BSA Electronic Filing Requirements For

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

Revised Date July 2011

DEPARTMENT OF THE TREASURY

These Requirements 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.
1.3	8/28/09	Adds SAR-SF Acknowledgement record formats.
		Adds Attachment B, Error Code List, showing error codes and error descriptions.
		Moves file error codes from the General Specifications For Electronic Filing Of Bank Secrecy Act (BSA) Reports (General Specifications) to this document.
		2A Record, Field Position 121-131, Central Registration Depository Number, may be blank if there is no number.
		2A Record, Field Position 132-140, Securities and Exchange Commission ID Number, may be blank if there is no number.
		2A Record, Field Position 141-148, National Futures Association ID Number, may be blank if there is no number.
		3A Record, Field Position 14, Multiple Subject or Subject Information Unavailable, may be blank if there is only a single subject and subject information is available.

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Version Number	Date	Reason for Change
		3A Record, Field Position 61-80, Commodity Type, clarified to indicate that this is required if Type of Instrument value is "Q".
		3A Record, Field Position 81-100, Instrument Description, clarified to indicate that this is required if Type of Instrument value is "T".
		3A Record, Field Position 101-104, Market Where Traded, clarified to indicate that this is required if Type of Instrument value is "S".
		3A Record, Field Position 393-417, Contact Title/Position, is required.
		4A Record, Field Position 13-47, Subject's Name, requires an entry.
1.4	12/12/09	Added guidance that this document should be used in conjunction with the paper form instructions and other published FinCEN guidance.
		Record 2A Field Position 68-92, Institution City (Item 39) revised to add "Do not abbreviate."
		Record 2B Field Position 39-63, Branch Office City (Item 44) revised to add "Do not abbreviate."
		3A Record, Field Position 81-100, Item Description (Item 23r), description first sentence corrected to read REQUIRED if Type of Instrument value is "R".
		3A Record, Field Position 438-439, Number of Explanation/Description Records, description corrected: (6A) Records corrected to read (5A) Records.
		Record 4A Field Position 113-142, Subject's Address (Item 8) and Field Position 143-167, Subject's City (Item 9) revised to add "Do not abbreviate."
		Record 4A Field Position 305-344, Subject's ID Other

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Version Number	Date	Reason for Change
		Description (Item 17e) was revised to add "If "E" was entered at position304 because the "Subject's ID" was not known, enter "XX" in "Subject's ID Other Description."
		Record 9A, Branch Summary, Record 9B, Broker-Dealer Parent Summary, and Record 9Z, File Summary, remarks revised.
		Adds information about obtaining the xml schema for the acknowledgement file.
		Attachment B, Error Code List, has been updated.
		Attachment C, Field Editing Instructions revised.
1.5	01/14/10	Clarification added for 99 maximum number of records for 4A, 5A records for each 3A record.
1.6	4/9/10	File Organization revised to indicate that at least one 2B record with a number is required even if there are no branches involved in the suspicious activity.
		Record 1A, Field Position 95-103, Transmitter Zip Code, was revised to add: "If 5 or 9 digits, entry cannot be all zeros or all nines. If 9 digits, the last 4 cannot be all zeros or all nines."
		Record 1A, Field Positions 149-157, Transmitter EIN, was clarified.
		Record 2A, Field Position 95-103, Institution ZIP Code (Item 41), clarification added: "Must be a 5 or 9-digit numeric value. A five-digit ZIP Code must be followed by four spaces. A nine-digit ZIP Code cannot end with four zeros. Record 2A, Field Position 104-112, Institution EIN (Item 37), was clarified.

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Version Number	Date	Reason for Change
		Record 2A, Field Position 121-131, Central Registration Depository Number (Item 47), Field Position 132-140, SEC ID Number (Item 48) and Field Position 141-148, National Futures Association ID Number (Item 49) entries must be blank or numeric. Record 2B, Field Position 66-74, Branch Office ZIP Code (Item 46) clarification added: Enter the five or nine-digit ZIP Code assigned to the branch office address by the U.S. Postal Service. A five-digit ZIP Code must be followed by four spaces. A nine-digit ZIP Code cannot end with four zeros. Record 3A, Field Position 304-357, Type of Institution (Item 51) remarks revised to read: "Each code is a digraph consisting of two letters or a letter followed by a space. A single code or multiple codes will be left justified in the field, with the remaining field positions space filled." Record 3A, Field Position 358-392, Contact for Assistance Name (Item 52, 53, 54), remarks revised to read: "REQUIRED. Enter the complete name of the contact person (format: last name/first name/middle initial) or the name of the contact office (format: office name followed by a single slash bar)." Record 3A, Field Position 393-417, Contact Title/Position (Item 55), remarks revised to read: "Enter the title or position of the contact person. If an office is designated as the contact, enter "XX". Record 4A, Field Position 48-82, AKA or DBA Name (Item 6), remarks revised to read: "Enter the AKA or DBA name of the subject. Do not include "AKA" or "DBA" with the entry."

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Version Number	Date	Reason for Change
		Record 4A, Field Position 170-178, Subject's ZIP Code (Item 11) clarification added: Must be a five or nine-digit numeric value or "XX". A five-digit ZIP Code must be followed by four spaces. A nine-digit ZIP Code cannot end with four zeros. Record 4A, Field Position 179-180, Subject's Country (Item 12) clarification added: Leave blank if the country is U.S. Record 4A, Field Position 211-219, Subject's TIN (Item 14) clarification added: "Do not enter hyphens, slashes, or invalid entries such as all nines, all zeros, or "123456789"." Record 4A, Field Position 296-303, Subject's Date of Birth (Item 16), clarification added: "The month or day can be "00" if the birth month and/or day is unknown." Record 4A, Field Position 345-366, Subject's ID Number (Item 17f) clarification added. Record 4A, Field Position 367-368, Subject's Issuing Authority (Item 17g) clarification added. Record 5A, Field Position 13-510, Explanation/Description (Part VI), revised to add "carriage returns" to the prohibited items listed in remarks. Record 9B, Field Position 10-16, SAR-SF Count, remarks clarified: "Enter count of Suspicious Activity (3A) Records for the financial institution." Record 9Z, Field Position 17-23, SAR-SF Count, remarks clarified: "Enter count of Suspicious Activity (3A) Records for the financial institution."

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Version Number	Date	Reason for Change
		Attachment A - Definitions, revised. Error Codes F35 and F36 added to Attachment B – Error Code List. Attachment C – Field Editing Instructions revised to remove the word "THE" from the list of prohibited words. Added "Some Spanish surnames consists of three names (e.g. father's last name, mother's last name, and husband's first last name.)"
1.7	06/28/2010	All ZIP Code field remarks revised to add "…or four nines".
1.8	05/23/2011	3A Record, Field Position 177-196 (Violation Type - Item 30) code option K - "Money manipulation" replaced with "Market manipulation".
1.9	06/06/2011	Acknowledgement Financial Institution Record 2B, Field Position 3-7 (Branch Code), value in the length column is corrected to 5 from 7.
2.0	06/17/2011	Error Codes F24 and F37 added to Attachment B – Error Code List.

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Purpose

The purpose of this document 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 requirements, 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/e-filing_GENspecs.pdf. It is recommended that you refer to the General Specifications first, and then the specific information contained in this document. This document should also be used in conjunction with the paper form instructions and other published FinCEN guidance.

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 document, 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) Record - Required

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

Parent Financial Institution (2A) **Record - Required**

There can be more than one of this record type depending on the number of different parent financial institutions which are included on the file. This record type will immediately precede all records which relate to the parent financial institution.

Financial Institution Branch (2B) Record - Required

There can be more than one of this record type depending on the number of financial institution branches which are being reported. One of these records will immediately precede all SAR-SF records for the branch. At least one 2B record--with a "Branch Code" number at field positions 3-7 and the remaining field positions space filled--is required even if there are no branches involved in the suspicious activity. Multiple 2B records that apply to a single SAR-SF in the file are not permitted .**Suspicious Activity (3A) Record - Required**

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) Record - Required

There can be more than one of this record type depending on the number of persons involved in this suspicious activity. There can be no more than 99 records of this type for the same Suspicious Activity (3A) Record.

Information Explanation/Description (5A) Record - Required

There can be more than one of this record type depending on the length of the explanation given for the suspicious activity. There can be no more than 99 records of this type for the same Suspicious Activity (3A) Record.

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Branch Summary (9A) Record - Required

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

Parent Financial Institution Summary (9B) Record - Required

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

File Summary (9Z) Record - Required

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 (1A) 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 reports 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 five or nine-digit ZIP Code assigned to the Transmitter address by the U.S. Postal Service. A five-digit ZIP Code must be followed by four spaces. A nine-digit ZIP Code cannot end with four zeros or four nines.
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.

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Field Position	Field Name	Length	Description and Remarks
149 – 157	Transmitter EIN	9	REQUIRED. Must be a valid nine-digit number assigned to the transmitter by IRS, entered without slashes or hyphens. Do not enter invalid entries such as all nines, all zeros, or "123456789".
158 –165	Coverage Beginning Date	8	REQUIRED. Enter the earliest Suspicious Activity (3A) Record "From Violation Date (Item 21)" present in the file. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
166 –173	Coverage Ending Date	8	REQUIRED. Enter the most-recent Suspicious Activity (3A) Record "From Violation Date (Item 21)" or "To Violation Date (Item 21)" present in 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 2A 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. Do not abbreviate.
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 five or nine-digit ZIP Code assigned to the institution address by the U.S. Postal Service. A five-digit ZIP Code must be followed by four spaces. A nine-digit ZIP Code cannot end with four zeros or four nines.
104 - 112	Institution EIN (Item 37)	9	REQUIRED. Enter the 9-digit EIN assigned to the institution by the IRS, without slashes or hyphens. Do not enter invalid entries such as all nines, all zeros, or "123456789".
113 – 120	Transmitter Control Code (TCC)	8	REQUIRED. Enter your assigned 8-character TCC.

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Field Position	Field Name	Length	Description and Remarks
121 – 131	Central Registration Depository Number (Item 47)	11	Enter the Central Registration Depository Number. Entry must be blank or numeric.
132 – 140	SEC ID Number (Item 48)	9	Enter the SEC ID number. Do not include dash. Entry must be blank or numeric.
141 – 148	National Futures Association ID Number (Item 49)	8	Enter the National Futures Association ID number. Entry must be blank or numeric.
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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Financial Institution Branch (2B) Record - Required

This record identifies information on the financial institution branch where the suspicious activity occurred. There can be more than one of this record type depending on the number of financial institution branches which are being reported. One of these records will immediately precede all SAR-SF records for the branch. At least one 2B record containing a valid Branch Code with the remaining field positions space filled is required even if there are no branches involved in the suspicious activity. Multiple 2B records that apply to a single SAR-SF in the file are not permitted. 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 (only if branch is where activity occurred). Enter the branch office address. Do not abbreviate.
38	Multiple Branches (Item 43)	1	REQUIRED (only if branch is where activity occurred). Enter "Y" if multiple branch locations were involved.
39 – 63	Branch Office City (Item 44)	25	REQUIRED (only if branch is where activity occurred). Enter the branch office city. Do not abbreviate.
64 – 65	Branch Office State (Item 45)	2	REQUIRED (only if branch is where activity occurred). Enter the two (2) character state code. Use the correct abbreviation from http://www.fincen.gov/forms/files/country_and_ state_codes.pdf

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66 – 74	Branch Office ZIP Code (Item 46)	9	REQUIRED (only if branch is where activity occurred). Enter the five or nine-digit ZIP Code assigned to the branch office address by the U.S. Postal Service. A five-digit ZIP Code must be followed by four spaces. A nine-digit ZIP Code cannot end with four zeros or four nines.
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:
			<u>Code</u> <u>Description</u>
			  A Initial report
			  B Corrects a prior report

14	Multiple Subject or Subject Information Unavailable (Item 2)	1	Enter:
			<u>Code</u> <u>Description</u>
			  A If multiple subjects
			  B Subject information unavailable

15 – 22	From Violation Date (Item 21)	8	REQUIRED. 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	REQUIRED. Enter the total dollar amount involved in suspected violation (must be numeric). If unknown, enter zero (zero-fill)

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Field Position	Field Name	Length	Description and Remarks
41 – 60	Type of Instrument (Item 23)	20	Enter from 1 to 20 instrument types as follows (leave blank if no instruments involved): Code Description A Bonds/Notes B Cash or equiv. C Commercial paper D Commodity futures contract 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/options P Foreign currencies Q Commodity type R Instrument description S Market where traded T Other
61 – 80	Commodity Type (Item 23q)	20	REQUIRED if Type of Instrument value is "Q". Identify the commodity type.
81 – 100	Instrument Description (Item 23r)	20	REQUIRED if Type of Instrument value is "R". Enter instrument description.
101 – 104	Market Where Traded (Item 23s)	4	REQUIRED if Type of Instrument value is "S". Enter 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 zeros 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 zeros 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 zeros 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 zeros 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 zeros 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 zeros unless they are part of the actual CUSIP number.
177 – 196	Violation Type (Item 30)	20	REQUIRED. Enter from one to 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 — Commodity futures/options fraud G — Forgery H — Identity theft I — Insider trading J — Mail fraud K — Market manipulation L — Money laundering/structuring M — Prearranged or other non-competitive trading N — Securities fraud O — Significant wire or other transactions without economic purpose P — Suspicious documents Q — Terrorist financing R — Wash or other 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: <u>Code</u> <u>Description</u> A DEA B US Attorney C IRS D FBI E ICE F Secret Service G CFTC H SEC I NASD J NFA K NYSE L Other RFA M Other RE-futures (CME, CBOT, NYMEX, NYBOT) N Other state/local O Other SRO-securities (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	REQUIRED if Enforcement Agency Contacted value is "B" or "L" through "R". Enter name of enforcement agency contacted.
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	Each code is a digraph consisting of two letters or a letter followed by a space. A single code or multiple codes will be left justified in the field, with the remaining field positions space filled. Code Description A Agriculture trade option merchant B Affiliate of bank holding company C CPO D CTA E Direct participation program F FCM G Futures floor broker H Futures floor trader I IB-C J Investment advisor K Investment Company – mutual fund L Market maker M Municipal securities dealer N NFA O RE-futures P Other RFA Q Securities broker – clearing R Securities broker – introducing S Securities dealer T Securities floor broker U Securities options broker-dealer V SR)-securities W Specialist X Subsidiary of bank Y U.S. Government broker-dealer Z U.S. Government interdealer broker AA Other

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Field Position	Field Name	Length	Description and Remarks
358 - 392	Contact for Assistance Name (Item 52, 53, 54)	35	REQUIRED. Enter the complete name of the contact person (format: last name/first name/middle initial) or the name of the contact office (format: office name followed by a single slash bar).
393 - 417	Contact Title/Position (Item 55)	25	REQUIRED. Enter the title or position of the contact person. If an office is designated as the contact, enter "XX".
418 - 420	Contact Area Code (Item 56)	3	REQUIRED. Contact or office area code
421 - 427	Contact Work Phone Number (Item 56)	7	REQUIRED. Contact or office phone number
428 - 435	Prepared Date (Item 57)	8	REQUIRED. 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 Information (4A) Records, which cannot be more than 99 for the same Suspicious Activity (3A) Record.
438 - 439	Number of Explanation/ Description Records	2	REQUIRED. Number of explanation/description records. Must be equal to the number of Information Explanation/Description (5A) Records, which cannot be more than 99 for the same Suspicious Activity (3A) Record.
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 but no more than 99 of these records for the same Suspicious Activity (3A) Record if there are multiple subjects. 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	REQUIRED. Enter the subject name in last name/first name/middle initial format. If the subject is an entity, enter the entity name followed by a slash and "XX". Follow the Field Editing Instructions in the attachment.
48 – 82	AKA or DBA Name (Item 6)	35	Enter the AKA or DBA name of the subject. Do not include "AKA" or "DBA" with the entry.
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	REQUIRED. Enter the street address of the subject. Do not abbreviate.
143 - 167	Subject's City (Item 9)	25	REQUIRED. Enter the subject's city. Do not abbreviate.
168 - 169	Subject's State (Item 10)	2	REQUIRED. Enter the appropriate state code for the subject. Use the correct code 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	REQUIRED. Enter the five or nine-digit ZIP Code assigned to the subject's address by the U.S. Postal Service. A five-digit ZIP Code must be followed by four spaces. A nine-digit ZIP Code cannot end with four zeros or four nines.
179 – 180	Subject's Country (Item 12)	2	REQUIRED unless the address country is the U.S. Leave blank if the country is U.S. Enter the appropriate country code. Use the correct code 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	REQUIRED. Enter the SSN/TIN of subject. Do not enter hyphens, slashes, or invalid entries such as all nines, all zeros, or "123456789".
220 – 237	Subject Account Number 1 (Item 15)	18	REQUIRED. Enter the account number affected. If no account number is involved, enter "XX" in this item.
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	18	Enter the account number affected.

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Field Position	Field Name	Length	Description and Remarks
	(Item 15)		
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). The month or day can be "00" if the birth month and/or day is unknown.

304	Subject's ID (Item 17)	1	REQUIRED. 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	REQUIRED If "E" - Other was entered in position 304, enter the description of Identification. If "E" was entered at position 304 because the "Subject's ID" was not known, enter "XX" in "Subject's ID Other Description".
345 – 366	Subject's ID Number (Item 17f)	22	REQUIRED unless the Subject's ID Other Description is "XX". Enter the number used for identification.

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Field Position	Field Name	Length	Description and Remarks
367 – 368	Subject's Issuing Authority (Item 17g)	2	REQUIRED unless the Subject's ID Other Description is "XX". 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.
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 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, but no more than 99 times for the same Suspicious Activity (3A) Record. **NO CARRIAGE RETURNS ALLOWED.** The 5A record 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	REQUIRED. Enter a detailed explanation/description of the Suspicious Activity. Upper case characters only. Do not use carriage returns, 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 financial institution 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 Information (4A) Records for the branch.
22 – 28	Explanation/Description	7	REQUIRED. Enter the number of Information 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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Parent Financial Institution Summary (9B) Record - Required

There should be one of these records on the file for each parent financial institution that is being reported. This record is to follow the last reported Branch Summary (9A) Record for the parent financial institution. This record contains counts of the number of each type of record associated with the parent financial institution. 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 Financial Institution Branch (2B) Records.
10 – 16	SAR-SF Count	7	REQUIRED. Enter count of Suspicious Activity (3A) Records for the financial institution.
17 – 23	Subject Record Count	7	REQUIRED. Enter count of Subject Information (4A) Records for the financial institution.
24 – 30	Explanation/Description Count	7	REQUIRED. Enter count of Information Explanation/Description (5A) Records for the financial institution.
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 Financial Institution (2A) Records.
10 – 16	Branch Transaction Record Count	7	REQUIRED. Enter count of Financial Institution Branch (2B) Records.
17 – 23	SAR-SF 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 Information Explanation/Description (5A) 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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Acknowledgement Record Formats

The SAR-SF batch acknowledgement file defined below is provided in ASCII format. Users can also choose to obtain an XML file. The XML schema is available at:

https://bsaefiling1.fincen.treas.gov/forms/ackSchemas/SARSFAcknowledgementData.xsd

Acknowledgement Transmitter (1A) Record

This record is created by Enterprise Computing Center – Martinsburg (ECC-M) as part of an acknowledgment file returned to the transmitter. This record contains identifying information and error codes pertaining to the transmitter data received by ECC-M.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "1A".
3-10	Coverage Beginning Date	8	From positions 158-165 of the incoming (1A) record. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
11-18	Coverage Ending Date	8	From positions 166-173 of the incoming (1A) record. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
19-26	Transmitter Control Code (TCC)	8	From positions 174-181 of the incoming "1A" record.
27-29	Batch Sequence Number (BSN)	3	References the batch number of the original transmission file submitted by BSA E-Filing. Enter as a numeric.
30-59	Error Codes	30	Each error code is 3 alphanumeric characters in length and this field contains up to 10 error codes. Unused error code positions are zero filled.
60-90	Filler	31	Space Filled.

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Acknowledgement Parent Financial Institution (2A) Record

This record is created by ECC-M as part of an acknowledgment file returned to the transmitter. This record contains identifying information and error codes pertaining to the parent financial institution data received.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "2A".
3-37	Institution Name	35	From positions 3-37 of the incoming (2A) record.
38-67	Error Codes	30	Each error code is 3 alphanumeric characters in length and this field contains up to 10 error codes. Unused error code positions are zero filled.
68-90	Filler	23	Space Filled.

Acknowledgement Financial Institution Branch (2B) Record

This record is created by ECC-M as part of an acknowledgment file returned to the transmitter. This record contains identifying information and error codes pertaining to the financial institution branch data received.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "2B".
3-7	Branch Code	5	From positions 3-7 of the incoming (2A) record.
8-37	Error Codes	30	Each error code is 3 alphanumeric characters in length and this field contains up to 10 error codes. Unused error code positions are zero filled.
38-90	Filler	53	Space Filled.

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Acknowledgement Suspicious Activity (3A) Record

This record is created by ECC-M as part of an acknowledgment file returned to the transmitter. This record contains identifying information and error codes pertaining to the suspicious activity data received.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "3A".
3-7	Transaction Sequence Number	5	From positions 8-12 of the incoming (3A) record.
8-21	Document Control Number	14	Assigned by ECC-M. A unique identifying number.
22-51	Error Codes	30	Each error code is 3 alphanumeric characters in length and this field contains up to 10 error codes. Unused error code positions are zero filled.
52-90	Filler	39	Space Filled.

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Acknowledgement Subject Information (4A) Record

This record is created by ECC-M as part of an acknowledgment file returned to the transmitter. This record contains identifying information and error codes pertaining to the subject data received. Note: there will be one Acknowledgement Subject Information (4A) Record for every incoming Subject Information (4A) Record in the original transaction.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "4A".
3-7	Transaction Sequence Number	5	From positions 8-12 of the incoming (4A) record.
8-21	Document Control Number	14	Assigned by ECC-M. A unique identifying number.
22-51	Error Codes	30	Each error code is 3 alphanumeric characters in length and this field contains up to 10 error codes. Unused error code positions are zero filled.
52-90	Filler	39	Space Filled.

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Acknowledgement Trailer for Transmitter (9Z) Record

This record is created by ECC-M as part of an acknowledgment file returned to the Transmitter. This record is a systems control record and it summarizes the data processed by ECC-M.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "9Z".
3-12	Number of Parent Financial Institution (2A) Records in File	10	Generated by ECC-M.
13-22	Number of Suspicious Activity (3A) Records in File	10	Generated by ECC-M.
23-52	Error Codes	30	Each error code is 3 alphanumeric characters in length and this field contains up to 10 error codes. Unused error code positions are zero filled.
53-90	Filler	38	Space Filled.

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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
BSA	Bank Secrecy Act
CC	Century (as part of date – CCYYMMDD)
CRD	Central Registration Depository
CUSIP	Committee on Uniform Securities Identification Program
DBA	Doing Business As
DD	Day (as part of date – CCYYMMDD)
FI	Financial Institution
MM	Month (as part of date – CCYYMMDD)
NFA	National Futures Association
SAR-SF	Suspicious Activity Report By the Securities and Futures Industry, FinCEN Form 101.
SEC	Securities and Exchange Commission
Subject	For SAR-SF purposes, a Subject is a person with questionable/suspicious activities.
YY	Year (as part of date – CCYYMMDD)

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Attachment B - Error Code List

* Indicates error codes generated by BSA E-Filing only.

An F error code will result in a rejection of the batch file (does not include error code F24).

Error Codes	Error Description	Record	Field Position	Form Field Number
F01	Non-numeric record counts reported on 1A summary record.			
F02	Number of records reported does not match the computer count for the 2A record or 2A record is not the second record on the file.			
F03	Number of records reported does not match the computer count for the 2B record or 2B record is not the third record on the file.			
F04	Number of records reported does not match the computer count for the 3A record, or 3A is not the fourth record on the file or the 3A record has no corresponding 5A record.			
F16	No Transmitter (1A) Record on file.			
F17	No Branch Summary (9A) Record on file or a 9A record is found with no prior 3A record.			
F18	No File Summary (9Z) Record on file.			
F24*	Number of forms reported on the batch form does not match the computed count of the forms found in the file.			
F34	An invalid record type was present on the submitted file.			
F35	A missing, invalid, or non-numeric "Branch Code" was present on the submitted file.			
F36	A missing, invalid, or non-numeric "Transaction Sequence"/"Transaction Sequence Number" was present on the submitted file.			
F37*	A duplicate "Transaction Sequence"/"Transaction Sequence Number" was present on the submitted file.			

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Error Codes	Error Description	Record	Field Position	Form Field Number
F88	The Transmitter Control Code (TCC) specified in the file is not a valid production TCC code.	1A	174 - 181	
F90*	The submitted batch is not a valid version.			
F91*	The submitted EBCDIC file is invalid.			
F92*	The submitted file is empty or the file type is invalid.			
F93*	An invalid line terminator was present on the submitted file			
F94*	Cannot continue processing the submitted file because of previous errors encountered.			
F95*	Too many errors were encountered while processing the submitted file to continue.			
F96*	One, or more, invalid characters were present in the submitted file.			
F97*	Invalid record sequencing was present on the submitted file.			
F98*	An invalid record length was present on the submitted file.			
F99*	Unknown file error. Please contact the BSA E-Filing Help Desk for assistance.			

The following error codes apply to SAR-SF fields in the Acknowledgement 2A, 2B, 3A, 4A, and 5A Records. An error description of "missing" indicates that a required value is not present. "Invalid" indicates an entered value does not match the electronic filing requirements and/or form instructions. Examples of invalid values include a check box value of "X" when it should be "A" or "B," a date in an incorrect format, a Social Security Number consisting of all nines, or a ZIP Code ending with four zeros or four nines.

R01	"Institution Name" is missing.	2A	3 – 37	36
R02	"Institution Address" is missing.	2A	38 – 67	38
R03	"Institution City" is missing.	2A	68 – 92	39
R04	"Institution State" is missing or invalid.	2A	93 – 94	40
R05	"Institution ZIP Code" is missing or invalid.	2A	95 – 103	41
R06	"Institution EIN" is missing or invalid.	2A	104 – 112	37
R07	"Transmitter Control Code" is missing.	2A	113 – 120	

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Error Codes	Error Description	Record	Field Position	Form Field Number
R08	"Central Registration Depository Number" is invalid.	2A	121 – 131	47
R09	"SEC ID Number" is invalid.	2A	132 – 140	48
R10	"National Futures Association ID Number" is invalid.	2A	141 – 148	49
R12	"Multiple Branches" is invalid.	2B	38	43
R14	"Branch Office State" is invalid.	2B	64 – 65	45
R15	"Branch Office ZIP Code" is invalid.	2B	66 – 74	46
R16	"Report Indicator" is missing or invalid.	3A	13	1
R17	"Multiple Subject or Subject Information Unavailable" is invalid.	3A	14	2a/b
R18	"From Violation Date" is missing, invalid, or more recent than "Prepared Date."	3A	15 – 22	21
R19	"To Violation Date" is invalid, earlier than the "From Violation Date," or more recent than "Prepared Date."	3A	23 – 30	21
R20	"Total Dollar Amount" is missing or invalid.	3A	31 – 40	22
R21	"Type of Instrument" is invalid or has duplicate entries.	3A	41 – 60	23
R22	"Commodity Type" is missing when "Type of Instrument" is 'Q'.	3A	61 – 80	23q
R23	"Instrument Description" is missing when "Type of Instrument" is 'R'.	3A	81 – 100	23r
R24	"Market Where Traded" is missing when "Type of Instrument" is 'S'.	3A	101 – 104	23s
R25	"Violation Type" is missing, is invalid, or has duplicate entries.	3A	177 – 196	30
R26	"Enforcement Agency Contacted" is invalid or has duplicate entries.	3A	197 - 214	31
R27	"Other Authority Contacted Or US Attorney Office" - is missing when "Enforcement Agency Contacted" is B or L-R.	3A	215 – 249	32
R28	"Contact Phone Number" is invalid.	3A	285 – 294	34

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Error Codes	Error Description	Record	Field Position	Form Field Number
R29	"Date Contacted" is invalid or more recent than "Date Prepared."	3A	295 – 302	35
R30	"Has Reporting Individual/ Entity Coordinated This Report With Another Individual/ Entity" is invalid.	3A	303	50
R31	"Type of Institution" is invalid or has duplicate entries.	3A	304 – 357	51
R32	"Contact for Assistance Name" is missing.	3A	358 - 392	52-54
R33	"Contact Title/Position" is missing.	3A	393 - 417	55
R34	"Contact Work Area Code" is missing or invalid.	3A	418 - 420	56
R35	"Contact Work Phone Number" missing or invalid.	3A	421 - 427	56
R36	"Prepared Date" is missing or invalid.	3A	428 - 435	57
R37	"Subject's Name" is missing or invalid.	4A	13 – 47	3-5
R38	"Subject's Occupation" - no special characters allowed.	4A	83 –112	7
R39	"Subject's Address" is missing.	4A	113 - 142	8
R40	"Subject's City" is missing.	4A	143 - 167	9
R41	"Subject's State" is missing or invalid.	4A	168 - 169	10
R42	"Subject's ZIP Code" is missing or invalid.	4A	170 – 178	11
R43	"Subject's Country" is invalid.	4A	179 – 180	12
R44	"Subject's TIN" is missing or invalid.	4A	211 – 219	14
R45	"Subject Account Number 1" is missing.	4A	220 – 237	15
R46	"Subject Account Number 1 Closed" is invalid.	4A	238	15
R47	"Subject Account Number 2" is missing when "Subject Account Number 2 Closed" is "Y."	4A	239 – 256	15
R48	"Subject Account Number 2 Closed" is invalid.	4A	257	15
R49	"Subject Account Number 3" is missing when "Subject Account Number 3 Closed" is "Y."	4A	258 – 275	15
R50	"Subject Account Number 3 Closed" is invalid.	4A	276	15

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Error Codes	Error Description	Record	Field Position	Form Field Number
R51	"Subject Account Number 4" is missing when "Subject Account Number 4 Closed" is "Y."	4A	277 – 294	15
R52	"Subject Account Number 4 Closed" is invalid.	4A	295	15
R53	"Subject's Date of Birth" is invalid or more recent than the "Date Filed."	4A	296 – 303	16
R54	"Subject's ID" is missing or invalid.	4A	304	17
R55	"Subject's ID Other Description" is missing.	4A	305 – 344	17e
R56	"Subject's ID Number" is missing.	4A	345 – 366	17f
R57	"Subject's Issuing Authority" is missing or invalid.	4A	367 – 368	17g
R58	"Subject's Work Area Code" is invalid.	4A	369 – 371	18
R59	"Subject's Work Phone" is invalid.	4A	372 – 378	18
R60	"Subject's Area Code" is invalid.	4A	379 – 381	19
R61	"Subject's Phone Number" is invalid.	4A	382 – 388	19
R62	"Subject's Association" is invalid.	4A	389	20
R63	"Explanation/Description" of the suspicious activity is missing or contains one or more blank records.	5A	13 - 510	Part VI

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Attachment C - Field Editing Instructions

These instructions apply to all SAR-SF text fields except the Part VI Suspicious Activity Information – Narrative.

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 separated by a space (e.g. DOE/JOHN/L JR).

B. Delete all punctuation (e.g. "JR." or "INC." would be submitted as "JR" or "INC").

C. Do not use the following words or variations of these words in fields:

    a. COMPUTER GENERATED
    b. CUSTOMER
    c. N/A
    d. NON CUSTOMER
    e. NONE
    f. NOT APPLICABLE
    g. OTHER
    h. SAME
    i. SAME AS ABOVE
    j. SEE ABOVE
    k. SEE NARRATIVE
    l. SIGNATURE CARD
    m. T/A
    n. UNKNOWN
    o. VARIOUS

D. Foreign surnames. Care must be taken in formatting multiple foreign surnames. Multiple surnames must be entered without punctuation in the name field's last name field positions. Some Spanish surnames consist of three names (e.g. father's last name, mother's last name, and husband's first last name.) For example, Spanish names are usually written in the order of first name, father's last name, and mother's last name, e.g., Juan Vega Santiago. The father and mother last names would be entered in the last name field positions followed by a slash bar and the first name in the first name field positions, e.g. as VEGA SANTIAGO/JUAN.

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E. Name separators. Place a slash ("/") before each name except the surname (e.g., WHITE/ELIZABETH/A or JOHNSON/JAMES/R III) but not between compound names or multiple surnames such as VAN GOGH or VEGA SANTIAGO. If only the surname of an individual is present, then place a slash after it (e.g. JONES/). If a non-individual is listed, do not enter slashes between names. Enter a slash bar following the name (e.g. WILSON ELECTRONICS LLC/).

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