

**BSA Electronic Filing
Requirements For The**

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



Revised Date July 2011

DEPARTMENT OF THE TREASURY

These Requirements for Electronic Filing of Suspicious Activity Reports by Casinos and Card Clubs (SAR-C) (FinCEN Form 102) were developed under the sponsorship of the following:

Financial Crimes Enforcement Network

Internal Revenue Service

Table of Contents

Purpose	1
Electronic Filing	1
File Organization	2
Record Layouts	3
Transmitter (1A) Record - Required	3
Casino/Card Club (2A) Record - Required	5
Suspicious Activity (3A) Record - Required	7
Subject Information (4A) Record - Required	10
Narrative Description (6A) Record - Required	14
Casino/Card Club Summary (9A) Record - Required	15
File Summary (9Z) Record - Required	16
Acknowledgement Record Formats	17
Acknowledgement Transmitter (1A) Record	17
Acknowledgement Casino/Card Club (2A) Record	18
Acknowledgement Suspicious Activity (3A) Record	18
Acknowledgement Subject Information (4A) Record	19
Acknowledgement Trailer for File Summary (9Z) Record	19
Attachment A - Definitions	21
Attachment B - Error Code List	22
Attachment C - Field Editing Instructions	27

Revision History

Version Number	Date	Reason for Change
1.1	3/31/08	State, Country and ZIP Code reference central lists on FinCEN.gov. Removed references to 9 Track Tape.
1.2	7/19/08	Replaces references to magnetic media with references to electronic filing using the BSA E-Filing System. General information has been moved from this document to the General Specifications For Electronic Filing Of Bank Secrecy Act (BSA) Reports (General Specifications). Only specific information regarding this form has been retained in this document.
1.3	8/28/09	Adds SAR-C 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. Record 2A Field Positions 43-77, Casino/Card Club Legal Name, is required only if different than trade name. Record 2A Field Positions 175-209, Contact Name, has been clarified to note that an office name can be provided in lieu of an individual's name. Field Position 210-249, Contact Title/Position is not required if the Contact is an office. Record 3A Field Positions 105-112, To Suspicious Activity Date, is required only if including a range of violation date. Record 3A Field Positions 113-122, Suspicious Activity

Version Number	Date	Reason for Change
		<p>Amount, stipulates that this value must be zero (0) if the amount is unknown or no dollar amount is involved.</p> <p>Record 4A Field Positions 43-77, Subject's AKA/DBA Name is not required.</p> <p>Certain fields which are only conditionally required have been clarified to indicate such.</p>
1.4	12/12/09	<p>Added guidance that this document should be used in conjunction with the paper form instructions and other published FinCEN guidance.</p> <p>Record 2A Field Position 108-132, Casino/Card Club City (Item 36) remarks revised to add "Do not abbreviate."</p> <p>Record 3A Field Positions 9-43, Enforcement Agency Name, description revised to bring it in line with the validation.</p> <p>Record 4A Field Position 78-107, Subject's Address (Item 8) and Field Position 108-132, Subject's City (Item 9) remarks revised to add "Do not abbreviate."</p> <p>Record 4A Field Position 146-154, Subject's TIN (Item 14) remarks revised to add "Do not enter hyphens, slashes, or invalid entries such as all nines or all zeros."</p> <p>Record 4A Field Position 183-212, Subject's E-mail Address (Item 20) "...if available" removed.</p> <p>Record 4A Field Positions 331-338, Subject Action Date, corrected to Field Positions 330-337.</p> <p>Record 4A Field Positions 339-410, Filler, corrected to Field Positions 338-410.</p> <p>Adds information about obtaining the xml schema for the acknowledgement file.</p> <p>Record 9A and Record 9Z remarks revised.</p> <p>Attachment B, Error Code List, has been updated.</p>

Version Number	Date	Reason for Change
		Attachment C, Field Editing Instructions, revised.
1.5	01/14/10	Clarification added for 99 maximum number of 4A, 6A records for the same 3A record.
1.6	4/9/10	<p>All ZIP Code field remarks revised to add "A 9-digit ZIP Code cannot end with four zeros."</p> <p>Record 4A Field Positions 43-47, Subject's AKA/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."</p> <p>Record 4A Field Positions 135-143, Subject's ZIP Code (Item 11), is not a required field.</p> <p>Record 4A Field Positions 146-154, Subject's TIN (Item 14) is not a required field. Remarks specify that "123456789" is not a valid entry.</p> <p>Record 4A Field Positions 330-337, Subject Action Date (Item 23) added "Date cannot be greater than the date the report was prepared." to remarks.</p> <p>Record 9A Field Positions 3-9, Casino SAR Count, remarks revised to read "REQUIRED. Enter number of Casino/Card Club (2A) Records."</p> <p>Record 9A Field Positions 10-16, 17-23, and 24-30 remarks revised to change "branch" to "casino/card club".</p> <p>In Attachment A – Definitions, the description for Casino was revised. The term "Supplemental" and its description were deleted.</p> <p>Error code F36 added to Attachment B – Error Code List.</p> <p>Attachment C – Field Editing Instructions were revised to remove the word "THE" from the list of prohibited words.</p>

Version Number	Date	Reason for Change
1.7	6/28/2010	<p>All ZIP Code field remarks revised to add "...or four nines".</p> <p>Record 4A field positions 146-154, Subject's TIN (Item 14) and field positions 135-143, Subject's ZIP Code (Item 11) remarks revised to add REQUIRED and an instruction to enter "XX" if unknown or not applicable.</p> <p>Record 4A Field Positions 330-337, Subject Action Date (Item 23) added "Date cannot be earlier than the From date of suspicious activity (Item 24)" to remarks.</p> <p>Revised Error Code A30 to read ""Subject's ZIP Code" is missing or invalid".</p> <p>Revised Error Code A32 to read ""Subject's TIN" is missing or invalid".</p> <p>Revised Error Code A48 to read: ""Subject Action Date" is missing, invalid, earlier than "From" date of suspicious activity or more recent than "Prepared Date"".</p>
1.8	6/17/2011	<p>Error codes F24 and F37 added to Attachment B – Error Code List.</p>

Purpose

The purpose of this document is to provide the requirements and conditions for electronically filing Suspicious Activity Report by Casinos and Card Clubs (SAR-C), Form FinCEN 102. For the purpose of this document, 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 purposes of this document, the Casino is the organization responsible for filing the SAR-C, and the transmitter is the organization preparing the electronic files. The Casino and transmitter may be the same or different organizations.

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

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

File Organization

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

Transmitter (1A) Record - Required

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

Casino/Card Club (2A) Record - Required

There can be more than one of this record type depending on the number of different casinos or card clubs which are included on the file. This record type will immediately precede all records which relate to the casino or card club.

Suspicious Activity (3A) 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 casino or card club.

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.

Narrative Description (6A) 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.

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

There must be one of this record type for each casino/card club reporting. It must be the last record associated with the casino/card club.

File Summary (9Z) Record - Required

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

Record Layouts

Transmitter (1A) Record - Required

The first record on each file is to be the transmitter record, which will contain information identifying the transmitter (person or organization handling the data accumulation and formatting). There will be only one Transmitter record on each electronic file. All data elements for this record are required.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "1A".
3-37	Transmitter Name	35	REQUIRED. Enter the name of an individual or an organization that is transmitting the transactions on this file.
38-67	Transmitter Address	30	REQUIRED. Enter the street address of the transmitter.
68-92	Transmitter City	25	REQUIRED. Enter the city of the transmitter.
93-94	Transmitter State	2	REQUIRED. Enter the transmitter state code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .
95-103	Transmitter ZIP Code	9	REQUIRED. Enter the transmitter ZIP Code. A 9-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	7	REQUIRED. Enter the telephone number.
114-148	Transmitter Contact	35	REQUIRED. Enter the name of an official contact for the transmitter.

Field Position	Field Name	Length	Description and Remarks
149-157	Transmitter EIN	9	REQUIRED. This must be the valid nine-digit number assigned to the transmitter by IRS. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines, all zeros, or "123456789".
158-165	Coverage Beginning Date	8	REQUIRED. This will be the date of the earliest original transaction on the file. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
166-173	Coverage Ending Date	8	REQUIRED. This will be the date of the latest original transaction on the file. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
174-181	Transmitter Control Code (TCC)	8	REQUIRED. Enter your assigned 8-character TCC.
182-409	Filler	228	Space Filled.
410	Format Indicator	1	REQUIRED. Enter "1".
411-420	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Casino/Card Club (2A) Record - Required

This record identifies information regarding the casino or card club. The number of casino or card club records will depend on the number of different casinos or card clubs that are included on the file. The 2A record item numbers refer to the SAR-C Form Part IV and Part V.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "2A".
3-7	Transaction Sequence	5	REQUIRED. Enter a sequential number starting with 00001 and increment by 1 for each suspicious transaction (3A) record.
8-42	Casino/Card Club Trade Name (Item 32)	35	REQUIRED. Enter the casino or card club's full trade name.
43-77	Casino/Card Club Legal Name (Item 33)	35	REQUIRED if different than trade name. Enter the casino or card club's full legal name.
78-107	Casino/Card Club Address (Item 35)	30	REQUIRED. Enter the address of the casino or card club. Do not abbreviate.
108-132	Casino/Card Club City (Item 36)	25	REQUIRED. Enter the city where the casino/card club is located. Do not abbreviate.
133-134	Casino/Card Club State (Item 37)	2	REQUIRED. Enter the two (2) character state code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf .
135-143	Casino/Card Club ZIP Code (Item 38)	9	REQUIRED. Enter the ZIP Code for the casino or card club. A 9-digit ZIP Code cannot end with four zeros or four nines.
144-152	Casino/Card Club EIN (Item 34)	9	REQUIRED. Enter the EIN of the casino or card club. Do not enter hyphens, slashes, alpha characters, or invalid entries such as all nines, all zeros, or "123456789".

Field Position	Field Name	Length	Description and Remarks										
153-154	Type of Gaming Casino or Card Club (Item 39)	2	Enter the type of gaming casino or card club as follows: <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="border-bottom: 1px solid black; width: 10%; text-align: center;"><u>Code</u></td> <td style="border-bottom: 1px solid black;"><u>Description</u></td> </tr> <tr> <td style="text-align: center;">A</td> <td>State Licensed Casino</td> </tr> <tr> <td style="text-align: center;">B</td> <td>Tribal Licensed Casino</td> </tr> <tr> <td style="text-align: center;">C</td> <td>Card Club</td> </tr> <tr> <td style="text-align: center;">D</td> <td>Other</td> </tr> </table>	<u>Code</u>	<u>Description</u>	A	State Licensed Casino	B	Tribal Licensed Casino	C	Card Club	D	Other
<u>Code</u>	<u>Description</u>												
A	State Licensed Casino												
B	Tribal Licensed Casino												
C	Card Club												
D	Other												
155-174	Type of Gaming Other Description (Item 39d)	20	REQUIRED if "Type of Gaming Casino or Card Club" value is "D". Enter a description of the gaming type.										
175-209	Contact Name (Item 40, 41, 42)	35	REQUIRED. Enter the name of the individual or office to be contacted regarding this report. For an individual's name use the format last name/first name/middle initial. Left justified and space filled. Follow the Field Editing Instructions shown in the attachment.										
210-249	Contact Title/Position (Item 43)	40	REQUIRED if the "Contact Name" is the name of an individual. Enter the title or position of the individual. Space fill if the contact is an office.										
250-252	Contact Area Code (Item 44)	3	REQUIRED. Contact person's area code.										
253-259	Contact telephone (Item 44)	7	REQUIRED. Contact person's telephone number.										
260-267	Prepared Date (Item 45)	8	REQUIRED. Date report prepared. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).										
268-410	Filler	143	Space Filled.										
411-420	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.										

Suspicious Activity (3A) Record - Required

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

Field Position	Field Name	Length	Description and Remarks																										
1-2	Record Type	2	REQUIRED. Enter "3A".																										
3-7	Transaction Sequence	5	REQUIRED. Enter a sequential number starting with 00001 and increment by 1 for each Suspicious Activity (3A) Record.																										
8	Enforcement Agency Code (Item 27)	1	Enter the agency contacted: <table style="margin-left: 20px; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;"><u>Code</u></th> <th style="text-align: left;"><u>Description</u></th> </tr> </thead> <tbody> <tr><td>A</td><td>DEA</td></tr> <tr><td>B</td><td>U.S. Attorney</td></tr> <tr><td>C</td><td>IRS</td></tr> <tr><td>D</td><td>FBI</td></tr> <tr><td>E</td><td>U.S. Customs</td></tr> <tr><td>F</td><td>U.S. Secret Service</td></tr> <tr><td>G</td><td>Local law enforcement</td></tr> <tr><td>H</td><td>State gaming commission</td></tr> <tr><td>I</td><td>State law enforcement</td></tr> <tr><td>J</td><td>Tribal gaming commission</td></tr> <tr><td>K</td><td>Tribal law enforcement</td></tr> <tr><td>L</td><td>Other (List in item 28)</td></tr> </tbody> </table>	<u>Code</u>	<u>Description</u>	A	DEA	B	U.S. Attorney	C	IRS	D	FBI	E	U.S. Customs	F	U.S. Secret Service	G	Local law enforcement	H	State gaming commission	I	State law enforcement	J	Tribal gaming commission	K	Tribal law enforcement	L	Other (List in item 28)
<u>Code</u>	<u>Description</u>																												
A	DEA																												
B	U.S. Attorney																												
C	IRS																												
D	FBI																												
E	U.S. Customs																												
F	U.S. Secret Service																												
G	Local law enforcement																												
H	State gaming commission																												
I	State law enforcement																												
J	Tribal gaming commission																												
K	Tribal law enforcement																												
L	Other (List in item 28)																												
9-43	Enforcement Agency Name (Item 28)	35	REQUIRED if the "Enforcement Agency Code" is "B" or "G" through "L". Enter the name of the law enforcement agency.																										
44-78	Enforcement Agency Person Contacted (Item 29)	35	Enter the name of the person contacted at the enforcement agency in the format last name/first name/middle initial, left justified and space filled. Follow the Field Editing Instructions shown in the attachment.																										

Field Position	Field Name	Length	Description and Remarks
79-81	Enforcement Agency Contact Area Code (Item 30)	3	Enter the area code of the contact person at the enforcement agency.
82-88	Enforcement Agency Contact Phone Number (Item 30)	7	Enter the phone number of the contact person at the enforcement agency.
89-96	Enforcement Agency Contact Date (Item 31)	8	Enter the date Enforcement Agency contacted. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
97-104	From Suspicious Activity Date (Item 24)	8	REQUIRED. Enter the suspicious activity date or beginning suspicious activity date (if including a range of activity dates). Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
105-112	To Suspicious Activity Date (Item 24)	8	Enter the ending date of suspicious activity (if including a range of violation dates) or leave blank. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).
113-122	Suspicious Activity Amount (Item 25)	10	REQUIRED. Enter the total dollar amount involved in known or suspected suspicious activity. Must be numeric, dollars and no cents, right justified, and zero filled. The value must be zero (0) if the amount is unknown or no dollar amount is involved.

Field Position	Field Name	Length	Description and Remarks																																				
123 - 139	Suspicious Activity Type (Item 26)	17	<p>REQUIRED. Enter from 1 to 17 suspicious activity types as follows:</p> <table border="0"> <thead> <tr> <th><u>Code</u></th> <th><u>Description</u></th> </tr> </thead> <tbody> <tr><td>A</td><td>Bribery/gratuity</td></tr> <tr><td>B</td><td>Check fraud (includes counterfeit)</td></tr> <tr><td>C</td><td>Credit/debit card fraud (inc. counterfeit)</td></tr> <tr><td>D</td><td>Embezzlement/theft</td></tr> <tr><td>E</td><td>Large currency exchange(s)</td></tr> <tr><td>F</td><td>Minimal gaming with large transactions</td></tr> <tr><td>G</td><td>Misuse of position</td></tr> <tr><td>H</td><td>Money laundering</td></tr> <tr><td>I</td><td>No apparent business or lawful purpose</td></tr> <tr><td>J</td><td>Structuring</td></tr> <tr><td>K</td><td>Unusual use of negotiable instruments (checks)</td></tr> <tr><td>L</td><td>Use of multiple credit or deposit accounts</td></tr> <tr><td>M</td><td>Unusual use of wire transfers</td></tr> <tr><td>N</td><td>Unusual use of counter checks or markers</td></tr> <tr><td>O</td><td>False or conflicting ID(s)</td></tr> <tr><td>P</td><td>Terrorist financing</td></tr> <tr><td>Q</td><td>Other (Describe in Part VI)</td></tr> </tbody> </table>	<u>Code</u>	<u>Description</u>	A	Bribery/gratuity	B	Check fraud (includes counterfeit)	C	Credit/debit card fraud (inc. counterfeit)	D	Embezzlement/theft	E	Large currency exchange(s)	F	Minimal gaming with large transactions	G	Misuse of position	H	Money laundering	I	No apparent business or lawful purpose	J	Structuring	K	Unusual use of negotiable instruments (checks)	L	Use of multiple credit or deposit accounts	M	Unusual use of wire transfers	N	Unusual use of counter checks or markers	O	False or conflicting ID(s)	P	Terrorist financing	Q	Other (Describe in Part VI)
<u>Code</u>	<u>Description</u>																																						
A	Bribery/gratuity																																						
B	Check fraud (includes counterfeit)																																						
C	Credit/debit card fraud (inc. counterfeit)																																						
D	Embezzlement/theft																																						
E	Large currency exchange(s)																																						
F	Minimal gaming with large transactions																																						
G	Misuse of position																																						
H	Money laundering																																						
I	No apparent business or lawful purpose																																						
J	Structuring																																						
K	Unusual use of negotiable instruments (checks)																																						
L	Use of multiple credit or deposit accounts																																						
M	Unusual use of wire transfers																																						
N	Unusual use of counter checks or markers																																						
O	False or conflicting ID(s)																																						
P	Terrorist financing																																						
Q	Other (Describe in Part VI)																																						
140 - 141	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.																																				
142 - 143	Number of Narrative Description Records	2	Required. Number of narrative description records. Must be equal to the number of Explanation/Description (6A) Records, which cannot be more than 99 for the same Suspicious Activity (3A) Record.																																				
144	Corrects Prior Report Indicator	1	Enter "X" if corrects prior report.																																				
145	Subject Information Unavailable	1	Enter "X" if all of the subject's information is unavailable. If this box is checked, there will be no 4A record.																																				
146	Multiple Subject indicator	1	Enter "X" if there is more than one subject.																																				
147 - 410	Filler	264	Space Filled.																																				
411 - 420	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.																																				

Subject Information (4A) Record - Required

This record contains information related to the subject’s identity. There can be more than one 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-C Form Part I.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter “4A”.
3-7	Transaction Sequence Number	5	REQUIRED. Enter the transaction sequence number from the associated 3A record.
8-42	Subject's Name (Item 3, 4, 5)	35	REQUIRED. Enter the name of the subject in the format last name/first name/middle initial, left justified and space filled. Follow the Field Editing Instructions shown in the attachment.
43-77	Subject's AKA /DBA Name (Item 6)	35	Enter the AKA or DBA name of the subject. Do not include “AKA” or “DBA” with the entry.
78-107	Subject's Address (Item 8)	30	REQUIRED. Enter the street address of the subject. Left justified and space filled. Do not abbreviate.
108-132	Subject's City (Item 9)	25	REQUIRED. Enter the subject's city. Left justified and space filled. Do not abbreviate.
133-134	Subject's State (Item 10)	2	REQUIRED. Enter the appropriate state code for the subject. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf
135-143	Subject's ZIP Code (Item 11)	9	REQUIRED. Enter the ZIP code for the subject. Enter “XX” if unknown or not applicable. A 9-digit ZIP Code cannot end with four zeros or four nines.
144-145	Subject's Country (Item 12)	2	REQUIRED. Enter the appropriate country code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf

Field Position	Field Name	Length	Description and Remarks										
146-154	Subject's TIN (Item 14)	9	REQUIRED. Enter the SSN/ITIN/TIN of subject. Enter "XX" if unknown or not applicable. Do not enter hyphens, slashes, or invalid entries such as all nines or all zeros, or "123456789".										
155-162	Subject's Date of Birth (Item 16)	8	Enter subject's date of birth. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD).										
163-165	Subject's Home Area Code (Item 19)	3	Enter subject's home area code.										
166-172	Subject's Home Phone Number (Item 19)	7	Enter subject's home telephone number.										
173-175	Subject's Work Area Code (Item 18)	3	Enter subject's work area code.										
176-182	Subject's Work Phone Number (Item 18)	7	Enter subject's work telephone number.										
183-212	Subject's E-mail Address (Item 20)	30	Enter the E-mail address of the subject.										
213-242	Subject's Occupation (Item 7)	30	Enter the occupation, profession, or business of the subject (e.g. attorney, securities broker, auto dealer)										
243	Subject's Identification (Item 17)	1	REQUIRED. Enter the appropriate code for the method by which the individual's identity was verified. <table border="0"> <tr> <td><u>Code</u></td> <td><u>Description</u></td> </tr> <tr> <td>A</td> <td>Driver's license/state ID</td> </tr> <tr> <td>B</td> <td>Passport</td> </tr> <tr> <td>C</td> <td>Alien registration</td> </tr> <tr> <td>D</td> <td>Other</td> </tr> </table>	<u>Code</u>	<u>Description</u>	A	Driver's license/state ID	B	Passport	C	Alien registration	D	Other
<u>Code</u>	<u>Description</u>												
A	Driver's license/state ID												
B	Passport												
C	Alien registration												
D	Other												
244-263	Subject's ID Other Description (Item 17d)	20	REQUIRED if "Subject's Identification" value is "D". Enter a description of the identification.										

Field Position	Field Name	Length	Description and Remarks
264-285	Subject's Identification Number (Item 17e)	22	REQUIRED unless "Subject's ID Other Description" is "XX". Enter the number used for identification.
286-287	Subject Issuing Authority (Item 17f)	2	REQUIRED unless "Subject's ID Other Description" is "XX". Enter the appropriate code to designate the state/country where the identification was issued. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf
288-295	Subject's Vehicle License Number (Item 13a)	8	Enter the subject's number on the vehicle's license.
296-297	Subject's Vehicle State Code (Item 13b)	2	Enter the subject's vehicle's state code. Use the valid abbreviation from http://www.fincen.gov/forms/files/country_and_state_codes.pdf
298-319	Subject's Account Number (Item 15)	22	REQUIRED unless field position 320, "Subject No Account Affected Indicator", has an entry of "X". Enter the account number affected, if any.
320	Subject No Account Affected Indicator (Item 15)	1	REQUIRED. Enter "X" if no account is affected.
321	Subject Account Opened Indicator (Item 15)	1	REQUIRED unless field position 320, "Subject No Account Affected Indicator", has an entry of "X". Enter: A - Yes B - No

Field Position	Field Name	Length	Description and Remarks
322-327	Subject's Relationship Code (Item 21)	6	Enter the appropriate code(s) to describe the subject's affiliation with or relationship to the casino or card club. Include from 1 to 6 applicable items. Left justify and space fill if less than 6 items: <u>Code</u> <u>Description</u> A Customer B Agent C Junket/tour operator D Employee E Check cashing operator F Supplier G Concessionaire H Other (Explain in Part VI)
328	Subject's Affiliation Indicator (Item 22)	1	Subject currently affiliated with the casino or card club. Enter: A - Yes B - No
329	Subject's Affiliation Code (Item 22)	1	REQUIRED if field position 328, "Subject's Affiliation Indicator", is "B". Enter the appropriate code from the list below: <u>Code</u> <u>Description</u> C Barred D Resigned E Terminated F Other (Specify in Part VI)
330-337	Subject Action Date (Item 23)	8	REQUIRED if field position 329, "Subject's Affiliation Code", contains a value. Enter the date affiliation action was taken. Enter as a numeric 8-position field in format: century, year, month, day (CCYYMMDD). Date cannot be greater than the date in Prepared Date (Item 45). Date cannot be earlier than the From date of suspicious activity (Item 24).
338-410	Filler	73	Space Filled.
411-420	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Narrative Description (6A) Record - Required

This record contains a detailed narrative of 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 6A record refers to the SAR-C Form Part VI.

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

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

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

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "9A".
3-9	Casino SAR Count	7	REQUIRED. Enter number of Casino/Card Club (2A) Records.
10-6	Suspicious Activity Count	7	REQUIRED. Enter a count of the number of Suspicious Activity (3A) Records for the casino/card club.
17-23	Subject Record Count	7	REQUIRED. Enter the number of Subject Information (4A) Records for the casino/card club.
24-30	Explanation/Description	7	REQUIRED. Enter the number of Narrative Description (6A) Records for the casino/card club.
31-410	Filler	380	Space Filled.
411-420	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

File Summary (9Z) Record - Required

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

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "9Z".
3-9	Casino/Card Club Record Count	7	REQUIRED. Enter count of Casino/Card Club (2A) Records.
10-16	Suspicious Record count	7	REQUIRED. Enter count of Suspicious Activity (3A) Records.
17-23	Subject Record Count	7	REQUIRED. Enter count of Subject Information (4A) Records.
24-30	Explanation/Description	7	REQUIRED. Enter count of Narrative Description (6A) Records.
31-410	Filler	380	Space Filled.
411-420	User Field	10	Use this field for any descriptive information you may require; otherwise, space fill.

Acknowledgement Record Formats

The SAR-C 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://bsaeiling1.fincen.treas.gov/forms/ackSchemas/SARCAcknowledgementData.xsd>

Acknowledgement Transmitter (1A) Record

This record is created by 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.

Acknowledgement Casino/Card Club (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 casino/card club data received.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "2A".
3-7	Transaction Sequence	5	From positions 3-7 of the incoming "2A" record.
8-15	Prepared Date	8	From positions 260-267 of the incoming "2A" record.
16-45	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.
46-90	Filler	45	Space Filled.

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 3-7 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.

Field Position	Field Name	Length	Description and Remarks
52-90	Filler	39	Space Filled.

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 transmission.

Field Position	Field Name	Length	Description and Remarks
1-2	Record Type	2	REQUIRED. Enter "4A".
3-7	Transaction Sequence Number	5	From positions 3-7 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.

Acknowledgement Trailer for File Summary (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".

Field Position	Field Name	Length	Description and Remarks
3-12	Number of Casino/Card Club (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.

Attachment A – Definitions

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

Term	Description
Card Club	Any organization duly licensed or authorized to do business as a card club, gaming club, card room, gaming room, or similar gaming establishment in the United States, including tribal card clubs, and having gross annual gaming revenue in excess of \$1,000,000. The term includes the principal headquarters and every domestic branch or place of business of the establishment.
Casino	Any organization duly licensed or authorized to do business as a casino or gambling casino, including a tribal casino, in the United States and having gross annual gaming revenues in excess of \$1 million. This includes the principal headquarters and every domestic branch or place of business of the casino.
SAR-C	Suspicious Activity Report by Casinos and Card Clubs (Form FinCEN 102).
Subject	For SAR-C purposes, a subject is a person who appears to be involved in questionable/suspicious activities.

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 Code	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.			
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.			
F09	Number of records reported does not match computer count for 4A records.			
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.			
F22	The number of records reported does not match the computed count of 6A records.			
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.			
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.			

Error Code	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.			
<p>The following error codes apply to SAR-C fields in the Acknowledgement 2A, 3A, 4A, and 6A 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.</p>				
A01	"Casino/Card Club Trade" Name is missing.	2A	8 - 42	32
A02	"Casino or Card Club" Address is missing.	2A	78 - 07	35
A03	"Casino/Card Club" City is missing.	2A	108 - 132	36
A04	"Casino/Card Club State" is missing or invalid.	2A	133 - 134	37
A05	"Casino/Card Club ZIP Code" is missing or invalid.	2A	135 - 143	38
A06	"Casino/Card Club EIN" is missing or invalid.	2A	144 - 152	34

Error Code	Error Description	Record	Field Position	Form Field Number
A07	"Type of Gaming Casino or Card Club" is invalid.	2A	153 - 154	39
A08	"Type of Gaming Other Description" is missing when "Type of Gaming Casino or Card Club" is "D."	2A	155 - 174	39d
A09	"Contact Name" is missing.	2A	175 - 209	40-42
A11	"Contact Area Code" is missing or invalid.	2A	250 - 252	44
A12	"Contact telephone" is missing or invalid.	2A	253 - 259	44
A13	"Prepared Date" is missing, invalid, or more recent than current date.	2A	260 - 267	45
A14	"Enforcement Agency Code" is invalid.	3A	8	27
A15	"Enforcement Agency Name" is missing when the "Enforcement Agency Code" is "B" or "G" through "L".	3A	9 - 43	28
A16	"Enforcement Agency Contact Area Code" is invalid.	3A	79 - 81	30
A17	"Enforcement Agency Contact Phone Number" is invalid.	3A	82 - 88	30
A18	"Enforcement Agency Contact Date" is invalid, more recent than "Prepared Date," or earlier than "From Suspicious Activity Date."	3A	89 - 96	31
A19	"From Suspicious Activity Date" is missing, invalid, more recent than the "To Suspicious Activity Date," or more recent than the "Prepared Date."	3A	97 - 104	24
A20	"To Suspicious Activity Date" is invalid, earlier than the "From Suspicious Activity Date", or more recent than the "Prepared Date."	3A	105 - 112	24
A21	"Suspicious Activity Amount" is missing or invalid.	3A	113 - 122	25
A22	"Suspicious Activity Type" is missing, is invalid, or has duplicates.	3A	123 - 139	26
A23	"Corrects Prior Report Indicator" is invalid.	3A	144 - 144	1
A24	"Subject Information Unavailable" selected but 4A record exists.	3A	145 - 145	2b

Error Code	Error Description	Record	Field Position	Form Field Number
A25	"Multiple Subject Indicator" is "X" but contains only one subject record.	3A	146 - 146	2a
A26	"Subject's Name" is missing.	4A	8 - 42	3-5
A27	"Subject's Address" is missing.	4A	78 - 107	8
A28	"Subject's City" is missing.	4A	108 - 132	9
A29	"Subject's State" is missing or invalid.	4A	133 - 134	10
A30	"Subject's ZIP Code" is missing or invalid.	4A	135 - 143	11
A31	"Subject's Country Code" is invalid.	4A	144 - 145	12
A32	"Subject's TIN" is missing or invalid.	4A	146 - 154	14
A33	"Subject's Date of Birth" is invalid or more recent than the "From Suspicious Activity Date."	4A	155 - 162	16
A34	"Subject's Home Area Code" is invalid.	4A	163 - 165	19
A35	"Subject's Home Phone Number" is invalid.	4A	166 - 172	19
A36	"Subject's Work Area Code" is invalid.	4A	173 - 175	18
A37	"Subject's Work Telephone Number" is invalid.	4A	176 - 182	18
A38	"Subject's Occupation" contains special characters.	4A	213 - 242	7
A39	"Subject's Identification" is missing or invalid.	4A	243 - 243	17
A40	"Subject's ID Other Description" is missing when the "Subject's Identification" value was "D. "	4A	244 - 263	17d
A41	"Subject Issuing Authority" is missing or is invalid.	4A	286 - 287	17f
A42	"Subject's Vehicle State Code" is invalid.	4A	296 - 297	13b
A43	"Subject No Account Affected Indicator" is invalid.	4A	320	15
A44	"Subject Account Opened Indicator" is missing or invalid.	4A	321	15
A45	"Subject's Relationship Code" is invalid or contains duplicates.	4A	322 - 327	21
A46	"Subject's Affiliation Indicator" is invalid.	4A	328	22
A47	"Subject's Affiliation Code" is missing or invalid.	4A	329	22

Error Code	Error Description	Record	Field Position	Form Field Number
A48	"Subject Action Date" is missing, invalid, earlier than "From" date of suspicious activity or more recent than "Prepared Date".	4A	330 - 337	23
A49	"Narrative" of the suspicious activity is missing or contains one or more blank records.	6A	8 - 403	Part VI
A50	"Subject's Identification Number" is missing.	4A	264 - 285	17c
A51	"Subject's Account Number" is missing.	4A	298 - 319	15

Attachment C - Field Editing Instructions

These instructions apply to all SAR-C 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. 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.

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/).