

The FinCEN Suspicious Activity Report

Introduction & Filing Instructions





Agenda

- **Introduction**
- **The New FinCEN SAR: General Information**
- **Features and Advantages of the FinCEN SAR**
- **Filing Instructions: How to File the FinCEN SAR**
- **Frequently Asked Questions**



Introduction

- This webinar is presented by the collaborative efforts of FinCEN's Office of Outreach Resources and Office of Regulatory Policy and the Office of Compliance.
- The purpose of this webinar is to provide the public with information and guidance regarding the new FinCEN SAR.



Agenda

- Introduction
- **The New FinCEN SAR: General Information**
- Features and Advantages of the FinCEN SAR
- Filing Instructions: How to File the New FinCEN SAR
- Frequently Asked Questions



The New FinCEN SAR

General Information

- It is a uniform report that can be used across multiple industries to report suspicious activity.

- It was structured to be more intuitive and user friendly,
 - The sequence of sections was revised.

- It has new fields to provide law enforcement with additional information and support,
 - Extended suspicious activity characterization list.



The New FinCEN SAR

General Information

- Beginning April 1, 2013, the new FinCEN reports must be used.
- Legacy versions of reports may not be uploaded into the E-Filing system after March 31, 2013.
- Filers should consider creating new templates.
- Only available through the BSA E-Filing System.
- No reports may not be submitted in paper format.



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- Introduction
- The New FinCEN SAR: General Information
- **Features and Advantages of the FinCEN SAR**
- Filing Instructions: How to File the New FinCEN SAR
- Frequently Asked Questions



Features and Advantages of the FinCEN SAR

- FinCEN created the new SAR as a uniform report that can be used by any type of financial institution.

*82 Type of financial institution

<input type="text"/>
Casino/Card Club
Depository institution
Insurance company
MSB
Securities/Futures
Other

- Reports have been restructured to position the different SAR Parts in a sequence that creates a more user friendly interface.



Features and Advantages of the FinCEN SAR

- The FinCEN SAR features the sequence:
 - Step 1: Part IV – Filing Institution Contact Information
 - Step 2: Part III – Information about the Financial Institution where the Activity Occurred
 - Step 3: Part I – Subject Information
 - Step 4: Part II – Suspicious Activity Information
 - Step 5: Part V – Narrative

Suspicious Activity Report

Home

Step 1. Filing Institution
Contact Information

Step 2. Filing Institution
Where Activity Occurred

Step 3. Subject
Information

Step 4. Suspicious
Activity Information

Step 5. Narrative



Features and Advantages of the FinCEN SAR

➤ The FinCEN SAR features the ability to add multiple data elements including but not limited to Subject Information, Account Numbers, and Information about where the Suspicious Activity Occurred



➤ Part III may be auto-populated with the simple push of a button

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



Features and Advantages of the FinCEN SAR

Suspicious Activity Report

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

Part II Suspicious Activity Information

When completing item 29 through 38, check all that apply

29 Structuring

31 Fraud (Type)

33 Money Laundering

35 Other Suspicious Activities

30 Terrorist Financing

32 Casinos

34 Identification/Documentation

- Suspicious Activity Characterization
 - Industry driven;
 - Revised to include additional types of suspicious activity;
 - More than one box may be checked.



Features and Advantages of the FinCEN SAR

- Filing Instructions
 - FinCEN has clarified and expanded the SAR filing instructions to be interactive and field specific.
 - A user is now able to place the mouse cursor over any field for the instructions to become visible and obtain detailed information about how to complete any particular field.

*82 Type of financial institution

Item 82 - Type of financial institution. Select the appropriate type of financial institution that best describes the filing institution recorded in Item 79. If none of the options apply, select "Other" and enter a brief description in the associated text field. If necessary, include a more-detailed description in Part V.



Features and Advantages of the FinCEN SAR

➤ Critical Fields

- Critical fields are those minimally required data fields necessary for the processing of the report by the BSA E-Filing System.
- Critical fields are easily recognizable by their yellow background and asterisk.

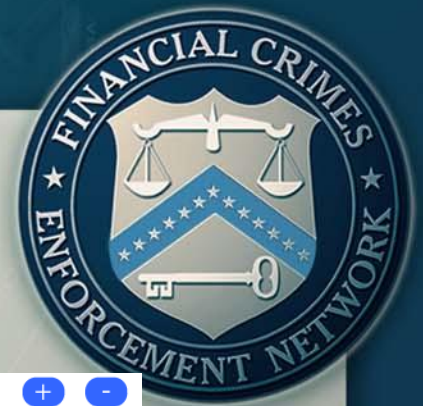
2 Check: if entity, if all critical* subject information is unavailable (Does not include item 24)

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

Unknown

*4 First name

Unknown



Features and Advantages of the FinCEN SAR

Part I Subject Information 1 of 1

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

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

*4 First name Unknown

➤ Critical Fields

- Now feature an “Unknown” box. Users will no longer have to enter responses such as “unknown”, “not applicable”, “Not Applicable”, or “XX” in critical fields.
- The “Unknown” box can be checked when the information is not known or unavailable.
- Non-critical fields may be left blank when the information is not known or unavailable.



Features and Advantages of the FinCEN SAR



- Critical Fields
 - The BSA E-Filing System will not accept filings when critical fields are left blank.



Features and Advantages of the FinCEN SAR

Attachment

Attachment Sample.csv

Add Attachment

Delete Attachment

View/Save Attachment

- Attachments
 - Filers are now able to attach .csv files, which are suitable for documenting transaction records that are too numerous to record in Part V.
 - The attachments are not a substitute for the narrative.
 - Confidentiality rules apply to attachments.

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BSA E-FILING SYSTEM

FINANCIAL CRIMES ENFORCEMENT NETWORK

User Test System

BSA E-Filing Home

New to BSA E-Filing

- Next Steps for Using BSA E-Filing

Alerts

- View Alerts

Documentation

- Frequently Asked Questions
- User Manual
- Quick Reference
- Computer Based Training

New Reports

- File Batch FinCEN CTR
- File FinCEN CTR
- File Batch FinCEN SAR
- File FinCEN SAR
- File Batch FinCEN DOEP
- File FinCEN DOEP
- File FinCEN RMSB

Learn More

- File Batch CTR
- File CTRC
- File CTRC
- File CTRC
- File CTRC

Welcome to the BSA E-Filing System

- *NEW*** [BSA E-Filing News: Jul 17, 2012 - Important Notice for Financial Institutions FinCEN E-Filing Transition Period July 1st - July 8th 2012](#)
- *NEW*** [BSA E-Filing News: May 02, 2012 - Informational Webinar Updated Technical Specifications for FinCENs New SAR CTR and DOEP](#)
- *NEW*** [BSA E-Filing News: Mar 29, 2012 - New Suspicious Activity Report and New Currency Transaction Report Now Available for E-Filing](#)
- *NEW*** [BSA E-Filing News: Mar 14, 2012 - Important Notice for Money Services Businesses FinCEN Releases the New Registration of Money Services Businesses \(RMSB\)](#)

You are currently logged in as Timothy Stokes. Last login: August 08, 2012 at 10:37:53 AM EDT.

The BSA E-Filing System allows you to file BSA forms with FinCEN via a secure Internet connection. BSA E-Filing allows you to receive system alerts and advisories via BSA E-Filing and respond to them by sending secure messages to FinCEN.

To learn how the system works, download and review the BSA E-Filing User Manual, Quick Reference Guide, and/or Supervisory User Manual depending on your role, all three of which are available on the BSA E-Filing Documentation menu to the left. If you have questions that are not resolved by the BSA E-Filing documentation, contact the BSA E-Filing Help Desk at 1-866-346-9478 (option 1) or BSAEFilingHelp@fincen.gov. The Help Desk regular hours of operation are 8:00 am - 6:00 pm East Coast Time, Monday - Friday. Please note that the Help Desk is closed on Federal holidays.



New to BSA E-Filing? Continue Here...

Getting Started



Open an Existing Form

*Unless you are making an amendment, please be sure you have not already submitted this form. To determine if a filing was submitted, compare the Filing Name on the form with the submissions listed in your Track Status view.

Browse to a saved form and click "Open Existing Form" to open it.

Open a New Form

Click "Open New Form" to open a new form.



Getting Started



- When uploading a previously saved report or utilizing a template, click on “Open Existing Form”

Open an Existing Form

*Unless you are making an amendment, please be sure you have not already submitted this form. To determine if a filing was submitted, compare the Filing Name on the form with the submissions listed in your Track Status view.

Browse to a saved form and click "Open Existing Form" to open it.

Open a New Form

Click "Open New Form" to open a new form.

Getting Started



- When completing a discrete filing or setting up a template for the first time, select “Open New Form”

Open an Existing Form

*Unless you are making an amendment, please be sure you have not already submitted this form. To determine if a filing was submitted, compare the Filing Name on the form with the submissions listed in your Track Status view.

Browse to a saved form and click "Open Existing Form" to open it.

Open a New Form

Click "Open New Form" to open a new form.



Suspicious Activity Report

Home

Step 1. Filing Institution
Contact Information

Step 2. Filing Institution
Where Activity Occurred

Step 3. Subject
Information

Step 4. Suspicious
Activity Information

Step 5. Narrative



Suspicious Activity Report

Version Number: 1.0

Filing name

SAMPLE FILE 123

*1 Type of filing

(Check all that apply)

Initial report

Correct/Amend prior report

Continuing activity report

Joint report

Prior report Document Control
Number/BSA Identifier

00000000000000

Attachment

Attachment Sample.csv

Add Attachment

Delete Attachment

View/Save Attachment



Step One:

Filing Institution Contact Information

Suspicious Activity Report

Home

Step 1. Filing Institution
Contact Information

Step 2. Financial Institution
Where Activity Occurred

Step 3. Subject
Information

Step 4. Suspicious
Activity Information

Step 5. Narrative

Part IV Filing Institution Contact Information

Suspicious Activity Report

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Where Activity Occurred

Step 3. Subject
Information

Step 4. Suspicious
Activity Information

Step 5. Narrative

Part IV Filing Institution Contact Information

*82 Type of financial institution

*78 Primary federal regulator

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

*80 TIN

*81 TIN type

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

Clearing broker-securities

Introducing broker-securities

SRO Securities

CPO/CTA

Investment Adviser

Subsidiary of financial/bank holding company

Futures Commission Merchant

Investment company

Other

Holding company

Retail foreign exchange dealer

Introducing broker-commodities

SRO Futures

84 Financial institution identification

Type

Number

*85 Address

*86 City

*87 State

*88 ZIP/Postal Code

*89 Country

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

Suspicious Activity Report

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Part IV Filing Institution Contact Information

*82 Type of financial institution

*78 Primary federal regulator

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

*80 TIN

*81 TIN type

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

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

84 Financial institution identification Type

Number

*85 Address

*86 City

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

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

Suspicious Activity Report

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Part IV Filing Institution Contact Information

*82 Type of financial institution

*78 Primary federal regulator

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

*80 TIN

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

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

84 Financial institution identification Type

Number

*85 Address

*86 City

*87 State

*88 ZIP/Postal Code

*89 Country

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

Suspicious Activity Report

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Part IV Filing Institution Contact Information

*82 Type of financial institution

Securities/Futures

*78 Primary federal regulator

Commodities Futures Trading Commission (CFTC)

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

ABC Company

*80 TIN

55555556

*81 TIN type

SSN-ITIN

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

Clearing broker-securities

Introducing broker-securities

SRO Securities

CPO/CTA

Investment Adviser

Subsidiary of financial/bank holding company

Futures Commission Merchant

Investment company

Other

Holding company

Retail foreign exchange dealer

Introducing broker-commodities

SRO Futures

84 Financial institution identification Type

Number

*85 Address

*86 City

*87 State

*88 ZIP/Postal Code

*89 Country

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

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Part IV Filing Institution Contact Information

*82 Type of financial institution

*78 Primary federal regulator

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

*80 TIN

*81 TIN type

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

Clearing broker-securities

Introducing broker-securities

SRO Securities

CPO/CTA

Investment Adviser

Subsidiary of financial/bank holding company

Futures Commission Merchant

Investment company

Other

Holding company

Retail foreign exchange dealer

Introducing broker-commodities

SRO Futures

84 Financial institution identification Type

Number

Central Registration Depository (CRD) number
Investment Adviser Registration Depository (IARD) number
National Futures Association (NFA) number
Research, Statistics, Supervision and Discount (RSSD) number
Securities and Exchange Commission (SEC) number

*85 Address

*86 City

*87 State

*88 ZIP/Postal Code

*89 Country

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



Financial Institution Identification

➤ The options listed in Item 84 are described as follows:

➤ **Central Registration Depository (CRD) number:** Is the central licensing and registration system for the U.S. securities industry and its regulators (used by FINRA and other securities regulatory bodies).

➤ **Investment Adviser Registration Depository (IARD) number:** The IARD and its system collect and maintain the registration, reporting and disclosure information for Investment Advisers and their associated persons.

➤ **National Futures Association (NFA) number:** The NFA is the industry-wide, self-regulatory organization for the U.S. futures industry.



Financial Institution Identification

➤ The options listed in Item 84 are described as follows:

➤ **Research, Statistics, Supervision and Discount (RSSD) number:**

The National Information Center (NIC) is a central repository of data about banks and other institutions for which the Federal Reserve has a supervisory, regulatory, or research interest, including both domestic and foreign banking organizations operating in the United States. The RSSD is a unique identifying number assigned by the Federal Reserve for all financial institutions, main offices, as well as branches.

➤ If “RSSD” is selected, but the identifying number is unknown, the information can be accessed at the Federal Financial Institutions Examination Council (FFIEC) Web Site at

<http://www.ffiec.gov/find/callreportsub.htm>.



Financial Institution Identification

➤ The options listed in Item 84 are described as follows:

➤ **Securities and Exchange Commission (SEC) number:** Issued to individuals and entities registered with the Securities and Exchange Commission.

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Part IV Filing Institution Contact Information

*82 Type of financial institution

*78 Primary federal regulator

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

*80 TIN

*81 TIN type

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

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

84 Financial institution identification Type

Number

*85 Address

*86 City

*87 State

*88 ZIP/Postal Code

*89 Country

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





Law Enforcement Contact

➤ Provide law enforcement contact information

91 Internal control/file number	<input type="text" value="1258H54"/>	
92 LE contact agency	<input type="text" value="FEDERAL BUREAU OF INVESTIGATION"/>	
93 LE contact name	<input type="text" value="AGENT SMITH"/>	
94 LE contact phone number (Include Area Code)	<input type="text" value="5555555555"/>	Ext. <input type="text" value="123"/>
95 LE contact date	<input type="text" value="07/02/2012"/>	
*96 Filing institution contact office	<input type="text" value="COMPLIANCE"/>	
97 Filing institution contact phone number (Include Area Code)	<input type="text" value=""/>	Ext. <input type="text" value=""/>
98 Date filed	<input type="text" value=""/>	(Date filed will be auto-populated when the form is signed.)



Step Two:

Information about Financial Institution Where Activity Occurred

Suspicious Activity Report

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Part III Information about Financial Institution Where Activity Occurred 1 of 1



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Part III Information about Financial Institution Where Activity Occurred 1 of 1



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

Yes

*47 Type of financial institution

*48 Primary federal regulator

49 Type of gaming institution

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

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

Clearing broker-securities

Introducing broker-securities

Subsidiary of financial/bank holding company

Futures Commission Merchant

Investment Adviser

Other

Holding company

Investment company

Introducing broker-commodities

Retail foreign exchange dealer

51 Financial institution identification

Type

Number

52 Financial institution's role in transaction

Selling location

Paying location

Both

*53 Legal name of financial institution

Unknown

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

Branch Activity

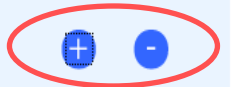


- If the suspicious activity occurred at a branch or an office complete this section of Step 2
 - Selling Location
 - Paying Location
 - Both

Branch where activity occurred information

If no branch activity involved, check this box

Branch Information



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

65 Address of branch or office where activity occurred

123 MAIN STREET

67 City WASHINGTON

66 RSSD Number 55523

68 State DC

69 ZIP/Postal Code 20004

*70 Country US



Step Three: Subject Information

Suspicious Activity Report

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Part I Subject Information 1 of 1



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Part I Subject Information 1 of 1



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

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

*4 First name Unknown

5 Middle name/initial

Suffix

Gender

*16 Date of birth Unknown

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



7 Occupation or type of business

7a NAICS Code

*13 TIN Unknown

14 TIN type

18 Phone number

Ext.

17 Type

18 Phone number

Ext.

17 Type

19 E-mail address

19a Website (URL) address

20 Corroborative statement to filer?

25 Subject's role in suspicious activity

Subject Address Information

*8 Address

Unknown



*9 City

Unknown

*10 State

Unknown

*11 ZIP/Postal Code

Unknown

33301

*12 Country

Unknown

*15 Form of identification for subject

Unknown

Type

TIN

Number

Issuing State

Country

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

a Institution TIN

b Accountant

e Attorney

h Director

k Officer

c Agent

f Borrower

i Employee

l Owner or Controlling Shareholder

d Appraiser

g Customer

j No relationship to institution

z Other

22 Status of relationship

23 Action date

*24 Financial institution TIN and account number(s) affected that are related to subject

No known accounts involved

Institution TIN

Non-US Financial Institution



account number

Closed? Yes



Step Four: Suspicious Activity Information

Suspicious Activity Report

Home

Step 1. Filing Institution
Contact Information

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Where Activity Occurred

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Information

Step 4. Suspicious
Activity Information

Step 5. Narrative

Part II Suspicious Activity Information

Suspicious Activity Information



- Dollar amount and date range of activity
 - Amount involved in this report
 - Date or date range of suspicious activity
 - Cumulative amount for continuing activity reports

Suspicious Activity Report

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Step 2. Filing Institution
Where Activity Occurred

Step 3. Subject
Information

Step 4. Suspicious
Activity Information

Step 5. Narrative

Part II Suspicious Activity Information

*26 Amount involved in this report Amount Unknown No amount involved \$ 252,320 .00

*27 Date or date range of suspicious activity for this report From 08/31/2012 To

28 Cumulative amount (only applicable when "Continuing activity report" is checked in Item 1) \$ 400,000 .00

Suspicious Activity Information



- Characterizations of Suspicious Activity
 - Use the activity category items 29 through 38 to record the types of suspicious activity being reported; check all boxes that apply.
 - If a category applies but none of the options within the category apply, select that category's "other" box and briefly describe the type of suspicious activity in the associated text field.

Characterization of Suspicious Activity



➤ Examples:

When completing item 29 through 38, check all that apply

29 Structuring

- | | |
|---|---|
| a <input type="checkbox"/> Alters transaction to avoid BSA recordkeeping requirement | e <input type="checkbox"/> Multiple transactions below CTR threshold |
| b <input type="checkbox"/> Alters transaction to avoid CTR requirement | f <input type="checkbox"/> Suspicious inquiry by customer regarding BSA reporting or recordkeeping requirements |
| c <input type="checkbox"/> Customer cancels transaction to avoid BSA reporting and recordkeeping requirements | z <input type="checkbox"/> Other <input type="text"/> |
| d <input type="checkbox"/> Multiple transactions below BSA recordkeeping threshold | |

30 Terrorist Financing

- | | |
|--|---|
| a <input type="checkbox"/> Known or suspected terrorist/terrorist organization | z <input type="checkbox"/> Other <input type="text"/> |
|--|---|

31 Fraud (Type)

- | | | | |
|---|--|---|---|
| a <input type="checkbox"/> ACH | d <input type="checkbox"/> Consumer loan | g <input type="checkbox"/> Mail | j <input type="checkbox"/> Wire |
| b <input type="checkbox"/> Business loan | e <input type="checkbox"/> Credit/Debit card | h <input type="checkbox"/> Mass-marketing | z <input checked="" type="checkbox"/> Other <input type="text" value="KITING"/> |
| c <input checked="" type="checkbox"/> Check | f <input type="checkbox"/> Healthcare | i <input type="checkbox"/> Pyramid scheme | |

33 Money Laundering

- | | |
|---|--|
| a <input type="checkbox"/> Exchange small bills for large bills or vice versa | g <input type="checkbox"/> Suspicious receipt of government payments/benefits |
| b <input checked="" type="checkbox"/> Suspicion concerning the physical condition of funds | h <input type="checkbox"/> Suspicious use of multiple accounts |
| c <input type="checkbox"/> Suspicion concerning the source of funds | i <input type="checkbox"/> Suspicious use of noncash monetary instruments |
| d <input type="checkbox"/> Suspicious designation of beneficiaries, assignees or joint owners | j <input type="checkbox"/> Suspicious use of third-party transactors (straw-man) |
| e <input type="checkbox"/> Suspicious EFT/wire transfers | k <input type="checkbox"/> Trade Based Money Laundering/Black Market Peso Exchange |
| f <input checked="" type="checkbox"/> Suspicious exchange of currencies | l <input type="checkbox"/> Transaction out of pattern for customer(s) |
| | z <input type="checkbox"/> Other <input type="text"/> |

Characterization of Suspicious Activity



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

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

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

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

41 Commodity type (If applicable)

42 Product/Instrument description (If needed)

43 Market where traded

44 IP address (If available)

45 CUSIP® number



Step Five: Narrative

Suspicious Activity Report

Home

Step 1. Filing Institution
Contact Information

Step 2. Financial Institution
Where Activity Occurred

Step 3. Subject
Information

Step 4. Suspicious
Activity Information

Step 5. Narrative

Part V Suspicious Activity Information - Narrative*

[See instructions](#)



The SAR Narrative

The narrative section of the report is critical to understanding the nature and circumstances of the suspicious activity. The care with which the narrative is completed may determine whether the described activity and its possible criminal nature are clearly understood by investigators.



The SAR Narrative

- The ability to add an attachment to the SAR was implemented.
- Because the ability to add an attachment to the new FinCEN SAR was implemented, the number of characters that may be entered into the narrative section has been changed.
- The attachment is not a substitute for the narrative itself.



Agenda

- Introduction
- The New FinCEN SAR: General Information
- Features and Advantages of the FinCEN SAR
- Filing Instructions: How to File the New FinCEN SAR
- **Frequently Asked Questions**

Frequently Asked Questions



Q: Are items without an asterisk required to be completed?

A: Items with an asterisk, or items with yellow shading, are critical fields that the filer is required to complete. If an item does not have an asterisk, it is not a critical field. However, financial institutions should file all FinCEN reports with complete and accurate information. As previously noted, if the information is unknown for a critical field, the filer must check the associated “unknown” box or the report cannot be submitted to FinCEN.

Frequently Asked Questions



Q: How do I use the NAICS code field (Item 7a)?

A: Select the option that best identifies the occupation or type of business entered in Item 7. Filers can access the FinCEN approved list of NAICS codes from the drop down menu in the FinCEN SAR. If no selection from the NAICS code list is appropriate, use a specific descriptive word or phrase, such as “Carpenter” or “Retired Carpenter” in the Occupation field, and leave the NAICS code field blank. Remember that simply entering “Retired” is not an adequate entry in this field.

Frequently Asked Questions



Q: How do I use the Paying and Selling Location options (Item 64)?

A: Check the box “Selling Location” if the branch sold the products or instruments recorded in Items 39 or 40 to a customer. Check the box “Paying Location” if a customer received payment from the branch for the products or instruments recorded in Items 39 or 40. Check the box “Both” if the branch was both a paying and selling location for the products or instruments recorded in Items 39 or 40.



Frequently Asked Questions

Q: How do I use the Paying and Selling Location options (Item 64)?

Example 1:

If a customer purchases a monetary instrument from a financial institution, then the financial institution has become the selling location. The filer would check the “Selling Location” box.

Example 2:

If a customer redeems or cashes a monetary instrument, then the financial institution where the monetary instrument was cashed would become the paying location. The filer would check the “Paying Location” box.

Frequently Asked Questions



Q: Where can I find the Technical Specifications and line item Filing Instructions for the new FinCEN SAR?

A: Technical Specifications and line item Filing Instructions may be found in Attachment C located at: <http://bsaefiling.fincen.treas.gov/news/FinCENSARElectronicFilingRequirements.pdf>

Frequently Asked Questions



Q: Can I access copies of previously filed reports through the BSA E-Filing System

A: The BSA E-Filing System is not a record keeping program; consequently, filers are not able to access or view previously filed reports. The BSA E-Filing system does, however, provide tracking information on past report submissions.

Frequently Asked Questions



Q: What is an internal control number/file number (Item 91)?

A: In an effort to avoid potential disclosure of a SAR, financial institutions may assign a unique internal control/file number to each report, which law enforcement or regulatory agencies can reference without disclosing the existence or content of a particular SAR.

For More Information



The BSA Regulatory Helpline

1-800-949-2732

BSA_Resource_Center@fincen.gov

BSA E-Filing Help Desk

1-866-346-9478

BSAEFilingHelp@fincen.gov