17e)	40	If 'E' - Other was entered in position 304, enter the description of Identification.
345 – 366	Subject's ID Number (Item 17f)	22	Enter the number used for identification.
367 – 368	Subject's Issuing Authority (Item 17g)	2	Enter the appropriate code to designate the state/country where the identification was issued. Use the correct abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf.

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Field Position	Field Name	Length	Description and Remarks
369 – 371	Subject's Work Area Code (Item 18)	3	Enter Subject's work area code.
372 – 378	Subject's Work Phone Number (Item 18)	7	Enter Subject's work telephone number.
379 – 381	Subject's Area Code (Item 19)	3	Enter Subject's home area code.
382 – 388	Subject's Phone Number (Item 19)	7	Enter Subject's home telephone number.
389	Subject's Association (Item 20)	1	Is individual/business associated/affiliated with the reporting institution? A - Yes B - No
390 – 510	Filler	122	Space Filled.
511 – 520	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

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Information Explanation/Description (5A) Record - Required

This record contains a detailed Explanation/Description of a known or suspected violation of law.   This record may occur multiple times. The 5A Record item number refers to the SAR-SF Form Part VI.

Field Position	Field Name	Length	Description and Remarks
1 – 2	Record Type	2	REQUIRED. Enter '5A'.
3 – 7	Branch Code	5	REQUIRED. Enter the branch number for the submitting branch.
8 – 12	Transaction Sequence Number	5	REQUIRED. Enter the transaction sequence number from the associated (3A) record.
13 - 510	Explanation/Description (Part VI)	498	Enter a detailed explanation/description of the Suspicious Activity. Upper case characters only. Do not use low values or special characters. Refer to Instructions on the form.
511 - 520	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

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Branch Summary (9A) Record - Required

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

Field Position	Field Name	Length	Description and Remarks
1 – 2	Record Type	2	REQUIRED. Enter '9A'.
3 – 7	Branch Code	5	REQUIRED. Enter the branch number for the submitting branch. Right justified and zero filled.
8 – 14	Suspicious Activity Count	7	REQUIRED. Enter a count of the number of Suspicious Activity (3A) Records for the branch.
15 – 21	Subject Record Count	7	REQUIRED. Enter the number of Subject (4A) Records for the branch.
22 – 28	Explanation/Description	7	REQUIRED. Enter the number of Explanation/Description (5A) Records for the branch.
29 –510	Filler	483	Space Filled.
511 - 520	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

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Broker-dealer Parent Summary (9B) Record - Required

There should be one of these records on the file for each broker-dealer that is being reported. This record is to follow the last reported Broker-dealer (Branch) Summary (9A) Record for the broker-dealer. This record contains counts of the number of each type record associated with the broker-dealers. Include the following data elements for these records:

Field Position	Field Name	Length	Description and Remarks
1 – 2	Record Type	2	REQUIRED. Enter '9B'.
3 – 9	Branch Record Count	7	REQUIRED. Enter count of Branch Records for the broker-dealer.
10 – 16	SAR-SF Count	7	REQUIRED. Enter count of SAR-SF for the financial institution.
17 – 23	Subject Record Count	7	REQUIRED. Enter count of Subject records for the broker-dealer.
24 – 30	Explanation/Description Count	7	REQUIRED. Enter count of explanation/description records for the broker-dealer.
31 – 510	Filler	481	Space Filled.
511 – 520	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

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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. These records should contain the following:

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 institution records.
10 – 16	Branch Transaction Record Count	7	REQUIRED. Enter count of branch institution records.
17 – 23	SAR-SF Count	7	REQUIRED. Enter count of SAR-SF.
24 – 30	Subject Record Count	7	REQUIRED. Enter count of Subject records.
31 – 37	Explanation/Description	7	REQUIRED. Enter count of explanation/description records.
38 – 510	Filler	474	Space Filled.
511 – 520	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

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Attachment A – Definitions

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

Term	Description
AKA	Also Known As
SAR-SF	Suspicious Activity Report By the Securities and Futures Industry, FinCEN Form 101.
Subject	For SAR-SF purposes, a Subject is a person with questionable/suspicious activities.

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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 which 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
   l. 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.

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F. If only the surname of an individual is present, then place a slash after it (e.g. Jones/).

G. If a non-individual is listed, do not enter slashes between names. Delete the word, 'The' whenever it appears. Drop the subdivision name (e.g., 'The First National Bank of Chicago-Manchester Branch' will be 'FNB of Chicago-Manchester').

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